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Overall progress achieved since the United Nations Conference on Environment and Development

Report of the Secretary-General

Addendum

Integrating environment and development in decision-making*

(Chapter 8 of Agenda 21)

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INTRODUCTION

1. The present report reviews progress made in the implementation of the objectives set out in chapter 8 of Agenda 21 (Integrating environment and development in decision-making), taking into account the decisions taken by the Commission on Sustainable Development on this subject in 1995 and 1996 at its third and fourth sessions.

I. SELECTING KEY OBJECTIVES

2. The overall goal of chapter 8 of Agenda 21 is to integrate socio-economic and environmental concerns in the decision-making process with a broad range of public participation. The present analysis addresses three of the four key objectives of that chapter. The other, relating to economic instruments, is dealt with in chapters 4 and 33. The first objective is development of integrated and participatory strategies for sustainable development at the national level. In this area, progress has been mixed since the Rio Conference with further steps needed to realize their full potential. The second is development and use of specific policy-making tools and instruments that help to integrate environment and development in decision-making, including environmental impact assessment and indicators. The third is development and application of integrated environmental and economic accounting, where some progress has been made at the international level but much work remains at the national level.

II. REPORTING AND ANALYSING SUCCESS

3. Countries ranging from China and Swaziland to Canada have produced national sustainable development strategies (NSDSs), national conservation strategies or environmental action plans. In some countries, this has been done with the assistance of the World Bank, the United Nations Development Programme (UNDP), the World Conservation Union (IUCN) and some bilateral donors. Over 40 African countries have some sort of coordinating mechanism to produce such plans. Environmental factors have also been incorporated into macroeconomic strategies. Costa Rica and the Gambia have brought "green accounting" methods into their policy-making processes while China, Malawi and the United Republic of Tanzania have supported the efforts of their planning bodies to incorporate sustainable development principles into their overall planning efforts, including the production of national Agenda 21s.

A. <u>National strategies</u>

4. Various planning and policy-making models were already in place at the close of the United Nations Conference on Environment and Development in 1992. These included conventional national development plans, national conservation strategies (NCSs) national environmental action plans (NEAPs) (see box 1), national environmental management plans, green plans and provincial and state conservation strategies. Agenda 21 introduced (para. 8.7) the concept of the

Box 1. Hungary

In Hungary, the first draft of the National Environmental Action Programme (NEAP) was prepared in February 1996, followed by a wide debate by non-governmental organizations. The final draft was submitted to and approved by Parliament in September 1996. The Programme reflected all the basic recommendations of Agenda 21. Emphasis was given to sustainable development, policy reforms, capacity-building, environmental investments in priority areas and public participation. Also in 1996, a National Environmental Health Action Plan was established as a complement to the NEAP.

national sustainable development strategy (NSDS) whose aim is to "build upon and harmonize the various sectoral economic, social and environmental policies and plans that are operating in the country". The idea is to unify and integrate economic, social and environmental issues in decision-making by bringing together in the strategy process governmental ministries and decision makers representing finance, planning, environment, health and other key ministries as well as sectors of civil society (major group representatives) who have a stake in policy outcomes.

- 5. Agenda 21 establishes no set structure for NSDSs and so many of the existing planning and policy-making processes for environment and development have been subsumed under this rubric, with environmental factors in particular being taken up under existing development plans or existing environment plans (in some cases, expanded to include broader considerations of economic and social development). While there is no single model for national strategies and plans, they do have some common features such as identifying priority environment and development problems, defining priority actions and following up to ensure effective implementation.
- 6. Some countries have developed sectoral or thematic policies that reflect broader sustainable development concerns. Some have been in the form of conventional sectoral master plans, which were often prepared as parts of five-year development plans to coordinate donor involvement in a particular sector. Other examples of sectoral/thematic strategies include national plans of action to combat desertification, national tropical forestry action plans and coastal zone management policies. In many of these cases, the sectoral policy is a tool for complying with the requirements of international commitments.
- 7. National strategies for sustainable development have been most successful when going beyond merely consulting a small and selected group of officials they ensure non-governmental and public participation in the formulation and implementation process. Public participation is often secured by involving various major groups in the decision-making process, especially in national councils for sustainable development or their equivalents. Public awareness-raising is important, and non-governmental organizations can play a key role in this regard.

B. Local Agenda 21s

The most significant area of success with strategies and plans is at the level of cities and municipalities, where local Agenda 21 initiatives have flourished (see box 2). These have been grass-roots expressions of public concern and involvement rather than top-down planning exercises. In some cases, local authorities were reluctant to link their efforts to national action plans for fear that the agenda would then be imposed upon them from above rather than flow from local needs. A wide variety of successful cases have been reported in the last four years on these initiatives. At the third session of the Commission on Sustainable Development local authorities presented 14 case studies of local Agenda 21 initiatives from around the world. Also, an extensive survey of local Agenda 21 initiatives conducted by the International Council for Local Environmental Initiatives (ICLEI), in cooperation with the Department for Policy Coordination on Sustainable Development of the United Nations Secretariat indicates that more than 1,500 local Governments from 49 countries are pursuing local Agenda 21 action plans through official planning processes in partnership with the voluntary and private sectors in their communities. Local Agenda 21 initiatives have encompassed community-wide consultation processes, formulation and implementation of local strategies, developing of local sustainability indicators, new local environmental management systems, concrete projects with public participation, and so on. In 1996, ICLEI, the International Development Research Centre (IDRC) and the United Nations Environment Programme (UNEP) prepared and launched the "Local Agenda 21 Planning Guide", which is already being used by a number of municipalities for local-level planning.

Box 2. Local Agenda 21 initiatives

In Peru, Cajamarca is one of two cities that have developed local versions of Agenda 21 through the Inter-Institutional Consensus Building Committee.

Nongkai, Thailand, is one of seven municipalities that participate in the Urban Environmental Management Guidelines Project. In 1994, it launched the Local Partnership for Community Land-use Planning which includes initiation of the process of producing local land-use plans.

9. In addition, the United Nations Centre for Human Settlements (Habitat) as part of its preparations for the United Nations Conference on Human Settlements (Habitat II) developed, in cooperation with other partners, an extensive database of "best practices" related to sustainable development at the local level which is now available on the Internet. Local-level strategies and plans have proved more successful than many of those at the national level in terms of making a direct impact.

C. <u>National councils</u>

- 10. A substantial number of countries (150) have established national-level commissions or coordinating mechanisms designed to develop an integrated approach to sustainable development and to include a wide range of civil society sectors in the process of agenda-setting and strategy-building. This has been especially true of developing countries and countries with economies in transition that have traditions of national planning. While some of these institutions existed prior to 1992, more than 90 per cent have been established in response to the Rio Conference. In other cases, longer-standing bodies, including the traditional type of environmental ministry, have been restructured in a manner consistent with Agenda 21.
- 11. Many of the councils are governmental bodies or bodies closely linked to the Governments (see box 3). The essential task of almost all of these bodies is coordination of actions related to environment and development, in most cases at different levels (national, local). Approximately half of the councils are in charge of formulation of a policy or national strategy for sustainable development; part of them are explicitly in charge of implementation and enforcement of national strategies for sustainable development.

Box 3. National councils for sustainable development

Typical composition

- (a) Governmental ministries and agencies only (multisectoral, sectoral)
- (b) Parastatal/multi-stakeholders
- (c) Major groups, particularly non-governmental organizations

Typical functions

- (a) Decision-making
- (b) Policy formulation
- (c) Policy implementation and enforcement
- (d) Policy analysis and evaluation
- (e) Focal point for coordination at different levels
- (f) Advisory
- (g) Collection of information and data, dissemination
- (h) Reporting to the Commission on Sustainable Development and/or government
- (i) Mobilization of resources and funds
- (j) Discussion and consultation forum
- 12. In almost all countries, at least one ministry is participating in a council for sustainable development or has a department in charge of coordination of sustainable development at the governmental level (see box 4). Nearly all of the newly installed councils include the participation of the public, academics, or private sector or other non-governmental institutions.

Box 4. Cameroon

After the United Nations Conference on Environment and Development, the Ministry of Environment and Forests (MINEF) was created with the primary task of formulating appropriate environment policy and strategies. At the level of the Prime Minister's Office, a National Commission on Sustainable Development has been established to bring together representatives from ministries, non-governmental organizations and the business community. A coordination unit (CU) within MINEF is responsible for the coordination of the implementation of the National Environmental Management Plan. At the local level, one Technical Regional Committee (TRC) in each province, in cooperation with CU, is charged with the overall coordination of sectoral activities. TRCs act on a highly participatory level, involving representatives of various ministries, non-governmental organizations and grass-roots organizations.

13. Various international organizations, for example, UNEP, the World Bank, UNDP, the World Health Organization (WHO), the United Nations Educational, Scientific and Cultural Organization (UNESCO), the Organization of American States (OAS), various development banks, and non-governmental organizations, assist countries in assessing the status of the environment, in building capacities within the countries to create national sustainable development strategies, and in promoting networking among countries in the same region. The agents for these support activities include national councils and the sustainable development advisers currently designated by UNDP in more than 40 countries around the world.

III. PROMISING CHANGES

A. Regional Agenda 21 initiatives

14. In the last two years, there has been an increase in the number of regional initiatives undertaken to formulate regional strategies of sustainable development, and action plans and to establish mechanisms for regional cooperation in implementing such initiatives (see box 5). These initiatives have often been launched as the result of summit or ministerial meetings. These initiatives are intended to translate global issues into regional ones, to provide a forum for regional cooperation and to promote networking among various national and local constituencies. Another feature is the involvement of non-State actors like local authorities and non-governmental organizations.

Box 5. Baltic Sea and Mediterranean regions

Agenda 21 for the Baltic Sea region

A regional Agenda 21 for the Baltic Sea region is being developed, to be completed by spring 1998. It is to be built on the earlier Environmental Action Programme coordinated by the Helsinki Commission. The Plan will be implemented by different sectors of the member countries on the basis of an agreed division of labour.

Mediterranean Commission on Sustainable Development

The Commission was established in 1996 to (a) identify, evaluate and assess major economic, ecological and social problems set out in Agenda 21 for the region and to make proposals to the contracting parties and (b) to enhance regional cooperation and rationalize the intergovernmental decision-making capacity in the Mediterranean basin for the integration of environment and development issues.

B. <u>Use of decision-making and policy tools</u> for sustainable development

15. One area of promising change relates to the increasing use by Governments, the private sector and other major groups of integrative decision-making tools. These are economic and policy instruments that aid the process of integrating environment and development in decision-making. While they do not by themselves constitute a strategy, they do help decision makers achieve and measure progress towards sustainable development goals and targets. Among the decision-making tools that have been particularly widely developed and used are the following.

1. <u>Environmental impact assessment</u>

- 16. Environmental impact assessment (EIA) started as a means to ensure that the environmental impact of projects and programmes was properly assessed during project planning and implementation. It is increasingly being seen and used as a continuous decision-making tool for integrating the biophysical and socio-economic aspects into development plans and policies. It is used by a wide variety of international organizations, financial institutions, government offices and non-governmental organizations. It is now no doubt one of the most widely used tools for sustainable development decision-making.
- 17. Since EIA was introduced at the national level for the first time more than 25 years ago, more than 70 per cent of countries have adopted laws and regulations requiring EIAs. In addition, mandatory or informal procedures of impact assessment for governmental activities have been developed in many countries. As reported in chapter 6 of Agenda 21, however, more needs to be done to incorporate health aspects into overall environmental impact assessment.

18. Strategic environmental assessment (SEA), a new technique of impact assessment, has gained attention in some developed countries in the last five years. Compared with EIA whose focus has mainly been on projects, SEA aims at the identification of the cumulative consequences of policies, governmental programmes and plans with impact on the environment, the economy and social development.²

2. <u>Indicators of sustainable development</u>

- 19. The growing use of indicators reflects the recognition that indicators are an essential tool for decision-making, for understanding and monitoring trends and for judging the effectiveness of policies and actions. Many Governments, non-governmental organizations and international organizations have contributed substantially to the development of indicators of sustainable development. The Commission on Sustainable Development for its part launched a global process to draw upon these initiatives and make use of their collective expertise and knowledge to arrive at consensus with regard to technical validity, comparability and political acceptability of indicators.
- 20. The Commission on Sustainable Development approved a programme of work and called upon the organizations of the United Nations system, with the support of other intergovernmental and non-governmental organizations, and through the coordination of the Department for Policy Coordination on Sustainable Development of the United Nations Secretariat, to implement the programme of work. As a result of the programme and wide cooperation within and outside the United Nations system, a core set of indicators were identified followed by preparation of methodology sheets for each of the indicators. The book Indicators of Sustainable Development: Framework and Methodologies, was published in October 1996 as a significant milestone leading to the establishment of national indicator programmes.

3. <u>Environmental management systems</u>

21. The International Organization for Standardization (ISO) 14000 series reported in detail under chapter 34, the European Union's Environment Management and Audit Scheme (EMAS) and a number of national environmental management system (EMS) standards have contributed to increasing the adoption of environmental management systems by the business sector in developed and developing countries. Additionally, many Governments are working towards developing legislation or national EMSs that closely mirror the ISO 14000 and EMAS standards in order to facilitate compliance with regulations as well as international standard certification requirements.

4. <u>Integrated pollution prevention and control</u>

22. Integrated pollution prevention and control (IPPC) provides for integrated environmental management in all environmental media simultaneously. By evaluating the total emissions from a facility, the transfer of pollution from one (strictly controlled) medium to another (non-controlled or less-controlled)

medium is avoided. The use of IPPC is accomplished, <u>inter alia</u>, with integrated permits and the observation of the entire life cycle of products.

23. While few countries have fully introduced IPPC, most Organisation for Economic Cooperation and Development (OECD) countries have implemented elements of an integrated pollution prevention system in their national policies and legislation. Successful introduction of IPPC methods at the national level can be achieved with regulations and institutional changes that abandon the media-specific approach.

5. Pollutant release and transfer registers

24. Pollutant release and transfer registers (PRTRs) are being designed or are already in use in most OECD countries, as well as in some non-OECD countries, for example South Africa and Egypt. PRTR is a catalogue or register of potentially harmful pollutant releases or transfers to the environment from a variety of sources, including information about wastes transported to treatment and disposal sites. The PRTR can be an important tool in the total environment policy of a Government, providing information otherwise difficult to obtain, encouraging business to reduce pollution levels and engendering broad public support for government environmental policies.

6. Other policy instruments

- 25. Economic instruments that are reported under chapters 4 and 33 are also being increasingly applied as integrative policy tools by national decision makers in different countries. Efforts to create the proper conditions to enable business and individuals to integrate environment into their decision-making processes have started to move Governments away from the traditional command-and-control approaches towards the adoption of economic instruments and other strategies that combine market-based instruments and direct regulation in "partnerships" with the private sector.
- 26. These instruments include environmental taxes and charges (as adopted within many OECD countries), environmental subsidies and green funds. There is increased understanding of the usefulness of tradable permits applied, for instance, in water resource management in Chile and in air emission control in the United States of America. Environmental performance bonds are also gaining attention in all regions by both industrialized and developing countries.
- 27. Voluntary agreements, reported under chapter 4, have been negotiated between industry and Government in several developed countries to complement, but not replace, environmental regulations. These agreements involve performance and timetable commitments by industry to achieve environmental protection and pollution prevention goals.
- 28. Joint implementation has the potential to enhance the cost-effectiveness of measures taken to combat transboundary pollution. Without distracting from the obligation to comply with the standards in the "donor" country, they provide the recipient country with much needed environmentally sound investments in

infrastructure and transfer of environmentally sound technology (see report of the Secretary-General on chapter 34 of Agenda 21 (E/CN.17/1997/2/Add.24)). Under the auspices of the United Nations Framework Convention on Climate Change, 4 a pilot project is being carried out on activities implemented jointly (see report of the Secretary-General on chapter 9 of Agenda 21 (E/CN.17/1997/2/Add.8)).

C. Integrated environmental and economic accounting

- 29. In the absence of an international consensus on how to incorporate environmental assets and the cost and benefits of their use into the internationally adopted System of National Accounts (SNA), the United Nations Statistics Division (UNSD) developed a System for Integrated Environmental and Economic Accounting (SEEA) as a satellite system of the 1993 SNA.⁵
- 30. Considerable efforts have been made at the international level in furthering the integration of economic and environmental accounting and in developing methodologies in this area. The current work is concentrated in three main areas: (a) creation of satellite accounts of the system of national accounts (SNA); (b) creation of specific national resource or environmental accounts; and (c) creation of environmental accounts at the microlevel.
- 31. Discussion at the macroeconomic level has focused on how the SNA can be adjusted to account for environmental values. This includes the calculation of a "green gross domestic product (GDP)". The adoption of an international consensus for a framework and reference for the compiling of "green national accounts" is an overall emerging priority, with the purpose of facilitating the implementation of the concept in practical terms and initiating regular publication. Only a few countries have attempted such an exercise, and the experiences of these countries are varied indeed, reflecting different objectives as well as different methodological approaches.
- 32. The United Nations Statistics Division has been very active in the development of satellite accounts, and proposed a system for integrated environment and economic accounting (SEEA), which was published in 1993. 6 Several industrialized and developing countries are presently experimenting with the implementation of satellite accounts through the general application of the SEEA framework to a specific national context (see box 6). However, the United Nations Statistics Division handbook has not yet been fully tested. Other initiatives include a manual to be prepared by the Statistical Office of the European Communities (Eurostat) at the request of policy makers in Europe, and preliminary drafts are under preparation by the Economic and Social Commission for Asia and the Pacific (ESCAP).
- 33. Taking into account the level of methodologies and their complex nature, the formulation of a clear, practical set of guidelines or manual for the application of the SEEA is considered essential and is being called for by a growing number of countries. An operational manual is being prepared and its publication by the United Nations Statistics Division in cooperation with the Nairobi Group is anticipated for 1997. (The Nairobi Group includes UNEP, the World Bank, Eurostat, the United Nations Centre for Human Settlements (Habitat),

Box 6. Colombia and the Philippines

<u>Colombia</u>: In 1992, the Inter-institutional Committee for Environmental Accounts (CICA) was established with the responsibility of defining and validating the methodology and integrating it in the national accounting system. With the assistance of the United Nations Statistics Division, the pilot project of an Integrated Economic and Environmental Accounting System for Colombia (COLSCEA) was initiated, and the system of national accounts has been executed since 1995 by the National Administrative Department of Statistics (DANE), as part of its consolidation strategy.

The Philippines: In 1994, the National Statistical Coordination Board (NSCB), the agency mandated to compile the national accounts, started a pilot project on the United Nations SEEA. So far, only the compilation of the asset account for three resources (fisheries, forest and minerals) has been carried out, but preliminary conclusions suggest that considerable processed and unprocessed administrative data can be transformed into useful data for environmental accounting.

the New Economics Foundation, the World Wildlife Foundation and individual experts.) In furtherance of this, considerable efforts are still needed to assist countries in developing environmental accounts with linkages to national accounting systems.

- 34. As environmental data related to individual economic sectors can yield valuable insights for resource managers in the concerned sectors, interest in the development and use of national resource accounts as a policy tool is growing in strength. It is building on sections of the satellite accounts and the underlying objective is to integrate parameters that reflect the depletion of natural capital into economic decisions.
- 35. At the microeconomic level, international as well as national accounting standard-setting bodies are making progress in looking at contingent liability and disclosure requirements for environmental impacts in annual business reports. A growing number of firms now refer to environmental practices in their annual financial statements and implement initiatives that may move business closer to cleaner production and eco-efficiency goals.

IV. UNFULFILLED EXPECTATIONS

A. <u>Sustainable development strategies</u>

36. Agenda 21 recommends (para. 8.7) that national sustainable development strategies should "build upon and harmonize the various sectoral ... plans that are operating in the country", and that the experience gained through existing planning exercises, national conservation strategies and environmental action plans should be, "fully used and incorporated into a country-driven sustainable development strategy", based on the "widest possible participation". While

integration, participation and unification of existing plans are key themes for sustainable development strategies, it has been difficult to realize this approach in practice. Frequently, governmental ministries and decision makers have continued to operate in separate and distinct spheres with conventional lines of reporting and modes of consultation without public participation. Other obstacles to the fuller use of sustainable development strategies, include the following states of affairs:

- (a) Governments, particularly those of developing countries, are overloaded with requests for various types of strategies, plans and schemes to satisfy the requirements of international banks, lending agencies and international organizations, and do not have sufficient resources to cope with all these requests. International organizations and the banks have not always been clear about which plans and strategies should have priority and there is no consensus on priority's being given to sustainable development strategies;
- (b) Not all agencies, even within the United Nations system, have the same understanding of or commitment to the idea of sustainable development. Some have adopted programmes of environmentally sustainable development, and others have called for sustainable human development while still others have talked of conservation or other types of environmental plans. These are all affirmed as being equivalent, but lead to confusion regarding what is actually meant by "sustainable development", in the final analysis;
- (c) Conflicting claims regarding priorities have emerged from different international conferences, so countries are not always clear about which issues should be given precedence in national programmes and action plans;
- (d) International agreements are often being reached faster than countries can effectively respond to the requirements agreed to;
- (e) Governments, particularly those of developing countries, often lack the financial and staff resources to implement the different international conferences, conventions, agreements and plans that they have endorsed or signed.
- 37. A top-down approach resulting from external requirements or the need to achieve loan replenishment conditions has generally resulted in impressive environmental action plans, but often at the expense of public participation and national ownership. It is only through the commitment and participation of non-governmental organizations, major groups, the public and ministry officials that implementation and follow-up can be assured. Non-governmental organizations, in particular, raise public awareness of issues and help to mobilize public support to keep governmental action on course. National sustainable development strategies are more useful for the process they involve than for the outputs they seek to produce.

B. <u>Integrated environmental and economic accounting at the</u> national level

- 38. There has been relatively slow progress in developing a system for environmental and economic accounting (SEEA) at the national level, although current efforts in a number of countries indicate that the SEEA may gain increasing attention in the near future. The SEEA seeks to integrate environmental issues into conventional national accounts. Conventional national accounts have provided indicators for assessment of economic performance and trends for many years, but the emphasis on integrating environmental information into this process is relatively new, and remains somewhat controversial. Among other issues, disagreement centres around which is preferable, monetary economic accounting through economic valuation of environmental cost or benefits, or physical environmental accounting.
- 39. Progress has been made in the implementation of national resource accounts within OECD countries, including water accounts in Spain, which combine information on water quality and quantity with information about expenditures on water pollution abatement and mobilization of resources. Water accounts in France, forest accounts in Japan, energy accounts in Norway, and crude oil and natural resource accounts in Canada, Indonesia and China are all being kept. Although work is under way in this area, progress remains limited, owing to countries' lack of knowledge of their potential resources or vulnerability and the problems connected with identifying the direct links between specific economic activities and particular environmental resources.

V. EMERGING PRIORITIES

A. <u>National strategies</u>

- 40. There is a need to further clarify the definition, purposes and modalities for national sustainable development strategies and to bring some consistency of practice to the different requirements that countries are to satisfy with respect to environmental action plans, national development plans and country strategy papers. There is also a need to clarify how the outcomes of different international conferences and their resulting calls for action can be integrated into national planning and overall action for sustainable development. Strategies, and especially sustainable development strategies, have to be seen as ongoing cyclic processes of action and learning from experience through a participatory approach, feeding into improved policies and programmes. The emphasis needs to be put on the participatory and learning aspects of the process more than on the document that is the product of the process.
- 41. There are donor-funded efforts in capacity-building to support the preparation of sustainable development strategies, such as UNDP's Capacity 21 programme and others supported by the International Monetary Fund (IMF) and OECD, among others. Many developing countries need continued capacity-building support to meet the requirements for the many types of plans and strategies called for, including those related to various international conventions and agreements.

B. Strategic environmental assessment

42. The limited practical experience with strategic environmental assessment (SEA) should be further expanded and applied since SEA could serve as a useful policy tool for many countries. SEA, in particular, helps to introduce sustainability principles and responsibilities into economic decision-making by drawing attention to existing environmental benefits and costs. It also provides a mechanism for public participation in discussions relevant to sustainability at a strategic level.

<u>Notes</u>

- ¹ Report of the United Nations Conference on Environment and Development, vol. I, Resolutions Adopted by the Conference (United Nations publication, Sales No. E.93.I.8 and corrigendum), resolution 1, annex II.
- ² Environmental Planning Group/International Institute for Environment and Development (IIED), <u>A Directory of Impact Assessment Guidelines</u> (London, June 1995).
 - ³ United Nations publication, Sales No. E.96.II.A.16.
 - 4 A/AC.237/18 (Part II)/Add.1 and Corr.1, annex I.
 - ⁵ United Nations publication, Sales No. E.94.XVII.4.
- ⁶ See <u>Integrated Environmental and Economic Accounting: Handbook of National Accounting</u>, Studies in Methods, No. 61 (United Nations publication, Sales No. E.93.XVII.12).
