

SUSTAINABLE DEVELOPMENT AND THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS: THE FAIR PROCESS

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ABSTRACT

During 1999, the Wildlife and Environment Society, Western Cape, (WESSA:WC) drew together a task team to critically examine the EIA process and its implementation. The problem was identified as a lack of effective participation by the public in the process and we arrived at a number of uncomfortable conclusions. Our findings show that the EIA process is manipulated by certain unscrupulous consultants in order to benefit the developer, misleading the public in the process. The attitude of authorities appears to be to condone the results of these processes.

WESSA:WC believes the current process leads to a polarisation between those pro and anti any specific development, and the resulting mistrust and antagonism leads to frustrating delays in the decision-making process. We have put forward certain recommendations which refine the EIA process and hopefully would prevent such manipulation. This presentation provides an opportunity to share these with you.

1. INTRODUCTION

The Wildlife and Environment Society acknowledges that in many cases, consultants, authorities, developers and specialists work together with the public to ensure sound environmentally sustainable decision-making results from the EIA process. However, as a response against the unethical behaviour of those who are supposed to protect our environmental rights and who instead have chosen to act irresponsibly WESSA:WC initiated the Development Planning and Environment Project. This paper highlights some of the key results of that project. The project looked at the weaknesses of the EIA process from an NGO perspective, and was not meant to be a definitive analysis of the EIA process. The case studies and recommendations were all Western Cape based.

How do we achieve sustainable development? What tools are available to assist us in wise decision-making? The continued existence of human society as we know it is dependent on effective decision-making tools. While the Environmental Impact Assessment process is just one tool and has its limitations, it is widely used in project-level decision-making. It is usually the only level at which local environmental groups and individuals have the opportunity to participate meaningfully instead of political decisions occurring far removed from their daily lives. It is for this reason that the WESSA WC has contributed considerable resources to analyse and refine the EIA tool as part of the environmental decision-making process.

If we fail to ensure that environmental concerns / impacts are integrated into government decision-making and not just seen as an afterthought, we will be faced with the loss of much of our pristine and unique habitats. An increase in inappropriate industrial and high-income residential

developments will result in water shortages, water, air and visual pollution and traffic congestion. These are indicators of a degraded environment which will destroy the engine of economic development in the Western Cape, i.e. tourism, specifically - ecotourism.

2. THE NATIONAL CONTEXT

The EIA regulations promulgated by government on 5 September 1997 increased the amount of public participation required in environmental decision-making considerably. These regulations instituted a particular way in which authorities needed to make decisions should the developments have significant environmental impacts, but their implementation was restricted to a specific list of activities.

The new National Environmental Management Act of 1999 puts legally binding responsibilities on all organs of government to include environmental issues as part of their decision-making processes. NEMA therefore not only applies to environmental decision-makers but to planners and other decision-makers at all levels of government.

The new Planning and Development Act of the Western Cape (Act no 7 of 1999) and its associated regulations will replace the Land Use Planning Ordinance of 1985 with planning legislation which is appropriate to the new South Africa. It has also made some attempts to be more environmentally friendly.

However, we are still seeing development planning and environmental management running in parallel tracks, which results in confusion and duplication of effort for all, particularly with regard to public participation.

Planning departments frequently give approvals without having the results of any environmental study. This is irrational decision-making. Planning decisions should not be given until all the relevant information is available. This included the record of decision for the EIA from the environmental authority, the Department of Environment Culture and Sport (DECAS).

Following the implementation of the EIA regulations, there appears to have been a proliferation of environmental consultants, all of whom claim to be following the EIA regulations. However, consultants follow their own interpretation of the EIA regulations process – this is very confusing for I&APs. "Unethical" consultants then manipulate the processes for their own gain and in the interests of the developer for whom they work. Our experience in these processes has led us to a number of uncomfortable conclusions:

- Consultants employed to run public participation processes can manipulate the process in order to benefit the developer.
- NGOs such as WESSA:WC do not have the capacity to "watchdog" every development process
- There is no uniform process in use and the public become confused as to their rights and the nature of their involvement.
- Inevitably, the EIA report arrives at a decision which is in favour of one or another of the development options, usually the most extreme.

The public become weary of continuously being asked to participate in processes where they fail to see their inputs being considered. This again increases the workload of non-government organisations as they struggle to assist local communities to participate in these processes.

3. HOW DO WE CONSTRUCTIVELY ADDRESS THIS PROBLEM?

WESSA:WC is proposing an "improved" public participation process which we feel will represent the interests of the broader public. We hope that this will ensure that all the relevant authorities and consultants fulfil their responsibilities within the spirit and goals of the applicable legislation and

regulations, and deter them from opportunistically exploiting technical and legal loopholes for their own benefit.

At the beginning of 1999, the WESSA:WC undertook a study in which a team of people drawn from community organisations, analysed various development projects which had undergone some form of EIA. The team found that there were various common flaws in the EIA processes which in the opinion of the task team, had, in some cases, led to the wrong decision being made by the authorities. These case histories have been used to evaluate the shortcomings of the current process and to draft an Environmentally Fair Assessment/ Impact Report process - which we have termed the environmentally "FAIR" process.

4. THE EIA PROCESS

The following section details various stages of the EIA process, highlights key concerns and puts forward recommendations to address these concerns.

4.1 Appointment of consultants

Points of Concern

Consultants act in the developer's interest and are not independent
Process consultants are not the principal consultants but are sub-contracted by "construction" firms (such as civil engineers etc).

Recommendation

- There should be a database of consultants which is open to public scrutiny. E.g. SAIE&ES directory of consultants/specialists. It would include details about consultants' qualifications and experience.
- The developer should employ a "process consultant" who then subcontracts other specialist consultants as required.
- The developer should pay for this as part of the application fee thereby removing the direct line of payment. DECAS should manage a fund out of which consultants should be paid. Applicants would pay into the centralised fund, proportionate to the value and extent of the development.
- If the developer is the local authority then the appointment of the consultant should be facilitated by the provincial authority.
- Consultants could be assigned to developers by DECAS - not chosen by a developer. DECAS could put forward 3 or 4 consultants who have the relevant expertise and the developer would then select their preferred consultant from the list.

4.2 Pre-application consultation

Points of Concern

Exemptions are given by authorities without any public knowledge or involvement

Recommendations

- The authority should consult key local I&APs at the pre-consultation stage to hear their concerns or opinions
- There must be strict criteria for the granting of exemptions. These criteria must be developed in consultation with I&APs.
- The public must be consulted before exemptions are given.

- Local authorities must publicise a list of proposed developments and proposed exemptions - see section 4.3 on advertising

4.3 Advertisement

Points of Concern

- Advertising is not, on the whole, adequate. (Sometimes only the erf number is given)
- People are not informed.
- Consultants generally rely only on written media.
- Newspaper adverts are small, and there are no uniform standards for advertisements.

Recommendation

- Advertising should be done on site via highly visible clearly-worded signs
- Consultants should send letters to everyone on the I&AP list (The authority must have a local database of registered I&APs for various areas)
- Newspapers – there must be a standardised format/ time and place in the newspaper for advertising. For example on Thursdays, p. 2 in column 3.
- 40% of the population is illiterate, so other media such as radio must be used.
- Information must be understandable and in appropriate languages for local I&APs.
- Notice to give exemptions must be advertised for comment or objection.
- The Background Information Document (BID) must include a description of the proposal, contact names and details, proposed public meeting dates, and closing dates for comments.

4.4.Scoping

Points of Concern

- Public Meetings are a necessary part of the process but are not accessible because of a lack of transport, safety of travel at night, lack of childcare facilities etc.
- Public meetings do not provide for full disclosure of all information.
- Public concerns are often "heard" and then ignored.
- Public meetings are often used by the developer and the consultant to manipulate the process.
- Consultants often pre-judge comments/concerns raised by I&APS, saying this comment /concern is not important or relevant or misinterpret it to reflect to the developer's advantage. I&APS feel intimidated by this and don't want to appear stupid so they are scared to raise or clarify their concerns.
- The Terms of Reference (TOR) for studies are dictated by the developer.
- TOR are not adhered to.
- If the public are asked to provide input into the terms of reference for the Specialist studies, it is possible that the same specialist studies are completed before input from public into the TORs has been received.
- The information documents are often technical. There is a lack relevant information or the document is not easily accessible (being placed at a public library where hours are restrictive and there may only be one copy. For example Rondebosch library is open only one evening per week)

Recommendations

- A well-advertised and resourced site visit should be held to brief I&APS.
- Full information should be provided – including the time frame/ schedule for the public process
- Local Councillors or MPLs should be in attendance at the public meeting

- Workshops/ open days, stakeholder meetings as well as public meetings should be held to communicate the relevant information
- The TOR should be agreed by I&APs and the developer (via consultant).
- The TOR should address I&AP concerns
- Scoping must look at the no-development option
- Detailed minutes must be kept of all workshops/ small group and public meetings, and included in the scoping report. These minutes should be available to all concerned.
- Transport should be provided to meetings and the site visit – taking into consideration the need for safety at night
- Childcare should be provided where needed.
- Scoping must look at alternatives- nothing should be rejected without I&AP agreement
- Local knowledge must be recognised in scoping and incorporated into the TOR of specialist studies
- The comment period should be extended to at least 6 weeks (especially in large/ high impacting developments)
- Consultants cannot pre-empt the public scoping process; the public must have input into issues and alternatives before a draft scoping report is drawn up and released.
- At the scoping stage, consultants must record (without making any judgement on the points raised) all concerns/issues raised by I&APs – i.e. at meetings, in writing or by personal communication.

4.4 Specialist studies

Points of Concern

- Specialists are appointed without input from I&APs.
- Generally, they are located in academic institutions and often base results on theoretical desk top studies as they are not given resources to do proper detailed studies or they lack baseline data
- Specialist reports often contain superficial studies. These flawed studies are then used as a basis for decision-making.
- The results are often in the form of dense, jargon-filled documents which require hours of reading. Most I&APs don't have the time or knowledge to digest these texts thoroughly - especially if their only access to the documents is at a public library with restricted hours.
- Specialist reports are not written for public consumption and sometimes are not available for public comment. (Reports are often in a separate, technical volume not supplied)
- Specialists are not expected to interface with public.
- Specialists accept briefs knowing that the results will be of limited value and therefore act with a lack of integrity.
- Studies are seldom reviewed by peers, and often peers are appointed by the consultant without consultation with I&APs.

Recommendation

- Specialists should provide a statement in the report putting forward their professional opinion, not hide behind "lack of data and the need for further studies" excuse. This professional opinion needs to withstand peer review. For example can a botanist confidently say that there will be no significant impact on the vegetation or identify any possible rare or endangered species after walking around the site for one day?.
- I&APs must be involved in drawing up TOR for specialist studies and for any specialist reviewer.
- Specialists must make themselves available to I&APs in order that I&APs can understand and comment meaningfully on their reports.

- Specialist and specialist reviewers' appointments should be subject to veto by I&APs.
- There should be a database of specialists (with their experience listed) which is available to I&APs.
- A risk-averse and cautious approach should be used. Specialist reports which do not contain sufficient information should not be used to justify development. For example, if there is insufficient information to determine the impact on the vegetation, it should be assumed that the impact will be significant until proven otherwise (the precautionary principle).
- Specialist reports must list what has been investigated and what could not be investigated. There must not be silence on issues **not** covered.
- Specialist reports must first be commented on by I&APs before they can be accepted and their information used by the consultants.
- Reasonable access to all documents must be ensured. There should be sufficient copies for I&APs through both electronic availability and accessible copies at venues which remain open late. (E.g. late night stores)

4.5 Conflict resolution

Points of Concern

- NEMA makes provision for conflict resolution to be part of the process, but authorities appear ill-equipped to deal with requests for conflict resolution.
- Conflict processes thus far have been negated by acts of bad faith on the part of developers(E.g. Brandwacht Appendix 9.1.6)
- I&APs are being asked to pay for the resolution of conflict which would not have arisen if the process had been correctly facilitated in the first place. (Eg Paradyskloof Appendix 9.1.5)

Recommendations

- A conflict resolution process must be put on the table at the first meeting as part of the overall EIA process.
- Mediators must be agreed to up front by the I&APs and the developer.
- Poor NGOs and I&APs cannot afford to pay for facilitators – consultants must build this fact into their costs as conflict resolution is a mandatory part of the process (NEMA).
- I&APs should be able to declare conflict, even early on in the process, if they feel that a consultant does not take their input/participation seriously - for instance if a consultant tells somebody that the issues they raised are not important. The authorities are tasked with ensuring that I&APs have access to conflict resolution procedures.

4.6 Scoping report

Points of Concern

- I&AP's concerns are ignored and not captured or reflected incorrectly in the report
- The assessment of the significance of the impacts is based on the consultants' subjective view and often appears unrelated to the results of specialist studies.
- The executive summary often appears to be the only document used to make a decision; much crucial information is therefore lost.
- The list of I&APs who have been consulted includes everyone who was sent an initial BID irrespective of whether they responded or not. Others are left out.

Recommendation

- Documents must be dated and numbered, e.g. Final Scoping Report or Draft 2 Scoping Report, etc.
- I&AP concerns must be correctly reflected in the executive summary as well as in the main body of the document.
- Scoping reports should reflect I&AP recommendations as to whether a full EIA is needed.
- Comments to the final scoping report must be sent directly to the authority for consideration with the final report.
- The Scoping report must list all issues and objections and /or concerns raised by I&APs and indicate how they have been investigated. If any issue/concern/ objection is rejected the consultant must give motivations for the rejection.
- Scoping reports must list I&APs and distinguish between those who were sent the documents and have not since responded and those who have actively participated.

4.7 Decision-makers (officials and politicians at all 3 spheres of government)

Points of Concern

- Decisions are often based on flawed, inadequate reports.
- The decision-making path is confusing (roles of officials vs.councillors).
- Undue influence can be wielded by developers/ politicians, or officials.
- Executive summaries are used as the main decision-making tool, not the whole body of information.
- Developments are given the go-ahead despite lack of adequate information. Authorities then attempt to address this by making it a condition of approval to obtain the missing information.
- Authorities appear to give conditional approval knowing full well that they will not be able to enforce the conditions.
- Authorities appear to rely on public watchdogs to enforce conditions - thereby rendering the conditions meaningless and placing an unfair burden on the public.
- Planning approval is given without finalisation of the EIA report. The fact that these processes run in parallel means that any environmental considerations are therefore negated.

Recommendation

- Full information necessary for informed decision-making must be available. If the information available is not sufficient, development rights must be refused (no approval if further studies are required)
- All permits/reports from all other relevant departments must be available and have been subject to public review before DECAS takes a decision.
- Planning officials may not make a decision unless they have received the ROD from DECAS.
- Responsible authorities must provide clear reasons in writing explaining why the advice or objections of project opponents have been rejected.
- Conditions must be strictly enforced by the authorities. No conditions should be set which cannot be enforced.

4.8 Appeals

Points of Concern

- I&APs become exhausted by the process and often don't have the technical skills and knowledge to make use of their rights to appeal.
- Appeals frequently don't give relief as the same official that made the original decision considers the appeal. He/she is unlikely to come to a different conclusion.

Recommendation

- Local government must give notice of the right of appeal to all I&APs
- It is unacceptable to have the same official that made the original decision now making the appeal decision – a review panel within the department, consisting of other officials should be constituted.

4.9 High court review

Points of Concern

- This is not available to the average I&APs owing to exorbitant legal costs
- Developers and authorities appear to rely on the I&APs inability to enforce their rights through the courts and continue to follow or approve flawed processes.

Recommendation

- The recourse to court action should be used by well-resourced NGOs to set precedents.
- Authorities should take into consideration the I&APs' ability to enforce their rights when making their decisions. The precautionary principle should apply. Where it is clear that conditions will not easily be met and DECAS has not the capacity to enforce them, then approval should be refused.

4.10 Monitoring and enforcement

Points of Concern

- The Environmental Monitoring Committee (EMC) is not weighted sufficiently to ensure that environmental concerns are taken seriously.
- Conditions of approval are ignored by developers and there is no recourse. For example it is not possible to replace a 100-year-old tree once it has been chopped down.
- The EMC oversees further studies which are needed as conditions of approval. This is therefore no longer an EIA monitoring function but an extension of the EIA.
- The EMC is appointed by the developer. This leads to problems of perceived and, in many cases, real, bias of the EMC.

Recommendation

- Community representatives and environmental NGO representatives should have more weight than developers in both the appointment of representatives and the numbers of representative on the EMC.
- Communities must be able to stop the development, raise early warning signals and be empowered to issue a form of "cease and desist" order or interdict if necessary.
- The EMC should be constituted only once all studies have been completed.
- The EMC must be appointed by the authority and away from the developer's influence

4.11 Structure plans/ Integrated development frameworks/ Spatial development plans

Points of Concern

- Structure plans are left hanging without finalisation, remaining in draft form for as long as a decade.
- Draft structure plans are selectively ignored or used by decision-makers depending on their interests. (E.g. *Boskloof* Appendix 9.1.1)

Recommendation

- Structure plans (and IDFs) must be finalised with a full public participation process.
- If there is a structure plan in place, then rezonings/ departures etc. which do not fit within structure plan should **not** be allowed. Structure plans are then reviewed every 5 years with a proper public consultation process)

4.12 Bias and vested interests

Points of Concern

- There appears to be undue influence exerted on or by officials/ councillors that results in decisions which are contrary to those drawn from the facts and public opinion!

Recommendation

- There must be a transparent process which the public can scrutinise. All decision-making meetings must be open to the public.
- All decisions must be clearly motivated and that motivation must be easily accessible to the public (be part of public record held on file).

While the EIA regulations form an important starting point, the way in which they are implemented leads to results far short of what was expected.

5. WORKING TOGETHER

In South Africa public suspicion of EIA processes is currently high with most CBOs and NGOs seeing consultants as paying lip service to proper process in order to get development approval. At the moment, it is extremely difficult for I&APs to participate in the myriad development processes which are under way because they lack knowledge and skills and the processes are themselves often presented in an inaccessible manner. Environmental NGOs are consequently thrown into the role of trainers and educators for which they do not have adequate resources. To address this problem in Asia, it was found that there was a need to increase the awareness of environmental issues among local NGOs that have a social and economic focus.

It is also necessary for local government to put resources into empowering councillors and communities. This empowerment will ensure that EIAs are used correctly as a tool in the decision-making process, as all participants would have a similar level of understanding.

This understanding enhances the success potential of the EIA process and would benefit local authorities too. It reduces the chances of manipulation of the process, ensuring community "buy-in" and thereby reduces the risks of conflict and appeals. A stream-lined decision-making process results.

EIA community empowerment fund

We believe a fund should be established which is administered by local government, funded by development application fees and which is drawn on by local groups as needed, to develop capacity. The funds could also be used to employ a process facilitator who can ensure that the public's rights are protected, particularly in cases where the public perceive that the consultant is biased towards the developer, provoking a loss of faith in the EIA process.

In our opinion, a clear distinction must be made between NGOs who are generally better resourced and can cope with techno-speak, and the lack of capacity at CBO or individual level. If the

consultants are truly independent, they should service these "clients" to the level that enables them to participate adequately.

Effective communication and the dissemination of information leads to a mutual understanding of the problems, resulting in working together in a co-ordinated manner to solve the problems for the good of all. These form the key aspects of public participation. The entry of South Africa into a democratic era has theoretically taken away the power from bureaucrats and placed it back in the hands of communities. However, implementation is slow and attitudes must change before effective progress takes place.

6. RECOMMENDED "FAIR" PROCESS

(Fair Assessment/ Impact Report)

Pre-application phase

- Developer plans to submit application
- Developer appoints consultant ensuring that consultant subscribes to "code of conduct" (or consultant appointed by authority)
- DECAS meets with consultant:- provides advice regarding legal requirements e.g. other relevant bodies who must be approached for approvals such as Dept of Transport, (Dept of Water Affairs and Forestry (DWAF) etc.
- DECAS tells consultant to meet with identified local key role players including local environmental groups
- DECAS officials contact local groups in the area and inform them of the proposal.
- Consultant meets with local groups collectively and at that meeting:
 - there is an assessment of the capacity of the I&APs, to participate
 - an independent chairperson is identified for the public meeting
 - there is agreement on the principles for development process or common vision of society.
 - there is agreement on level/spread of public participation of I&APs which will be deemed sufficient

Start of formal EIA process

- Circulation of BID (Background Information Document)
- Ensuring that process accommodates skills transfer
- Advertising is done on site - giving details of open days and public meetings as well as deadlines for comments.
- There is a Public open day (at least a couple of hours prior to public meeting)
- Public meetings include:
 - presentation of draft process and timeframes for comment
 - need and desirability for development must be part of scoping process
 - explanation of the EIA process in plain language (must include how TOR for specialists to be drawn up/ criteria for identification of specialists/ conflict resolution/ peer review)
- Plenary questions or small group discussions to ensure that the proposed process is understood
- presentation of the draft development proposal - there should be clear articulation of the problem which the proposal is to solve.

Scoping of issues/alternatives

- Alternatives to the project: assess the potential for solving the same problem using other means AND evaluate alternative solutions to particular problems which arise within the project

Consideration of Alternatives :

"Alternative means" of carrying out the project are methods of a similar technical character or methods that are functionally the same. "Alternative means" with respect to a nuclear power plant, for example, includes selection of a different location, building several smaller plants and expanding an existing nuclear plant.

*In contrast, "Alternatives to" the project are functionally different ways of achieving the same end. For example, "alternatives to" the nuclear power plant include importing power, building a hydro-electric dam, conserving energy, and obtaining energy through renewable sources.
(Canadian Environmental Assessment Act)*

In our case:

"Alternative means" with respect to an incinerator, for example, includes selection of a different location, building several smaller plants and expanding an existing waste treatment plant, and "alternatives to" the incinerator include removal of waste to a landfill site, reducing the waste stream, using a non-incinerator waste disposal technology.

- Issues should be weighted
- Identify capacity building workshops if needed
- Record of meeting kept to include OHP slides, newsprint with points raised, etc. - summary of main points to be given to I&APs
- Consultants must ensure that the contact details of all interested persons are gathered.
- Consultants draft TOR in order to address concerns raised in scoping process and send out to I&APs to check that their concerns are covered. They also send out a list of possible specialists for comment.
- Take in comments; adjust TOR if necessary; appoint/confirm specialists

Capacity building workshops (to be held throughout process, not only during scoping)

These are held to:

- explain in detail the purpose of the EIA process, and the integration with any planning decision-making process which is happening in parallel. E.g. Local authority planning approval process
- provide further scoping opportunities
- demystify the specialist studies
- promote understanding of the scoping report
- explain the implications of the ROD (record of decision) including any conditions of approval
- clarify any other issues

Specialist studies commissioned

- Specialists visit site with I&APs in order to understand local knowledge.
- Specialist studies incorporated into scoping report
- **Draft Scoping report circulated for comment**
- Comments addressed
- **Final report sent out to I&APs and authorities** - deadline given to I&APs to comment on final report directly to DECAS.
- The weight of public opinion vs. the development must be clearly indicated
- **DECAS makes decision - issues record of decision (ROD)**
- DECAS distributes copies of decision to I&APs and advertises on site. Notice must give details of appeal procedure including timeframes.
- **I&APs appeal to provincial minister should they want to.**
- **DECAS issues ROD on appeal**

- **I&APs can continue and go to court to take the DECAS decision on review** should they feel their case is sufficiently strong and they have the resources to do so.

7. REFERENCES AND RECOMMENDED READING

(relevant extracts of the readings below are available from the WESSA offices)

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