

A STRATEGIC ADVOCACY ROLE IN SEA FOR SUSTAINABILITY

MARIA ROSARIO PARTIDARIO

CEG-IST, Instituto Superior Tecnico (IST)

University of Lisbon, Lisbon, Portugal

mariapartidario@tecnico.ulisboa.pt; mpartidario@gmail.com

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In this paper I advocate SEA as an instrument of change towards more sustainable patterns of behaviour and development, by following strategic thinking and constructive approaches. I recommend that the future research agenda of SEA should contribute to make SEA a matured, full-fleshed instrument with a clear identity, and coherent functions and forms. This may be achieved by exploring how to engage all actors in a fundamental new attitude in understanding and addressing the complexity of strategic processes, enabling dialogues towards mutual understanding, offering flexibility, ensuring a long-term and large scale perspectives when exploring development options.

Keywords: Strategic thinking; strategic environmental assessment; sustainability.

What is this Paper About

This paper reflects on how scholars have approached Strategic Environmental Assessment (SEA) in terms of its value added to strategic sustainability decision-making. Based on the assumption of an SEA locked in Environmental Impact Assessment (EIA) practices and paradigms ([Partidário, forthcoming](#)), this paper elaborates on the need for research on strategic thinking in SEA to enable sustainability.

Two aspects that may act as a crucial condition to unlock SEA and enhance its advocacy role for sustainability are the focus of this reflection. One is the adoption of a strategic, as opposed to a project, decision-making culture in SEA. The second

is the political attitude in SEA in relation to the integration of environmental concerns in decision processes, whereby environment becomes a decision factor not because it is a legal imposition but because it constructively adds value to decision-making.

The Growth and Shrinkage of a New Instrument

From its early days SEA has been popularised as the environmental assessment process for policies, plans and programs (EA of PPP) to upstream environmental issues into higher levels of decision-making (Lee and Walsh, 1992; Tetlow and Hanusch, 2012), and so continues to be (João and McLauchlan, 2014). It emerged as a normative approach driven by “the limitations of project’s EIA to respond to the new assessment requirements arising from policy commitments to sustainable development” (Lee and Walsh, 1992: 126). The link between SEA and sustainable development has therefore always been acknowledged (Thérivel *et al.*, 1992; Boothroyd, 1995; Partidário, 1996; Sadler and Verheem, 1996).

Academic positions in relation to SEA range across a broad spectrum, flowing after disciplinary and political interpretations of environmental performance, of decision-making, and indeed of what strategic could mean (Hacking and Guthrie, 2008; Tetlow and Hanusch, 2012; Bidstrup and AM Hansen, 2014). Categories of SEA have been suggested in different occasions. Related instruments, such as sustainability assessment (SA), emerged both as a specialised form of SEA and also with the purpose of enhancing sustainability objectives and criteria in project’s assessment (Pope *et al.*, 2004; Gibson *et al.*, 2005; Morrison-Saunders and Therivel, 2006; OECD-DAC, 2006; White and Noble, 2013).

But dominant practice show SEA closely following the footsteps of EIA. Dalal Clayton and Sadler (2005) embraced a broader view of SEA practice, criticising the narrow concept of SEA found in EIA-based approaches, which they associate to “the concept to the European Union (EU) Directive 2001/42/EC on the assessment of certain effects of plans and programs on the environment” (Dalal Clayton and Sadler, 2005: 358). Generalised as the “SEA” Directive, it has been largely cloned across the world as a legal standard for SEA (considering legal frameworks adopted outside the EU).

The EU Directive locked SEA in a 1970s impact assessment concept, interpreting SEA as an enlarged EIA (Verheem and Dusik, 2011) and enforcing a project’s culture in SEA. The strategic consequence of this political choice is the shrinkage of an instrument that has a much bigger potential (Partidário, 2000, 2009; Bidstrup and AM Hansen, 2014; Lobos and Partidário, 2014), with consequences not only within the EU but all over where the Directive has been cloned. Recent reviews note

limitations concerning lack of effectiveness of SEA in enabling learning and consideration of indirect impacts (Fischer *et al.*, 2009; Acharibasam and Noble, 2014) and show practitioners reluctance in using an instrument not adequate for higher levels of decision-making (João and McLauchlan, 2014). But the review conducted by Lobos and Partidário (2014) went further to explore why is this happening. The authors found a resistance to change in SEA, among most practitioners and some scholars, to move away from the comfort zone established by the technical-rationalist EIA model, even in face of inevitable complex systems. All these reviews, in one way or another, illustrate the still reduced strategic nature of SEA (considered as long-term and large vision beyond the PPP and decision context, learning outcomes, attitudinal and value changes (Partidário, 2000).

Shifting from a Project's (Operational) to a Forward-Looking (Strategic) Decision-Making Culture

SEA is often described as the EA of policies, plans and programmes (PPP) as opposed to EIA that applies to projects (as presented by the OECD-DAC, 2006 and hundreds of other authors). But the PPP terminology is problematic, PPPs are not clearly defined and mean different things to different people (Marsden, 2002). There are differences in purpose, in process of development, in objectives to be achieved, in timing of design and of implementation, in tangibility and level of detail (Partidário, 2000). And there can be multiple combinations of these Ps: policy plan, planning policies, project plan, project programmes, and other. Some Ps may be more strategic, others more operational. As previously suggested, linking SEA to PPPs does not help in realising the full potential of SEA (Partidário, 2000).

Tetlow and Hanusch (2012) review on the status of SEA draw on several scholars debating the epistemology of SEA, and its role in making a difference to decision-making. Many scholars (Partidário, 2000; Kornov and Thissen, 2000; Clark, 2000; Nitz and Brown, 2001; Nilsson and Dalkmann, 2001; Thissen *et al.*, 2001; Partidário, 2005; Bina, 2007) have alerted to problems with pursuing a rationality paradigm in SEA and recommended that "SEA must become more strategic" (Tetlow and Hanusch, 2012: 22). An increasing number of scholars suggest a conceptual shift in SEA, to evolve from an assessment of impacts and measurement of changes made to a PPP into a process for actively shaping and formulating strategic initiatives (Partidário, 1996, 2000; Dalkmann *et al.*, 2004; Bina, 2007; Partidário, 2009, 2012).

Strategic thinking calls on a different philosophy from operational thinking. Mintzberg (1994) showed that in planning and policy-making many intended

decisions may never be implemented. Instead what shapes development are unplanned emerging decisions. Also for [Morin and Viveret \(2010\)](#) strategy establishes an objective and a scenario for action, but modifies its action as a function of the emerging unexpected events it encounters in its pathway ([Morin and Viveret, 2010](#)). This is opposed to an operational philosophy. Operational actions are conscientiously implemented, changed or abandoned. Operational PPP are designed how they will be implemented, such as projects, but unlike strategic intentions.

In strategic thinking SEA is conceptualised with respect to its capacity to influence decisional contexts and the formulation of strategic initiatives, adjusting to the flow and dynamics of strategic decision-making. That is the purpose of the guidance for better SEA practice, with strategic thinking for sustainability, developed by [Partidário \(2012\)](#).

The Political Attitude in Relation to the Environmental Integration in the Decision Processes

The literature acknowledges that SEA was introduced to help improve environmental performance in the complex contextual decision frameworks that anticipate development projects. But there are different interpretations on how this can be done. Some authors reflect a more positivist rationality, advocating a control role of SEA ([Fischer, 2003](#)), others advocate the design of SEA to enable integration and adaptation to policy-making and planning realities ([Nitz and Brown, 2001](#); [Sheate et al., 2003](#)). [Partidário \(2009\)](#) discussed the advocacy role of SEA in mainstreaming environmental and sustainability issues in decision-making and suggested three categories of approaches — marginal, compliance, and constructive approaches (see Table 1).

A systematic review of the SEA experience worldwide showed that the marginal and compliance approaches are still largely more common ([Lobos and Partidário, 2014](#)).

Towards a Strategic Advocacy Role in SEA for Sustainability

For [Clark \(2000\)](#) it appears that SEA has different features to other types of impact assessment. According to this author, while high quality assessment of cumulative effects makes EIA richer and assessment of social impacts makes EIA deeper, SEA is a different kind of analysis. Recognising this difference may be a crucial condition for understanding SEA and allow process and practice improvement.

Also [Owens \(1995\)](#) stated that the closer environmental appraisal gets to policies, the more uncomfortable the questions become for fundamental political and

Table 1. Forms of SEA advocacy role in decision-making (Partidário, 2009).

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- **A marginal approach** when SEA becomes an end in itself and limited effort is made to understand decision needs. SEA collects and delivers environmental and social baseline studies and the assessment of the effects of proposals in a formal report, following a standard sequence of formal activities. The outcome of such SEA is likely to be irrelevant to decision-making, despite invested resources in accumulating information.
 - **A compliance approach** when SEA is an instrument for control of legal and policy compliance. SEA still collects and delivers environmental and social baseline studies and the assessment of the effects of proposals in a formal report, following a standard sequence of formal activities. The outcome of such SEA will likely fulfill decision needs concerning legal requirements, but may be limited adjusting to decision needs and in generating an added-value concerning environmental and sustainability benefits.
 - **A constructive approach** when SEA main purpose is to help decision-making drive strategies towards better environmental and sustainability integration. This means that SEA is designed to facilitate decision-making. The priority is to use SEA to understand the complexity of decision-making, its needs and priorities, and to assist in a mutual learning process about how environmental and sustainability issues can be constructively built into decision-making. The outcomes of the SEA are embedded in the decision-making cycle, inputs are made at key moments (decision windows) when it can actually make a difference and add value.
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economic assumptions, and questioned whether SEA would itself be captured by, or instrumental in changing, the existing system.

Following the line of thinking argued in this paper, we need a type of SEA that is instrumental in changing the system, to enable a transition to better environmental and sustainable decision-making. This calls for a strategic advocacy role in SEA for sustainability (Partidário, 2000, 2009, 2012). If we look at SEA through strategic lenses, and if we follow a constructive approach (Table 1), we may increase opportunities for better environmental integration and more sustainability driven decision-making.

Strategic interpretations of SEA that proactively assist the shaping and the design of strategies, including the governance conditions that set policy contexts, are needed. Such a strategic approach incorporates a mutual molding process of SEA and strategies formation, working through problem based learning and policy design to flexibly respond to problems (Partidário, 1996). SEA must learn how to convince users of the benefit of incorporating environmental issues earlier on, well embedded in the strategic decision-making process. SEA must be driven by the need to help formulate and discuss strategic alternative options, and in following up the acting of such strategies that better recognise environmental and sustainability priorities.

So what is that scholars might do to facilitate this transition? First recognise that SEA emerged to be different from EIA, and then explore how different it must be — that sets a most needed critical and innovative attitude. Then learn about strategic thinking from distinct disciplinary fields, including systems thinking and forward-looking methods and techniques (Holling, 1978; Meadows, 2008; Schwartz, 1996). Accept the relevance of the decision context for SEA and find ways to make SEA adaptable to changing decision contexts. Find ways to improve SEA tangibility without falling into project's thinking. Explore the fundamental scientific principles that should support a theory of SEA, and accept that SEA will always have a variable geometry, as different as decision cultures and planning systems. Avoid looking for prescriptive standard formulas in SEA.

This paper argues that SEA can be an instrument of change, by following strategic thinking and constructive approaches. SEA can facilitate decision-making by involving key actors, enabling dialogues towards mutual understanding, offering flexibility, ensuring a long-term and large scale perspectives when considering development options that help to meet sustainability aims.

By promoting a fundamental new attitude in strategic development processes, understanding and addressing the complexity of strategic processes, SEA will be able to demonstrate the competing advantage of taking into account big-picture environmental issues to enable sustainable decision-making. Eventually accumulated knowledge and experience will enable SEA to become a matured, full-fledged instrument with a clear identity, and coherent functions and forms. This should be reflected in the future research agenda of SEA.

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