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**Survey of Perceptions among
Key Decision-makers of Environmental Issues in the
Transitional Zone of Ghana**

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1 Introduction

The aim of this study was to investigate the perceptions of the environment at national and sub-national levels among actors who play, or may be expected to play in the future, key roles in the processes of environmental policy development. This study was carried out as part of the NRSP funded project entitled 'Dimensions of Public Governance and Forest Management in Ghana'¹ (DEAR). Among the main findings of the scoping study for DEAR was that, while local government decentralisation might be hoped to improve environmental management by bringing decision making closer to the resource users, there is little evidence that this is actually occurring. Rather, the dominant process has been dominated by principles of technological modernisation which have guided policy formulation since Independence.

DEAR's focus has been mainly on the effects of these external narratives on policy development at the local levels (District Assembly and Area Council/Unit Committee). It has not investigated in depth the extent to which these external narratives also dominate environmental discourse and policy development at the higher levels. Understanding of these arenas is nevertheless important if the local level forces for change that the project is trying to promote are to be effectively articulated with national level constituencies. This study aimed to fill some of this gap in knowledge.

The report is divided into four main sections:

- i. The issues which are perceived by these actors as the main environmental issues and threats in the transition zone
- ii. The remedial actions which these actors see as necessary.
- iii. The way in which views are formed and the sources of influence
- iv. The way in which these views enter the policy process

The areas of particular concern focussed upon in the report are charcoal production and wild fire, and their perceived effects on the natural environment. Throughout the discussion the results are discussed in terms of the variations which exist between, and within, different categories of respondent.

2 Methodology

The research was based around a relatively short attitudinal semi-structured questionnaire, which struck a balance between pre-determined and open-ended questions, and objective and subjective information. This questionnaire was administered to as wide a range of policy and decision makers as was feasible in the time available, with due regard to the need for a broadly representative sample, and (where appropriate) an adequate gender balance. Two visits to Ghana were made and the research took place over six days in June 2004 and six days in February 2005. A delay was experienced in the second trip due to the national elections which fell in November, 2004.

The categories covered included:

¹ NRSP PROJECT R8258: 'Informing the Policy Process in Ghana'

- Senior and middle ranking civil servants and politicians in relevant ministries of government (including Lands and Forests; Agriculture; Environment; Energy; Office of the Senior Minister); and associated Wildlife Division and the Forest Services Department.
- Senior and middle ranking representatives of other public bodies and parastatals, including the Environmental Protection Agency and the Energy Commission
- Parliamentarians and members of the Environment Select Committee
- Staff members of national and international environmental and resource rights NGOs
- Environmental journalists and other media representatives
- Donors involved in implementing, and funding, land and natural resource issues.

As well as an exploration of the perceptions of environmental issues, this report discusses the way in which national actors are influenced and how their perceptions and subsequent policies which are based on these perceptions are formed. Although not the primary focus of the study some attention was given to the way in which those attempting to influence policy are influenced themselves. The results of this study may therefore go some way to answering questions on the way in which research can influence policy. The study has focussed on discussions of individual, rather than institutional, perceptions of environmental issues and the sources of influence of these perceptions. An attempt was made to talk to respondents at various levels of the hierarchy within the different institutions to gain a perspective of how the perceptions can vary within an institution.

In answering some of these questions there is a danger that two assumptions will be overlooked. The first assumption is that the individuals we interviewed *are* influential in policy making and the second is that the individual perceptions which were elicited reflect institutional policy and are influenced by *dominant* narratives. Another methodological shortcoming in this research is the sample size which was restricted by the time available. In addition the methods of sample selection were not random, rather, particularly in the case of the line ministries, respondents who were working in the issues of concern were sought out. This will affect the nature of the responses and may be an explanation for the observation, that officials in the line ministries are better informed than those in NGOs or the media.

3 Attitudes to environmental issues

3.1 Perceptions of priority problems

The first section of the report discusses the main perceptions of environmental issues (and narratives voiced by) key players at the national level. The respondents were asked to concentrate on environmental issues of relevance to the transition zone in Ghana but some responses covered the country more generally. The responses varied according to the type of respondent. The respondents from environmental NGOs laid a heavy emphasis on land degradation, deforestation, wild fire and pressures on conservation. Populist statements such as ‘the desert is not far and creeping closer’, and fears such as the increasing area of savannah and species extinction were voiced. In most discussions with environmental journalists and less senior government officials, urban issues such as waste, sanitation and water pollution were emphasised, reflecting the primary concerns of the urban public.

Discussions over the causes of environmental problems in the transition zone were surprisingly unsophisticated, even amongst those working directly on these

problems. For the most part blame was laid on technical reasons and not on political roots. Some NGOs however did make tangential reference to the political basis to these problems, emphasising the problems of illegal logging by the timber industry and lack of compensation for negative impacts caused by mining.

In more specific discussions on the main environmental issues facing transitional areas, and Brong Ahafo region in particular, fire was listed as a priority concern by officials in Environmental Protection Agency, Ministry of Environment and the Ministry of Lands and Forests. Parliamentarians viewed erosion and drought as being the result of deforestation and burning leading to the 'impoverishment of agricultural solids and fauna which has resulted from wild fires (Interview with MP from the Volta Region, June, 2004).

Many of the problems were attributed to the 'fragility' of the transition zone. Others put forward a more complex explanation of the role of the shift in agricultural production systems and the ways in which the loss of the cocoa trees in the 1983 fires changed farming systems and pushed cocoa farmers further west. However, despite some sophisticated analysis of the problems, statements suggesting an 'environmental crisis' were made even by the most 'informed'. Evidence of an 'energy crisis' was supported by the fact that charcoal exports have increased by 39% between 2002 and 2003, and one respondent from Environmental Protection Agency went as far as to claim that the 'Sahara Desert is receding 25km a year'. Many others stressed the need for urgency and increased 'awareness of the degradation and the threat to life'.

3.2 Attitudes to charcoal production

There was a clear dichotomy in the discussions surrounding charcoal production between the perceptions of those in government compared to the environmental NGOs. Many responses from non-governmental actors reflected a view that charcoal burning has negative environmental impact and that the current levels are problematic. The media in particular had a negative perception of the activity in terms of its relation to deforestation, and this attitude is said to reflect the majority view of the public. However, the evidence used to back up these views were often vague. When one NGO respondent was challenged on how he arrived at these conclusions he replied that 'we just know', then referring to the high rate of deforestation and land degradation in the Brong Ahafo region as evidence.

Although many NGO respondents were dismissive of suggestions that charcoal production could be sustainable ('it is hard to convince me that regeneration is sustainable') respondents from government ministries who work directly on the issue were more positive about the situation and revealed a more nuanced understanding of the issue. One example from Brong Ahafo was given where communities are demarcating areas and have received training to manage charcoal sustainably. These respondents were quick to point out the way in which the supply of the resource is not the problem, it is the distribution. The head of the renewable energy unit in the Ministry of Energy claimed that, according to data from the Energy Commission, although wood for charcoal is being harvested unsustainably in some areas there is no problem with the supply of wood fuel on a national basis. Therefore if the current situation was properly managed and there was reallocation of the resource or utilisation of currently 'underutilised' species, it could be sustainable. On the other hand this was combined with a realisation that the displacement of people from transition zone to western region to carry out this activity is not realistic.

The fact that wood fuel provides 90% of fuel in Ghana was stated by many and awareness of the importance of urban demand for charcoal was found even amongst those who were less informed on other aspects. There was also a high level of awareness of the dilemma that, for many, it represents an important source of income generation and that the costs of alternatives make them unavailable to the poor. The dominant view was that it is unrealistic to move away from the use of charcoal.

The role of charcoal production in the economy, both local and national was recognised by those working directly on the issue. These discussions focussed around the interaction with the farming system and the way in which for many farmers it is an off-season activity, and that charcoal production is subsidiary to farming or taken up if crops fail. The way in which much labour is utilised in the transport of charcoal was also raised. Some reference was also made by a parliamentarian to political complexities behind charcoal production and the reasons why traditional authorities are encouraging charcoal and certain farming practises.

The lack of prioritisation of the issue of wood fuel within the institutions responsible for policy on charcoal utilisation is reflected in the staff assigned to work on these issues. It was hard to find any member of staff in the Forestry Commission with responsibility for charcoal, and the position of renewable energy (including charcoal) within the Energy Commission does not carry a high status. The issue is championed by one key figure and only has a team of only three working on solar and wind power and the monitoring of charcoal exports. The low technological requirements for addressing the problem make it hard to raise a high profile in the Energy Commission and the perception of fuel efficiency as a 'backward' programme in relation to the development of liquefied petroleum gas or electricity was felt to be an additional barrier to its adoption at the policy level.

3.3 Attitudes to forest burning,

Detailed discussions on wildfire were only held with those involved directly in the issue, and to a degree their perceptions reflected their informed positions. The respondent in the Wildlife Division has long been advocating the use of fire as a management tool. According to him, a great percentage of the savannah woodland is fire climax and therefore fire is important for its regeneration. Within this he recognised the need for accurate timing and the need to alternate between early and late burning to allow regeneration². However, attitudes were dominated by the realities of implementation: 'any policy is going to be paperwork', and the fact that burning is the only viable way to remove brash was recognised. In his view knowledge of fire management has not only been guided by academic research but that much of the practical knowledge has come from the older, rural-based staff that have been used as guides.

Views about traditional knowledge were put forward in relation to this issue by some of the environmental NGOs and revealed some simplistic attitudes. Many of these views showed a distinction between 'positive' and 'negative' traditional knowledge. For example Friends of the Earth Ghana is involved in a project in Northern Ghana to 'discourage negative traditional practises and encourage positive ones'. The

² The Executive Director of the Wildlife Division outlined the problems faced over the direction of the policy of fire in protected areas. The burning encourages fresh grass and so communities around protected areas have been burning to attract animals out of protected areas so the Wildlife Division has to burn to attract them back in 'burning is therefore determined by the activities around us'. This is a serious problem for the smaller protected areas which do not have control over when and how to burn.

discussion of this project in relation to the control of burning led the respondent to elaborate on the way in which it is 'very hard to move people's beliefs 'in this area'.

Comments by some revealed perceptions that the transition zone has been altered either by fire or by changing farming practises unlike the northern savannah³ which is a fire-climax environment. Many referred to the fires of 1983 as representing a watershed which has necessitated a new way of approaching land use management. Reference was made to the loss of cocoa trees since the 1983 fires and the way in which Brong Ahafo is increasingly farmed by northern migrants who create open areas for their crops and who have brought in new traditions of early burning.

Others, most notably those in the forestry sector, were more explicit about their prejudices: 'to us fire in any form is quite dangerous'. The cause of burning was attributed by many to 'poor' agricultural techniques and the lack of mechanisation resulting in slash and burn. Some linked burning to poverty, but often in a simplistic manner. For example, claiming that poverty forbids the use of tractors and therefore encourages slash and burn, and that traditional activities of hunting and honey collection (both activities linked to the use of fire) are increasing because of poverty.

3.4 The degree to which tenure is perceived as an important issue in environmental problems

There was limited reference to the role of tenure in the cause and solution of perceived problems. Explicit reference was limited to those working on the fuel wood issue who noted that unsustainable charcoal production tended to be carried out by those who have bought the concessions from the traditional authorities and therefore had no incentive for sustainable harvesting. Both respondents from the Ministry of Energy and the Energy Commission were adamant that knowledge of appropriate harvesting is often present but that ownership issue is the key barrier to sustainable production. The Ministry of Energy respondent went further to say that the introduction of sustainable harvesting would allow regeneration after charcoal production and that sustainable production was not limited by technical knowledge but by tenure. The only reference to the importance of tenure by NGO respondents was that of the economic importance of Shea butter trees in the northern region as an incentive to protect against fire.

3.5 Opinions on the role of the traditional authorities in environmental management

The attitude of respondents towards the traditional authorities was unanimous in terms of recognition of their importance and therefore the need to involve them. This importance was linked partly to their land-owning role and the importance of tenure in many of these problems; and partly due to their recognition of the influence and respect which they command in many communities. One respondent claimed that even if the District Assembly buys into a plan there is a need to 'convince' the traditional authorities' as the traditional authorities will resist if they are not involved.

Parliamentarians also stressed the political power of the traditional authorities and the need to relate to the traditional authorities and 'other opinion leaders' to ensure that laws can work effectively. According to one MP, chiefs are frequently briefed by the sector ministers however, on checking this in the case of the agricultural sector

³ When discussing the use of fire in the northern area of Ghana others referred to the importance of traditional methods referring to the festivals associated with burning and its association with the hunting of wild animals, the cultivation of Shea-nut trees and its role in the encouragement of new grass.

plan, it transpired that the traditional authorities had not been involved in the consultation process which had involved other key stakeholders.

A lack of criticism of the activities of traditional authorities was notable, reflecting perhaps the lack of awareness of local level concerns where this can be a predominant concern. Only one NGO respondent referred to concern over the power of the chiefs in ascribing them a dominant veto power in decisions over natural resource use. He expressed fear that this would lead to a dependence by the private sector on negotiations with the chiefs. Another NGO respondent raised the need to build community capacity to interface with the traditional authority to ensure a situation where communities 'cannot be forced into decisions which may have a negative impact on them.

4 Perceptions over remedies for environmental problems

Responses over the perceived solutions and remedies for environmental problems revealed much about respondents' perceptions and helped to uncover more detail on ingrained attitudes. Attitudes to remedies varied widely but few respondents made reference to the need for consultation and dialogue to resolve environmental problems. The only reference that was made to this as a necessary technique was over the conflict surrounding the development of the wood fuel policy and the need to bring together the stakeholders involved. The need to educate the public in the importance of the environmental issues was surprisingly only mentioned by one respondent, the parliamentarian member of the environmental select committee.

4.1 Regulations

The need for regulation was voiced by many as the most favoured solution for the fuel wood 'crisis'. This included calls for regulation of the resource base, transport, harvest and consumption. The idea of financial incentives for sustainable management was also popular. Taxation was felt, by one respondent who had worked intensely of the wood fuel issue, to be an important tool in the sustainable management of wood fuel as this would allow tax rebates to be given to those who carry out sustainable production.

During the process of the development of the Wood Fuel Policy it was suggested that each community should have demarcated area over which a permit would be granted. The permit would indicate how it should be managed. If good management was not adhered to the licence would be revoked. This process was to involve the Forestry Commission, District Assembly and community members. However there was no effective accountability or transferability of funds, the money was paid into a consolidated fund and there was no register of who the producers were. A special fund was proposed for the revenues accompanied by a disbursement formula, for example giving 20% to community, 20% to District Assembly and the rest to a restoration fund.

Box: 4.1. Interview with ex-member of the Traditional Energy Unit, Forestry Commission, June, 2004.

The respondent from the Energy Commission was concerned that the production of charcoal from natural forest areas should be continued. He combined this with awareness that to do would require regulation of the market and an introduction of a system for grading the product. This is particularly the case for the export of charcoal where there is a need to provide transporters with permits and therefore a system for

keeping a track on how much charcoal they are supplying and the sources⁴. In this way the amounts could be limited, or the District Assembly can be alerted as to when the resource base is being depleted.

Some tailored their discussion of this solution with an awareness of the complexity of regulations, and in particular the way in which the wood-fuel market is regulated by both the District Assembly and the Forestry Commission. The lack of revenue from the activity leads to the lack of interest (particularly from the Forestry Commission) in regulation of the market. It was also noted that due to the dependence of some poor groups on charcoal as an income, regulations would need careful design to avoid being anti-poor.

Journalists were unable to enter the discussion on this issue at this level of detail but there was a dominant attitude that there should be a combination of choice and incentives, standards and regulation over the use of environmental goods.

4.2 The role of law

Some respondents emphasised the importance of legislation as a basis for solutions. The parliamentarian member of the environmental select committee was a strong supporter of 'laws, rule and regulations'. Those involved in district level projects such as the Environmental Resource Management Programme⁵ (ERMP) staff were especially keen on the effectiveness of strengthening bye-laws (see box).

In one district selected as a priority for wild fire and a bye-law was enacted. In other areas district byelaws were introduced to restrict charcoal burning to the use of dead wood only and each traditional ruler was charged to oversee the charcoal burners associations. Some early burning connected with festivals, yam farming and hunting was permitted and fire volunteers were trained in early burning and green fire breaks. The subsequent wild fire outbreaks were minimal.

Box 4.2. Interview with Coordinator of ERMP, June, 2004.

Others were of the view that as legislation is rarely enforced it can have little impact. According to the Energy Commission respondent the ban on export was only made effective via a radio announcement and not through legislation. One MP was especially vocal on this: 'the main problem is the byelaw system is ineffective. District Assembly byelaws can address these problems in theory but in practise in means that they are passed to the Ministry of Local Government for action and this can take several years'. In addition it was felt that the problem is compounded by the way in which each sector has its own, often contradicting, laws and policies (see section?).

4.3 Attitudes to bans

Of particular interest was the attitude of respondents to utilisation bans, which almost across the board, were rejected as an effective solution. This attitude spanned from the more informed and involved in the issue who did not recognise the utilisation as the source of a crisis, to those who may perceive utilisation as problematic but recognised that bans are unjust or hard to enforce.

⁴ Currently the only charcoal produced from wood scraps is permitted but this is insignificant either on in terms of percentage or in terms of the volume of wood from sawmills which it is utilising. (Energy Commission, fuel wood policy officer, Interview, February, 2005).

⁵ The ERMP is a programme of the Ministry of Environment aimed at improving local and national capacity for poverty reduction through improved environmental management that integrates economic and social concerns in ensuring sustainable livelihoods.

In relation to fire many respondents pointed out that some fires are natural and the prevention of fire can be problematic. Even amongst the media respondents it was recognised that banning cannot stop accidental burning and that it is better to manage the situation. In terms of charcoal arguments were put forward that the banning of charcoal would be unacceptable as it would have a negative impact on local people and it is needed in urban areas. The view that it is unfair to impose bans without providing alternative solutions was dominant.

4.4 Market-based remedies

Attitudes to the use of the market as an incentive or as a driver for sustainable management were mixed. Amongst the three government officials most closely involved in the charcoal issue whom we talked to, two were adamant that the market could be used to tackle poverty issues and that if production were formalised, it would make a viable business. They were both frustrated that government policy does not recognise this and that charcoal production is perceived to be degrading the environment. According to them, it is this perception which leads to the lack of action in formalisation of the activity. This vacuum means that control is left to the District Assembly and this control forces people to operate illegally.

Attitudes to export were more controversial, with a divergence of opinions between the individuals concerned in the Energy Commission and the Ministry of Energy. The Energy Commission is keen to export charcoal and the justification that revenue raised through export which could be reinvested in improved charcoal production. The respondent in the Ministry of Energy however was opposed to the export of charcoal, even that which is from the high forest zone, due to the problems of accurate sourcing. A debate on this issue in interviews within the forest sector institutions was notably lacking. We were not able to find anyone who specialised in this area and discussion on this topic was short in detail. One forest sector respondent for example claimed, falsely, that the export for charcoal was forbidden unless it can be certified to be from a plantation.

4.5 Technological solutions

As could be predicted from a group of respondents with a predominantly technical background, technical solutions were a popular choice. These ranged from reforestation and improved harvesting techniques to more efficient technologies.

4.5.1 Reforestation

The need for reforestation was a popular response from the forest service officials, NGOs, environmental journalists and other more junior or middle-ranking government officials. However discussions about reforestation as a potential solution was notably avoided by those working directly on this issue in the Ministry of Environment and the Energy Commission. The call for increased reforestation was for the most part based on an alarmingly ill-informed evidence base (see Box).

'The solution is to increase the stock through planting and encourage a shift from natural trees to plantations. For every tree cut '10 to 20 need to be put in its place' (Interview with NGO respondent, June 2004).

'Large scale afforestation by the government is the right direction. Planting has a better impact than regeneration because trees die if they are left to grow on their own' (Interview with EPA official, June, 2004).

Box 4.5.1. Evidence cited to support the importance of reforestation.

Perhaps as a reflection of the problems of solving off-reserve issues in an arena controlled by the District Assembly, respondents from the forest service and the ERMP were keen on plantations of fast growing species as a solution for wood fuel problems. 'The government should establish woodlots on marginal lands with species such as acacia and leucaena which provide good charcoal because it has high calorific value' (Interview with ERMP officer, June, 2004).

4.5.2 Harvesting techniques

Significantly, the lack of interest in reforestation amongst the respondents from the Energy Commission and the Ministry of Energy was mirrored by their enthusiasm for proper harvesting methods as a solution to the wood fuel problem. This enthusiasm not found amongst other respondents. They advocated training for charcoal producers in less damaging harvesting methods which can allow regeneration and prevent conversion to grassland. To some degree this attitude may be attributable to their institutional base which would not have the jurisdiction over reforestation activities. However they did recognise that mainstreaming this approach would involve engagement with the Forestry Commission who would be responsible for the monitoring and the technical aspects of supply. When forestry sector respondents were prompted as to whether natural regeneration and coppice was a feasible option, their response was to claim that the problem of wildfire made it unfeasible.

4.5.3 Efficient technology

A similar divide can be found between respondents in views over the need for more efficient technology. The Energy Commission respondent was adamant that the domestic market in charcoal should only be regulated if fuel efficient technology was brought in⁶. Attempts to increase the efficiency of charcoal production have been adopted by the Environmental Resource Management Project in Brong Ahafo which is developing charcoal production using different low technology charcoal production methods. They, and some environmental NGOs, are also working on, and advocate, the use of improved stoves.

The use of liquefied petroleum gas as a substitute is frequently mentioned in documentation on the issue and is the focus of research by UNDP. However the majority of those talked to were of the view that it is irrelevant as a solution. The price of LPG acts as a barrier to access by the poor, and would require high subsidies which are currently not permitted under IFI lending conditions. As a result the need to find substitutes for charcoal was raised only by Friends of the Earth who suggested that the government should subsidise liquefied petroleum gas (liquefied petroleum gas) and import the necessary technology so rural people can convert from using charcoal.

5 How views are formed

5.1 The main sources and format of evidence for policy formation

This section discusses the sources of information which are used by respondents in their work in informing their policy decisions. Making the assumption that research influences policy directly would be naïve, but these discussions give some insight not only into the information which is being used but also into the most effective form of presentation of research results.

⁶ He claims that steel kilns are more efficient than earth mounds (8 tonnes of wood can result in 1 to 1.5 tonnes of charcoal).

MPs claimed that pure research reports are not taken seriously and to some degree this view was echoed by junior and middle-ranking government officials although they tended to lay a little more emphasis on the role of information from consultants, internal experts or universities.

An interview with a Chief Director of one of the ministries, who was new to the sector, claimed that he had gained an understanding of the issues in the sector through meetings, workshops, one on one discussions, donor reports and through a gradual process of learning. However he claimed he does not have time to read academic work. Short workshops are a useful format for learning but he feels that the most effective method for those who want to influence policy makers is to 'take us out of the conference room into the field'. Parliamentarians were also clear that the most effective method for influence is through personal lobbying and briefing of the minister, 'blended with political undertones'. Personal interaction involved in field visits can therefore bring support from higher level decision makers. Donor respondents were also keen on less formal channels of influence such as field visits and studies.

In terms of presenting research results three to four page briefs with bullet points were felt to be most effective as well as communication on ongoing and periodic research results rather than those that come after some delay. There is some evidence that data presented in an economic format is the most effective. The experience of Forest Watch Ghana would support this.

In this respect some of the NGOs are employing the techniques which have been claimed by decision makers to be the most effective. CARE international campaign through media training workshop, press conferences, presentations to ministries, legal bodies, parliament, house of chieftaincies and other policy makers. They also carry out regional workshops with stakeholders at the community level. Green Earth invites government officials to visit projects and set up field trips and training for journalists 'to build their confidence and enthusiasm in the issues'. Journalists claim that they struggle in getting access to information and they list this as a main reason for their poor involvement and lack of influence on these issues.

In terms of the sources of information drawn on by the NGOs in their policy work, workshops and ten page documents were mentioned as the most useful. However, in NGOs others mentioned an overload of workshops and a lack of capacity in following up on what was learnt. There were complaints from a few NGOs that they find access to information from government bodies such as Environmental Protection Agency and the Forestry Commission lacking.

In contradiction to the discussion we had with NGOs who see the media as a crucial part of their communication strategy, the environmental correspondents stated that NGOs rarely contact the media. The environmental correspondent at the Voice claims only to know of a couple of environmental NGOs. The main sources or influence for the environmental correspondents talked to are occasional seminars at the Ministry of Environment, the Environmental Protection Agency library, the internet or discussions with friends. Only very occasionally they will 'push' academics. According to one correspondent, workshops do not provide enough detailed information but field visits are very effective.

5.2 *The use of research evidence in the formulation of policy*

A large degree of seriousness about the importance of a research base to policy decisions, particularly in the area of impact, was voiced in interviews with senior

officials. In a description of the process of policy development by an official in the Forestry Services Department the inclusion of researchers in workshops which bring together Ministers and district assemblies was stressed. As a basis to the wood fuel policy development, studies were carried out in the northern savannah region to look at how communities harvest wood for charcoal⁷⁸. In addition to this study tours were arranged to Burkina Faso to look at management examples. However, others involved in the process lamented the way in which many of those involved in the wood fuel policy development are not aware of the 'facts'.

The challenge made by the Energy Commission to the 'myth' that liquefied petroleum gas and electricity can supply demand was made possible due to an argument built on empirical data sources (such as the GLSS and primary market surveys). He used these sources to show that the cost and inaccessibility of liquefied petroleum gas and electricity would forbid its wide usage. Others went further to point out that resource management and utilisation (such as the case of fire management) should be informed by research data, there is also a need for interpretation and clear prescriptions to be attached to that data.

The research basis to Environmental Protection Agency policies is provided by consultants from ministries or universities. For example they used UST researchers for the work on the Action Plan on Desertification. EPA staff feel that there is no lack of internal or external capacity in this respect, even in the area of social science and economics. Discussions with a senior civil servant revealed that they actively solicit information from external organisations and research is commissioned to look at the impact of proposed policies. However some felt that these types of research reports are not academic nor privy to new methodologies and research tools.

The role of research was noted to be important to avoid the hazard of sensationalism in the media. NGOs respondents were also firm in their emphasis on the importance of an evidence basis: 'the opportunity to present our case to donors is a good one but only if we have the research to back up what we are saying'. However he was also quick to add that possessing the research base but having no communication strategy will undermine the effectiveness of their results.

Another issue raised by the NGOs was not only the need for quality and detailed scientific research to make an effective point, but also to give the organisation an accurate understanding of what is happening on the ground. Organisations like Third World Network do not do their own research but commission consultants and use academics from university departments with which they have links. They also draw on some foreign research contacts outside Ghana.

Asking respondents as to whether or not there is a research basis to their policy making is methodologically flawed, as few people are likely to admit that there is not an evidence basis to their policy decisions. Responses therefore have to be interpreted with this in mind. However some were keen to discuss the weakness of the research basis to policy work and to emphasise the need for more impact costs benefit and economic impact analysis. The responses of others, who stressed the importance of political and contextual factors in the formation of policy, will be discussed in subsequent sections.

⁷ Results show there was a particular system, it was 'crude' and they were allowing wild coppice

⁸ This was a comprehensive inventory including species composition which covered the Northern region, Upper East and West as well as some of the Wenchi area and the Afram Plains. In one hectare it was found that less than 20% was harvested. In the high forest the percentage depended on the ecological condition of the forest.

5.3 The influence of international agendas and donors

Few of the interviews touched on examples of tensions between donor and government perceptions of environmental issues. The main exception was the interview with the policy, planning and monitoring and evaluation directorate in the Ministry of Agriculture who described the exchange over the agricultural sector plan which was said by the donors to be too growth orientated and not to focus sufficiently on pro-poor impacts. In this case the need for donor funding was a clear influence: 'if we cannot fit it into the GPRS we will not get funding' There was talk however of the problem of donors shifting their attention to social welfare sectors and the neglect of the environmental sectors. To illustrate this, the technical director of Ministry of Lands and Forests lamented the way in which proposals for forest issues to be included in the GPRS such as community involvement, plantations and land, and log tracking were all rejected. This has meant that natural resources are increasingly being ignored as a basis for development.

It was recognised by the NGO respondents that many groups depend on donors for funding and therefore the themes they prioritise can be easily influenced. Green Earth dismissed this problem, stating that although the structure of the projects may be determined by the donor guidelines, the content is driven by a 'Ghanaian view'. One member of a natural resource rights network claimed that public mobilisation is more effective than international support in influencing change as if there is no demand change the movement will not succeed.

However, it does seem that priorities of NGOs are set by funding and expertise. This has two implications: firstly a shift towards the priorities of the funders (the GoG provides little funding for NGOs). And secondly that those who work in environmental NGOs, as supposed to other development NGOs, tend to have a technical or scientific background rather than a training in development issues or social science. Some were also concerned that not only can donors influence the themes of NGOs work but there is an increasing tendency for donors to only want to fund advocacy and not the ground level work that NGOs feel is necessary to fuel that advocacy.

Beyond the role of the donors, only Third World Network referred to geopolitical concerns in terms of the influence of IFIs and northern governments. In this case the way in which policies over gold have been developed allow 90% of processing to be done outside the country. The way in which this concern was not raised in more interviews may reflect the way in which the subjects of fuel wood and wild fire are unlikely to raise geo-political concerns.

5.4 Consultative mechanisms

This section provides some insight in to the ways in which the voices of different stakeholders are, or are not taken up by decision makers. In theory every government department carries out consultations as part of their policy development, and in their routine monitoring and evaluation systems and decentralisation legislation call for all policies to be consulted on with the communities. For example regional agricultural directors, academics, NGOs and think tanks were invited to a strategic planning workshop for the agricultural sector strategic plan. Similarly, before the GPRS was drawn up there were a series of discussion sessions with interest groups (see Box). However the perception of these consultations by officials was dominated by the objective that people should 'get to know our ideas' and that a quick response should be elicited. Discussions with the Ministry of Agriculture revealed a top down and tokenistic attitude to the process. Many NGOs felt that the consultations surrounding the second GPRS have been tokenistic, with the strategy having been written before the consultation process.

In talking through an example of a policy change the technical director of the Ministry of Lands and Forests emphasised the way in which consultation and negotiation was used as a method to address the clash between private and public interests in the introduction of competitive bidding for timber rights. Consultative methods were used to bring together various interest groups and technocrats as well as NGOs, presidents of the timber trade associations and the media. 200 parliamentarians were taken on a retreat, seminars were held, the Select Committee on lands and forestry were involved, local government was trained and the Traditional Authorities were also supported. However the process involved a huge amount of resources and an avoidance of media coverage.

Box 5.4.1 Interview with the Technical Director of the MLF, June, 2004.

Consultations are also used in situations where there has been some conflict in a policy process. For example the draft wood fuel policy has been discussed with stakeholders⁹ and all those interested in the energy sector (such as renewable energy and wood fuel service providers and charcoal producers). However the description of the wildfire policy process outlines the perspective of the national level on how policy is made and the controlled notion of consultation as a process to build a consensus rather than to change policy content (See Box).

The draft national policy on wildfire is currently in preparation¹⁰. The outline of the policy was laid out and all regions contributed to this draft through workshops which involved the Ministry of Lands and Forests, Environmental Protection Agency, Ministry of Agriculture, traditional authorities, the land management bodies and NGOs such as Green Earth and Friends of the Earth Ghana. The stakeholder workshops were the source of much of the information and also helped to pinpoint shortcomings in the proposals. There were no examples where policy was changed as a result of the consultation but the process did enable a consensus to be developed.

Box 5.4.2 Interview with official from EPA, February, 2005

There is therefore a perception amongst some, that consultations are used as a tool to pacify opposition and do not represent a significant part of the policy making process. For example one environmental lobby network was only invited to a consultation meeting by the Forestry Commission only once they had gone to the press with an exposure. However according to this group 'nothing serious' was discussed or came out of that meeting.

One of the main concerns voiced by some NGOs is how to avoid being compromised through agreeing to be part of an official consultation process. Forest Watch Ghana for example have turned down a contract which FAO wanted to offer them to help organise the national forest forum as they felt that they 'were not ready' as an organisation to take the contract. Some NGOs were firm on the degree to which they decide not to participate in meetings or consultations citing reasons against as invitations being issued too late for a measured response, or if they feel that do not have the expertise and therefore it is not legitimate for them to be consulted. These groups were clear that rejecting the opportunity to be part of a consultation does not

⁹ The choice of who to consult was through the District Assemblies who know who the professional producers are in some areas.

¹⁰ As of Feb 2005 it was with the Attorney General Dept.

mean that they cannot continue to monitor or offer alternate approaches and recommendations.

5.4.1 Attitudes towards the role of NGOs in policy formulation

There was a clear dichotomy amongst the respondents between those in the government and NGOs over the perceived importance of NGOs in policy formation. Quite predictably those in government down-played the role of NGOs in shaping policy. On first questioning, many of the government policy makers claimed that they have useful relations with NGOs, citing their positive role in the organisation of workshops as an example. However, further probing revealed a concern with limiting the damage they may cause and a scepticism of the role of NGOs whom they see as little more than playing a predominantly critical role.

In support of the argument that NGOs play a minimal role in influencing policy directly, the press officer at Environmental Protection Agency was only able to name two NGOs: Friends of the Earth Ghana and Green Earth. In the case of Friends of the Earth however, he did talk about a two way interaction in dialogue over the content of policy. One senior civil servant claimed that his department rarely interacts with NGOs 'as NGOs are not aware of its role'. This attitude suggests a reactive attitude driven more by the need for damage limitation rather than a perception that NGOs play a valuable role in informing decisions. The Energy Commission respondent also revealed this attitude in the statement: 'Friends of the Earth used to make a noise but we didn't hear their noise'.

In addition NGOs are often perceived by policy makers to have political affiliations and for this reason government may prefer to seek policy advice from western NGOs. One senior civil servant claimed that on the whole, politicians are 'suspicious' of NGOs and that it is the advisors that influence politicians directly and not civil society. For example from his perspective, NGOs have not campaigned much on the content of the GPRS. MPs have their own researchers and rarely draw on NGOs in this way.

Other bureaucrats, particularly those in Environmental Protection Agency and Ministry of Lands and Forests, were more positive about the role of NGOs but this may well reflect the personal judgement and experience of individuals. As one official stated about a particular environmental NGO 'their campaign makes a lot of noise and many don't like them but I am happy with their work, they help to push what we think is important'. A senior civil servant noted that NGOs like ATN and ISODEC have put the government under real pressure through their water privatisation campaign but he made a distinction between those groups that lobby and influence the government through the threat of exposure, and those that provide advice. The latter he claims often present a well researched position and are constructive.

There are however felt to be few research-based NGOs, few advocacy groups are perceived as being evidence based. The credibility of many NGOs in presenting evidence is therefore problematic. The technical director of the Ministry of Lands and Forests felt that NGOs can be very useful but they lack a sophisticated understanding of the issues and they often criticise without knowing the facts. The biggest barrier perceived to be facing most advocacy groups is getting access to the 'facts'. Some respondents cited examples where a poor understanding of the issue by NGOs had been damaging. One such example is the banning of charcoal production in the Afram Plains which was the result of NGO campaigning and succeeded in pushing the activity underground into illegal production. Some within NGOs even felt that their influence exceeds their technical capability. Many of these

organisations have only one competent individual who tends to be overburdened. For example, according to one respondent from an environmental NGO, many of the members of environment NGOs are not technically trained, and as a result 'are not hitting the issue in the right way through their advocacy'.

Many of the NGOs have a lack of ability in carrying out research particularly in analysing social and political process. A particular problem in environmental advocacy is that those, such as ISODEC, who are good at advocacy, do not prioritise environmental issues, whereas those that understand the technical issues are less good at advocacy. For NGOs to be taken seriously by the technicians working on many of the complex technical aspects of environmental issues this understanding is necessary.

Although it was recognised that it is hard to attribute impact, the NGOs themselves were more positive about their role in influencing environmental policy. Examples cited include the way in which NGOs have been instrumental in getting the Ochene to become the chair of Environmental Protection Agency and getting traditional authority presence on the Forestry Commission board. Other cited examples of NGO influence included the campaign against mining in forest areas and the way in which although the government has gone ahead with the bidding system only one company is prepared to carry out the activity.

5.4.2 The role of evidence from the grassroots in policy formulation

The lack of grounding of advocacy work in empirical data and ground level experience was evident in discussions with some of the NGOs. Civil society in Ghana has a weak history, perhaps due to recent dominance by the two charismatic political leaders and recent history of repressive political systems. Recently, however there has been an emergence of a n active civil society, vibrant independent media and resurgence of a number of national level NGOs and grass root associations (Abugre, 2001). The development of a number of national level NGO networks is in response to donor encouragement but is also said to be rooted in wider processes of social and political rooted civil society growth which is a product of the re-emergence of multi-party politics (Booth et al, 2004).

Those active in environmental policy tend to be urban-based and despite their claims that they represent local people there does appear to be a limited grounding of environmental NGOs in a rural or local constituency. This results in a gap between many of the urban- based organisations and more locally based groups: 'No one has had a discussion with people on the ground' to hear what they have to say – and those that have, do not have the capacity to locate their knowledge in the national policy debate. Some of our members are really strong on grassroots issues but are intimidated at the higher level' (Interview with member of a natural resource campaign network, February, 2005).

On the other hand it is grounding in local concerns which, it was argued by some, gives national level organisations the legitimacy to advocate on the behalf of rural people. This represents a dilemma particularly in the case of environmental issues, opinions over which can vary widely between the national and local concerns. Other groups, which are made up of community based organisations, feel strongly that any struggle needs the active involvement of communities to bring it legitimacy. In their view winning the sympathy of the public is particularly important as some of the issues they are campaigning on are challenging aspects of development. This means that their success may negatively affect those who benefit directly from resource use or who are employed from it.

When questioned on the issue of who they represent, one NGO respondent responded 'we represent ourselves but we talk on the basis of research'. The conviction that there is such a thing as apolitical or unbiased evidence is perhaps a problematic notion, but one which permeated through many of the interviews. Some urban based environmental advocacy organisations are very aware that they cannot move immediately to working at the grass roots level as it will take time to build up support for their campaigns, which are primarily based on national level concerns. In the case of this network it was not clear the degree to which they are reflecting the voice of local concerns in their advocacy or rather that they are looking for their concerns to be reflected at the grassroots. On probing this respondent as to whether his network would change their position according to the local communities priorities should they clash with that of the network's his reply was 'no, we do not claim to be representative....we are a solidarity organisation and have our own positions, if the community doesn't agree with us we don't support them'.

5.4.3 The role of, and attitudes towards, the media in policy formulation

Attitudes towards the media were divided between, on the one hand, recognition of its important role in information and dissemination and on the other hand, a dismissal of the degree to which the media is well informed and is able or willing to deal with complexity. This was shown by a discussion on the role of the media by a senior civil servant who claimed that analysts draw on newspaper and radio reports to make specific input in to the Cabinet Office decisions but there is a predominant feeling that the media is not well informed on most of these issues.

Interviews with other government staff did not reveal perceptions of a significant role of the media for their own work. Negativity about the reliability of media reports was found in an interview with the technical director of the Ministry of Lands and Forests, he claimed for example that part of the success of the process of the introduction of competitive bidding for TUCs was due to their deliberate policy to keep the process away from the media and the explicit banning of press conferences on the topic.

Whilst recognising the limitation of the media in understanding the complexity of issues, other government officials, most notably those in the Environmental Protection Agency praised the role of the media in disseminating government messages. The EPA are keen to encourage their involvement in public environmental debates and the Environmental Protection Agency press officer arranges for experts to explain issues to journalists and to get involved in popular radio shows such as Choice FM.

Many observers did recognise the central role of the media in public opinion and the increasing freedom to the press in comparison to past decades. This, some claim, has played an important role in environmental awareness among the public. Environmental journalism however in Ghana is not strong and most focus is on sanitation and health issues which are the stories that 'sell'. It is a struggle for environmental journalists to getting their stories on the front page, and one journalist claimed he has to think carefully about how to sell the issue while avoiding sensationalism. Some NGOS also lament that they face a dilemma between getting information out and getting the public interested. They are aware that there are various audiences which need different types of information spanning from policy makers, the average middle class, and the rural and urban illiterate. Each of these require information presented in a different format.

The more politically minded NGOs are sophisticated in their use of the media and are well aware of the risk of misinterpretation. To counter this the Third World Network usually send the material out for the media to use directly, rather than inviting them to workshops which gives scope for different interpretations to be made. The example of FWG shows that the use of the media does not have to result in a compromising of in-depth technical issues. One member of FWG claimed that access to information and analysis is the least of their problems but 'our main headache is how to put it in the papers and how to judge the terrain and get our timing right'. Their strategy to date has been dominated with techniques for making the issues public, with a combination of TV and newspaper reports. Paying for advertisements to be placed in the papers allows them to have full control over the content.

Other groups complain about the control of the media by interest groups. According to WACAM, the pro-development editorial policy of the Graphic has supported mining. As a result WACAM was forced to launch the issue through Public Agenda (see Box) and only then did other media outlets pick up on the issue.

ISODEC has been the most pro-active NGO in recognising the role of the media and has specifically set up a newspaper Public Agenda to cover the development issues which do not otherwise 'sell' in the press. This, in combination with their website is seen as one of the factors behind the success of ISODEC. ISODEC will release press releases through Public Agenda when they start a campaign but Public Agenda is editorially independent. Public Agenda is used by government officials in ministries, international community, those with a more academic perspective; and the NGO community. They have three paid journalists and otherwise rely on stringers.

They do cover forestry issues but on the whole their coverage of environmental issues is limited as, as with every news paper in Accra it has an urban readership. Their interest in rural based environmental issues is lower. The two times that forestry was on the front page there were low readership numbers. In addition the low staff member means access to data and information outside Accra is limited.

Box 5.4.3: Interview with the Editor of Public Agenda, February, 2004

6 The way in which views enter the policy process

6.1 The main institutions or planning strategies which deals with environmental policy for the transitional zone

The key institutions involved in environmental policy formulation include

- The National Planning Development Commission which conducts research and makes strategic analyses. prepares development policy frameworks and coordinated the preparation of multi-year rolling developing plans and programmes and has been responsible for coordination of the GPRS
- The Ministry of Environment Science and Technology which is responsible for the work of CSIR and Environmental Protection Agency among others. Its task is to coordinate the implementation of Agenda 21.
 - CSIR advises the government on new scientific and technological advances of importance for national development.
 - The Environmental Protection Agency whose mandate it to maintain ecosystems and ensure sounds management of natural resources

- Ministry of Lands and Forests (and associated Wildlife Division and the Forest Services Department).
- Ministry of Energy and associated Energy Commission
- The Policy Planning, Monitoring and Evaluation Department (PPMED) which is one of MOFA's nine constituent departments and is responsible for the collection of data and the analysis of national policies.

Each line ministry has a guiding strategy or policy document but other key documents include

- The GPRS which superseded Vision 2020
- The National Action Plan on Desertification
- Wildfire Policy (in preparation)
- Wood fuel Policy (in preparation)

6.2 Mechanisms for information flow and policy development between ministries

One specific feature of environmental policy is the high degree to which issues span the jurisdictions of various ministries and institutions. Interaction and information flow between ministries was identified as a problem by senior staff in Ministry of Lands and Forests. Some felt that an increase in direct budget support from donors will increase networking between ministries, but they were also worried that the Ministry of Finance would become a 'super-ministry' and that without active attempts at increased cross ministry communication, issues such as forestry will be under prioritised.

One of the main problems identified in the slow progress of the policy surrounding the wood fuel policy development was the poor communication and interaction between ministries over the issue. Management of the supply of wood fuel resource falls under the Forestry Commission, whereas policy over which energy type to promote (the demand side) is made by the Ministry of Energy. Despite this, the person responsible in the Ministry of Energy for wood-fuel policy was not able to name any one in the Forestry Commission working on this issue.

The priorities of the forest sector remain firmly on timber and there is little interest in charcoal issues. In theory, tax income from charcoal accrues to the Forestry Commission and not to the Energy Commission however in practise most of the revenue goes to the District Assembly. The Forest Services Department argue that as most charcoal production concerns off-reserve resources there is little that the Forestry Services Department can do.

Those attempting to revise byelaws responsible for the regulation of charcoal concessions licenses and harvesting techniques have identified a lack of interest from the Forestry Commission as a barrier. 'If someone wants to buy a charcoal concession, the forest service is responsible for issuing permits and they should assist in harvesting techniques....but the Forestry Commission is concerned only with timber' (Interview with respondent from the Energy Commission, February, 2005).

The process of the wood fuel policy development is an example of policy development which has been stalled partly due to this lack of interest and partly due to conflicting interests and to date the policy remains in draft to date (see Box).

The development of the National Wood-fuel Policy was designed by the Energy Commission and the Forestry Commission. The Danish Embassy has supported the

process with two years of data collection and analysis but it was not completed before the project ended. A national workshop was held in Tamale bringing together the results of the district level workshops. The draft was submitted to the Energy Commission with the plan that it was to be part of the national energy policy and would pass through the Cabinet for approval. The plan intended that in the savannah areas clear cutting for wood-fuel would be permitted and in the high forest zone off-cuts (from saw-mills) would be utilised. The policy also forbids wood from natural forest to be exported. However, conflict emerged over this as exporters have argued that some species are not utilised and as there is a high demand for light charcoal for the Far East, the export of these species would not have a detrimental impact. Others resisted this argument due to the fear that allowing the exploitation of these species for export would create a loop hole for others to take advantage of.

Box 6.2. Interviews on the development of the National Wood-fuel Policy

6.3 The role of politics in environmental policy formulation

Many respondents from across the groups stressed the crucial role of political feasibility in the adoption of policies and the degrees to which issues are picked up or not. Parliamentarians were not perceived by many respondents to play a significant role in decisions over environmental issues although recent attention has been placed on the role of the parliamentary select committees by donors and some campaigning NGOs. Most respondents however were sceptical both about the importance of environmental issues to parliamentarians, and about the capacity amongst MPs to deal with them as few have an environmental background. Some claim that environmental issues are usually only raised in parliament as a result of *ad hoc* events such as UN Environment Day or because the Environment Select Committee is mandatory, otherwise the issues would not be raised. Much of the coverage is said to be 'lip service' to the issues rather than real commitment. The Chief Director of one ministry admitted that his relations with Parliamentary Sub-Committees or parliamentary members were limited and restricted only to the budget process. However some environmental NGOs emphasise the importance of direct political links, in the past they have benefited from personal contacts with ministers and have had direct links with the Castle through Valerie Sackey.

Many respondents were adamant that in the last two elections the environment was never an electioneering issue, except in certain local areas, but it was rarely raised at the national level. The period in which policy development occurs is however important, for example, if it is an election year the government may be wary of placing a sensitive issue in the public domain. NGOs are also aware of the importance of the timing of the election. One network claimed they launched themselves as watchdog body because their launch occurred in the election year. Interviews with members of the network suggest that this role may change to more of an advocacy role now that the election has passed.

The role of the private sector in influencing environmental policy was an under-discussed issue in the interviews. It was however discussed in terms of the mining industry where, it is claimed by campaigning NGOs, that there have been changes in national mining policy which provides opportunities for industry and incentives for increased production. According to Third World Network, policy which usually protects industrial interests is only challenged when the government is forced to respond to acute livelihood impacts rather than to protect industry. There is little consumer pressure in the minerals sector.

6.4 The role of decentralised levels in the formation of national policy

6.4.1 Perceptions of the most important level for environmental management

Although Ghana's decentralised planning system does allow for a heavy central influence, the majority of those questioned were sceptical about the role of the national level in environmental management. Others were more strident that 'there is no national policy as all decisions are made at the district level'. Many pointed out the problems faced in the translation of national level policy to the local level, and that for policy transfers to be effective there needs to be a functioning structure. It could be argued that narratives and the policy which they may result in are not the driving force, what is, is the detail of implementation, or how policy is operationalised and set within local politics.

Attitudes towards decentralisation were positive in theory but were moderated with the recognition for the need for strong institutions and constant monitoring particularly in the case of environmental management. Some respondents were questioned on how environmental issues of a national interest can be maintained through the decentralised system. The approach of the ERMP to influence district level policy has been to write bye-laws for the districts by collating existing by laws and employing a lawyer who carried out consensus building with the District Assemblies, traditional authorities and local members. According to them the District Assembly were supportive as this assisted them with a complex job.

Others were more pessimistic about how easily district level policy could be influenced and stressed the need to get the District Assemblies to understand and appreciate the value of the resource and why people destroy them. The way in which the District Assembly do not plough the revenues earned from charcoal back into management was identified as a major problem. According to the Director of Operations for the Forest Service, fees for charcoal are only collected by the Forestry Service in the Upper East region.

6.4.2 The perceived role of national and regional bodies in district policies

Frustration was voiced by those in the Ministry of Energy and Environmental Protection Agency about their lack of institutional presence below the national level. In this respect they felt that the Ministry of Lands and Forests had a clear advantage in policy influence whereas they felt powerless to influence directly at the district level and below. In addition this lack of a decentralised presence can result in a poor understanding by these institutions of the local conditions, perspectives and political processes.

Despite pessimism from some about the significance of national level policy at the district level and below, the view of the staff in the Ministry of Agriculture in Accra was that of a very top down process of policy development (see Box)

In July of each year the Ministry of Finance organises a policy review to set the programme for next year. This is then sent to the regional level for costing and the results are then collated into the Ministry of Agriculture's work-plan and budget. The policy process in the Ministry of Agriculture is based around the strategic plan which is set within the broad framework of the Food and Agricultural Sector Policy. The strategic plan was developed through a multi-stakeholder, strategic planning workshop and working groups. The budget committees then go to the regions 'to tell them' what are the policy priorities are and to cost the programme. Regions can respond to the strategic plan but objectives can not be changed. Planning is then carried out at the district level. Monitoring is the responsibility of the centre.

Box 6.4.2. Interview with Planning Office in the Ministry of Agriculture, February, 2004.

On the other hand this will depend to a large degree of the institution involved, the weak capacity of Environmental Protection Agency to operate below the regional level was unanimously referred to, both by those inside and outside of the organisation. This is partly a function of the lack of capacity at the regional level, a lack of a presence at the district level but also because Environmental Protection Agency has held no district level trainings since 1996.

6.4.3 Perceptions on the effectiveness of district level institutions

Few responses on the effectiveness of the district level were received from the government officials talked to, and some viewed the District Assemblies as having very little role in policy formulation. Indeed it was noted, by those involved at the district level, that central departments have a tendency to by pass the District Assembly. Some respondents were keen to point out the short comings of district officials and their shallow understanding of environmental problems resulting in a situation where perceptions of environmental problems by district level officials may not reflect real priorities.

Some community development NGOs are attempting to overcome this problem by working on the capacity building of the Area Councils to lobby the District Assembly effectively. This is in recognition of the role of the Area Council as the lowest level of administration decentralisation and the way in which District Assembly strategy is both informed by the Area Council plans and enacted by the Area Councils. Therefore it is hoped that if environmental concerns can be built at the Area Council level the District Assembly will utilise these ideas in their plans.

The discussion around the role of the District Environmental Management Committees was particularly negative and most respondents concluded that they were not fulfilling their role of supporting national environmental interests and implementing them at the local level in the local context. The DEMCs are perceived as having low capacity and focussing predominantly on sanitation, drinking water and waste management as these are the most visible problems. Reasons for ineffectiveness vary from the lack of incentives such as a seating allowance for the committee members as well as pressures from the other priorities faced at the district level including revenue generation and building social infrastructure, at the expense of environment. The environment is rarely a priority for the common fund. Most of the members of the DEMC are not trained and members frequently change after elections.

7 Conclusion

Perceptions of key environmental problems varied hugely between categories of respondent. Populist statements of a crisis were common among journalists, NGOs and junior government officials and these perceptions were also reflected in their discussions of the perceived remedies. On the other hand discussions with higher level officials directly involved in the issues of fuel wood and bushfire revealed a high level of understanding of the complexities. Many avoided crisis narratives in the way in which they discussed their suggested solutions. However this depth of understanding was rarely found in more junior officials and this has implications for more generic institutional attitudes and policies, particularly given the high level of turn over amongst competent staff.

The more 'informed' NGO staff tended to be those that had come from a government background and had a specialist training in the issues. Those with a background in journalism tended to have a less sophisticated understanding of the issues. Social and rights-based NGOs showed a deeper understanding of the political realities of environmental problems than those in environmental NGOs. Political causes and solutions were not emphasised by technical government staff.

These results suggest that the perpetuation of environmental narratives of crisis and a lack of evidence basis which may be found within national policies is not the direct result of misinformed government officials but rather suggest a more complex picture. The media and some environmental NGOs are providing a simplistic understanding of the issues but the degree to which they are the main influence on official policy is questionable. The majority of bureaucrats dismiss the role of NGOs and the media in influencing the content of policy. Instead what is more likely is a complex system of decision-making whereby evidence and narratives are drawn on simultaneously in order to back up the position of various interest groups and agendas within the decision making process. This mirrors Keeley and Scoones (2003) in their claim that narratives are established first and these are then supported by scientific 'facts'.

The mismatch observed between the level of understanding of the issues amongst some senior officials and the resulting policy which often does not reflect this understanding, suggest the source of this failure is due to the way in which the policy is reinterpreted and a policy consensus is reached, rather than a lack of appreciation of the complexity of the issues by key individuals.

Attitudes to NGOs on the part of government officials were, for the most part, restricted to damage limitation. The restricted use of consultation (either from civil society or from the decentralised levels) in national policy making was apparent and suggests an isolation both from the interest groups in civil society but also from an

increased evidence basis which may emerge from genuine consultation and participation with locally based constituents. The individual attitudes of decision makers to NGOs varied but apart there was little mention of a protocol in the way in which government bodies interact with NGOs. The degree to which their campaigns are based on local concerns and evidence are mixed and the gap between those groups with a national voice and those with local evidence is clear. Thinking on the crises of legitimacy which this situation may present for national level advocacy groups was limited. This raises some doubts of a future of evidence based policy influence in a policy arena increasingly dominated by urban-based NGO voices.

In conclusion media coverage of environmental issues is often sensationalist and misinformed, parliamentarians show little relative interest in the issues and national level environmental NGOs are dominated by low capacity both in understanding the technical issues and having an effective policy influence. As a result there is little oversight of environmental policy at the national level with and certain individuals within the technical ministries exist as the only effective champions for representing complexity and a holistic picture of rural development. The degree to which these individuals can influence policy outcomes in terms of final policy documents or the way in which it is interpreted and implemented at decentralised levels of the administration is questionable.

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