

Therefore, it can be foreseen that EIA will be effective and binding only for the small private sector projects. Governmental projects and the big private sector actors, who can influence the situation, might manage to find solutions that lead to their projects being authorized. It could be argued that having two opportunities for appeal is a device that can be used to ensure that rejected projects are authorized. Thus, if a proponent failed to win the case against GCEA, there would still be another opportunity of appeal against the licensing authority (which is not defined in the EPA).

In addition to the above, the current situation of the EIA Unit and GCEA in general is not comfortable. Space, staff and resources are lacking. Also, there is a lack of updated information. Recently, government departments were provided with access to the Internet. Nevertheless, it is presently unavailable to the private sector and general public, although they may be given access in the future.

### **CONDITIONS FOR EFFECTIVE EIA IN SYRIA**

The conditions necessary for an effective Syrian EIA are identified in a set of six comprehensive but integrated proposals (Mahayri, 1998). First comes the need to enhance the existing legal base. The second is a key factor vital for all the other conditions, namely support in the form of high level political will. Third is the need to enforce relevant legislation. Fourth comes effective communication, coordination and cooperation. Fifth is the need for good information flow and management, which would be resolved by establishing a national GIS data centre. Then, to accommodate these conditions, the sixth proposal is for administrative reform. Other conditions, such as enhancing the relation between governmental, private sectors and the public are also important.

The implementation of these proposals is not supposed to be sequential. Rather, achieving these conditions should be sought simultaneously. This is especially true for administrative reform, which, for example, would be a basic requirement when implementing not only an enhanced legal base but also coordination in administrative processes. Some changes would be necessary to guarantee the efficacy of this reform. Awareness comes at the top of the list as it is severely lacking at present. Training and capacity building in all governmental sectors is needed. Lee (1988) discussed some training types, *inter alia*, 'on-the-job training'. Specialized 'on-the-job training' is necessary, as Syria lacks experienced, well qualified personnel.

Other parameters should be taken into consideration such as enhancing public participation; facilitating and encouraging the private sector to establish environmental consultancies; and establishing an effective Syrian Non-Governmental Organization (NGO) sector.

## **STRATEGIC ENVIRONMENTAL ASSESSMENT**

The EIA Decree is supposed to be a base for implementing Strategic Environmental Assessment (SEA). However, the Decree does not satisfy the procedural and legal requirements of SEA. A cornerstone requirement is the need for a separate SEA Decree. Some conditions identified earlier for EIA, such as high-level political will and support, information management and co-ordination, would also serve the development of SEA in Syria.

## **EIA AND THE ENVIRONMENTAL STRATEGY OF NEAP**

The National Environmental Action Plan (NEAP) for Syria was developed in June 1998. In NEAP, priority problems and priority actions were defined. On the other hand, 'enabling factors' to stop environmental degradation were discussed.

NEAP identified five strategic priority areas. The first, strengthening environmental management capacity within different governmental bodies, was considered a limiting factor for implementation of NEAP itself. Secondly came the need to review the policies encouraging the current misuse of land and water resources. The third priority was applying management systems, treatment facilities, environmental standards, emission limits, product standards and training that would protect human health against current pollution. The fourth strategic priority was the need for rural development and enforcement of urban planning norms in order to remedy the impacts of degraded urban environments caused by the increased urbanization. Lastly, the fifth priority dealt with protecting the degraded priceless Syrian cultural heritage, being one of the oldest human heritages (ERM 1998).

The overall goal of NEAP cannot be achieved without EIA. Effective EIA would minimize pressure factors and promote better planning and management of resources. It would ensure environmental factors were taken into consideration during the development and planning process. EIA would contribute in the internalization of environmental costs from an environmental economics viewpoint. The conditions identified for effective EIA in its crucial role of strengthening environmental management and capacity would be to improve the environmental planning and management institutions and complete the environmental legislation. At the same time, EIA would play a major role in coordination amongst different sectoral bodies and in raising awareness.

Notwithstanding, SEA is a key factor for the overall process. As a higher level of EIA, it would ensure that policies are environmentally friendly before dealing with the lower level of planning represented by projects. SEA plays the role of a framework for planning, which steers the general orientation of the development process leaving the details to be dealt with at the project level within EIA. An interactive integration of SEA and EIA

should be sought in order to accommodate the implementation of NEAP in Syria and to achieve better sustainable development.

## CONCLUSIONS

Syria is in a phase of transition, which involves major economic activities and change. At the same time, the environmental resources in Syria are being continuously degraded. EIA, including SEA, is a tool that would promote the sustainability of the current economic progress by ensuring consideration of environmental factors at an early stage in planning and decision making. However, the current situation with respect to EIA in Syria has many shortcomings. These are mainly a lack of: binding environmental legislation; enforced procedural framework; communication, coordination and cooperation; awareness; experience; resources; and information. This is leading to inefficient EIA. Indeed, there are even specific shortcomings in the draft legislation. The lack of authority given to personnel responsible of EIA has originated from many causes, mainly the absence of binding law, and is considered a key element contributing to the current unsatisfactory situation with respect to EIA.

There is a need to enhance the current legal base and to bring it into effect. High level political will and support is considered to be the ultimate element that would resolve the existent hindrances. This element will ensure that the legislation is brought into force; establish a more efficient communication, coordination and cooperation between all stakeholders involved in the EIA process; speed the information flow; and promote the conditions required to accommodate all the other proposals, namely, administrative reform. Some improvements such as: national coordination and cooperation; promotion of the private sector; enhancing information management; the national GIS information centre; awareness and training programmes, would not only provide for an efficient future EIA, but for the general development of the country.

The cornerstone of sustainable development in Syria in the future is likely to be NEAP. However, the goals and priorities of NEAP will not be achieved without an effective and integrative implementation of EIA and SEA in Syria.

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