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**Strategic Environmental Assessment in Vietnam:
Challenges to the Integration of Environmental Considerations in the
Policy Process**

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To my Parents!

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Abbreviation

ADB	Asian Development Bank
CPV	Communist Party of Vietnam
DEIA&A	Department of Environmental Impact Assessment and Appraisal (of MONRE)
DONRE	Department of Natural Resources and Environment (of MONRE)
DPI	Department of Planning and Investment (of MPI)
EIA	Environmental Impact Assessment
GDP	Gross Domestic Product
ICEM	International Center for Environmental Management
I-SEA	Institution centered Strategic Environmental Assessment
LEP	Law on Environmental Protection (of Vietnam)
MOC	Ministry of Construction (of Vietnam)
MOIT	Ministry of Industry and Trade (of Vietnam)
MONRE	Ministry of Natural Resources and Environment (of Vietnam)
MPI	Ministry of Planning and Investment (of Vietnam)
NEPA	National Environmental Policy Act (of Vietnam)
OECD	Organization of Economic Cooperation and Development
PPP	Policy, Plan, Program
SEA	Strategic Environmental Assessment
SEDP	Socio-Economic Development Plan (of Vietnam)
SEMLA	Vietnam-Sweden Strengthening of Environmental Management and Land Administration Program
SIDA	Swedish International Development Cooperation Agency
SPP	Strategy, Planning, Program (of Vietnam)
UNDP	United Nations Development Program

Executive Summary

This study analyzes challenges to the institutionalization of the strategic environmental assessment (SEA) as an approach to integrate environmental considerations in the policy process. In addition to economic and social development, environment has become a strategic issue in achieving sustainable development. SEA helps decision makers reach a better understanding of how environmental, social and economic considerations fit together and thus minimize negative environmental consequences. Since its introduction in America in 1969, SEA has been adopted in European legislations and is increasingly used in developing countries. Even with strong support from international developmental organizations the implementation of SEA in developing countries faces serious challenges as the political systems and institutional contexts are different and shaped by different histories, cultures and norms. Through a case study of Vietnam, a developing country, we aim to understand obstacles affecting the country's effort to institutionalize SEA and provide relevant insights for improving institutionalization of SEA in the country's specific context.

The study employs a qualitative method, with literature review and interview of key informants involving SEA in Vietnam. The policy structure is also reviewed to provide a background understanding of Vietnamese planning system. Findings are examined using the institutional analysis framework at *micro*, *meso* (organizational) and *macro* level by Turnpenny et al. (2008) to identify key challenges to the SEA institutionalization in the Vietnamese policy making context.

The most critical challenges come from the planning structure, e.g. high degree of personal political influence in the informal decision-making and in-cohesive planning that undermine a scientific approach like SEA. As a result, at *meso* level, SEA suffers from weak coordination across agency's administrative boundary, lack of public participation and insufficient appraisal. At *micro* level, while the study confirmed obstacles of weak SEA awareness and capacity and low budget and time as described in the literature, it further identifies an obstacle of lack of civil servants' motivation in conducting SEA. Constraints at *macro* level such as low environmental priority, significant political influence of the ruling party to the top down planning system and a weak law making structure not only directly undermine SEA adoption but also prompt barriers at *micro* and *meso* level persisting.

Recommendation to improve the SEA institutionalization in Vietnam starts with awareness building to top leaders focusing on the benefit of SEA to gain their political support. Allocation of adequate SEA budget is needed to increase personal motivation on SEA. At *meso* level, improvement toward a coherent and transparent planning process should be made to increase responsibility and stakeholder's collaboration in SEA. SEA appraisal credibility should be improved together with an increase of SEA ownership at sector and provincial level. At *macro* level, the law making structure should be revised to reduce vested interest's influence to the creation and approval of legislation. Finally, in addition to the Party's influence in the top down planning process, media and civil society participation should also be allowed.

Lessons learnt from the introduction of SEA in Vietnam are drawn for countries in similar condition. They are: 1) SEA legislation is needed but it should start at small scale, targeting sectors with the most visible environmental impact; 2) SEA legislation should be accompanied by enabling environment; and 3) there needs to have a dedicated national agency to lead the SEA introduction and that international support should aim at the right national agent of change to promote SEA.

The study concludes with implication for further study on how SEA changes the power structure in the provincial context, the implication of decentralization of strategic planning to the voluntary application of SEA in Vietnam and how would the adoption of SEA as a democratic instrument change if the single party state's political system changed.

The paper has 6 sections: section 1 introduces the study, section 2 reviews theories of institutions and sustainable development and institutional challenges to SEA, section 3 presents research methodology, followed by section 4 provides an overview of the application of SEA in the Vietnamese policy making context, section 5 discusses constraints to the institutionalization of SEA, finally section 6 draws conclusion with lessons learnt and recommendation.

Key words: strategic environmental assessment, integration, institutionalization, strategic planning, Vietnam

1. Introduction

Strategic environmental assessment (SEA) *“is a systematic process for evaluating environmental consequences of proposed policy, plan or program initiatives in order to ensure that they are fully included and appropriately addressed at the earliest appropriate stage of decision making on par with economic and social considerations”* (Sadler and Verheem, 1996 in Therivél, 2010). SEA helps decision makers reach a better understanding of how environmental, social and economic considerations fit together and think through the consequence of their actions. Hence future environmental negative consequence might be avoided or reduced (OECD, 2006).

Originating from the US National Environmental Policy Act (NEPA) in 1969 under the name of environmental impact assessment (EIA) at project level, SEA has been developed as an extension of EIA at higher strategic planning levels such as policies, plans and programs (PPP) (Therivél et al., 1992). The traditional methodologies of SEA therefore were dominated by the EIA approach focusing on systematic assessment of issues, formal procedure and scientific quality of the assessment. However, this scientific oriented SEA approach has limited effectiveness when it comes to influence decision makers towards sustainable development. SEA research has been refocused from scientific content and procedures to integrated policy process and impact of SEA on policy outcomes (Nitz & Brown, 2001). SEA practitioners and researchers have started to emphasize the institutional context to integrate environmental considerations in all stages of the decision making process and to identify possibilities for institutional improvement (Nilsson & Dalkmann 2001, Slunge et al., 2009).

The political and institutional aspects in SEA are particularly important when SEA, a concept originated in developed countries is introduced to developing countries where the political system and institutional context are at different development stages and shaped by different histories, cultures and norms. For example, in Vietnam or China where traditional top down decision making without public involvement is the norm and civil society organizations have limited influence, public participation, one of key features in SEA is not strictly required by SEA legislation. Furthermore, in developed countries environmental concern has become important in the policy agenda and is exposed to more available resources while in most developing countries environmental consideration is ranked relatively low compared to

economic and social concerns and is faced with resource constraint. More empirical analysis to understand barriers to the SEA approach in developing nations is therefore necessary. The application of SEA in Vietnam offers an interesting example of a country that does not hold theoretical pre-conditions for SEA when its regulatory enforcement system is weak, the policy planning process is not clear and the decision making is rather informal.

Vietnam, the 13rd world populous developing country of 87.3 million inhabitants in 2009 has managed to become one of the best economic performers in the world with an average annual real GDP growth of 7.3% and per capita income of 6.2% during 1995-2005 and poverty reduction from 58% to 16% during 1993-2006. Vietnam is approaching the middle income country ranking by achieving target of 1,000 US dollar per capita income in 2010 (World Bank, Vietnam Country Brief). The downside of this development is that the country is experiencing environmental stresses, from air and water pollution, soil erosion to biodiversity lost. The need for a strategic approach to institutionalize environmental consideration into the country's development policy is reflected in a number of strategic policies like the Comprehensive Poverty Reduction and Growth Strategy in 2002, the National Strategy for Environmental Protection to 2010 and Vision to 2020 and Vietnam Agenda 21 (Dusik & Xie 2009). Although SEA has gained political momentum from the top leadership and has been constitutionalized in the revised Law on Environmental Protection (LEP) in 2005 in Vietnam, there remain challenges to fully institutionalize SEA in the national policy making context. As of the end of 2009, the number of SEA appraisal is 49 (MONRE 2009), despite a great number of policies, programs and plans at national, regional and sectoral level (which are required SEA by law) were being drafted for the next development period (2011-2020).

The purpose of the study is therefore to investigate the challenges and lessons learned from introducing and institutionalizing SEA as an approach for environmental integration in the policy formulation process in Vietnam and to provide recommendations to address these challenges.

The study aims to answer a sequential set of questions. First, *how has SEA been introduced in Vietnam?*; second, *what are key challenges to institutionalizing SEA as an approach to integrating environmental consideration into the policy formulation process in Vietnam?*; third, *what are the key lessons learned from introducing SEA in Vietnam?*; and finally *how can the challenges be addressed?*

There is the lack of empirical analysis of the institutionalization of SEA in the policy process in developing countries after the initial introduction of SEA, often with strong influence from donors or international development organizations, which is the case in Vietnam. Through deepening the understanding of obstacles to this institutionalization in Vietnam this study can provide insights which are valuable for improved institutionalization of SEA in Vietnam and other developing countries.

The paper is organized as follows: section 2 reviews theories of institutions and sustainable development and institutional challenges to SEA, section 3 presents research methodology, followed by section 4 provides an overview of the application of SEA in the Vietnamese policy making context, section 5 discusses constraints to the institutionalization of SEA, finally section 6 draws conclusion with lessons learnt and recommendation.

2. Theoretical Review

2.1. Institutions and Sustainable Development

Institutions have gained academic attention in the field of sustainable development. Widely known by the work of many social scientists, among others is Ostrom the Nobel Award winner 2010 for her work focusing on institutions to manage common pool resources. Institutions as “the rules of the game” (North, 1994) enable the functioning of the governance subsystem interacting with the resource subsystem in a complex overall social ecological systems; i.e. institutions determine how resources are used by creating management rules and organizing the resource management (Ostrom, 2009). Empirical evidences worldwide have provided correlation examples between institutions and environmental issues, for example property rights and ecological quality or the government effectiveness and quality of water (Environmental Sustainability Index, Fraser Institute 2002; Environmental Sustainability Index, World Bank, Governance Indicator 2002-[Annex 1](#)).

Institutional theory has a long tradition from the work of ancient Greek philosophers like Aristotle who first discussed the role of institutions in the governing system, representing the old school of thought that focuses on the normative aspect of institutions (Peters, 1999) to the contemporary school of thought, widely known as the new institutionalism with emphasis on the historical learning perspective of institutions with three institutional theories: the rational choice, the sociological/cultural and the historical institutionalism (March & Olsen, 1984). The rational choice institutional theory is based on the rational maximized utility preference of individual and emphasizes formal established institutions, for example private property right law or government regulations on taxation. On the other hand, the sociological institutional theory advocates for informal institutions like social norms and morals, for instance the cast system in Indian society. Finally the historical institutional theory considers both formal and informal institutions and focuses on the path dependency and formative moment aspect of institutions. The definition of institution developed by North (1994) reflects this theory. He defines institutions as

“humanly devised constraints that structure human interaction. They are made up of formal constraints (e.g., rules, laws, constitutions), informal constraints (e.g., norms of behavior, conventions, self-imposed codes of conduct), and their

enforcement characteristics. Together they define the incentive structure of societies and specifically economies”.

In other words, institutions are structures that pick up signals and reflect society interactions to cope with economic, social and environmental issues. SEA as an instrument to integrate environment to policy formulation process should reflect the role of key institutions in this process and identify possibilities for institutional improvement (Slunge et al., 2009).

North (1994) also drew institutional implications to the evolution of the economic system. First of all, the mixture of formal and informal institutions and their enforcement attributes determine the economic performance. Second, deep society’ embedded informal norms are important since they are difficult to change and they evolve and legitimize written rules which could be changed overnight. The application of formal rules of the democracy model from the Western world to the Middle East countries might not produce the same outcome. Third, the success of economic reform depends on a) the polities who design and enforce the rules, b) change of both formal and informal rules and c) a long process of creating informal norms and behaviors that support the legitimacy of formal rules. Finally, flexible institutional structures to survive the shock and change of the evolution process needs to develop over a long period of time. These implications are also shared by other scholars, for example Williamson (2000) and Ostrom (2005) in their institutional analysis frameworks.

While the institutional theory developed by North (1994) has implications for economic systems, the SEA itself as an institution for sustainable development is also influenced by these implications, for example the informal institution, the time dimension of change or the flexible institutional structure. SEA as a procedure developed in democratic western developed countries may not produce the same outcome as in Vietnam due to the institutional difference in public participation. While the former countries allow greater public participation in their governance, Vietnam as a single ruling party state holds the governing power, media or civil society organizations have very limited influence on the Vietnamese strategic planning process. Nevertheless, the introduction of SEA in Vietnam is an opportunity to open the planning process to wider stakeholder participation. Hilding Rydevik (2007) argued that if environmental integration in policy process is a goal to achieve sustainable development, SEA should induce “*a radical change in the planning practice, organizational culture, norms, and values in relation to environmental issues*”. These

institutional changes in SEA however take long time. SEA should also be designed as a flexible approach to mingle with specific context of the complex and ongoing nature of the decision making process (Kørnø & Thissen 2000, Nitz & Brown 2001, Nilsson & Dalkmann 2001, Scrase & Sheate 2002, Hilding Rydevik 2007, Ahmed & Sánchez-Triana 2008). Furthermore, institutional context is important to the performance of environmental policy assessment instruments like EIA and SEA (Rydevik 2007, Kolhoff et al., 2009).

2.2. SEA and Institutional Challenges

Institutional analysis models have been developed to understand the institutional aspect of SEA in integrating environmental concerns in the policy process, notably the ‘institution-centered SEA’ conceptual framework (I-SEA) proposed by Ahmed and Sánchez-Triana (2008) and institutional analysis framework at three level of *micro*, *meso* and *macro* developed based on theoretical models by Ostrom and Williamson (Slunge et al., 2009, Nilsson and Nykvist 2009). The later framework was used by Turnpenny et al., (2008) and Nilsson and Nykvist (2009) to identify institutional possibilities and constraints to the integration of environmental policy assessment approaches to the policy process.

The I-SEA model, inspired from the World Bank’s agenda of policy reform in developing nations, suggests that in addition to the traditional two analytical and participatory methodological components of SEA, the SEA for policies should consider institutions and governance issues by adding another component for enhancing learning and continuous improvement of policy design and implementation. The model identifies institutional challenges to integrating environmental issues to policy making; i.e. the process continuity, path dependency, conflicts of group interests, complex and inherently political process and ambiguity. The principles of the I-SEA institutional analysis model are environmental issue priority setting, inclusion of the most vulnerable stakeholder groups, feedback mechanism through social accountability, system of social learning, institutional assessment and long term perspective. The I-SEA approach has been piloted in the World Bank’s programs in developing countries for example Argentina and Colombia (World Bank 2005, 2008). Similarly, OECD has developed an institutional analysis guideline for SEA with emphasis on institution and governance assessment and opportunities for improvement (OECD 2006).

Turnpenny et al., (2008) on the other hand, examined the institutional opportunities and constraints to environmental integration of the policy evaluation instrument like SEA by distinguishing different institutional levels. The authors argued that in order to achieve the integration of policy assessment into policy process, it is important to relate the assessment (as an institution itself) to the existing institutional context, for example staff capacity and institutional arrangements which affect the ability of a political system to engage in integrative assessment activities or the vertical and horizontal coordination processes within organizations. The authors proposed a three level analytical framework to identify institutional opportunities and constrains for integrated policy assessment. At *micro* level, the human resources available for policy assessment is in focus, for instance, the levels and types of expertise, training, background and skills of officials, practitioners and users of the assessment. At *meso* level, organizational issues like procedures and management structures, systems of knowledge transfer, norms and incentive structures are examined. Finally, at *macro* level, one needs to analyze broader assessment of linkages with values, norms and societal goals and connections with the larger policy network of stakeholders.

In their analysis, however the lines between institutions at *meso* and *macro* level are not delineated, for instance, the policy network of stakeholders and the horizontal and vertical coordination among government agencies could be both at *meso* and *macro* level, depending on the country's political system and context.

This theoretical framework was supported by empirical findings of the use of policy assessments in four different jurisdictions (EU, Germany, UK and Sweden) that revealed barriers to different dimensions of policy assessment integration at all levels, for example lack of resources or training to policy officials, the perception that policy assessment plays a supporting rather than determinant role, organizational tradition, institutional interaction and coordination or path dependency; i.e. new policy assessment is framed based on existing policy or international commitments (Turnpenny et al., 2008).

Similarly, Nilsson and Nykvits (2009) employed the same institutional layer analytical approach to investigate institutional barriers to the application of environmental impact assessment procedures to promote sustainable development with empirical evidences found in the Swedish committee system. Their empirical results showed that institutional constraints to the promotion of sustainability and the use of impact assessment instruments existed at all levels. While at *micro* level, individual performance and personal expertise prevent the

venture into new areas of sustainability, at *macro* and *meso* level, consensus seeking and tradition in assessment methodologies further limit the change.

3. Methodology

The study employs a qualitative method, starting with literature review to refine the analytical framework and answer research question one *‘how has SEA been introduced in Vietnam’*, followed by the review of complementary information from semi-structured questionnaire interview with SEA authorities and practitioners. To answer question two *‘what are key challenges to institutionalizing SEA as an approach to integrating environmental consideration into the policy formulation process in Vietnam’*, findings from this review is analyzed using the analytical framework of institutional constraints at *micro, meso* and *macro* level. In addition, literature of the Vietnamese strategic planning process is reviewed to provide a background context with formal and informal planning characteristics influencing the SEA application. From the review of the SEA introduction, lessons learnt are drawn to answer question three *‘what are the key lessons learned from introducing SEA in Vietnam’*. Finally, based on the analysis of challenges, recommendations to improve the institutionalization of SEA in Vietnam are proposed to answer question four *‘how can the challenges be addressed’*.

The following section describes the analytical framework in detail.

3.1. Analytical Framework

The analytical framework used for this study is a simplified version of the three level institutional analytical framework described in section 2 above. By organizing institutional constraints into different levels, the obstacles to SEA application could be deliberated systematically and in detail, i.e. not only specific constraints but also the triggering reasons or the relationship among constraints at different levels. As a result, more relevant recommendation for improvement could be induced.

At each level, a number of institutional aspects are selected to be examined in detail. The selection is based on the review of key institutional constraints addressed in the literature of SEA in Vietnam during the last decade.

At *micro* level, individual capacity like background and training are investigated together with time and budget constraints. In particular, Vietnamese civil servants in charge of environment and planning, SEA regulators and practitioners are examined about their professional

background, awareness of SEA, exposure to SEA training as well as their SEA experience. The officers' motivation in conducting and appraising SEA is also explored. Finally, the source and allocation of time and budget for SEA are examined, for example the average time and cost for SEA preparation and appraisal, the SEA cost norm and SEA budget decision makers.

Both international and national SEA practitioners claimed that awareness and capacity building for national and provincial planning authorities and sufficient budget are key elements in the adoption of SEA in Vietnam (Chu 2008, Dalal-Clayton 2009, Dusik & Xie 2009, Le 2008, Le & Le 2008, Luu & Dunn 2008, Bass et al., 2009, Soussan & Nilsson 2009). Dalal-Clayton (2009) recommended that the role and value of SEA should be promoted within the top leadership, for example members of the National Assembly and that the capacity building strategy based on training should be revised to focus on effectiveness and outcomes and to identify participant's motivation and vision towards conducting SEA (Dalal-Clayton 2009). Similarly, the Vietnam-Sweden Strengthening of Environmental Management and Land Administration (SEMLA) Program, one of the major donors who supported the institutionalization of SEA in Vietnam through developing guidelines and piloting SEA projects together with Vietnamese stakeholders, in its assessment of these pilots, stated that obstacles to the quality of pilot SEAs are limited budget, poor understanding of the concept of SEA and lack of practical experience in conducting SEA (SEMLA 2009).

At *meso* level, the analysis emphasis is given to government institutions, specifically the organizational culture of decision making and inter-agency coordination both at horizontal and vertical axis. Specifically, challenges at *meso* level are investigated through the practice of SEA preparation and appraisal, formal and informal inter-department coordination, stakeholder participation and information sharing practice. In addition, the strategic planning practice with implication to the SEA process are explored, e.g. group vested interest, planning ownership and cohesion of different types of strategies.

UNDP, in its review of the progress of integrating environment in the development in Vietnam stressed that the dominant "silo" working tradition has prevented government agencies to collaborate across their administrative boundaries and that to improve governance remains the biggest challenge (Bass et al., 2009). SEA practitioners in Vietnam often identified governance issues such as limitation in stakeholder involvement, collaboration

among agencies and sharing of information across agencies are key obstacles in the preparation of pilot SEAs (Chu 2008, Dusik 2010, Le 2008, Le & Le 2008, Luu & Dunn 2008, Bass et al., 2009, SEMLA 2009). Although the establishment of inter-departmental working group with representatives from different line ministries is an initiative to facilitate stakeholder coordination in SEA, how the working group operates remains significant to the outcome of stakeholder coordination. At regional level, inter-provincial collaboration and vertical coordination between central and local authorities have been marginal in pilot SEAs (Le & Le 2008, SEMLA 2009, Soussan & Nilsson 2009).

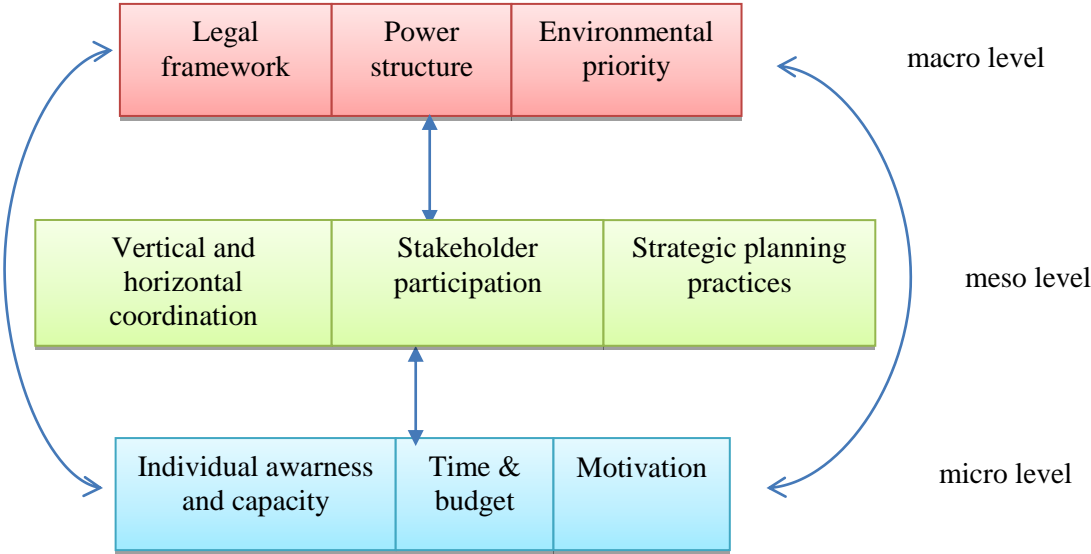
At *macro* level, the analysis is focused on the political power structure and legal framework affecting SEA application in Vietnam, particularly formal and informal institutions of the legislation, the power sharing structure among national, local government and sector ministries and how this structure affects the policy process. How environment is positioned in the country development vision is also explored.

Although SEA has been included in the revised LEP in 2005, enforcement structure as well as supporting regulations, for example SEA classification for sector specific, information sharing and collaboration across the administrative boundary are keyed to improve SEA enforcement (Chu 2008, Le 2008, Le & Le 2008, Luu & Dunn 2008, Bass et al., 2009, SEMLA 2009). Moreover, the overall pro-economic development goal, the policy networking particularly between national and provincial governments and the participation of public stakeholder are important in positioning SEA in the policy process. The role of the party state with strong influence of the party leadership to the country development direction, the decision making process and government personnel (Dang Phong & Beresford, 2001) could also have impact on the institutionalization of SEA.

Finally, the study examines inter-linkages across three levels, for example the influence of the top down planning system, the policy networking to the inter-department collaboration practice or the motivation and interest of individual staff in SEA.

Figure 1 visualizes the institutional constraint analytical model to be applied in this study.

Figure 1: Institutional Challenges Affecting SEA



Note: The arrows only illustrate the relationship of the challenges across the level without indicating its causality or intensity. (Source: derived from Turnpenny et al., 2008)

3.2. Data Sources

The study used two sources of data: secondary information from current literature and reports related to SEA in Vietnam (see References for detail) and primary data from in-depth interviews with a total of 15 international experts, national officers and practitioners involved in SEA in Vietnam. The informants were selected from national EIA and SEA practitioners who conducted and appraised SEAs for socio economic development plans and sector strategies in Vietnam. Other informants are SEA regulators at the Department of Environmental Impact Assessment and Appraisal (DEIA&A) at Ministry of and Natural Resources and Environment (MONRE). Finally, international experts who have been working with international programs that support SEA development in Vietnam (SEMLA, DANIDA and UNDP) were another group of informants. Some national informants are both SEA regulators and practitioners who work at government agencies, at the same time providing SEA consultancy service. Table 1 below profiles the interviewees. The detailed list of interviewees is in [Annex 2](#).

Two semi-structured interview questionnaires were developed to operationalize the institutional aspects discussed in section 3.1. One questionnaire targets national SEA

practitioners while the other's was designed for SEA experts and regulators. While the former focuses on practitioner's experience of the SEA preparation and related obstacles at *micro* and *meso* level, the latter emphasizes the expert opinions of SEA introduction in Vietnam, SEA and the strategic planning process and related challenges at *meso* and *macro* level. The questions were also opened for other unexpected issues during interview. [Annex 3](#) provides the interview questionnaires.

The information obtained from the interviews is consistent in key obstacles at individual, organizational and macro level, nevertheless, there exists some different opinions reflecting the interviewees' perception and working position. For example, although informants all agreed that SEA as an instrument to integrate environmental issues to the strategic planning is necessary, there is diversion of opinion when it comes to the question if SEA should be an approval condition for PPP or should it not. While some SEA experts and appraisers supported the former opinion, citing the specific context of the economic oriented and top down Vietnamese governing system, other ministerial civil servants argued for the latter, citing the ownership principle of SEA.

In addition to published SEA literature, the study relies on primary sources of SEA documents in Vietnam that are available at the national SEA regulatory body-DEIA&A of MONRE. DEIA&A is also a focal point of contact to domestic SEA teams and relevant stakeholders. International organizations like SIDA, ADB, World Bank and SEI provide access to donor supported pilot SEAs and contacts of SEA international experts.

Table 1: Profile of Interview Informants

Informant's Title	Work Location	No. of Informants
National SEA practitioners and appraisals	Consultancy organizations	4
SEA officers	Ministry of Planning and Investment, Ministry of Industry and Trade, Ministry of Construction	3
SEA regulators (including a retired person)	Ministry of and Natural Resources and Environment	3
International SEA experts	International organizations	5
Total		15

3.3. Delimitation

This study contributes to the understanding of the overview of SEA introduction and application in Vietnam and lessons learnt with emphasis on the institutionalization of SEA as an approach to integrate environment in the policy making process. The scope of the study is therefore does not go into in-depth analysis of specific institutional issues. The study however concluded with suggestion for further research.

The coverage of the study is limited to key ministries in charge of environmental regulatory, strategic planning, industry and trade and construction. Study of SEA adoption in other ministries with visible environmental impacts in for example agriculture and rural development, transportation, health and tourism may have led to additional insights. Due to a tight field work schedule and lack of SEA documents in these ministries, the study however could not extend its coverage. Similarly, understanding of the SEA adoption at provincial level would have been enhanced if more interviews with provincial leaders had been conducted. Ideally, provinces with both positive and negative attitude and experience with SEA should be approached. Comparison of SEA application among these provinces would provide more in-depth understanding of opportunities and obstacles in adopting SEA in the local context.

Another limitation is the time dimension of the SEA application in Vietnam which is rather short. Even though SEA has been legislated since 2005, SEA commissioned with national capacity actually started in 2008-2009 when the planning for the next development period (2011-2020) started. It is therefore difficult to have a full evaluation of the SEA progress after such a short time.

Nevertheless, the result of this study remains firm given the review of extensive literature, interviews of active informants in key areas relating to SEA in Vietnam and the application of a systematic analytical model.

4. Introduction of SEA in the Vietnamese Context

In this section, first we introduce the policy making context in Vietnam and its characteristics as a background for the discussion of the institutionalization of SEA. Second, we review the introduction of SEA in Vietnam in two phases: legislation, capacity building and pilot SEA; and SEA as a part of the government's procedure.

4.1. The Vietnamese Policy Making Context

The role of the Communist Party of Vietnam (CPV) in the State was presented in this section, followed by short descriptions of the top down decision making process at the strategic, ministerial and local level.

4.1.1. The Party State

Vietnam has a formal structure of tripartite state with legislative, executive and juridical branch (Vietnam Constitution 1992) but with significant involvement of the CPV as a real decision making power. CPV shapes the ideology and development direction of the country through the Party's embedded power in key political institutions: The National Assembly (NA), the State President and the Government (Dang & Beresford 1999). The Party's Central Committee with current representation of 160 members who are high ranking leaders in the government system is a forum for strategic decision-making in Vietnam. These members are selected through a comprehensive and semi-competitive election process once every five year (Malesky et al. 2010).

During the period of central planning economy before the reform in 1986 the Party directly controlled the planning process. After that, the transition into a market based economy decreased the role of the Party in the state's governance, hence gave more power to the Government and legislative institutions (Dang & Beresford 1999, McCarty 2001). Nevertheless, those bodies are far from autonomous since almost all of the state's senior leaders are party members (McCarty 2001). The Party's Central Commission for Organization and Personnel (CCOP) decides top personnel in the Government and the National Assembly instead of the Prime Minister and the NA Chairman. CCOP also intervenes in conflicts between central and provincial administrative leadership. Deep control of the Party in the state's senior personnel management forces party member' government officials comply firstly to the Party's principles. With this personnel management institution, on the one hand,

state senior leaders have administrative responsibilities without personnel management authorities, for example the Prime Minister cannot discipline a minister without the approval of the CCOP. On the other hand, it is difficult to hold individual accountability to government leaders given this mismatch between their power and responsibilities.

4.1.2. The Planning Process at the Strategic Level

The Government implements policies which the Party has agreed, for example the country's most important planning document-the national 10 year socio economic development strategy (SEDS) is created with the guiding statement issued by the Politburo, the Party's executive body. Once the SEDS is drafted, it is sent to the Government for appraisal and to the Politburo for endorsement, before it is approved by the National Assembly (MPI 2008).

The process is formally top down but in reality, there are "soft" institutions that complicate the process. The strategic planning is influenced by two principles that guide the Party's top political discourse: consensus and balance of regional political power (Dang & Beresford 1999, Mc Carty 2001). For instance, collective decision has to be reached among member groups who come from the north, central and southern regions or between those who support market-based development and those hardcore socialists who advocate for social-based development. The principles on the one hand allow a certain degree of democracy within the party as argued by Malesky et al. (2010). According to the authors, when compared with China

"Vietnam's institutions empower a larger group of decision-makers and place more constraints on the party leadership through vertical checks and semi-competitive elections."

Although agreed with the democratization within the Party, Mc Carty (2001) argued on the other hand that collective decision making makes it a difficult and lengthy process since it involves extensive negotiation and compromise and when and where consensus is difficult, the process can come to a dead end. He further stated that consensus draws indistinctive lines between private and state, ministries and agencies, central and local governments, the Party and the State and that power is to be shared as widely as possible. As a result, government officials in theory are accountable to a single leadership, but in fact there exists widespread conflicts with other ministries, local authorities, or with the management of state enterprises.

4.1.3 The Planning Process at Ministerial Level

Within the framework of national development strategies, ministries develop their plans. Almost every ministry has its own think tank institute, providing advices on policy formulation within the ministry. According to Mc Carty (2001), the ministry prepares a new policy recommendation and submits it to the office of government for appraisal. Once it is appraised and passed, the policy will be approved by NA and endorsed by CPV. In this process, ministries often operated in ‘silo’ rather than working together across the administrative boundaries to safeguard their sector’s interest and as a result, the planning relies heavily on scientific quantitative information without involvement of wider stakeholders (Bass et al., 2009). This operating practice combined with the state control media, prevent free flow of information, instead, information becomes a profitable “product” of the authorities.

The “silo” operation is also reflected in the relationship between provincial socio economic development plan (SEDP) and sector plans. By law, those two plans should be congruent and complement each other while in fact, sector plans are often developed within the ministry without consideration of the provincial SEDP or in some cases influential provinces might lobby the government to include them in the sector strategies without considering the overall picture of the sector. Different ownership of SEDP and sector plans also limits the harmonization of the plans. While the provincial government is responsible for drafting SEDP, line ministries are responsible for sector plans. Also, the planning circles of SEDP and sector plans are not cohesive, making it even more difficult to harmonize the two plans. Although SEDP is commissioned every 5 years and sector plans are developed for 10 years with 5 year update but in fact, sector plans could be developed and updated more often, depending on the proposal by the ministries.

4.1.4. The Planning Process at Local Level

Unlike the decision making process at strategic and ministerial levels, the process at local commune level involves direct public participation which is regulated by The Government Decree No. 29/1998/ND-CP (1998) on “*The promulgation of regulations on the exercise of democracy in communes.*” This decree requires participatory governance in four areas: information, consultation, approval and supervision of public expenditure project at the

commune level to ensure state policy implementation cohesiveness at local level. Despite the legislation, this process is heavily influenced by informal politics at the local level (Mattner 2004).

In summary, in Vietnam strategic policy making is dominated by the CPV, involving extensive discourse to reach consensus and regional power balance while sectoral planning is influenced by individual ministries/ministers with minimum inter-sector collaboration. A low degree of democracy is legislated for low level planning at commune level but the process is heavily subjected to informal local politics. SEA as one of the instruments to integrate environmental issues in the policy process is also affected by these principles and practices, notably:

- Directional influence of the ruling Party to the country's strategic development;
- Regional political power balance and consensus;
- Top down strategic planning structure; and
- Informal planning politics with personal influence and 'silo' operation among government agencies

The following section reviews the introduction of SEA in Vietnam.

4.2. Introduction and Institutionalization of SEA in Vietnam

The application of SEA in Vietnam can be divided in two phases: phase 1 when SEA legislation was established, capacity building activities and pilot SEAs were conducted and phase 2 when SEA has become a part of the regular governance procedure.

4.2.1. Phase 1: SEA Legislation, Capacity Building and Pilot

Vietnam has legislated EIA in its Law on Environmental Protection (LEP) in 1993. Since 1997, the Government of Vietnam has expressed interest in SEA as, through a project commissioned by the Center for Environment of Towns and Industrial Areas of the Hanoi Construction University and the Vietnam Environment Administration of MONRE to study the scientific rational for SEA (Pham 2011). Then the revision of LEP 1993 after 10 year of its implementation opened a window of opportunity for the introduction of SEA as an improved environmental assessment tool to address strategic policies, plans and programs. SEA hence became legislated in the revised LEP in 2005.

The Vietnamese SEA legislation contains general elements for SEA provision in Vietnam such as the type of strategy, planning and plan (SPP) which is equivalent to policy, plan and program (PPP) in the SEA definition (Thérivel 2010, Pham 2011) subjected to SEA, the ex-ante SEA principle, the SEA ownership of the planners, the report content and the appraisal process. In the legislation, however, the article about SEA appraisal remains vague, stating that SEA requires appraisal and the result of the appraisal is to be submitted to the PPP's approval authorities to serve as one of the considerations to approve the PPP. One could interpret either way that SEA is not a condition for PPP approval or that SEA is one of the PPP's approval conditions. [Annex 5](#) presents the translation of key SEA components in LEP (2005).

MONRE was responsible for drafting the SEA provision and supporting documents. According to LEP (2005) MONRE is the prime authority in charge of SEA regulation and appraisal. Within this ministry, the Department of Environmental Impact Assessment and Appraisal (DEIA&A) that regulates EIA is also in charge of SEA. The DEIA&A authority was exposed to different SEA approaches through the co-organization of the international conference on SEA with the OECD SEA Task Team at Ha Long Bay, Vietnam in 2005. Between two main SEA approaches² discussed at the conference, Vietnam selected the EIA based SEA for two reasons: this assessment approach focuses on environment and Vietnam has accumulated EIA experience and expertise since 1993. Other international organizations also introduced the concept of SEA through their projects as early as in 1996, for example the European Commission funded project 'Capacity Building for Environmental Management in Vietnam' VNM/B7-6200/IB/96/05 or the project between IUCN and the Vietnam Environment Administration of MONRE in 1997 (Pham 2011).

The SEA introduction in Vietnam has had strong support from the international donor community; among others are the Swedish International Development Cooperation Agency (SIDA), GTZ, the Asian Development Bank (ADB), the World Bank and other bilateral country cooperation programs. The Swedish funded program Vietnam-Sweden Strengthening Environmental Management and Land Administration (SEMLA) has assisted MONRE during 2005-2009 to organize consultative workshops to discuss SEA legislation and develop

² The EIA based SEA approach led by EU and the Sustainable based SEA led by South Africa

SEA guidelines (Dusik & Le 2009, SEMLA 2008). Since 2008, other donors like DANIDA also assisted various ministries to develop their own SEA institutions and guidelines, i.e. Ministry of Planning and Investment (MPI), Ministry of Construction (MOC), Ministry of Agriculture and Rural Development (MARD) and the General Department of Tourism. To date, legal, regulatory framework and technical guidelines for SEA have been developed (Dusik & Xie 2009, Le 2008, Dalal-Clayton 2009) (see [Annex 4](#)). SEMLA also supported MONRE to facilitate a “Framework for Donor Coordination and Cooperation in SEA” since 2005. Nevertheless, this framework ceased to operate when SEMLA program ended in 2009.

The donors and development banks like ADB and the World Bank provided financial and technical support to build national SEA awareness and capacity. SEMLA together with MONRE acting as a focal point conducted generic training workshops to raise SEA awareness for 450 government staff and practitioners. SEMLA also launched the SEA training of trainer (TOT) program for 32 trainers who were nominated from 6 line ministries³, universities and research institutions across the country. Many trainers have strong background of EIA. Training materials were created based on the “Core Training Material for SEA” developed for Yunnan Environmental Protection Bureau in China with financial support from SIDA and the GTZ-InWent’s Practice oriented SEA Training Package (SEMLA 2008). However, there is no evaluation of the training’s outcome for example the ability of trainees to conduct SEA (SEMLA 2009). Furthermore, the training targeted a mixed pool of participants including government bureaucrats, planners, practitioners and appraisers whom might be suitable for different training approaches. For example while the practitioners need to know the process of conducting SEA, strategic planners should learn about the benefit and logic of SEA in the context of the Vietnamese planning process. On the other hand, appraisers might need to be equipped with evaluation methodologies for SEA. Finally, in addition to lack of time to follow lengthy training seminars, the ministry leaders hardly attended these mixed audience seminars since that might undermine their positions.

Donors and development banks also financed SEA pilot projects. Some pilots were even conducted prior to the SEA legislation, for example the SEA of Land Use Planning for Ha Long City in Quang Ninh Province, SEA for the Ha Tay Province’s Socio Development Plan

³ MONRE, MARD, MPI, MOIT, MOT and Department of Tourism

and the integrated SEA of Port Developments in Ba Ria-Vung Tau Province (Dusik & Xie 2009). Since the strategic planning for development period of 2006-2010 already took place prior to 2006, most of pilot SEAs conducted during 2006-2007 are ex-post, which means they were conducted after the creation or approval of the plans, for example SEAs for provincial socio development plans, land use or hydropower planning for the period 2006-2010. The pilot SEAs therefore had minimum influence on the policy making process; they did not trigger any major changes in the plans. Pilot SEAs instead served as methodology tests for national authorities and experiments for SEA practitioners who mainly have EIA background (SEMLA 2009). [Annex 7](#) provides the overview of major pilot SEAs.

The donor's review of pilot SEAs revealed key obstacles including lack of SEA knowledge, unsystematic environmental baseline data, weak legitimacy due to limited stakeholder cooperation, lack of capacity in conducting, implementing and following up SEA and lack of public participation (Chu 2008, Dalal-Clayton 2009, Dusik & Xie 2009, Le 2008, Le & Le 2008, Luu & Dunn 2008, Bass et al., 2009, SEMLA 2009). When donor's support was withdrawn (SEMLA and DANIDA in 2009) and when SEA is being no more pilot but as a part of the government procedure, the issue is how these obstacles remain with SEA undertaken during this subsequent period with limited financial and human capital resources and domestic politics.

4.2.2. Phase 2: SEA as a Part of the Government Procedure

Although SEA legislation has been commenced since 2006, actual SEA performance as a part of the government work took place some years later, when strategies and plans for the next planning period (2011-2020) were prepared. In addition, since 2009, when major donors concluded their support for SEA, SEA started to be undertaken by national agencies. According to MONRE (2009), 49 SEAs have been commissioned by these agencies as summarized in Table 2. This number of SEA is small compared to 159 PPPs which have been approved by the GOV for the period until 2020⁴. Among 49 SEAs, DEIA&A has appraised 31 SEA⁵ including 26 SEAs for provincial Social Economic Development Plan-SEDP (2011-2015) and 5 SEAs for sector strategies while MARD has appraised 5 of its SEAs and MOD appraised 1 SEA.

⁴ Including 29 socio economic development strategies, 53 sector planning, 14 regional planning and SEDPs for 63 provinces. http://www.chinhphu.vn/portal/page?_pageid=33,129115&_dad=portal&_schema=PORTAL

⁵ The number of SEAs submitted to DEIA&A for appraisal is 33, but 2 SEAs were returned due to bad quality

Table 2: SEAs Commissioned by Vietnamese Agencies until 2009

Commissioning Agencies	Type of SEA	No. of SEA
Ministry of Industry and Trade	For sector strategy	6
Ministry of Agriculture and Rural Development	For sector strategy	7
Ministry of Transportation	For sector strategy	3
Ministry of Defense	For sector strategy	1
Ministry of Planning and Investment	For regional socio economic development plan	6
Provinces	For provincial socio economic development plan	26
Total		49

(source: MONRE 2009)

5. Challenges to Institutionalize SEA in the Vietnamese Planning Process

This section analyses obstacle to institutionalize SEA as an approach to integrate environmental concerns in the strategic planning process in Vietnam at *micro*, *meso* and *macro* level, using the analytical framework illustrated in [Figure 1](#) in Section 3.1.

5.1. Challenges at the *micro* level

5.1.1. Low Awareness of SEA

Low and inaccurate awareness of SEA prevents fully application of the approach. Many senior ministerial and provincial leaders are not aware of the concept and benefits of SEA in the context of the Vietnamese planning. Given the top down planning structure in Vietnam, leadership proper understanding of SEA is vital in providing political support for the application of SEA at lower management levels. The perception about the usefulness of SEA at different ministries and provinces varies immensely, in some cases depending on personal awareness. Moreover, some ministerial and provincial leaders where there are visible environmental impacts seem to pay more attention to SEA, for example the chairman of Quang Nam Province where two world cultural heritage sites are located supported the SEA for the hydropower plan in the region's river basin and the SEA for the provincial SEDP. Or the leaders of Vinh Phuc Province where there is Tam Dao National Park are proactive in commissioning SEA for its SEDP 2006-2010 and 2011-2015. While some leaders find SEA as an additional burden and interference into their area of responsibility. This negative perception and that many SEAs are ex-post conducted reflect underestimate of the usefulness of SEA as a supporting tool to decision makers.

Low SEA awareness at the leadership level is partly a consequence of limited training target. SEA training has so far only focused on one group of SEA targets-the practitioners through series of TOT training of SEA methodology with supported of international expertise and finance. There has been no specific training about the benefit of SEA targeting senior planning bureaucrats like directors of ministerial research institutes or provincial chairmen. Similarly, no training of the evaluation methodology for SEA appraisers has limited their capability and credibility. MONRE is currently proposing a project to improve the national capacity of SEA, in addition to practitioner training there is a media public education

program on SEA and an awareness building program targeting top leaders with different messages and communication instruments than normal awareness seminars.

5.1.2. Insufficient SEA Capacity

Insufficient SEA capacity on the one hand, is a consequence of the generic SEA guideline developed by MONRE with in 2009 (with technical support from SEMLA program). The guideline is criticized to be misleading since it does not provide thorough presentation of the SEA concept which is relatively new and complicated, creating different interpretations among SEA practitioners and strategic planners. The guideline also does not address the diversified and informal context of the planning practice and the lack of quality information database in Vietnam. Further, the guideline has no specific methodological instruction to different types of SEA subjected to different PPP. With international technical assistance, other ministries like MPI, MARD and MOC are developing sector SEA guidelines based on MONRE guideline. MPI is in the final stage of finishing its SEA guideline for socio economic development strategies and plans. All these guidelines are not legislated except for the SEA guideline for urban planning developed by MOC which has become a ministerial circulation in January 2011 (MOC 2011).

On the other hand, many SEA practitioners although being trained with SEA approach has strong EIA background with technical orientation while lacking the strategic thinking, understanding of the planning practice in Vietnam and cross-cutting field experience. They face difficulty in convincing the planning team to accept their comments. For example some SEA teams did not priority key environmental issues; instead they included all environmental issues in the SEA. This while is not practical, also creates perception from the planning team that the SEA team only cares about environmental objectives and proposes unrealistic proposals. In turn, lack of environmental knowledge prevents strategic planners from effective discussion and understanding of the SEA practitioner's proposal.

5.1.3. Low Budget Allocation to SEA Training and Preparation

The SEA insufficient capacity is further constrained by the lack of regular government budget allocation for SEA awareness and capacity building. Among other reasons is that SEA is not an annual government activity since it is conducted following the 5 year strategic planning circle. If needed, MONRE has to request an SEA training budget within the overall

environmental annual budget of the ministry. And the budget request administrative process is lengthy and cumbersome.

In addition, low budget allocation to SEA preparation has limited the scope of the work. The fact that SEA team had to scope SEA activities based on a low amount of budget has undermined the importance of proper performance of stakeholder consultation activities or baseline data collection. In fact many of SEA activities were not conducted or being simplified, for example data collection and verification or stakeholder consultation.

By law, the SEA budget is within the planning budget, nevertheless there is no SEA cost norm regulation given no SEA experience existed in Vietnam by the time the law was formulated in 2005. In 2007, MPI issued an insufficient SEA cost norm of 2-3% of the total planning budget, amounting to an average SEA budget of 20-30 million Vietnamese dong (1,000-1,500 USD) for a provincial SEDP which later was terminated. The mandate to develop SEA cost norm now belongs to MONRE and MOF.

According to Vietnamese SEA practitioners, the SEA budget varies greatly depending on the scope and location of the SEA and the required amount of work for data collection. The norm currently is that SEA for provincial SEDP costs 10% of the planning budget, about 100 million Vietnamese dong (5,000 USD). Once the baseline information become systematically and publicly available, this cost might be reduced substantially.

5.1.4. Low Personal Motivation in Conducting SEA among Civil Servants

Civil servants who are responsible for preparing SEA, have no motivation to conduct SEA in-house. The main reason is because low SEA financial budget gives no incentive to government staff to commission SEA. Instead, they may contract SEA work to external consultants to gain multiple benefits: a) reduce their workload; b) have extra time to work as SEA consultant for other agencies and c) may earn extra income from the contract's kickback. Moreover, the fact that many SEAs were contracted to external consultants to prepare independently and after the PPP were completed has limited the effectiveness of SEA in terms of discussion between the planning and SEA team, hence SEA recommendations become less relevant.

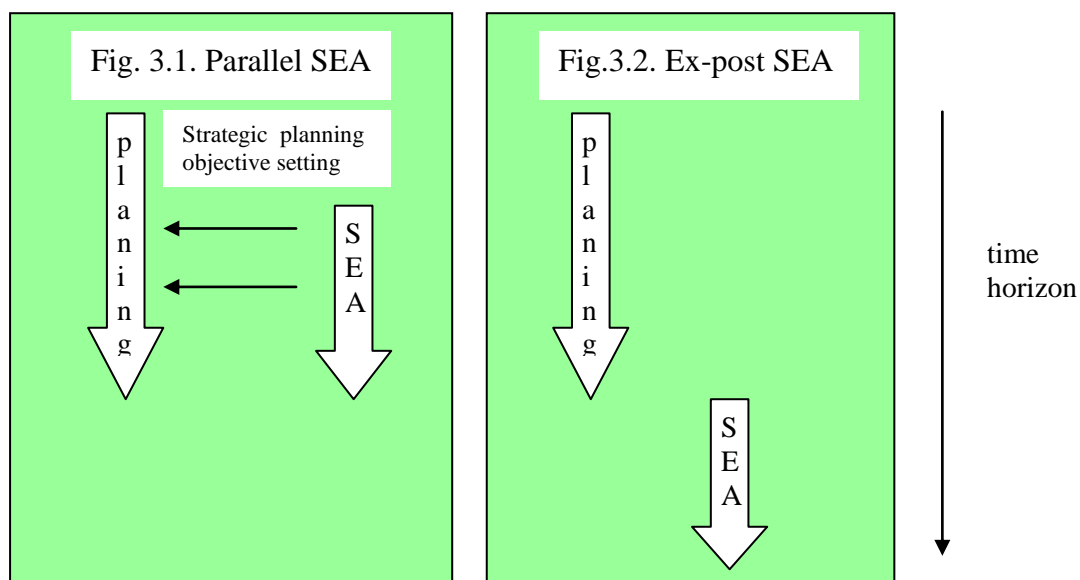
5.2. Challenges at the *meso* level

5.2.1. In-cohesive Planning Practice

Informal and in-cohesive planning practices prevent effective integration of environmental issues in the strategic planning. On the one hand, the strategic planning carries strong influence of the Party's political will with economic development and social priorities. On the other hand, there is little coherence among strategies at national, provincial and sector level that in many cases could produce conflicted objectives that miss the big picture of development. For example, while the provincial SEDP aims to promote tourism and protection of the world cultural heritage site, the industrial sector strategy might plan extensive industrial infrastructure at the same location. Further, it is difficult to prioritize strategic objectives in this incoherent planning context. Detailed discussion of the Party's role in strategic planning as well as the planning characteristics in Vietnam affecting SEA was presented in [section 4.1](#).

This puzzling planning practice impedes SEA to be conducted simultaneously with the strategic planning as required by law. Even in the best case as illustrated in Figure 3.1. below, the SEA process is often in parallel with the planning process with one step behind, after the planning team identified initial key strategic objectives. In practice many SEAs were done after the PPP was completed (Figure 3.2.). SEA report becomes an extra document which is submitted to MONRE or line ministries for appraisal independently from the appraisal of the PPP. The timing for SEA is therefore often short within a couple of months, in order to meet the submission deadline of the PPP.

Figure 3: SEA and Strategic Planning in Vietnam



5.2.2. Limited Horizontal and Vertical Coordination

Cross administrative boundary collaboration which is a vital in SEA is limited. At the horizontal collaboration level, the 'silo' operational practice as a result of the top down planning system allow government departments or provinces to have no motivation to share information or engage in inter-department or regional coordination and stakeholder's consultation during the SEA process. SEA practitioners find it difficult to obtain baseline information. Ministries or provinces maintain their information as private asset. One needs to have personal contact or pay to get access to the information. Even though, in many cases, the information is of poor quality without systematic update and storage. Further, government staff is busy with daily administrative work and has no incentive to response to request for information from outside of their line agencies.

Although stakeholder consultation is a mandate of SEA it is often poorly conducted or is superficial. Ministries or provinces find it not necessary and time consuming to expose their SEA to other partners' consultation. For the same reason, public consultation with civil society organizations like the women's union, farmer's union or the scientist association is avoided. The stakeholder consultation in the form of seminar or written comments is often organized late when the SEA was completed; hence comments were not fully taken into account. On the other hand, some stakeholder's comments are of poor quality and irrelevant. Since stakeholders are busy with their own mandates and find that their comments might not be considered in anyway, junior staff was often assigned to participate in these seminars instead, hence could not provide quality contribution. Conflict of interests among different sectors and provinces further prevent effective stakeholder's participation. Finally, within the SEA preparation team, lack of moderator skill of the planning and environment groups also limits the effectiveness of stakeholder's participation.

Vertical coordination, however could be more easily established and maintained as a result of the top down planning system. For example, within a province, the Chairman could order departments to collaborate in the preparation of the provincial SEA while it is much more difficult to do so for an SEA with multiple provinces or sector ministries involvement. Nevertheless, the effectiveness of vertical collaboration in SEA depends on the level of political power of the provincial or ministerial leader.

Finally, effective measurement of stakeholder consultation is absent to enforce such collaboration, allowing SEAs to escape this mandate. In many cases, even the collaboration if existed, becomes superficial.

5.2.3. Insufficient SEA Appraisal

Unclear usage of the result of SEA appraisal, lengthy appraisal administrative process and weak credibility of the appraisal committee undermine the SEA appraisal. By law, appraisal of SEA is compulsory and result of the appraisal can be used for the consideration of PPP approval but there is no further legislation on how the result will be used. MONRE is responsible for organizing appraisal committee for SEA for PPPs that are subjected to the prime minister's approval. They are for example, national and provincial socio economic development strategies and plans and national sector strategies. The result of the SEA appraisal then will be sent to the Office of the Prime Minister for consideration in the approval of the PPP. This gives an opportunity for lobbying the PM office for the approval of PPP without referring to the SEA appraisal. Line ministries or provinces are responsible of appraising SEA of PPP subjected to their approval, for example the sub sector plans at local level. In fact, line ministries and provinces only prepared SEA that needs MONRE appraisal.

The Department of Environmental Impact Assessment and Appraisal (DEIA&A) within MONRE has the appraisal mandate. DEIA&A after receiving SEA report organizes the appraisal committee with members of relevant ministries and provinces and SEA experts. The appraisal process could last more than a month due to insufficient number of DEIA&A personnel and long time to organize the committee with all member participation. Currently, DEIA&A has only 5 full time SEA specialists in addition to a department manager.

Finally, the credibility of the appraisal committee is in doubt. Some popular SEA practitioners with long time EIA experience often sit in this committee. Since there has been no training on SEA appraising methodology, the appraisers often using their personal experience to scrutinize SEA, hence in some cases produced recommendations which do not convince the SEA and planning teams. On the other hand, some ministries and provinces could lobby the appraisal team to pass unqualified SEAs. In this case, the appraisal of SEA hence becomes superficial.

5.3. Challenges at the *macro* level

5.3.1. Low Environmental Priority

Although the Vietnamese government aims for sustainable development, the reality of low income on average and density population gives priority of economic and social development over environment. Low resource allocation and attention hence are given to environment in practice. As a result, environmental objectives, even though existed in strategic documents in many cases cannot be achieved because lack of enabling conditions, for instance effective legislation, awareness training and human and financial capital investment. Insufficient national SEA capacity and budget discussed in [section 5.1](#). are some illustrating examples. Another example is a neglected personal awareness of some government leaders about SEA.

5.3.2. Significant Influence of the Party's to the Top Down Policy System

Referring to the discussion in [section 4.1](#), the Communist Party of Vietnam (CPV) holds a strategic decision making power by shaping the ideology and development direction of the country. The CPV's key principles of the political consensus and regional balance enable the prioritization of political than other issues in the policy process. In addition to a low priority on environment, it will take time for SEA as a strategic decision making supporting tool for environmental concerns to gain popularity among decision makers. Another aspect of the CPV's ruling influence is the state control of media. This has worsened the 'silo' operating culture among government agencies. There is no effective public check and balance system to hold these agencies accountable. Public involvement in strategic planning hence is almost absent. Without stakeholder's participation, the usefulness of SEA has significantly been undermined.

Finally, in the context of the top down planning structure in Vietnam, voluntary adoption of SEA in the planning process might undermine the legitimacy of SEA. If the approval of the strategic plans may depend on the political will and personal influential power then there might be no motivation to conduct SEA.

5.3.3. Weak Law Making System

The system of law making in Vietnam allows contradictory law and influence of vested interest in the creation of the law and regulation. The Party has directional power in shaping policies while the legislation committee of the National Assembly is unable to harmonize cross-cutting law and regulation like in the area of environment. Ministries have vested power in drafting law proposals without consultation with other stakeholders while provincial leaders could influence the government for their favoring policies without considering neighboring provinces. As a consequence, the strategic planning process is highly informal and incoherent with inconsistent timing, different ownership and minimum cross boundary coordination, creating low quality and contradictory laws and policies. SEA as a supporting tool to the decision making process, has to face all these constraints. Moreover, the SEA legislation also suffers contradiction; while MONRE guideline instructs a separate SEA report from the PPP report and SEA is appraised separately, the law on urban planning in 2009 states that SEA is one chapter of the urban planning and is appraised together with the planning's appraisal (Article 40, Law on Urban Planning, 2009).

A new decree on SEA, Decree No. 29/2011/ND-CP (18/4/2011), has just been passed as a result of MONRE's review of the SEA application over the last 5 years. Highlights of the decree are presented in [Annex 6](#).

Finally, constraints at *macro* level could trigger or worsen constraints at other levels, for instance, the government's focus on economic growth and social development does not motivate leaders to improve their awareness on environment. Or the lack of media freedom protects the 'silo' culture within government agencies, giving them the vested interest with no public responsibility.

In conclusion, the institutionalization of SEA as an instrument to integrate environmental issues in the Vietnam planning process is constrained by the incoherent and informal practices within the legal and strategic planning structure. Limited understanding of government bureaucrats and SEA practitioners has further slowed down the SEA institutionalization. Lastly, the country's priority for economic development and social stability undermines the environmental intent in strategic planning.

6. Conclusion and Recommendation

6.1. Conclusion

The analysis of the application of SEA in Vietnam confirms the theoretical discussion that institutions are important for the institutionalization of SEA as an approach to integrate environmental concerns into the policy process and that the country's context matters. The specific policy making structure in Vietnam characterized by high degree of Party's political influence, informal decision-making power and in-cohesive planning challenges the SEA institutionalization most. The following sections draw lessons learnt and provide a summary of the most important constraints.

6.1.1. Lessons Learnt- Looking Back

Overall, the introduction of SEA in Vietnam is positive, reflecting the country's direction towards sustainable development. Despite slow application, the continuous development of SEA in Vietnam indicates that the introduction has been on the right track. More importantly, SEA as a participatory approach can be used in a one party ruling state like in Vietnam and can be an instrument to open up the planning system to be more transparent and involve more stakeholders including the public. Nevertheless, the expectation of SEA in Vietnam should not be as high as in countries with higher degree of democracy where public participation is a norm. Changes in and from SEA should also be expected to take place gradually.

The following lessons can be drawn from the introduction of SEA in Vietnam, which may provide important insights for other countries with similar context.

Lesson 1: It is necessary to have SEA legislation to reflect the top leadership commitment and to ensure SEA legitimacy. However the SEA legislation should start with a small scale, targeting specific PPPs that have visible environmental impact⁶ and with specific guidelines and trainings to targeted groups. This could help create success stories that SEA can change, as visible examples to convince top leaders of the usefulness of the SEA approach. Once successfully launched in a small scale and the SEA capacity has been in place, SEA could be expanded its coverage to more PPP.

⁶ for example spatial development strategy; land use planning; socio economic development strategy at specific region like national park, large river basin or coastal zone; energy sector plan, forestry and transportation plan.

The selection of SEA approach should be subjected to the country specific context. A country with EIA capacity like Vietnam might find it easier to adopt the EIA based SEA, on the other hand the EIA influence on SEA could undermine the strategic implication and participation attributes of the SEA approach. The sustainable based SEA approach requires completed information and complicated analytical capacity which is absent in many developing countries. Finally, institutional based SEA could help improve the country's institutional capacity together with the SEA process. Nevertheless, a clear understand to distinguish different SEA types is necessary to avoid confusion and resistance from adopters.

Lesson 2: SEA legislation must be accompanied with enabling environment/condition for implementation. For example, awareness building for leaders and strategic planners, resource allocation for SEA implementation such as on-going personnel capacity building and budget regulation, information sharing and stakeholder's involvement capacity and mechanism, appraisal and monitoring capacity and regulations.

Lesson 3: It is important to have a dedicated agency to lead the process of SEA introduction, i.e. the Ministry of Natural Resource and Environment (MONRE) in Vietnam. MONRE was in charge of drafting the revised LEP 2005 that provides a great opportunity to legislate SEA. It has engaged other ministries and provincial authorities in the early process of SEA introduction through seminars and training workshops. This helps increase the visibility and ownership of SEA to planners. In some pilot SEA, top leaders actively engagement is essential to get the SEA through. The story of the SEA for Vu Gia Thu Bon river basin has a vital contribution from personal commitment of the Provincial Chairman who directed departments to collaborate during the SEA process and enabled wide stakeholder consultation, including the public.

Finally, international support to promote SEA has approached a right intervention target in Vietnam. The department in charge of environmental assessment of MONRE was approached by international organizations that are specialized in SEA (OECD DAC Task Team) or through development projects (ADB, World Bank, SIDA, IUCN and GTZ).

6.1.2. Challenges – Looking Forward

The following are the most important obstacles that have been identified. At *micro* level:

- Low awareness of leaders inhibits the implementation of SEA down the system;
- Insufficient capacity of both SEA practitioners and planning team;
- Low motivation to conduct SEA in house; and
- Low budget allocation for SEA training and preparation

At *meso* level, the most challenging constraints are the incoherent and informal planning practice and limited cross administrative boundary coordination. As a result, SEA is often conducted separately or after the PPP formation with limited change to the PPP. Moreover, stakeholder consultation is limited and in many cases superficial. Finally, weak SEA appraisal further undermines SEA.

At *macro* level, systematic challenges including the top down strategic planning system with deep political influence from the ruling Communist Party, low environmental priority in the country's development agenda and weak law making structure restraint the application of SEA. More importantly, these macro obstacles also create constraints at *meso* and *micro* level.

The section below proposes suggestions to address these obstacles to improve the institutionalization of SEA in Vietnam. While recommendations to solve challenges at the *micro* level appear specific, recommendations for those at *meso* and *macro* level aim at structural institutions which can be complicated to tackle. Nevertheless, measurements taken at all levels are needed for an effective institutionalization of SEA in the Vietnamese context.

6.2. Recommendation

First of all, individual understanding of SEA, particularly its strategic and participation implication as well as its benefits and methodology should be properly promoted to different target groups with different messages and approaches. For example, for top decision makers at national, provincial and ministerial agencies, SEA should be promoted as one of the supporting tools to decision makers in achieving sustainable development and that among other benefits, SEA enable consensus through stakeholder's participation, providing development alternatives and minimizing long term costly environmental consequences. The SEA awareness building to this group should be in the form of policy brief and case study to illustrate that SEA could change towards sustainable development in the Vietnamese context.

Or an SEA module in the environment management and policy analysis training curriculum at institutions where all senior leaders are trained, for example the National Academy of Public Administration⁷ should be developed with emphasis on the benefits and logic of SEA in relation to the strategic planning system in Vietnam.

Secondly, training to SEA practitioners and planners, in addition to SEA preparation technique should also include a module of strategic planning principles, the planning practice in Vietnam and their implication to the integration of environmental considerations in the planning process. This will enable more effective discussion between the planning and environment teams, particularly in identifying key environmental issues and alternatives and proposing mitigation measurements within the SEA. Further, SEA practitioners should acquire cross sector knowledge, strategic thinking and facilitation capability. SEA appraisers (including SEA regulators at MONRE), in addition to knowledge about SEA preparation technique should be trained on policy evaluation methodology to increase their professional credibility. Moreover, SEA guideline and training should emphasis that technical analysis should only be one part of the SEA process, more importantly is the political consulting process at strategic level and that the SEA approach should be flexible to take into consideration the informal institutions in the strategic planning in Vietnam. Equally important is the development of specific SEA guidelines for different types of PPP.

In addition, the SEA preparation process should include a refresh training on updated SEA methodology, particularly at provincial level where SEA is only required for 5 year strategic socio development plans. More importantly, in the context of parallel SEA preparation practice in Vietnam, the refresh training could help gain common understanding between the planners and SEA practitioners.

To gain motivation and more resources for SEA preparation, the cost norm for SEA should be developed based on realistic SEA experience in Vietnam with reference from other countries and should be legislated soon.

At *meso* level, in order to increase the credibility of the SEA appraisal, the appraisal process should be improved with selection of qualified appraisers and appraisal methodology and

⁷ Reference to this Academy can be found at its website: <http://www.napa.vn/vi/dtbd/cbcc/Trang/hbdcvcc.aspx>

clear division of appraisal responsibility. At the same time, SEA ownership at provincial and sectoral level should be increased, for example through the development and application of specific SEA guidelines and trainings.

The stakeholder coordination challenge in SEA should be overcome by improving the strategic planning process towards more coherent and transparent with clear division of responsibility. Nevertheless, to enable this improvement, *macro* level institutional improvement should be made, for example in the area of the Party's influence in the top down strategic planning process or media and civil society participation in this process.

Finally, the law making structure should be revised to reduce vested interest's influence to the creation and approval of legislation. Quality independent legal expert committee should be allowed to examine cross-cutting legislation like environmental legislation, including SEA to ensure coherent and feasible legislation.

6.3. Further Study

As discussed at length above, the institutionalization of SEA as an instrument to integrate environment in the decision making process has strong influence from the political structure in Vietnam. The result of this study, therefore will be enhanced with further study in this area. For example, although the national top leadership is committed to environment protection reflecting in the country's strategic development documents, the awareness of the importance of environment is not clear at local government level. A study of how SEA change the power structure in the local context should be explored to understand how to create awareness of SEA to local leaders. Further, study of the implication of decentralization of strategic planning to the voluntary application of SEA in Vietnam would provide insight to address the obstacle of 'silo' operational culture among government agencies as it is a consequence of the current top down strategic planning system in Vietnam. Last but not least, the implication of the application of SEA as a democratic instrument in a single ruling party state like in Vietnam should be understood. SEA assumes a certain degree of democracy, specifically in stakeholder participation. How would the SEA adoption change if the state's political system remains unchanged or reforms toward democracy quickly or slowly?

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Annex 1: Environmental Sustainability Index

Figure 4: Property Rights and Ecological Quality

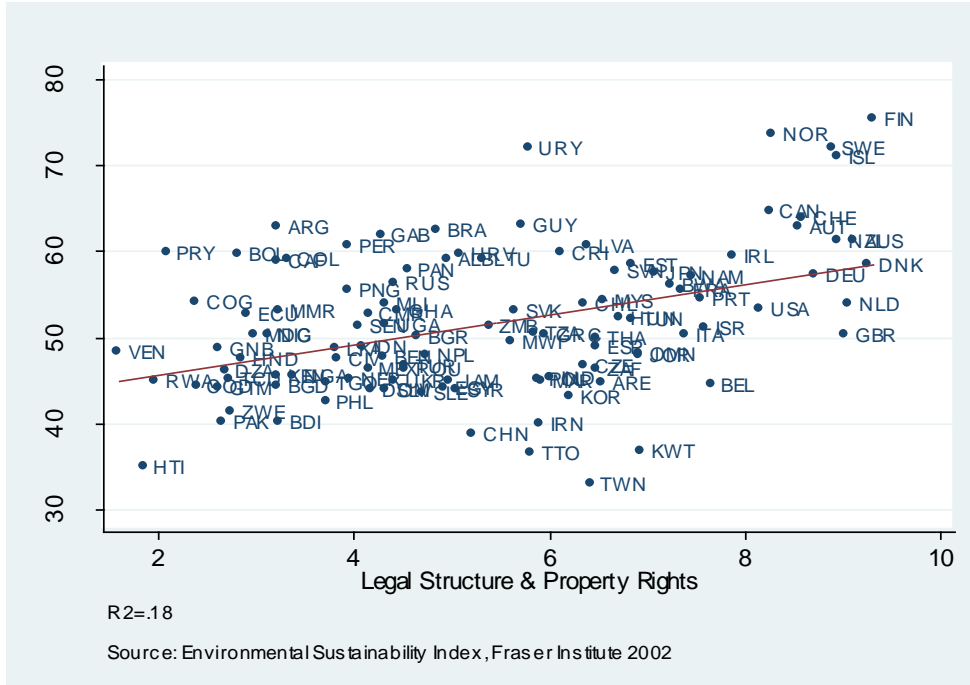
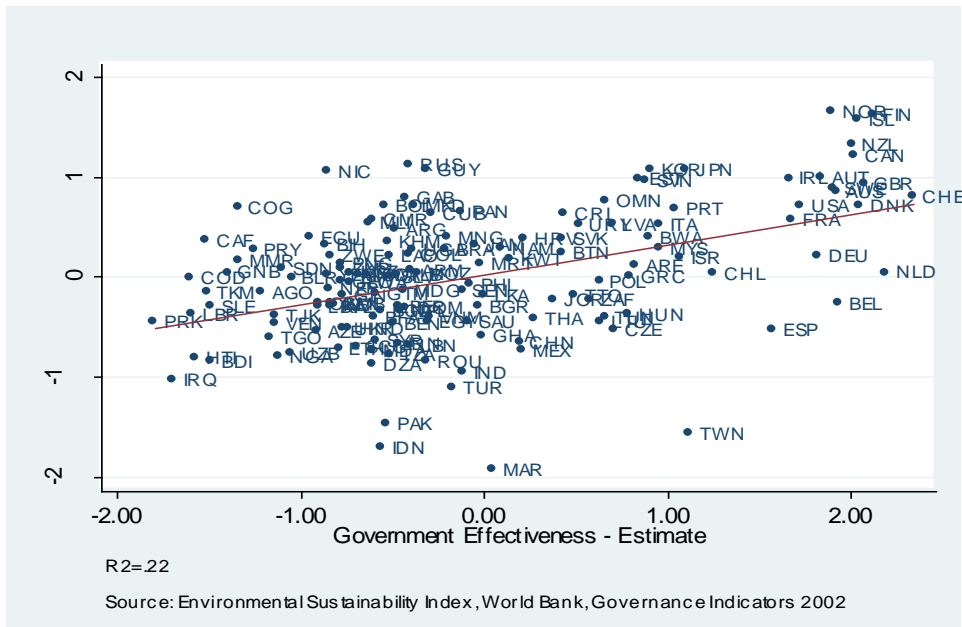


Figure 5: Government Effectiveness and Water Quality



Annex 2: List of Interviewees

No.	Date	Name	Title
	Vietnamese Civil Servants involved in SEA		
1	13 & 25-Apr	Msc. Le Hoai Nam	Deputy Director, Agency for EIA and Appraisal, MONRE
2	14-Apr	Tran Viet Hoa	Manager, Energy Efficiency and Conservation Office, Science and Technology Department, MOIT
3	16-Apr	Msc. Nguyen Ngoc Hai	Deputy Director, Department of Regional Research and Development, Development Strategy Institute, MPI
4	18-Apr	Dr. Luu Duc Cuong	Director, Centre for Research and Planning on Urban and Rural Environment (CRURE). Vietnam Institute for Architecture and Urban-Rural Planning (VIAP), MOC
5	20-Apr	Chu Quoc Hai	Deputy Director, DONRE, Vinh Phuc Province
	Vietnamese SEA Experts		
6	13-Apr	Dr. Le Hoang Lan	Director, Pi Company Ltd, for Consultancy and Communication in Culture, Education and Environment
7	13-Apr	Tham Hong Phuong	Coordinator of the Vietnam SEA TOT program (funded by SIDA, GTZ & SDC)
8	14-Apr	Dr. Nguyen Khac Kinh	Vice President, Vietnam Association for EIA. Retired Director of Agency for EIA and Appraisal, MONRE
9	15-Apr	Dr. Le Trinh	Director, Vietnam Environmental Science and Development Institute (VESDEC)
10	18-Apr	Prof. Dr.Sc. Pham Ngoc Dang	Director, Center for Environment of Towns and Industrial Areas (CETIA). Chairman of Vietnam Association for Conservation of Nature and Environment (VACNE). Vice Chairman, Vietnam Association of Civil Engineering Environment (VACEE)
	International SEA Experts		
11	17-Feb	David Annandale	SEA International expert, Integra Consulting Services
12	21-Feb	Niels Juul Busch	SEA International expert, Ramboll Consulting
13	24-Feb	Jiri Dusik	SEA International expert, Integra Consulting Services
14	19-Apr	Johan Kieft	UNDP Vietnam. working closely with MPI - for example on the SEA for the national five year plan. And he is coordinating the development of the new SEA legislation from donor side
15	25-Apr	Tarek Ketelsen	Environmental System Engineer, Technical Program Manager, International Center for Environmental Management (ICEM)

Annex 3: Interview Questionnaires

Questionnaire for national SEA practitioners

1. *What is your area of work/responsibility?*

2. *How did you know about SEA?*

- Have you attended any seminar or training? Have you found them useful? (the concept, methodologies, training method and materials?)
- Do you know how a SEA is conducted? Have you used any of the knowledge obtained?
- Is SEA part of your routine's mandate? What type of SEA?
- How much time of your work is dedicated to SEA?

3. *In your organization, how is SEA conducted?*

- What are the procedures (instruction, guidelines)?
- Who decides if any SEA is to be conducted? Who are the main responsible for the preparation of SEA? Your role?
- How long does it take to undertake a SEA?
- Does SEA involve other departments/stakeholders? How to work with them?
- How is information obtained for SEA? What is the mechanism to share information relating SEA?
- How is the budget for SEA allocated? What are the budget sources? Do you find that sufficient? Why? Why not?
- How does the reporting of the SEA progress take place?
- How is SEA approved in practice? Who holds the decision power?

4. *In your opinion, what are the most **three important obstacles** in undertaking SEA and how to address them?*

5. *Your opinion about the legal documents relating to SEA?*

- Are there sufficient legal documents?
- Any gaps between law, implementation and enforcement? How to address them?

6. *Your other comments to improve the undertaking of SEA in Vietnam? Your comments for other countries in similar condition?*

Questionnaire for SEA Experts and Regulators

1. *How has SEA been introduced in Vietnam?*

- How has SEA as an international concept been adopted in the Vietnam context?
- What driving forces/actors/motivation was behind the SEA introduction?

2. *What are key lessons learnt from this introduction?*

- What could have been done differently given the experience of SEA introduction in Vietnam?

3. *How is SEA related to the strategic planning process in Vietnam?*

- Roles/interest of ministries (MONRE, MPI, MOF, etc) and provincial People's Committees in the SEA process?

4. *What are main challenges for institutionalizing SEA as an approach for integrating environmental considerations in strategic decision making in Vietnam and making it a functioning part of the Vietnamese legal and decision-making context? For example at:*

- Micro level (i.e. individual level)
 - a. Training and knowledge of SEA practitioners, appraisals, decision makers.
 - b. Is there budgetary and human resources available for SEA? Where does the financing for SEA come from?
- Meso level (i.e. Organizational level)
 - a. What mechanisms exists for information exchange and coordination between ministries and agencies across different sectors?
 - b. How does horizontal coordination work in practice?
 - c. What mechanisms exist for coordination between central and regional level?
 - d. How does vertical coordination work in practice?
 - e. How would you characterize Vietnamese decision making culture?
 - f. How does SEA procedure fit with the Vietnamese decision making culture?
 - g. Stakeholder participation is a central part of most SEA systems. How well does this work in Vietnam?
- Macro level (i.e. Legal structure, national policy priorities etc)
 - a. Is SEA legislation and regulation sufficiently developed? Deficiencies?

- b. How would you describe the level of political commitment to addressing environmental problems in Vietnam? Does it differ between different sectors or different levels (e.g. national, regional, local)?
- c. How does the political commitment affect the possibilities for environmental integration and the use of SEA?

5. *How to address these challenges in Q 4?*

6. *Other comments of the institutionalization of SEA in Vietnam and other countries that are in similar situation?*

Annex 4: Major Legal Documents Relating to SEA in Vietnam

Vietnam National Assembly, 2005. No. 52/2005/QH11, 29/11/2005: Law on Environmental Protection (LEP) (in Vietnamese and English)

GOV, 2006. Decree 80/2006/ND-CP, 9/8/2006: Guidelines for Implementation of Law on Environmental Protection (in Vietnamese and English)

GOV, 2008. Decree 21/2008/ND-CP, 28/2/2008: **Amendment** to Decree 80/2006/ND-CP, 9/8/2006 (in Vietnamese)

GOV, 2011. Decree 29/2011/ND-CP, 18/4/2011: **Amendment** to some articles in Decree 80/2006/ND-CP and Decree 21/2008/ND-CP (in Vietnamese)

MONRE, 2006. Decision 13/2006/QD-BTNMT, 8/9/2006: Guidelines to Establish the SEA Appraisal Committee (in Vietnamese)

MONRE, 2006. Circular 08/2006/TT-BTNMT, 8/9/2006: Guidelines for SEA, EIA and Environmental Protection Commitment (in Vietnamese)

MONRE, 2008. Circular 05/2008/TT-BTNMT, 8/12/2008: **Replacing** Circular 08/2006/TT-BTNMT (in Vietnamese)

GOV, 2006. Decree 92/2006/ND-CP, 7/9/2006: Regulation on Development, Approval and Management of Comprehensive Plans for Socio Economic Development (in Vietnamese)

GOV, 2008. Decree 04/2008/ND-CP, 11/1/2008: **Amendment** to Decree 92/2006/ND-CP (in Vietnamese)

MPI, 2007. Circular 01/2007/TT-BKH, 7/2/2007: Guidelines for Implementation of the Government's Decree 92/2006/ND-CP (in Vietnamese)

Vietnam National Assembly, 2009.No. 30/2009/QH12, 17/6/2009: Law on Urban Planning

MOC, 2011. Circulation 01/2011/TT-BXD, 27/1/2011. SEA Guideline for Urban Planning.

Annex 5: Summary of SEA Component in the Law on Environmental Protection-LEP (2005)

SEA is required for strategies, planning and plans (SPP)⁸ in:

- national socio-economic development SPP;
- national sector development SPPs;
- provincial and regional socio-economic development SPPs;
- planning of land use, forest protection and development, exploitation and utilization plans of other natural resources at inter-provincial or inter-regional level;
- planning for development of key economic regions; and
- planning for inter-provincial river basin development.

SEA undertaken responsibility is with the SPP formulation agencies and is prepared concurrently with the formulation of the SPP and that SEA reports must constitute an integral part of the proposed SPP.

SEA appraisal:

- SEA report is appraised by an appraisal committee.
- MONRE is responsible for organizing the appraisal committee for those SPPs subjected to the approval by the National Assembly, the Government and the Prime Minister. Line ministries, ministerial level agencies and provincial governments are in charge of organizing the SEA appraisal committee for SPPs subjected to their approval.
- The appraisal result is one of the considerations for the approval of the SPP.

⁸ SPP is equivalent to the definition of Policies, Plans and Programs defined in Therivel 2010

Annex 6: Summary of SEA Component in the GOV's Decree 29/2011/ND-CP (2011)

SEA classification:

SEA type A: full scale SEA integrated in the SPP as an integral part of the SPP report, is required for SPP with 5 year or longer period in:

- National socio economic development strategy and planning
- National sector development strategy in industry, agriculture and rural development, transportation, construction, tourism and health sector.
- National sector development planning in industry, agriculture and rural development, transportation, construction, tourism and health sector (not included in the category for SEA type B).
- Inter-provincial river basin planning

SEA type B: full scale SEA with a separate SEA report is required for SPP with 5 year or longer period in:

- socio economic development planning for economic regions
- socio economic development planning for provinces and cities under direct central regulation.
- National sector development planning in electric, hydropower, thermal power, nuclear power; oil extraction and refinery; paper; basic chemistry, insecticide, fertilizer; rubber; garment; cement; steel; extraction and processing of coal, iron, thiec, aluminum, tin, volfram, antimony, titan, gold, rare minerals and other radio-active minerals
- Planning of the agriculture, fishery, forestry and water resource
- Planning for transportation infrastructure development of roads on land, rail, sea, river and aviation and ports
- Urban planning, planning for management of construction materials, solid waste and hazardous waste
- Planning for tourism and golf
- Planning for development of hospital network
- Planning for development of economic zone, industrial zone, high tech zone and export zone
- Regional planning of land use, forestry and other natural resource utilization

- Other SPPs ordered by the National Assembly, Government and Prime Minister

SEA type C: simplified SEA integrated in the SPP as an integral part of the SPP report, is required for national sector SPPs with 5 year or longer period which are not categorized in SEA type A & B.

Five year plans as a component of the strategy and planning which SEA have been appraised are not required extra SEA.

Specific report format requirements for each type of SEA.

Result of the SEA must be integrated in the SPP report.

SEA appraisal:

- Appraisal of the simplified SEA could be in the form of written comments from the appraisal committee.
- Appraisal activities include: appraisal committee meeting, survey of the SEA location, verification and evaluation of SEA information and analysis results, consultation of civil society organizations and experts.

Annex 7: Major Pilot SEAs

- *SEMLA SEA pilots*

During 2006-2008, SEMLA supported 13 SEA pilots for land use planning and economic development plans at district and inter provincial levels. The SEAs were conducted by local practitioners with assistance from MONRE and international technical advisors. Most of the SEAs were ex-post. The results of the pilots were different, depending on the local environmental priority, staff commitment, planning capacity and the tradition of working across administrative boundaries (Dusik & Xie 2009).

In 2008, the only ex-ante pilot SEA was executed for the SEA for the Master Plan for the Tonkin Gulf Coastal Economic Corridor in Vietnam to 2020. The team comprised staff of the Development Strategy Institute (DSI) of the Ministry of Planning and Investment (MPI) that is in charge of developing the Master Plan and SEA practitioners of the Vietnam Environment and Sustainable Development Institute (VESDI) with support from DEIA&A and SEMLA. The SEA and the planning process were conducted in parallel as described in Table 4 below. Key recommendations from the SEA were accepted by DSI planning team, resulting in environmental mitigation measures, centralized solid waste landfills and scaling down Master Plan. However, no analysis of institutional capacity was conducted (Le & Le 2008).

Table 3: SEMLA Pilot SEAs (2006-2008)

Project Name
Inter provincial SEA for
<ul style="list-style-type: none"> • Land use planning in key economic zone in the Northern Region
<ul style="list-style-type: none"> • Industrial development planning in key economic zone in the Central Region
<ul style="list-style-type: none"> • Socio-economic planning for the coastal corridor in the Gulf of Tokin
District SEA for
<ul style="list-style-type: none"> • The development plan for Thanh Thuy Economic Zone, Ha Giang Province
<ul style="list-style-type: none"> • The integrated land use planning for Vi Xuyen District, Ha Giang Province
<ul style="list-style-type: none"> • The integrated land use planning for Yen Thanh District, Nghe An Province
<ul style="list-style-type: none"> • The integrated land use planning for An Nhon District, Binh Dinh Province
<ul style="list-style-type: none"> • The plan for Southern Economic Zone in Phu Yen Province

• The plan for Xuan Phuong District, Phu Yen Province
• The integrated land use planning for Nhon Trach District, Dong Nai Province
• The integrated land use planning for Long Hai Township, Ba Ria-Vung Tau Province
• The land use planning for Con Dao District, Baria Vung Tau Province
• The land use planning for Phu Quoc District, Kien Giang Province

(Source: SEMLA 2008)

Table 4: Planning and SEA Steps for the Master Plan for TonKin Gulf Coastal Economic Belt in Vietnam to 2020

Time	Steps taken by planning team	Steps taken by SEA team
Oct-Dec 2007	Identify development objectives; Receive component sector plans proposed by ministries; Review thematic reports from SEA team	Collect environment data and information; Review proposed sector plans and develop thematic reports of environmental evaluation for each sector plan.
Jan-Mar 2008	Review and accept some comments from SEA team; Revise sector plans accordingly; Prepare initial Master plan to send to SEA team for comment	Review the revised sector plan and initial master plan; Send feedbacks to the planning team
Apr-Jun 2008	Prepare draft master plan by combining sector plans and regional development plans	Prepare draft SEA report; Review draft master plan; Send comments to planning team
Jul-Dec 2008	Organize consultation meetings for review and comments on Master plan and SEA report; Review and finalize Master plan report and SEA report; Submit SEA report to MONRE for appraisal.	

(source: VESDI 2008)

- *Pilot SEA for the hydropower plan for the Vu Gia Thu Bon River Basin in Quang Nam Province in Vietnam*

From October 2006 to November 2007, the SEA was executed by the International Centre for Environmental Management (ICEM) together with local consultants with the financial support from ADB. The team was able to obtain endorsement of the Provincial Chairman and to conduct multi-stakeholder consultation workshops hence generated significant recommendations which were recognized and triggered modification of the hydropower plan. The SEA also suggested institutional arrangement principles to improve existing river basin planning and management institutions, including inter-provincial involvement, participation of communes and districts affected by the hydropower plan, endorsement of provincial leaders and flexible and informal operation. (ICEM 2008, Bass et al., 2009, SEMLA 2009).

- *Pilot SEA for sustainable Hydropower Development within the Power Development Plan (PDP) VI in Vietnam (2011-2025)*

This ex-post SEA was undertaken by international consultants of SEI and the Institute of Energy in Vietnam that created the Power Development Plan with funding from ADB in 2008. It took a broader approach on sustainability rather than only environmental impacts. This SEA pilot aimed to provide an exercise to build national capacities for the integration of SEA in the strategic planning of hydropower in Vietnam, specifically for the preparation of the subsequent PDP VII. The SEA explicitly recommended on the institutionalization of SEA in the strategic planning process by suggesting a model of power development planning that facilitates effective consultation and participation of stakeholders outside the energy sector, including local communities to ensure that social and environmental issues are effectively taken into account in the planning process (Soussan & Nilsson 2009).