

# A review of EIA Quality in Jamaica



Proposals for improvement

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# Overview

- Background
- Historical Analysis
- Updated Analyses
- Challenges and Opportunities
- Recommendations/Discussion



# Background

- Pre-cursors: NRCD – early projects:
  - Luana Oil Refinery Complex (1973-5)
  - Peat Mining Project (1981-5)
  - Montego Freeport Dredging Project (1989)
- By virtue of the NRCA Act (1991), legal responsibility for the EIA Process in Jamaica is vested with the NRCA Authority – one of 3 boards operated by the National Environment and Planning Agency (NEPA)



# Legal Framework

- NRCA Act – Section 10:
  - The Authority may by notice in writing require an applicant for a permit ...where it is of the opinion that the activities of such enterprise are having likely to have an adverse effect on the environment, to submit to the Authority...an (EIA)...”
- Formal EIA system based on the NRCA (Permits and Licences) Regulations (1996)




# 1997 Study on EIAs

- Survey of EIA Practitioners – Private and Public Sectors, and NGOs
- Quality Review of EIAs using a previously tested scoring process (Lee-Colley, University of Manchester)
- Individual Interviews
- Desk Research of International Methods for Findings



# 1997 Study: Survey (of EIA Practitioners)

- 60% thought the EIA process was adequate
  - 1 person – more than adequate
  - 1 person – grossly inadequate
- Length of time to prepare EIA, working full time with adequate resources:
  - 6-9 weeks – 20%
  - 9-12 weeks – 20%
- 74% - knew NRCA staff reviewed EIAs and thought this sufficient
- Timing of EIA Reviews:
  - 9-12 weeks – 36%
  - More than 12 weeks – 20%
  - Longer than 16 weeks – 20%
  - Review timing understood – 56%
- EIAs being prepared adequately? – 36%
- EIAs NOT reviewed by adequately trained personnel? – 36%



# 1997 Study: Quality of EIAs

- Sample – 16 reports
  - Overall Average: D
  - 6 were satisfactory
- Recurring issues in EIAs:
  - No timeframe for development
  - No analysis of decommissioning
  - No quantitative analyses of predictions – except sewage generation and water usage
  - Analysis of alternatives rare – and weak
  - Use of figures, tables, graphs was weak – improving with technology
  - highly technical...reports AND summary
  - Very few used weightings or other factors in determining impact – definitions of minor vs. major
  - Weak public consultations and responsiveness to them
  - Data for general area used. Specific analysis of the site was weak (physical and socio-econ.)
  - Mitigation measures often not SMART



# 1997 Study: Recommendations

- Public Presentation
  - One needs to be added at scoping stage – to effectively design TORs
  - For ALL potential developments subject to EIA, not only those deemed to require one
- Scientific Data Pool
  - Scientific data available on any area in Jamaica needs to be collected and at least referenced to ensure comprehensive knowledge, develop trends, etc
  - Consultants: NRCA's Job!
  - Professional Environmental Association
    - JIEP? – but need identified was to identify unqualified consultants
    - Regulating consultants? – NRCA's Job!
- Environmental Monitoring Programme
  - Usefulness of the EIA beyond development approval, as a means of ensuring compliance



# 1997 Study: Recommendations (cont'd)

- Strategic Environmental Assessments (SEAs)
  - To consider cumulative, synergistic, saturation, induced/indirect, and time/space-crowded impacts
  - SEA policy drafted 2003
- Review Panel
  - “an assembly of experts agreed upon by stakeholders in the EIA process. Like many of its kind internationally, the panel would review the EIA report before submission to the NRCA to ensure that:
    - Info sufficient to consider environmental effects
    - Interpretation of data sound
    - Ability to assist with decisions
    - Review of effectiveness and quality of reports