

ARTICLES

**REDESIGNING EIA TO FIT THE FUTURE:  
SEA AND THE POLICY PROCESS**

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**INTRODUCTION**

Since its inception, environmental impact assessment (EIA) has developed into both an important and institutionalized decision-making tool. However, the project-specific nature of contemporary EIA practice is seen as a constraint on accounting for sustainability (Goodland and Tillman 1995; Lee and Walsh 1992). According to current professional thinking, the assessment of environmental impacts would be more effective if executed in an environmentally sound policy context (Lee and Walsh 1992). Moreover, these authors conclude that the current environmental agenda (that is, sustainability) will only be realized if consideration is given to the environment at all significant decision points; this includes policy and planning decisions, as well as the more usual project decisions. One of the more immediate responses to this problem, in academic as well as governmental spheres, has been the concept of applying EIA to earlier (in a planning context) tiers of

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decision making to include policy, plan, and program decisions (Lee and Walsh 1992).

The extension of project-based **EIA** to strategic levels of decision making forms the basis for one of the predominant, current approaches toward strategic environmental assessment (SEA). As an instrument for integrating environmental considerations into policy, plan, and program decision making, both the necessity for and aims of **SEA** have been generally agreed upon by **EIA** professionals and governments in many countries (Partidario 1996; Sadler and Verheem 1996). Agreement is not quite as forthcoming, however, on the future directions (that is, development and application) being proposed and taken for **SEA** (Sadler and Verheem 1996). While a more discriminating process has emerged in practice where the form of SEA is adapted to the function required (Sadler and Verheem 1996), some (including the present authors) posit an alternative approach that extends beyond the existing practice and theory entrenched in SEA.

This paper focuses in part upon developing a more sustainability-based approach to SEA, particularly the integration of sustainability into policy proposals. More explicitly, the appropriateness of applying **EIA** principles to policy making as a means of achieving this integration is examined. We propose that in order to fully integrate environmental factors into policy decisions, an alternative approach to the extension of project **EIA** principles and methods (indeed, impact assessment in general) to policy making will be required. The nature and form of such an approach is yet to be fully developed—to do so, it is first necessary to better understand the manner in which government agencies are both able to and actually do take environmental consequences into account during policy-level decision making.

To this end, a survey of Commonwealth and state government agencies throughout Australia was conducted in late 1995. The survey was aimed at determining agencies' awareness of the importance of environmental considerations (and the existence of environmental impact assessment), and obtaining a clearer understanding of the potential amenability of the agencies' decision-making processes to some (modified) form of environmental assessment. Information regarding agencies' policy role and policy-making structure was also obtained. Hence, this study was most concerned with facilitating the methodological development of an appropriate approach for integrating environmental considerations into policy making.

This paper introduces the development of an alternative conceptual approach to developing SEA methods and procedures, followed by a brief description of the research design and methodology for the survey undertaken and the results obtained. More importantly, the implications of the study's findings are discussed, then used to develop preliminary guidance and recommendations for the development of an environmentally comprehensive approach to policy assessment.

### **Policy Assessment**

One of the more comprehensive and creative attempts at developing an alternative process to fully assess policy decisions is offered by Boothroyd (1995). Boothroyd considers current forms of policy environmental assessment (such as **SEA**) deficient in addressing three major conceptualizations of rational, democratic policy making, prompting the need for a policy assessment process that—

- \* Comprehensively and simultaneously assesses policy outcomes in terms of objectives, higher goals, and externalities;
- Comprehensively assesses implicit as well as explicit, existing as well as proposed, fundamental policies; and
- Is both integrated with policy design and scrutinizes designs.

Boothroyd proposes that these three processes be combined under the term *policy assessment (PA)*, defining PA as “the process by which fundamental policy options are continuously identified and assessed in terms of all highest level societal goals” (Boothroyd 1995: 105). The current authors believe that comprehensive and successful policy assessment will require us to move away from approaches evolving from the extension of EIA-based methods upwards (that is, the bottom-up approach). As an amalgamation of impact assessment and policy analysis traditions, ideal policy assessment as described by Boothroyd would break away from the tendency to simply extend policy assessment from either impact assessment or policy analysis and focus upon both the attainment of the policy goals and the mitigation of undesirable side-effects. Policy assessment could start afresh by synergizing SEA's concept of formality (though not its specific procedures) with policy analyses' heuristic potential.

## METHODOLOGY

The research reported here was accomplished through a survey of agency decision making in all Commonwealth and state spheres of Australian government. The investigation included not only management and regulatory agencies whose decisions give rise to direct environmental impacts, but also agencies such as treasuries whose decisions are not environmental in nature but produce impacts further removed from the decision point.

The primary source of data collection was a written survey. After a pilot trial, a final questionnaire was prepared to gather information both about the nature of agency decision making generally and the extent to which agencies' decisions are sensitive to environmental issues. Agencies from all Australian sectors and jurisdictions were initially identified through government directories and confirmed by telephone calls. The structure of some portfolios meant that functional areas within one department were treated as discrete agencies—for instance, minerals and forestry operations within one agency portfolio. This approach enabled appropriate officers within agencies to be approached directly, thereby increasing the likelihood of a response.

One hundred fifty-nine questionnaires were distributed to the nominated personnel in mid-September 1995, followed by reminder correspondence six weeks later. This sample size represents all relevant agencies. The actual number of agencies (and functional **work** areas) that received a survey was somewhat less than the number originally contacted because of the dynamics of agency restructuring (for example, agency amalgamation, abolishment, privatization), despite best efforts to anticipate such movement. The 64 questionnaires returned represented a 40 percent response rate. Upon receipt of completed surveys, follow-up telephone interviews were conducted with individual agency officers to clarify written responses or where it was felt that additional detail might provide insights into agency decision making. The results of the primary research were also validated against the annual reports and corporate plans of each agency.

## DISCUSSION

### **Agency Policy Making**

The most important and informative result obtained from the survey was that, ironically, no trends or patterns with respect to agency policy making,

or consideration of environmental issues during policy making, were identified. Notwithstanding the use of strategic objectives in guiding policy making, extensive analysis of all agency responses, including numerous permutations of the data, failed to find any consistent process through which agencies' policies were developed, structured, or formulated. Several categories were used to analyze the survey data, including (1) agencies' policy role—that is, whether they were policy-making, policy-responsive, or policy-advisory agencies; (2) agency jurisdiction—by state as well as the Commonwealth; and (3) agency sector (treasury, mining, water, agriculture, etc.). The survey data analyzed on the basis of these categories included:

- Agency policy evaluation;
- Inter-agency cooperation;
- Ministerial influence;
- Constraints to all levels of agency decision making (policies, plans, programs, and projects);
- Agency environmental expertise; and
- Constraints to considering environmental issues at all levels of decision making.

Other denominating factors, such as responses to particular questions in the survey, were used in an attempt to further delineate the results. Such questions included previous experience with EIA and the most appropriate point in the decision-making process to consider environmental issues. The results of this analysis showed that policy-making agencies failed to exhibit any discernible trends with respect to any of the aforementioned survey data, nor did policy-responsive agencies or policy-advisory agencies. Likewise no trends were evident when the survey data was analyzed as a whole, that is, when attempting to ascertain a picture of overall agency decision making within Australia.

While the absence of any trends or patterns in the analysis of the survey data may initially appear a disappointing outcome, quite the contrary is the case. The overriding conclusion of this result is the need to explicitly acknowledge the diversity and variation within *actual* policy-making structures of government agencies—not to rely on *ideal*, theorized policy-making processes. In fact, these results suggest that the generically applied policy process prevalent in much EIA and SEA literature is perhaps far too prescriptive; rather, agency policy making (at least in Australia) is characterized by a much more diverse, agency-dependent component.

The above conclusion is borne out by agencies' responses to the question of tiering. Agencies were asked to provide definitions for the terms *policy*, *plan*, *program*, and *project* as these terms applied to them, to state whether or not relationships existed between these terms and, if so, to give examples. While some agencies exhibited the tiered, hierarchical structure (that is, policies giving rise to explicit plans, providing for more explicit programs and projects) discussed by Wood and Dejeddour (1992), other agencies emphasized a more integrated system of decision making and planning, whereby policies provide "direction ... goals ... and outcomes" for subsequent decisions. Moreover, a number of agencies identified substantial feedback loops such that projects, programs, and plans provide outcomes and directions for future policy initiatives.

The diversity of responses to the question of tiering in decision making, coupled with the absence of any consistent agency decision-making trends, highlights the problem in applying any form of environmental assessment initiative to an ideal concept of policy or planning decision making. A more prudent approach, as has been suggested by others (see Boothroyd 1995; Sadler and Verheem 1996; Therivel et al. 1994), is to acknowledge and accept expressly the realities—not the ideals—of agency policy making as compared to other levels of decision making (plans, programs, and projects), and to account explicitly for this in developing future methods for policy (environmental) assessment. This was the primary rationale behind the present study—to detail, through the use of explicit raw data, the realities of agency policy making in Australia. It is these realities that must be further investigated and expounded so that they can be accommodated into the development of any method for policy assessment.

As a part of investigating agencies' approach to policy making in general, the questionnaire required agencies to define the term *policy* as it applied to them. Of the 64 responding agencies, 21 (33 percent) indicated that they performed explicit policy-making roles, while 16 (25 percent) acted either as advisory bodies to the government (or to their minister) or in response to directives or guidance from cabinet and/or their minister. The remaining 27 agencies (42 percent) failed to provide meaningful definitions of the term *policy* as it related to their agency operations. Based on the results, the responding agencies were categorized according to their policy role—policy-making agencies, advisory agencies, and policy-responsive agencies. As described above, however, further analysis of results on the basis of these categories failed to produce any discernible trends or patterns.

As the results of the survey indicate strongly an agency mission-dependent component with respect to policy-making procedures, it is crucial that more specific comparative data be obtained to assist in developing policy assessment methods. Ultimately, what may be required for policy assessment is the flexibility to enable it to be tailored to the characteristics of individual agency policy-making procedures, rather than the existence of generic methodologies that are applied irrespective of agency operating procedures.

A somewhat curious result in relation to the categorizing of responding agencies based on their definition of policy was evident. Although only **21** agencies acknowledged an explicit policy-making role, almost all of the agencies considered (or at least implied) themselves to have a role in policy making by responding to questions directed specifically to this activity. It is not, therefore, unreasonable to suggest that there exists a perception at an agency level that policy implementation is in fact a component of policy making. As such, actions and decisions taken at the level of implementation may require greater consideration within policy assessment in concert with policy making itself. The translation of policy objectives into action by appropriate agencies is one such issue of policy implementation that will need to be addressed in developing any methodology for policy assessment.

The perception of policy implementation as a component of policy making was evident in the strong link found between government priorities and the use of strategic objectives in guiding the large majority of agencies' policy making. All **64** agencies responding indicated that their decision making was guided by strategic objectives. In fact, the strategic objectives of **62** agencies (97 percent) were designed to achieve government priorities. Similarly, all but two agencies said that their policy formulation—and following from above, policy implementation—was guided by strategic objectives at least sometimes. While such a link is perhaps not unexpected, it does reinforce the necessity for political support for environmentally acceptable priorities to emerge and translate into strategic objectives and policies. The extent to which policy assessment may influence (directly or indirectly) such political support perhaps remains to be seen. Independent of this, the development of agencies' strategic objectives can be viewed as significant decision points within agency policy making to be targeted for integrating environmental factors, a consideration that needs to be reflected in the development of policy assessment methods.

The need for integration of environmental factors at such points is emphasized by the results detailing agencies' experience with policy performance evaluation. Fifty-five agencies (**86** percent) indicated that they evaluated the performance of their policies, 49 agencies (77 percent) using performance indicators in their evaluation, while internal review also proved a common method for 44 agencies (69 percent). In spite of strong support for the use of performance indicators in policy evaluation, comparatively little use of environmental indicators was evident, just 20 agencies (31 percent) employing their use. The lack of background information seemingly inhibited many agencies' decision making (as discussed in more detail later) and may well be a significant contributor to this result.

In redressing this situation, not only is a far more concerted effort in the collection of environmental data required, but also greater rigor in the application and end use of such data. In this sense a greater capacity for agencies to both access and use environmental data for policy formulation and evaluation is needed. This would require the establishment of greater support mechanisms for interagency cooperation, in particular for data sharing and transfer. Additionally, it may prove beneficial to explore the integration of environmental data with other performance indicators given the strong support for their use in policy evaluation.

### **Policy Decision Making and EIA**

The results from the survey provided a valuable insight into agency policy making, particularly responses concerning the consideration of environmental factors in decision making. Agencies were asked in the survey to indicate where, if at all, in the decision-making process it would be appropriate for them to consider environmental effects. The most popular response was during agency policy formulation (40 agencies, **63** percent). Slightly fewer agencies also indicated that the consideration of environmental effects would be appropriate for their agency as a part of plan or program decision making, and likewise as a part of project decision making. These results are especially interesting given agencies' responses when asked to indicate which methods would facilitate greater consideration of environmental factors during policy formulation. The use of **EIA** of policy as such a method was favored by just 11 agencies (17 percent).

Thus it is clear that the majority of responding agencies view policy formulation **as** the most appropriate point in the decision-making process for the consideration of environmental effects, a satisfying and substantial result for

the future of environmentally sound policy making. Less satisfying, perhaps, is the distinct rejection by government agencies of EIA of policies as a means of facilitating the consideration of environmental factors during policy formulation. The data indicate that agencies are willing to integrate environmental concerns into their policy formulation procedures, but not by means of a simple extension of **EIA** to the level of policy.

Such results strongly support the underlying premise of this paper—the necessity for the development of an alternative mechanism (to EIA-based methods) to ultimately achieve environmental integrated decision making. With little support for EIA of policy from those who will be most affected (that is, government agencies subjected to, or with the responsibility for carrying out, such an assessment), but strong support for integrating environmental considerations at the level of policy formulation, an alternative approach within Australia (and possibly elsewhere) is required. The extent to which these results mirror government agency decision making overseas will to some extent determine the applicability of the above statement outside of Australia.

It is important to note that fewer than half of all responding agencies (**29** agencies, 45 percent) indicated that they had been subject to EIA, just two of these being assessments of policy decisions. After further analysis of these agencies, it was apparent that previous experience with EIA **did not** bias agencies' preference or otherwise for EIA of policy.

### **Environmental Issues and Policy Decision Making**

In response to questions concerning the consideration of environmental issues in policy making, the survey data indicate that the majority of the responding agencies do consider environmental issues in their policy decisions. When questioned on international issues such as sustainability, preservation of biodiversity, and intergenerational equity, well over half of all agencies indicated that they did consider these issues during policy making. A similar story emerged for national initiatives (such as the national strategy for **ESD**, the national strategy for biodiversity, the national greenhouse strategy), as well as more local issues. In addition, agencies were asked to indicate whether any factors (**17** in all—for example, other agencies' interests, lack of background information) constrained their decision making at the policy level or constrained their consideration of environmental factors during policy formulation. It is important to note that more than half of the responding agencies **did not** consider any one factor to be a constraint to

their policy making, nor to their consideration of environmental factors during policy formulation.

Such results create numerous implications for the development of policy assessment methods. On one hand, these results may imply that agencies consider themselves to be giving environmental concerns due representation at the policy level where they feel few constraints operate dissuading such representation. This scenario poses an important question regarding the prospects of subjecting future government policy decisions to some form of policy assessment. If most agencies feel there is little constraining their consideration of environmental effects during policy formulation, and that little needs to be done to facilitate greater consideration of environmental issues (see following section), is it reasonable to expect little resistance to the assessment of such policies, independent of how it is carried out? With agencies attempting to integrate environmental concerns into their policies at present (as implied by most agencies' responses), an assessment of policy decisions would presumably bear this out, providing a substantial basis for consensual implementation of the policy. Given this, the rejection of policy EA by many agencies may well reflect concerns over the methods and principles associated with EIA, rather than the concept of environmentally sound policy making per se.

Alternatively, these results may indicate that agencies are not particularly aware of (or willing to accept) the importance of integrating environmental considerations into policy formulation. Agencies may not be giving environmental issues the priority they require, therefore perceiving little difficulty (and few constraints) in considering the environment in general. If such agency indifference and bureaucratic inertia is the case, there exists the potential for more barriers to the application of some form of environmental assessment at the policy level. It is exactly these types of issues that require much further and more specific investigative attention as part of the development of policy assessment methodologies.

As mentioned above, agencies were asked to indicate those methods that would facilitate greater consideration of environmental factors during policy formulation. Better access to environmental information (30 agencies, 47 percent), greater financial resources (29 agencies, 45 percent), a higher level of political support (22 agencies, 34 percent), and enhanced environmental expertise within agencies (20 agencies, 31 percent) were the most popular methods. Surprisingly, of 15 agencies indicating they were without their own

environmental expertise, just two were included among the 20 agencies supporting enhanced environmental expertise. Again however, these results indicate that more than half of all agencies responding were of the opinion that such changes would **not** facilitate the consideration of environmental factors during their agency's policy formulation. **As** discussed above, this may reflect agencies' perceptions that little needs to be done to improve the environmental content of their policies, or that the priority being paid to environmental considerations during policy formulation is perhaps not as high as environmentally sound policy making may require. Follow-up investigations to determine the exact nature of these results is obviously an immediate priority for the development of policy assessment.

In analyzing such responses, however, it is encouraging to note the number of agencies recognizing the necessity for environmental providence in policy formulation. **As** indicated above, better access to environmental information and additional resourcing to consider environmental effects were the two most favored methods to facilitate greater consideration of environmental factors during policy making—amounting to an implicit acknowledgment on the part of at least some agencies that greater attention must be focused upon environmental considerations to enhance policy formulation.

### **Decision Making at the Project and Policy Level**

To investigate the viability of extending project level EIA upwards to consider the effects of policy decisions, the questionnaire sought to identify the major constraints acting against decision making at both the project and policy level. First, agencies were asked to indicate which factors constrained their decision making for project and policy decisions. Although as noted earlier, many agencies considered no constraints to exist, those that did identify constraints provided an interesting picture of project and policy decision making. **At** the project level the most common constraint was seen as insufficient financial resources as indicated by 36 agencies (56 percent), while community concern and lack of background information were each cited by 17 agencies (27 percent) as constraints to project level decisions. However, at the level of policy making, a different story emerges. Ministerial direction (27 agencies, 42 percent) was seen as the most common constraint to policy decisions, closely followed by other agencies' interests (26 agencies, 41 percent) and lack of background information (23 agencies, 36 percent).

Agencies were also asked to indicate which factors constrained their consideration of environmental issues during project and policy decision making. Again, perhaps not unexpectedly, insufficient financial resources was the major constraint at the project level (26 agencies, 41 percent). Lack of background information and other agencies' interests were the next two most common constraints. At the policy level, lack of background information was cited as the major constraint (27 agencies, 42 percent). Similar to the constraints for general policy making, other agencies' interests (18 agencies, 28 percent) and ministerial direction (17 agencies, 27 percent) were common constraints, as was insufficient financial resources (17 agencies).

Although there appears some overlap in constraints to decision making at both levels, that is, lack of background information and other agencies' interests, these results do indicate that the major constraints encountered in decision making at the project level are in fact distinct from those encountered during policy making (as maintained by Therivel et al. 1992), most notably insufficient financial resources and community concern. Similarly, constraints such as ministerial direction are much more pronounced in policy decisions than project decisions.

Quite clearly, these anomalies hold substantial implications for the notion of extending project-level EIA to include policy decisions. It may be the case that refining EIA at the project level in anticipation of its application to the policy arena will do little to address those decision-making constraints intrinsic to the policy arena. Whilst project EIA may prove an incremental tool in effecting policy change in the long term, the refinement of project EIA would likely fail to address problems specific to policy making and the policy process in general and, in particular, constraints to decision making far more pronounced at the policy level such as ministerial direction. In this instance, an alternative approach to policy assessment such as that advocated in this paper must accommodate not only the nature of policy making as contrasted to project decision making, but also the particular constraints faced by those agencies that have attempted to consider environmental issues during their policy making, as well as the role played by these agencies in the policy process (c.g., policy making, policy implementing, or responsive).

In a similar manner to general policy and project level decision-making constraints, a distinction could be made between problems encountered in general agency policy making and those in integrating environmental considerations into policy formulation and decision making. As indicated

previously, the most commonly reported constraints to general policy decisions were seen as ministerial direction, other agencies' interests, and lack of background information. The most commonly reported constraints to the consideration of environmental issues in policy decisions were lack of background information, followed by other agencies' interests, ministerial direction, and insufficient financial resources.

Agencies were also asked to list the three most frequent constraints to both policy formulation and the consideration of environmental issues during policy formulation. In both cases, lack of background information was the most frequent constraint; however, this was far more pronounced when considering environmental issues in policy formulation than general policy formulation. Ministerial direction and other agencies' interests were the second and third most frequent constraints to general policy formulation, while insufficient financial resources and other agencies' interests were frequent constraints to considering environmental issues in policy formulation.

While constraints to agency policy making and the consideration of environmental issues in policy making appeared somewhat similar across the board, it is evident that the lack of background information is perhaps a more prominent constraint to the consideration of environmental issues in policy formulation than general policy decisions. Insufficient financial resources appears to have a similar influence on both general policy formulation and the consideration of environmental issues, while ministerial direction and other agencies' interests have much greater influence over general policy formulation than the consideration of environmental issues.

Such discrepancies within the policy domain again highlight the need for more attention regarding both the collection and application of environmental data, particularly with agencies' citing the lack of background information as the major constraint to the consideration of environmental issues within policy formulation, and to a lesser degree the major constraint to general policy making. This problem should foreshadow a much more stringent link between higher level decision making and state-of-the-environment reporting. Databases of environmental information need to be established with the prime objective, among other things, being the ability to integrate such environmental data into agency policy making procedures. The fact that many agencies have recognized the lack of available data as a constraint to considering environmental concerns perhaps implies a willingness on the part

of government bodies to do more to enhance policy formulation in terms of environmental content.

## DESIGN GUIDANCE AND RECOMMENDATIONS

At the beginning of this paper it was asserted that the survey results could be used to provide guidance and/or recommendations for future developments of policy assessment methodologies. The following is a summary of the major findings of this survey, with particular reference to those findings of relevance to the development of **PA**.

The survey produced two major findings of significance for **PA**:

1. *The need **for** an alternative mechanism to EIA-based methods in developing a policy assessment system.*

This assertion has not only been identified by reference to other authors (see Boothroyd 1995; Therivel et al. 1992), but also supported by the raw data of the survey that shows a distinct rejection of policy **EIA**, the differing decision-making constraints acting at policy and project levels, and the integrated/feedback nature of much agency policy making that does not appear to follow a prescribed decision-making pattern.

2. *The need to account **for the realities of agency policy making**, and not to rely on the ideal or theorized view of a generic 'policyprocess'.*

The survey data showed to a large extent the diversity within agency policy making procedures in Australia such that reliance on a generic, idealized view of policy making would prove unsuitable for developing effective policy assessment methods.

In addition to these findings, a number of further issues must be considered in the development of policy assessment methods. The survey data indicates the need to—

- \* Acknowledge an agency-dependent component within policy making.

- Account for the nature of policy making as contrasted to project decision making.
- Account for particular decision-making constraints faced by agencies attempting to consider environmental issues during their policy making.
- Account for the varying policy roles of government agencies.
- Consider policy implementation as a component of policy making.
- Target agencies' strategic objectives as significant decision points within agency policy making.
- Develop more stringent links between higher level decision making and state-of-the-environment reporting.
  - Establish databases of environmental information with the view to integrating such information into policy-making procedures.
  - Apply greater rigor in the collection and end use of such environmental data.
- Establish a greater capacity for agencies to access and utilize environmental data.
- Establish greater support mechanisms for interagency cooperation.
- Explore the integration of environmental data with other performance indicators as a means of enhancing policy evaluation.

The survey data also brought to light a number of areas within policy assessment research that require more specific attention. In designing future policy assessment research strategies there is a need to, among other things—

- \* Investigate further agency policy-making procedures to develop a more precise understanding of the realities of agency policy making.
- Determine more explicitly agency attitudes toward the consideration of environmental issues during policy making.

- Determine why agencies feel there are few (if any) constraints to policy making and the consideration of environmental issues during policy making.
- Determine why many agencies feel that little needs to (or should be) done to facilitate consideration of environmental issues during their policy making.

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