



Comprehensive Sustainability Assessment Policy (CSAP) Tool

**A Guide and Framework on how to incorporate
Sustainability into the making of Policies, Programmes and
Projects.**

**PUBLIC SECTOR MODERNISATION UNIT
OFFICE OF THE CABINET**

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PREFACE

INTRODUCTION

1. Under the Government of Jamaica's Public Sector Reform Programme, the Cabinet Office is mandated to design and implement initiatives that will modernize government and governance processes in the country. One of the key elements of the modernization strategy and programme is to revise the way in which policy making is conducted. This approach calls for policy making that is sustainable and evidence based. Policies should be sustainable both in terms of cost and relevance over time. In fact, the Modernisation Vision and Strategy Paper (MVSP) describes sustainable development as the overarching framework for the achievement of national goals and public sector reform.
2. The overall goal of this Comprehensive Sustainability Assessment Policy (CSAP) Tool *is to improve the responsiveness of public policies to the needs of the public*. It is being designed to support the policy making process in terms of identifying the most critical strategic considerations that should be taken into account in the formulation of government policies, programmes and projects. It is being designed against the background that policy formulation is a process that must be strategic and well thought through in order to ensure that policies and programmes are created in an environment which is cognizant of the fact that such functions are carried out within an ever changing local and global environment.
3. This guide proposes a practical way in which you can determine the sustainability of planning activities and build sustainability into national decision-making. The assessment mechanism is presented as a sort of checklist that will help you in making these decisions.

SECTION 1

Objective of the CSAP

4. An essential function of technical personnel within government ministries and agencies is to provide policy makers (Cabinet Ministers) with options that have been fully investigated and appraised. Technical personnel are expected to provide sound and objective advice which should be used to assess the extent to which policies are feasible and will contribute to the government's objectives towards sustainable development. The CSAP is geared at supporting this critical function. The objective of the CSAP Tool is therefore:
 - to establish a standard for ensuring comprehensiveness and consistency in the quality of public policies across ministries; and
 - to support ministries in assessing the sustainability of a proposed policy option prior to approval and implementation.
5. The Tool raises questions which policy advisors need to address in making policy prescriptions that are responsive, relevant and consistent with national development goals and relevant to existing and emerging global conditions. They then have to make judgments between costs and benefits and decide on the most appropriate compromise in terms of sustainability. The Tool can be seen as an approach for modernizing government's policy making process and supporting the strategies articulated in the MVSP.

What is Sustainable Development?

6. The MVSP defines sustainable development as "an ongoing process" with actions which integrate the need for social development, economic opportunity and environmental protection to meet the needs of present and (future generations). While not explicit, it is felt that inherent in this definition is the consideration of emerging global and regional trends, patterns and standards that are likely to have an impact locally. Therefore the definition implies that for development to be sustainable there should be:
 - Social progress which is guided by inclusiveness,
 - Economic growth and employment considerations and opportunities for all,
 - Prudent management of existing natural and cultural resources and care in maintaining acceptable carrying capacity levels of the natural environment and

- Governance systems and values (institutional arrangements, peace, justice, preservation of cultural values and heritage, etc.) that facilitate the above.

In an ideal situation, a sustainable policy, programme or project would promote benefits in all of the above areas. However, in practice this is difficult to achieve. Sustainable policy making, therefore is essentially about trade-offs between costs¹ and benefits. By considering the complete range of possible impacts of a proposed intervention, it should be possible to identify the relative sustainability offered by different delivery options. This is vital information for the decision making process.

7. Sustainable policy making should involve integration of efforts and collaboration among ministries and agencies. An open and participatory style of policy making is therefore required in using this Tool.

Sustainable Development and Specific Ministries and Agencies

8. Ideally, each ministry and agency of the government should have a clear understanding of its role in supporting the sustainable development goals of the country.² In other words, policy advisors should be clear about the impact of their work on social progress, the natural and physical environment and the economy. This will guide the development of ministry/sector specific policies, programmes and projects.

The Comprehensive Sustainability Assessment Policy Tool

9. The Tool is designed to support policy makers and policy advisors as well as those responsible for designing and managing projects in making decisions and formulating quality advice that takes account of all aspects of sustainable development. It is crafted to:
 - Consider the full range of effects that a policy or programme might have, so that comprehensive advice covering all angles, can be provided. This will minimize the risk of unexpected drawbacks and policy conflicts.
 - Align resources to critical national priorities.

¹ In the context of the CSAP, the term cost is used to mean full cost accounting, a principle of sustainable development to which the public sector has committed. As noted in the MVSP, full cost accounting will be incorporated into all government policies, programmes and projects. It is an accounting framework which requires the recording of all costs associated with the generation and use of a product or service, including raw material collection, production and disposal of wastes (p. 14).

² A National Sustainable Development Framework is currently being developed.

- Assemble evidence in a systematic way to provide a summary of the likely impacts of an intervention and the likely scale of these impacts. This will support transparency in decision making.
 - Encourage the input of specialist guidance where in-depth consideration of the potential impact is needed.
 - Be used at different levels of the policy process.
10. The CSAP also supports the implementation of commitments by the government through initiatives such as: Jamaica Social Policy Evaluation Project: Jamaica 2015 (JASPEV), the Strategic Environmental Assessment Policy (SEA) , the Modernization Vision and Strategy Paper (MVSP), the Medium Term Socio-economic Framework (MTF) and Gender Analysis Checklist.

JASPEV was developed by the Cabinet Office and is a framework and Action Plan for the development of social policy. The principle of partnership among communities, policy makers and technocrats is espoused as the way for planning and decision making.

The SEA Tool has been developed by the Cabinet Office as a guide for including environmental considerations in the policy making process.

The MVSP was developed by the Cabinet Office and articulates the government's commitments and strategies for a reformed and customer oriented way of providing services.

The MTF was developed by the Planning Institute of Jamaica and outlines the government's commitments and areas of focus for a specific planning period. The current period is up to 2007.

The Gender Analysis Checklist was also developed by the Cabinet Office and serves as a guide to determining how policies and programmes are likely to impact men and women, girls and boys.

Cross-cutting Considerations in the Policy Process

11. There are several major cross-cutting issues that should be considered in the policy process and which make for more sustainable policy making. As expressed in *Jamaica 2015*, **effective governance systems and practices** is one of those issues. It is recognized that good governance is fundamental to the strategic objectives of the

government. It facilitates open and trusting relations between the government and civil society.³

12. Another is **gender considerations**. Gender equity and consideration of the differential impact of policies on women and men as well as boys and girls are essential to sustainable development. Several government institutions have undertaken initiatives to mainstream gender analysis in their operations and the creation of a national policy on gender is being prepared.⁴ It is worth noting also that the promotion of gender equity and equality is one of the UN Millennium Development Goals, an international set of targets to which Jamaica is committed.
13. A third consideration is the **availability of the requisite resources** to facilitate policy development and implementation. Resources include but are not exclusive to financial, technical and human resources.

Regional, Global and Emerging Considerations

Jamaica is part of a wide world economy and therefore consideration of global and emerging issues is a priority in policy making. In formulating national policy, Jamaica must take into account developments at the bilateral, regional, hemispheric and international levels. In this regard, it is imperative that consideration be given to whether or not changes to existing policies and new policies are in keeping with Jamaica's international obligations as well as how international obligations is likely to affect a policy course, option or outcome.

At the bilateral level, policy makers have to consider the likely political, economic and social impact on Jamaica's relationship with the developed countries, particularly those with whom it has a very close relationship, e.g. with the USA, Canada, and the European Union. In addition, policies can result from or impact on Jamaica's relationship with other developing countries or groups of developing countries with whom Jamaica has formed political and economic alliances. Such developing countries and groups include Cuba, Venezuela, among others.

Jamaica is a member of various regional and international institutions the activities and decisions of which affect policy making. Of great significance is Jamaica's membership of the regional integration body, the Caribbean Community (CARICOM) of which the Single Market and

³ See the *Medium Term Socio-Economic Policy Framework: 2004-2007*. Governance is addressed on p 49.

⁴ See the MTF and Jamaica's Progress Report on the Millennium Development Goals (both are available on the PIOJ's website). See also the *Gender Analysis Checklist* and the *Gender Equity Mechanism Toolkit* for the PIOJ. Both are available from the Cabinet Office.

Economy (CSME) now requires the coordination and harmonization of trade and economic policies among Member States. At the hemispheric level, Jamaica is an active member of the Organization of American States (OAS), which continues to play an important role in the development of our foreign policy. In addition, Jamaica is also a member of the United Nations and other international organizations. Jamaica is also a member of the Commonwealth, a significant source of technical assistance.

Jamaica is a signatory to a wide range of bilateral and multilateral agreements and treaties, the provisions of which should be taken into account in the formulation of policies.

With globalization, a changing political and economic environment, and continuing advances in science and technology, new issues are emerging daily in health (HIV/AIDS, SARS, Avian Flu), security (terrorism, drug trafficking, transnational organized crime), movement of people (refugees and human trafficking), in science, technology and ethics, the environment and trade and economics, which require Jamaican policy-makers to monitor closely developments at the regional, hemispheric and international levels.

Use of the CSAP in the Policy Process

14. The Office of the Cabinet has a clearly defined interpretation of the policy process.⁵ The process has six main steps, set out as follows:

- Initial advisory to Cabinet
- Preparation of Concept Paper
- Preparation of Policy Development Plan
- Policy preparation and analysis
- Public consultations and reviews
- Submission to Cabinet for approval

The CSAP is designed for use at all levels of the policy process. Key to the process is participation and open discussions with stakeholders and partners. The application of the Tool will encourage a minimum set of criteria for determining feasibility at each stage of the process.⁶

15. For the **initial advisory to Cabinet**, you will need to have an understanding of the issues that have led to the need for a policy. Based on the principles outlined in *Jamaica 2015*, these issues must be informed by public participation. You will also need to know whether

⁵ See *The Process of Policy Development*, Cabinet Office.

⁶ See also *Jamaica 2015* (p.44) for complementary steps to improve the quality of the policy making process.

the policy will support your organisation's strategic goals and objectives and how it relates to government policy. This preliminary policy analysis will normally be done before the CSAP is applied but the Tool can be used in determining the above.

16. The **preparation of the Concept Paper** is the initial "develop" phase of the policy cycle and is where an initial assessment against the CSAP can be applied. This assessment should involve an investigation of the different delivery options against the framework of questions and completing a table of responses. It should also include research findings; finance/budgetary implications; linkages to national priorities etc. (see section 2 for details).
17. Once the go-ahead is given by Cabinet, the **Policy Development Plan** can be prepared. The Plan should include timelines and resources. At this stage also, the CSAP will assist in determining whether there is the need for more in-depth analysis such as the need for a strategic environmental assessment or a social assessment.
18. Like all policy assessment methods, the CSAP needs to be part of an iterative process. As policy prescriptions are developed, changes made and more information becomes available, the assessment should be revisited and updated.
19. The iterative process would continue with the **policy preparation and analysis** and **public participation and review** stages of policy development.
20. Cabinet can also use the CSAP to determine whether the policy should be approved. The potential impacts and risks identified, using the CSAP, can assist in identifying criteria against which evaluation can be done.

SECTION 2

ASSESSING POLICIES, PROGRAMMES AND PROJECTS USING THE CSAP

21. Using the CSAP enables you to assess your policies, programmes and projects against a set of questions that covers all aspects of sustainable development (economic, social and socio-cultural, environmental, and governance). It also helps you to determine the distributional effects⁷ of the intervention, the costs versus the benefits and an analysis of the risks involved. The process is set out in a tabular form which allows for the various areas/factors under consideration to be worked out methodically and using empirical evidence where relevant. It allows for consultation and the identification of partners as well as key stakeholders in the policy process. The Tool also permits a more objective and balanced way of making policy decisions. The output from the assessment will be a completed CSAP Summary Table that identifies all of the possible significant impacts that a policy or programme may have. A blank CSAP Summary Table is at Annex 1 and electronic versions can be found at www.cabinet.gov.jm.

To What Policies, Programmes and Projects can the CSAP be Applied?

22. The CSAP may be applied to any policy, programme or project, decision that is likely to impact national development. In some cases, an initial review may be sufficient while in others full use of the Tool may be the best option. This is because sustainability implications are not confined to specific types of policies, decisions or projects.

When to Use the CSAP

23. The Tool may be used at any point in the policy cycle to ensure sustainable outcomes and that the costs and risks, in particular are continuously assessed.

Who Should Use the CSAP?

24. The CSAP is designed for use primarily by policy analysts and policy advisors.

How to Use the CSAP

25. Use of the CSAP may be determined by a range of factors such as the magnitude of the issue or decision to be made, the complexity of the policy or programme, the political implications or even the interdisciplinary nature of the intervention. Usage is left up to the

⁷ Distributional effects refers to the different groups of people which the intervention will affect e.g. youths, the elderly, persons in poverty, women and men. It may be appropriate to treat discrete groups differently.

respective policy analyst and team. It is possible for one person to complete the Summary Form. This might be a sensible approach when the issue is pretty straight-forward. However, for more complex prescriptions the CSAP should be applied with a small multi-disciplinary (i.e. one that has representation of the three main tenets of sustainable development) team. This type of approach will permit the issues to be assessed from all angles.

26. The degree of detail to be entered in the CSAP summary will vary but should be proportionate to the issue and any potential impact. At this initial stage, the aim is to identify potential significant impacts for further consideration. Along with identifying likely impacts, also note where there are uncertainties that may give rise to significant impacts, and which therefore would need further assessment.
27. It is possible that no significant impact is identified against some of the questions. Where this occurs, a statement such as “No impact identified” is acceptable. It is also recommended that you give brief explanations, where appropriate, so that persons can understand the reasoning behind any assertion.

Are Considerations Limited to Impacts on Jamaica?

28. Even though your focus is on assessing the impact of interventions on Jamaica, it is essential that you also examine (where relevant) the impact of a policy on other countries. For example, for issues related to trade, one would need to determine the impact on trade relations with other countries or regions. The same applies to impact on international protocols, conventions, environmental matters, etc. Be realistic however, and consider only those impacts which are quite significant and relevant.

Where to Get Advice about Using the CSAP

29. Issues related to sustainable development can be wide and varied. In some cases, technical expertise is necessary. The Public Sector Reform Unit and the Policy Analysis and Review Unit (Cabinet Office) may be good places to seek initial information. Other agencies are the Planning Institute of Jamaica (PIOJ) which has a Sustainable Development and Regional Planning Division. The PIOJ is also a good point of reference for economic and social issues. Additionally, sources of advice include:
 - a. websites of government ministries and agencies. Many are current and are user friendly
 - b. websites of international organisations e.g. UN bodies, the U.K. Department for International Development and the Commonwealth Foundation

- c. academic bodies e.g. universities, documentation centres of some government agencies and ministries e.g. the PIOJ

Consultation and Participation

30. The CSAP encourages consultation with and participation of stakeholders and partners in the development and design of policy. This is in keeping with the government's stated commitment to openness in communication between government and the wider society, transparency and "effective accountable governance" (Jamaica 2015). In a similar manner, consultation on the sustainability of policies is encouraged. This is important for several reasons:
- a. assumptions can be confirmed
 - b. stakeholder support and ownership is more likely to be secured
 - c. the assessment is made open to wide expert analysis
 - d. additional information is gathered
 - e. stakeholder views are sought and received about where the balance between costs and benefits lies and whether this is acceptable.

A Consultation Code has been developed and this should be used as a guide for consultations.⁸

Presentation of the CSAP Analysis

31. You may determine how best to present the CSAP analysis. One way is simply to reproduce the completed CSAP table; another is to produce a narrative summary. Both could also be presented together.

Completing the CSAP Summary Table

32. The following pages are designed to guide you through the CSAP Summary and how to complete it. Where possible, reference is made to other sources for more detailed information and guidance. Some are included as annexes to this Tool. (Annex 1 has a copy of the Summary Table).
33. Bear in mind that your initial assessment will be used to identify significant potential impacts that may result from the proposed initiative– both positive and negative. In this context, significant would imply any impact that would warrant further consideration. This includes instances where the degree of impact is uncertain but could be significant.

⁸ The Consultation Code is available at www.cabinet.gov.jm

34. The questions used are more or less of a generic nature and therefore serve as a guide. This means that you can tailor the instrument to meet your organisation's needs.

SECTION 3

The Comprehensive Sustainability Assessment Policy Tool Framework

The first page of the CSAP describes the policy, project, programme or other activity as well as its purpose and strategic objectives. It is important that this description is clear in order to facilitate effective communication during consultation as well as to focus the assessment.

Name of Ministry/Agency	Division	Contact Person
Policy/Project Title	Make sure to use a title that is clear and aids understanding of the issue.	
Brief description of the policy, project, etc.	Give just enough information for someone to understand the nature of the proposed intervention.	
Purpose	Indicate the overall goal of the proposed intervention and what is the intended outcome. Does it support the government's plan for sustainable development?	
Objectives	What are the main objectives of the policy, programme, etc? How do fit with the ministry's/agency's strategic objectives?	
Success criteria	What outcomes are being sought? How will these be measured?	
Base case	State the base case against which the intervention is being compared for the purpose of appraisal.	

You may add columns to this framework, depending on your needs. The areas of focus are not presented in any order of priority.

While recognizing that in instances, some questions will not be relevant to all policies, it is important that you give consideration to all of the questions. Also, bear in mind that you can modify the CSAP to suit your organization's needs.

AREA OF FOCUS BY SECTOR	FACTORS TO CONSIDER	FURTHER INFORMATION/ REFERENCES	SCORE
GENERAL CONSIDERATIONS	<ul style="list-style-type: none"> ▪ Does the policy support Jamaica's identified development priorities? (50 points) ▪ Are sufficient data available to inform the policy? Are data disaggregated by sex and by population segment? ▪ Is institutional capacity available to do a gender analysis of the policy? ▪ Have the priorities of the target beneficiaries been ascertained? How are these being considered? ▪ Does the target population or the key stakeholders need to be sensitized and/or mobilised? ▪ Have you thought of ethical factors (e.g. principles governing particular populations, religious convictions, cultural beliefs, etc.) that could affect or be affected by the policy? ▪ Is there a need for inter-sectoral collaboration? ▪ Is there a need for training? How will this need be financed? ▪ Have key scientific and technological considerations been enunciated? ▪ Will these impact or be affected by the policy? ▪ Will the priorities of IDPs impact the policy? ▪ Has a monitoring and evaluation framework been developed? 	<p>These are some basic considerations that are applicable to policy development. You are encouraged to be as specific as possible as this will assist in proper targeting/focusing of the intervention which in turn enhances sustainability through better planning.</p> <p>It is almost inevitable that all policies will come at a cost to the government. What is important is that you note the significant costs and how these will be addressed in way that will enhance the sustainability of the policy.</p> <p>Be reminded that a gender analysis should be done at each stage of the policy cycle.</p> <p>References: National Industrial Policy The budget</p>	<p>Maximum 200 points</p>

AREA OF FOCUS BY SECTOR	FACTORS TO CONSIDER	FURTHER INFORMATION/ REFERENCES	SCORE
SOCIAL CONSIDERATIONS	<ul style="list-style-type: none"> ▪ Will the policy give support to the country's poverty eradication strategy? ▪ Has the policy given consideration to the poor – rural and urban? ▪ Will the policy impact an area of national security and human security? ▪ Will the policy impact criminogenic conditions i.e. conditions that are likely to cause criminal behaviour? ▪ Is the policy likely to impact human rights? ▪ Does the policy have implications for social and institutional justice? ▪ Will the policy impact women and girls, men and boys? What is the desirable outcome? How will inequity be addressed? ▪ Has consideration been given to men, women and children in poverty? ▪ Will the policy impact men and women's access to, use of and control over resources? ▪ Are socio-cultural and inherent differences between women and men likely to affect the outcome of the policy? ▪ Is it important for planned activities to involve women and men? ▪ Will the policy contribute to the development of human capital? ▪ Is the policy likely to impact homogeneous populations such as young children, youth, the elderly, persons with mental, psychological and physical disabilities, incarcerated populations, etc.? ▪ Will the policy impact the quality of life e.g. access to health care, education and 	References: <ul style="list-style-type: none"> ▪ Ministry Paper #13 (NPEP) ▪ Medium Term Socio-Economic Policy Framework (including Social Policy Matrix) ▪ Jamaica 2015 ▪ Consultation Code ▪ Policy on Strategic Environmental Assessment ▪ Gender Analysis Checklist (GAC) ▪ PIOJ Gender Equity Mechanism Toolkit ▪ Jamaica's Report on the MDGs ▪ National Development Plan – 2030 Plan ▪ Vision 2025 – SD Framework ▪ Child Care and Protection Act ▪ Tourism Master Plan ▪ Policy on National Culture 	Maximum 200 points

AREA OF FOCUS BY SECTOR	FACTORS TO CONSIDER	FURTHER INFORMATION/ REFERENCES	SCORE
	<p>appropriate sanitation?</p> <ul style="list-style-type: none"> ▪ Is the policy likely to enhance social values and attitudes? 		

AREA OF FOCUS BY SECTOR	FACTORS TO CONSIDER	FURTHER INFORMATION/ REFERENCES	SCORE
ECONOMIC CONSIDERATIONS	<ul style="list-style-type: none"> ▪ Is sufficient budgetary support available for full policy implementation? Consider existing resources. ▪ Will the policy impact on your ministry's/agency's budget e.g. salaries, procurement of goods and services? ▪ Will it impact the tax base, especially as it relates to the informal economy? ▪ Will the policy impact real interest rates? ▪ Will it impact on the real sector (tourism, distribution, agriculture, mining small business, manufacturing, construction and housing)? ▪ Will it impact international/regional trade relations? ▪ Will it impact stakeholders and economic agents such as small businesses, the self-employed and the Cooperative sector? ▪ Will the policy be attractive to the private sector and to investors? ▪ Will the policy impact rural and urban development? ▪ Will it impose any "burdens" on the public/consumers? How will this be dealt with? ▪ Will the policy improve the quality of life of the consumer? 	<p>Economic policies can impact differently on various groups and sectors. Make sure to consider the distributional effects of the proposed intervention.</p> <p>References MTSF (see in particular the policy matrix)</p> <p>Policy on SEA Tourism Master Plan Consultation Code</p>	<p>Maximum 200 points</p>

AREA OF FOCUS BY SECTOR	FACTORS TO CONSIDER	FURTHER INFORMATION/ REFERENCES	SCORE
ENVIRONMENTAL CONSIDERATIONS	<ul style="list-style-type: none"> ▪ Does the policy have outcomes which will negatively affect natural resources such as aquifers, sensitive coastal areas and forests? ▪ Does the policy have a direct or indirect outcome that is likely to negatively affect the achievement of the country's environmental quality goals? ▪ Does the policy involve a new process, technology or policy delivery arrangement that may have significant environmental implications? <p><i>If your response to any of the above is in the affirmative, a more complete environmental analysis is needed (See Appendix 6 - the Environmental Checklist of the SEA Policy). The results from the Checklist should determine the score for this section.</i></p> <p><i>Please note that if the identified effects are beneficial, the application of the SEA would be for information only since the overall score would not be affected. For example, if the answers to the first two questions are "no" and the answer to the third question is "yes" with positive benefits to the environment, the score would remain at 200.</i></p> <p><i>If responses to all questions are in the negative, no further analysis is required.</i></p>	<p>It is important that you refer to the Policy on Strategic Environmental Assessment to sufficiently consider any (positive or negative) environmental implications of your policy. Step by step guidance is provided in the SEA policy. This instrument is currently in draft form and available at www.cabinet.gov.jm.</p> <p>The questions on the left were taken from the SEA policy (P.29) and are designed to assist you in doing a preliminary scan.</p> <p>References SEA Policy MTSF GAC Cabinet Office Policy Register</p>	<p>Maximum 200 points</p>

AREA OF FOCUS BY SECTOR	FACTORS TO CONSIDER	FURTHER INFORMATION/ REFERENCES	SCORE
CONSIDERATION OF STRATEGIC AND EMERGING ISSUES	<ul style="list-style-type: none"> ▪ Have you considered emerging global trends that are likely to affect policy implementation in the short to long term? ▪ Has consideration been given to population changes (including demographic ageing, internal and external migration) and how these are likely to affect your policy in the medium to long term? ▪ Are conditionalities under CSME likely to affect your policy at various stages of implementation? ▪ Are provisions and agreements under regional and international arrangements likely to affect the policy at various stages of implementation? ▪ Have you considered how the policy will affect Jamaica's ratings internationally e.g. in areas such as human trafficking, human rights and corruption? ▪ Does the policy have the potential to trigger and/or increase the country's vulnerability to acts of terrorism? ▪ Is the policy sufficient to counter vulnerabilities to acts of terrorism? 	<p>You should remember that domestic policy making must be done within the context of current and emerging global realities. Many of these are likely to affect your policy at one stage or another.</p> <p>References: Economic and Social Survey of Jamaica</p>	<p>Maximum 200 points</p>
ALL SECTORS			

Risks

It is very important that an analysis of risks be done in the policy making or programme planning process. This is especially so as regards the

implementation of the initiative. A policy may be acceptable in terms of sustainability but there may be challenges in actual delivery. Your risk analysis could be structured as follows:

Summary of Main Risks	Recommendations on How Best to Address Risks
1. Inadequate budgetary support	Record how this is likely to impact delivery of the policy both in the long term and in the short term. It is more critical for the long term (sustainability).
2. Cultural Factors/Stakeholder Rejection	Consider the strategies that may be useful in counteracting negative cultural factors. Are these factors strong enough to cause an abortion of policy delivery?
3. Political Unfeasibility	Consider possible strategies which could make the policy politically feasible before discarding. Strategies could include strategic partnerships and the targeting of specific populations.
4. Consumer behaviour	If consumer behaviour can be negatively influenced by other factors, put in place a plan to counteract this change.

SECTION 4

Assessing Sustainability, Costs and Benefits: Making Decisions

35. Although the CSAP will help policy makers to do a reasonable estimate of the potential impact of delivery options⁹, it does not provide this information in a quantifiable form. Informed judgement is the basis on which the Tool can be used to determine whether a delivery option is likely to be sustainable or not, given the potential impact on the three main elements of sustainable development (social, environmental and economic considerations). The CSAP allows for costs to be measured against benefits; and in this case, long term as well as short term costs and benefits are important considerations.

Furthermore, the Tool should be viewed as an instrument for encouraging specialist dialogue and input in the formulation of policies and programmes. It encourages consultation, dialogue and consensus around key issues.

Determining sustainability

36. A sustainable policy or programme option is ideally one that is beneficial to the target population, is not detrimental to any aspect of social or economic development, and does not cause any harm to the natural resource base. This is desirable but is not often achieved. By assessing the degree of sustainability it will be possible to determine the most suitable options for achieving the desired outcome(s); and to also decide whether the level of sustainability is acceptable.

How sustainable is a policy or programme?

37. Making a decision on how sustainable a policy or programme will be involves a process similar to cost/benefit analysis. Unlike the cost/benefit analysis however, special attention is paid to any negative impacts that could undermine the delivery of the policy, particularly in the long term. It is these concerns that determine sustainability, not an absolute balance between benefits and costs.

⁹ In the policy making process, different options for delivering the policy should always be considered. The most cost-effective option should be used to implement the policy.

Rule of Thumb for Policy Makers

- Always consider different options for your policy or programme.
- A formula worth remembering is:
Optimizing benefits + Minimizing Costs = Enhanced Sustainability

Analyzing sustainability

38. The following approach may be used to determine sustainability of your policy and programmes. Here again, determining sustainability is somewhat subjective and judgemental. As agreed in the various consultations for the different drafts of the Tool, a quantitative measurement approach is likely to defeat the purpose of the Tool. What this approach enables you to do is to think critically and long term about the delivery options that are available to you; and to determine the magnitude as well as the likely short, medium and long term impact of your options.

The approach requires that you identify the most critical considerations (sub-categories) for implementing each policy option in terms of the social, environmental and economic impact. It requires that you take into account the costs as well as the benefits in analyzing each option. Note, however, that the interpretation of impact may be different within and across disciplines. For example, moderate impact in environmental terms may necessitate a full re-consideration of a policy option; while in economic terms the nature of moderate impact may not require such a consideration. Examples 1-3 give examples of how to analyse sustainability. Box 1 makes a recommendation on how scoring could be done.

Box 1: Scoring to Determine Sustainability

General Considerations	maximum 200 points
Social Considerations	maximum 200 points
Economic Considerations	maximum 200 points
Environmental Considerations	maximum 200 points
Strategic and Emerging Considerations	maximum 200 points

Total *1000 points*

A minimum of 750 points (75% of total) could be used as a benchmark for determining sustainability of an option.

The approach for scoring, used above, totals the score for all five areas for consideration. This approach may be varied, with scoring done for individual areas and which are considered individually. This means that the minimum score for each area should be 150 points. If an area scores below this minimum, that is a red flag and the policy option (or aspects of the option) must be reconsidered.

Also worth considering is the allocation of points to each question in the different areas for consideration. Points may be weighted depending on the significance of the likely impact. Factors which are likely to have a negative impact may be given a negative figure e.g. -25 points and those that are likely to have a positive impact, a positive number e.g. +25 points.

Example: Determining sustainability

CRITICAL CONSIDERATIONS	RESPONSE (YES/NO)	LIKELY AREAS/SOURCE(S) OF IMPACT	MINIMAL IMPACT	MODERATE IMPACT	SIGNIFICANT IMPACT	RISKS & ASSUMPTIONS	SCORE
<i>Example of social consideration</i>							
Will policy outcomes affect poor rural households?		Increase in transportation costs.					
		Access to potable water.					
		Reduced school attendance - children.					

CRITICAL CONSIDERATIONS	RESPONSE (YES/NO)	LIKELY AREAS/SOURCE(S) OF IMPACT	MINIMAL IMPACT	MODERATE IMPACT	SIGNIFICANT IMPACT	RISKS & ASSUMPTIONS	SCORE
<i>Example of economic consideration</i>							
Will an increase in interest rates affect critical sectors of the economy?		Micro-enterprise sector.					
		Agriculture sector.					
		Co-operative sector.					
		Consumers (specific segments?)					
<i>Example of environmental consideration</i>							
Will policy outcomes affect water quality?		Contamination from use of fertilizers, pesticides, etc.					
		Sedimentation caused by mining, construction, etc.					
		Improper disposal of waste.					

NOTES TO TABLE HEADINGS:

Critical Consideration: the factors to be considered as identified in the CSAP Tool Framework and any other considerations that are appropriate.

Response: A yes/no response is applicable.

Likely source/area of impact: A source of impact could be another programme, policy initiative, etc. that may affect your policy option. An area of impact could be a group of persons or a geographical location that will be affected by the policy intervention or option.

Minimal impact: of short duration, non-permanent damage (or benefit).

Moderate impact: of short duration but can be significant if not addressed.

Significant impact: long duration, may result in permanent/long term damage (or benefit).

Assumption: A statement that is taken as being true for the purposes of planning a policy, programme or project, but which could change later (see glossary).

Risks: Risks are inherently uncertain factors and situations that can potentially affect the viability of a policy option.

The greater the social, economic and environmental benefits of a policy option, the more sustainable it is. The greater the cost (particularly in the long term), the less sustainable an option is likely to be.

ANNEXES

ANNEX 1: CSAP Summary (Table) Template

Name of Ministry/Agency	Division	Contact Person	
		Contact Details	
Policy/Project Title			
Brief description of the policy, project, etc.			
Purpose			
Objectives			
Success criteria			
Base case			
AREA OF FOCUS BY SECTOR	QUESTIONS FOR CONSIDERATION	DESCRIBE IMPACT/ DEGREE OF IMPACT	DECISION
General Considerations			
Social Considerations			
Economic Considerations			
Environmental Considerations			
Consideration of Emerging Issues			

ANNEX 2: PROCESS USED TO DEVELOP THE CSAP

Three main principles guided the development of the CSAP Tool. The process was participatory, iterative and national in its scope.

The process started off with an initial consultation with the PRIME Committee. This group was established to guide the policy reform process being spearheaded by the Office of the Cabinet. That initial consultation served as the first step in articulating the content and design of the CSAP Tool. This meeting provided a context through which the consultant was able to conduct searches and gather information to inform the development of the Tool.

Step two was a series of focused sector consultations through which senior technical officers within ministries, agencies along with representatives from the private sector, NGOs and CBOs participated in developing key questions for inclusion in the Tool. Consultations were had for the social, economic and environmental sectors. A first draft of the Tool was prepared after these consultations.

The draft Tool was taken to regional consultations for wider stakeholder input. Three consultations were held in Kingston, Montego Bay and Mandeville. Subsequently, the Tool was further refined and became draft number two.

The second draft was circulated to the PRIME Committee for review and further amendments. The revised version (third draft) was tested by members of the Policy Analysts Network (PAN), in which the Tool was applied to the National Transport Policy and the Sexual Harassment Policy. Again, valuable feedback was received and the final and fourth draft was prepared for sensitization of the Cabinet Committees and submission to Cabinet.

ANNEX 3: GLOSSARY

Assumption

A statement that is taken as being true for the purposes of planning a policy, programme or project, but which could change later. An assumption is made where some facts are not yet known or decided and is usually reserved for matters of such significance that if they change or turn out not to be true then the intervention will need considerable re-planning. Examples of assumptions include: i) budgetary support will be timely and ii) a change of political directorate will not negatively affect national priorities.

Benefit

A positive outcome of an intervention (a negative outcome is sometimes called a disbenefit).

Concept Paper

The second step in the GOJ's policy making process. The Concept Paper serves to clarify, organize and present ideas in a written form. It provides the basis for consideration of a proposed policy or programme, and is usually about 8-10 pages, double spaced.

Costs

The expenditure of something, such as time, labor, raw material collection, production and disposal of wastes, etc. which are necessary for the attainment of a goal.

Cost/Benefit Analysis

In simple terms, a cost benefit analysis finds, quantifies and adds all the positive factors. These are the benefits. Then it identifies, quantifies and subtracts all the negatives, the costs. The difference between the two indicates whether the planned action is advisable. The real trick to doing a cost benefit analysis well is making sure that all the costs and all the benefits are included and that they are properly quantified.

Impact

The negative or positive outcome of an intervention on policy objectives.

Policy

A public policy outlines the commitment of government on an issue. It is a guide for action to be taken by public authorities and the wider civil society to address a given problem or interrelated set of problems.

Programme

Broadly, a programme is a collection of projects and other items of work managed coherently together as a portfolio to achieve a particular goal within or by a particular sector or area of policy. Programmes can be temporary in the same way that projects are; however, most programmes span over a longer period of time than projects.

Project

A temporary organisation, either as a free-standing entity or now more commonly as an integrated component of a programme, set up to produce something or manage a particular change.

Risks

A key concept in policy making that may refer to specific hazards but also to new approaches and methodologies. Risks are inherently uncertain factors and situations that can potentially affect the viability of a policy option. Contending with risks necessarily involves making decisions which are potentially contentious and disputable (*See page 22*).

Sustainable development

An ongoing process with actions which integrate the need for social development, economic opportunity and environmental protection to meet the needs of present and future generations (*see page 6*)

ANNEX 4: USEFUL REFERENCE MATERIALS

Most of these reference materials are available at the Cabinet Office. Some can be accessed via the website: www.cabinet.gov.jm.

- Consultation Code
- GOJ Strategic Environmental Assessment Policy (*currently in draft form*)
- Integrating Gender into Government Policies and Programmes: Process Report prepared by Leith Dunn, September, 2001
- Jamaica 2015: A Framework and Action Plan
- Jamaica's Report on the Millennium Development Goals (PIOJ)
- Medium Term Socio-Economic Policy Framework: 2004-2007 (PIOJ)
- National Development Plan:2030 (PIOJ)
- National Population Policy and Plan of Action (PIOJ)
- National Sustainable Development Framework (*when it becomes available*)
- National Youth Policy (Ministry of Education and Youth)
- PIOJ Gender Mainstreaming Toolkit
- Public Sector Modernisation Vision and Strategy Paper
- The Process of Policy Development
- Vision 2025: Sustainable Development Framework (currently being prepared - PSRU, Cabinet Office)

ANNEX 5: ACRONYMS

CBO	Community-based Organization
CSAP	Comprehensive Sustainability Assessment Policy (Tool)
JASPEV	Jamaica Social Policy Evaluation (Project)
MTSF	Medium Term Socio-Economic Framework
MVSP	Modernisation Vision and Strategy Paper
NGO	Non-government Organization
PIOJ	Planning Institute of Jamaica
PRIME	Policy Reform Inter-Sectoral Monitoring and Evaluation (Committee)
PSRU	Public Sector Reform Unit (Cabinet Office)
SEA	Strategic Environmental Assessment

ANNEX 6: Checklist for Conducting SEA (extracted from the SEA Manual)

GUIDELINES AND CHECKLIST FOR ENVIRONMENTALLY FRIENDLY POLICY

As part of Government of Jamaica's commitment to sustainable development, the GOJ will ensure that all its policies adequately consider potential environmental effects and impacts, and where these are adverse, incorporate appropriate measures to reduce or eliminate these effects and impacts.

To this end, the government will be implementing a systematic, proactive process for evaluating the environmental consequences of policies in order to ensure that their environmental consequences are fully included and adequately addressed at the earliest appropriate stage of decision-making, on par with economic and social considerations. This process is referred to as the Strategic Environmental Assessment (SEA) of policies, plans or programmes (ppps).

PROCESS/ STEPS TO CONDUCT A SEA

The usual steps for conducting a SEA (as described in the Strategic Environmental Assessment Policy for Jamaica) include:

Conducting A Preliminary Scan - The preliminary scan considers the following:

- If the policy proposal has outcomes that will affect natural resources
- If the proposal has a known direct or indirect outcome that is likely to affect the achievement of the country's environmental quality goals
- If the proposal involves a new process, technology or delivery arrangement with important/significant environmental implications
- If the scale and timing of the proposal could result in significant interactions with the environment

If the Preliminary Scan does not identify the potential for important environmental considerations, no further analysis is required.

Scoping - Its objective is to identify the main issues related to the appraised proposal. The analysis of environmental effects will take in-depth account of:

- The scope and nature of potential effects – including cumulative effects which could result from the use of, or changes in atmospheric, terrestrial, aquatic resources, physical features/conditions or human components of the environment
- Scope and nature of residual effects – potential environmental effects that may remain after taking into account mitigation measures
- A classification of each effect as positive or negative
- An analysis of both positive and negative effects
- An estimation of the likelihood and magnitude of each identified effect.

See Appendix I below for Key Issues and Questions relevant to the Scoping process.

***Mitigation Measures* – these will identify the following:**

- Measures that could reduce or eliminate potential adverse environmental consequences of the PPP proposal
- Recommendations that could result in changes in the proposal; conditions that may need to be placed on policies; or activities arising from the proposal or compensation measures
- Steps for identifying uncertainties and determining the means to acquire more information about unknowns.

APPENDIX I

KEY ISSUES AND QUESTIONS RELATED TO THE SCOPING PROCESS

Air Quality

- Will the PPP lead to an increase in the emissions of air pollutants?
- Will the PPP result in improvements in air quality?
- Will the PPP result in greater or fewer numbers of people being affected by existing levels of air pollution?
- Will the PPP have a bearing on areas of existing poor air quality?
- Will the PPP result in new areas, previously unaffected by poor air quality to have air quality problems?
- Will the PPP result in changes in indoor air quality of buildings?

Landscape

- Will the PPP involve visually intrusive construction work or architecture that might conflict with the natural and built surroundings?
- Will the PPP involve demolition or modification of cultural or archaeological sites or historic buildings?
- Will the PPP impact on location in such a way as to change its sense of place or identity in any other way?

Land Use

- Will the PPP result in loss of arable lands or lands suitable for agriculture?
- Will the PPP affect the amount of land available for recreation, including land within urban areas?
- Will the PPP change the economic and social resource base for specific areas within rural and urban areas?
- Will the PPP have a different impact in one region or locality from that elsewhere because of the particular ecological characteristics of those areas?
- Will the PPP lead to changes in traffic volume or traffic patterns?
- Will the PPP lead to changes in housing and settlement patterns?
- Will squatting and unsustainable settlement patterns impact on the PPP?
- Will the PPP cause an unsustainable settlement or foster a squatter settlement?

Waste

- Will the PPP lead to a change in the volume of waste (solid or liquid municipal, industrial, agricultural or other category) produced or to the way it is processed?
- Will the PPP result in increased production of hazardous waste or medical waste?
- Will the PPP require specific processes or technologies for the treatment and/ or disposal of waste?
- Will the PPP introduce forms of waste management such as recycling?

Resource Consumption

- Will the PPP affect consumption and production patterns of renewable and non-renewable resources?
- Will the PPP lead to an increase in the use of imported petroleum?
- Will the PPP lead to an increase in water consumption, particularly freshwater?
- Will the PPP be impacted by increases in utility costs?
- Will the scarcity of water impact on the PPP?
- Will the PPP increase or decrease abstraction of groundwater (construction of wells etc.), surface water (rivers, streams, reservoirs, dams) or otherwise affect the flow, run-off or recharge of water?
- Will the PPP involve the use of forest resources (timber, wood, wildlife, rocks, minerals)?
- Will the PPP involve the abstraction of resources (such as fisheries) using new technologies?
- Will the PPP consume a substantial volume of natural, non-renewable resources, including land and minerals?

Biodiversity

- Will the PPP involve disturbance or relief to habitat or species by change of land use, light or noise?
- Will the PPP lead to severance, fragmentation, isolation or change in size of habitats?
- Will the PPP result in loss of diversity and distribution of animal or plant species?
- Will the PPP result in the introduction of non-native species into an ecosystem?
- Will the PPP change the genetic variety within specific species or for ecosystems as a whole?
- Will the PPP result in conversion of one type of ecosystem or alter specific characteristics of an ecosystem?
- Will the PPP result in the elimination of any species?

Ecosystems

- Will the PPP involve clearing of forested areas?
- Will the PPP require infilling or draining of wetlands?
- Will the PPP place demands in coral reef resources (harvesting corals, fish, etc.)?
- Will the PPP lead to disruption of beaches or riverbeds?

Chemical Contamination

- Will the PPP result in increased quantities and levels of pollutants, toxins and heavy metals being deposited in land and marine animals and plants?
- Will the PPP result in contamination of air, soil or water (fresh or coastal) by pollutants, heavy metals and other toxic substances?

Water Quality/Eutrophication

- Will the PPP lead to a change in the levels of nutrients (sewage, fertilizer, etc) in water bodies?
- Will the PPP lead to an increase or decrease in the volume of surface and ground water affected by pollution?
- Will the PPP increase the amount and concentration of faecal coliform?
- Will the PPP jeopardize the safety of water systems for fish or shellfish harvest or for human consumption?

Human Health and Safety

- Will the PPP lead to a deterioration of ambient air quality?
- Will the PPP enhance or harm safety at work, or affect the use of the work environment to maintain or improve health?
- Will the PPP affect access to national health care services, including the use of preventative services such as health screening, immunization, sexual health services?
- Will the PPP affect the ability of people to return to work from illnesses (whether the illness is work-related or not)?
- Will the PPP increase or reduce access to and availability of clean, potable water?
- Will the PPP increase or reduce access to sanitation services, including sewerage and solid waste disposal?

Climate Change

- Will the PPP lead to a change in the emissions of any of the six greenhouse gases?
- Will the PPP lead to an increase in the consumption of fossil fuels (e.g. imported petroleum such as natural gas or coal)?
- Will the PPP affect, or be affected by, vulnerability to the predicted effects of climate change e.g. flooding and shoreline erosion?

Noise

- Will the PPP lead to increase or decrease in exposure to noise of sensitive buildings such as schools and hospitals?
- Will the PPP lead to an increase or decrease in the number of people affected by existing noise?
- Will the PPP lead to a change in standards or use that would increase or decrease the noise generated by products?