

ENVIRONMENTAL PROTECTION LEGAL FRAMEWORK IN PAKISTAN: CHALLENGES AND RECOMMENDATIONS

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ABSTRACT

This research evaluated environmental impact assessment (EIA) advocates in Punjab, Pakistan, in order to evaluate their contributions to the profession and the obstacles they confront. The anticipated involvement of project proponents in EIA was calculated using regulations, guidelines, and suggestions. To evaluate the efforts of proponents, viewpoints from the Environmental Protection Agency (EPA), non-governmental organisations (NGOs), and consultants were extracted from the available literature. In Punjab, forty semi-structured interviews with proponents from the commercial and public sectors were undertaken to learn about the difficulties they encountered at each stage of the EIA process. It is very rare for projects to begin before receiving a permission to safeguard the local environment. In the majority of situations, proper scoping is disregarded. EIA does not significantly engage stakeholders. When project proponents fail to provide consultants with all relevant project information, the quality of the report is compromised and timely decisions are delayed. Even some supporters attempt to sway the evaluation and decision-making procedure, and with the exception of a few multinational corporations, no one can guarantee that the approval requirements will be satisfied. The decision by the EPA to distinguish between public and private initiatives was a significant source of worry for advocates. The lack of professionalism and hazy decision-making of some experts also contributed to the situation. Despite the study's regional focus, its conclusions are relevant to EIA systems worldwide, particularly in nations with similar economic systems that confront the same trade-off between economic growth and environmental sustainability.

Keywords: Development; Environment; Pakistan; Punjab; Sustainability

INTRODUCTION

Environmental impact assessment (EIA) was used for the first time in Pakistan in 1983 as part of the Pakistan Environmental Protection Ordinance (Khan et al., 2018, 2020a, 2020b). Despite the passage of forty years since Pakistan's first efforts to adopt EIA, studies indicate that there is still space for development in both areas (Nadeem and Hameed, 2010; Khan et al., 2018, 2020a, 2020b). For a successful rollout, it is necessary to include many different groups and individuals, such as activists, consultants, regulators, NGOs, impacted communities, and the general public.

Prior study has explored the responsibilities of consultants, regulators, and nongovernmental organisations (NGOs) in Punjab, Pakistan, as well as some of the issues they encounter (Khan et al., 2018, 2020a, 2020b). Participants highlighted the obstacles that proponents faced to themselves and the EIA. In their various studies, Shah (2013), Nadeem and Hameed (2008a, 2008b, 2010), and Hameed and Nadeem (2012a, 2012b) identified comparable issues.

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There are three key reasons why it is important to listen to the argument from the proponents. In the first place, their occupation necessitates an EIA. Second, they offer financial support for the EIA, therefore their objectives and degree of commitment inevitably influence its implementation. Thirdly, they are the ones who are required to perform the EIA (Morrison-Saunders et al., 2015; Kolhoff et al., 2016). As the most populous and economically significant province in the nation, Punjab was selected as the research location in order to assess the role of proponents and the obstacles they confront (Khan et al., 2020a). Punjab contributes for 53% of economic production, and more EPA EIAs are granted to Punjab than to any other province (Khan et al., 2018; Mumtaz et al., 2019).

EIA System in Punjab

In 1997, the Environmental Conservation Act entered into force in Pakistan, making environmental protection a priority for all provinces. Also produced in 1997 as part of a "bundle of processes and suggestions" were the following: Comprehensive sector recommendations, regulations for important and sensitive areas, national environmental quality standards, and guidance for environmental report production and evaluation are also provided. As stated by the Pakistani government (1997a, 1997b, 1997c). The IEE/EIA rules were last revised and made public in the year 2000. These regulations outlined the methods and essential criteria for evaluating reports, having public hearings, and keeping track. The Pakistan Environmental Protection Act laid the groundwork for environmental regulations enacted by the federal government until the 18th amendment to the Constitution of 1973 was passed in 2010, at which point provincial governments were given legislative authority over the environment. The 1997 law was reviewed and renamed the Punjab Environmental Protection Act in 2012 by the Punjab Environmental Protection Agency, which had been established in 1987 (PEPA revised 2012). This idea is supported by a number of research (Nadeem and Hameed, 2008b; Khan et al., 2018). Since 2000, the Punjab Environmental Protection Agency has complied to all IEE/EIA standards and procedures. Section 12 of the PEPA mandates doing either an IEE or EIA.

An EIA is a more comprehensive examination of a project's possible negative environmental implications, while an IEE is a more preliminary evaluation. The method for evaluating EIA studies must always involve a public hearing. Schedule 1 of the IEE/EIA rules lists projects requiring IEE approval, whereas Schedule 2 lists projects requiring EIA permission. A project may need an IEE or EIA based on its scope and budget (Government of Punjab, 2000).

It is usual for proponents to use third-party consultants to do the required IEE/EIA evaluations (Khan et al., 2018). After obtaining an IEE/EIA, the EPA conducts an initial verification of the given data. Now, the EPA will conduct a site inspection to determine if work started before the NOC was given, and if it did, it will issue a Site Inspection Report (SIR). Upon completion of the research, the EPA will issue a notice of public hearing (for EIA only). The assessment will end after the conclusion of the public hearing. When comparing the length of time necessary for IEE and EIA assessments, 45 days is the more frequent statistic (Government of Punjab, 2000). At this point, the EPA may seek input from industry specialists. The last stage is to make a choice. If a NOC is obtained, construction or operation may begin, and the EIA can provide any necessary follow-up.

REVIEW OF LITERATURE

As a result, a comprehensive literature study was done to determine how EIA advocates' efforts and the obstacles they confront impair the global efficacy of EIA. The terms "proponent/s," "developer/s," "environmental impact assessment," "impact assessment," "proponents AND EIA," "EIA AND developers," "proponents AND roles AND EIA," "proponents AND challenges AND EIA," "EIA AND reports AND proponents," "EIA AND reports AND proponents," "EIA AND reports AND proponents," "EIA AND proponents AND Pakistan," "EIA, role AND We employed a snowball effect to find related items. Additional materials were found by scouring the bibliographies of previously published studies (Sayers, 2007).

For this research, only academic publications and scholarly reviews were evaluated. Due to the fast evolution of EIA, no pre-2000 works were evaluated. 135 papers were downloaded in total. After deleting duplicates and articles unrelated to the objectives of the research, we were left with sixty. Nine of them emphasised the significance of supporters to Pakistan's EIA.

Role of and Challenges to EIA Proponents Worldwide

According to reports, proponents in other nations, like the United States and Thailand, see EIA as an unneeded financial and administrative burden (Wilkins, 2003; Chompunth, 2017; Schumacher, 2019).

In Western Australia, Bangladesh, Japan, the Netherlands, and the United Kingdom, project proponents use environmental impact assessments (EIAs) to fulfil the bare minimum legal criteria for project approval rather than as a tool for sustainable development (Morrison-Saunders et al., 2001; Ahammed and Harvey, 2004; Nakamura, 2013; Chanthy and Grünbühel, 2015; Nishikizawa).

Proponents in several countries, like Lithuania, Brazil, Turkey, Sri Lanka, Georgia, and Armenia, are known to ignore the EIA (Karakitapoglu, 2015; Garcia and Fonseca, 2018; Kolhoff et al., 2018). Due to the pressure exerted by the project's sponsors, the Australian environment department approves several projects without conducting adequate reviews (Macintosh and Waugh, 2014). In certain circumstances, such as Uzbekistan's, project sponsors may even change the project's vocabulary to avoid doing an environmental impact assessment (Khusnutdinova, 2004). In Russia, however, project proponents seeking foreign finance must conduct not one, but two environmental impact assessments (EIAs) in order to satisfy the severe standards of both the foreign funding agency and the Russian government (Cherp and Golubeva, 2004).

When discussing the tremendous repercussions of their programmes, proponents must be straightforward and truthful (Mayhew and Perritt, 2020). In nations like as Bangladesh, Guatemala, and Brazil, proponents have constructed EIA assessments that emphasise the advantages above everything else in order to get clearances (Momtaz, 2002; Bragagnolo et al., 2017; Williams and Dupuy, 2017; Mehdic et al., 2019). Singh et al. discovered the similar issue in Canada (2019). Hegmann (2019) claimed that this was an exaggerated response and that the consultants that conduct EIA on behalf of the proponents are experts who adhere to the greatest ethical standards. Wilkins (2003), Murray et al. (2018), and Singh et al. (2017) assert that when proponents employ consultants to conduct an EIA on their behalf, bias is unavoidable (2019).

It has been seen in Spain and Denmark (Enrquez-de-Salamanca, 2018; Landauer and Komendantova, 2018; Larsen et al., 2018) that proponents may influence the process by offering incorrect information, exaggerating consequences, and concealing facts such as the true project cost. Providing only project options that suit the proponents is a second kind of manipulation. This method has been used in Poland's transportation route design (Keshkamat et al., 2009).

The desire of investors to pay for EIAs has a significant impact on their quality. As in Vietnam, advocates may choose consultants based simply on price. This renders the EIA less trustworthy (Doberstein, 2003). Numerous issues, including financial ones, make proponents hesitant to implement EIA-improving legislation (Jo ao et al., 2011).

Numerous nations, like Egypt, Vietnam, and Indonesia, have advocates who shun public engagement (Purnama, 2003; Badr, 2009; Clausen et al., 2011). As seen by a number of initiatives in Pakistan and Canada, proponents earn the public's mistrust rapidly when they fail to address their concerns (e.g. Papillon and Rodon, 2017; Hasan et al., 2018). People are increasingly adopting social media to express their ideas. It is more of a one-way communication tool than a two-way conversation tool in Denmark (Aaen et al., 2018). It has also been noticed that in India, while presenting their ideas to the public for a vote of favour, proponents often put environmental concerns second (Sainath and Rajan, 2015).

Even when an EIA has been completed, proponents typically neglect the follow-up procedure. This is likely due to a variety of reasons, such as a lack of resources, clear instructions, and efficient enforcement. This is an issue not just in Zimbabwe, but also China, Brazil, India, South Africa, and the United Kingdom (Ahammed and Nixon, 2006; Paliwal and Srivastava, 2012; Machaka et al., 2013; Bennett et al., 2016; Chang et al., 2018; Junior et al., 2018). In Western Australia, proponents are required by law to get authorisation, and they are also trained on how to monitor and report their operations (Morrison-Saunders et al., 2014).

As observed for Cameroon, Kenya, Rwanda, the Czech Republic, Tanzania, and Australia, exorbitant costs may prevent proponents from conducting or implementing EIA (Brani's and Christopoulos, 2005; Alemagi et al., 2007; Marara et al., 2011). The proponents are responsible for delays in making decisions and carrying out the project, as well as compliance costs, legal fees, and lobbying expenses to change the rules (Macintosh, 2010; Barandiaran and Rubiano-Galvis, 2019; Schumacher, 2019). In nations like as Bangladesh, where there are no sector-specific EIA criteria, proponents apparently face difficulties (Kabir and Khan, 2020).

Expected Versus Actual Role of Proponents in Punjab, Pakistan

To begin defining the proponent's role in Punjab, we gathered the following papers for their explanations of the responsibilities proponents are supposed to do throughout the IEE/EIA process: Dated to the year 2000 are policies and processes for submitting, assessing, and approving environmental assessments, standards for collecting and analysing reports, and PEPA 1997 (Amended 2012). Second, using secondary data, we compared the actual involvement of proponents across all phases of the EIA process to their anticipated participation. For this reason, we examined the nine publications that resulted from our literature search and recorded the activities of advocates in Pakistan. Fisher (2014, 2014a, 2014b), Fischer and Nadeem (2014, 2014a, 2014b), Saif et al. (2018, 2020a, 2020b), Khan et al. (2018, 2020a, 2020b), Nadeem and Hameed (2008a, 2008b, 2010), and Fischer (2014, 2014b) are a few examples of recent publications on this topic (2015). The opinions of consultants, the EPA, and non-governmental organisations were taken into account and utilised to compare the actual roles performed by proponents, as described in these publications, with the predicted roles. According to interviews with stakeholders conducted in prior research, intended duties, document titles, clause numbers, and actual obligations of each stakeholder. In the last column of the table is a summary of the authors' evaluations (Government of Pakistan, 1997a, 1997c; Government of Punjab, 2000, 2012).

METHODOLOGY

The study is founded on the interpretivist paradigm, which asserts that there are several perspectives on the world and that each adds to our total knowledge of it. To guarantee the validity of the study's findings, the research methodology, sample strategy, and data analysis must be compatible with the study's ontological and epistemological assumptions (Leung, 2015). Therefore, qualitative research methodologies were required to understand the obstacles encountered by advocates. As stated by Fagan and Sircar, semi-structured interviews were performed with corporate (national and multinational) and government proponents to get insight into the issues they face (2010). We utilised semi-structured interviews because, compared to more conventional interview techniques, they provide participants more leeway to expound on their comments (Khan et al., 2020b). Included are all of the questions we asked during the interview. Technical/health, safety, and environmental managers from the proponent firms that interact with third-party consultants were interviewed. Overall, forty interviews were conducted (10 government and 30 private). Seventy to eighty percent of the time, the Environmental Protection Agency (EPA) in Punjab receives reports from private proponents, and twenty to thirty percent of the time, from government proponents (personal communication with EPA Punjab). Consequently, we employed targeted recruiting to identify IEE/EIA expertise in diverse businesses (Palinkas et al., 2015). Before conducting any interviews, we checked with the university to verify that we were acting ethically. Two rounds of telephone interviews were conducted, the first between September and December 2018 and the second between October and November 2019. According to Khan et al. (2020a, 2020b), the interviews were done at random, based on the availability of the interviewee, rather than in a preset sequence. In qualitative research, sample size is defined by the number of interviews completed up to the point when more interviews yield no additional information (Saunders et al., 2018). We had acquired as much information as possible on the matter at hand after conducting forty interviews. This sample size is thus enough for the objectives of this investigation.

Typically, interviews run between thirty and fifty minutes. Prior to conducting any interviews, respondents were told of the research's goals. Following the conclusion of data collection, interview transcripts and analysis were undertaken. Relevant quotations were highlighted in transcripts which were frequently read aloud (Kgstrom, 2016). Finally, pertinent data was organised into topic categories (EIA steps)

Table: Interview Question

S.No.	Interview questions
1.	Do you have experience with IEE/EIA cases?
2.	How many different consultants have you collaborated with?
3.	Do you encounter any difficulties throughout the EIA's scoping and screening phases?
4.	What kinds of difficulties do you encounter while collaborating with the consultant

- throughout the report-writing phase?
5. What kinds of difficulties do you encounter throughout the initial investigation and EIA review stages?
 6. Do you encounter any difficulties during the EIA's public involvement phase?
 7. What obstacles do you encounter throughout the EIA decision-making stage?
 8. Are there any difficulties you're having with the EIA follow-up stage?
 9. What areas do you think could use improvement?
 10. Do you have something to add?
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RESULTS

Challenges Faced by Proponents

The difficulties that proponents faced at each stage of the EIA process are extensively discussed. The responses from the interviews are provided as an appendix to this paper. The respondents' identities and those of their individual employers have been kept a secret from the public out of an abundance of caution. The problems that were most often raised, the number of respondents who raised them, and the disagreements between private and public proponents for each phase and stage of the EIA are summarised in the table below.

Screening

It was shown that proponents often undervalue their contribution to the overall cost and possible consequences of a project. When questioned about the obstacles they are now facing, activists from both the private and public sectors provided identical responses. Five respondents (both commercial and public) said that submitting an EIA for projects requiring IEE sooner was more time-consuming and challenging. In Pakistan, project proponents may overestimate a project's cost in order to avoid submitting it to an IEE or EIA, which are both time-consuming and costly procedures. Schedule I of the 2000 IEE/EIA rules says, for instance, that an IEE is required for highway building projects costing less than 50 million Pakistani rupees, whereas an EIA is required for projects costing more than 50 million Pakistani rupees (Government of Punjab, 2000). According to the EPA's explanation in Khan et al., the problem is the result of inflation and out-of-date rules (2020b). The legislative procedure required an acceptable cost requirement, but factoring in inflation, it's impossible to conceive that even a minor road construction project would cost less than 50 million Pakistani Rupees. Consequently, EIAs are increasingly needed for a broad range of projects. Another factor to examine is the competency of the project. Environmental Impact Assessment (EIA) is required for all hydroelectric power production projects larger than 50 megawatts (MW), but Industrial Energy Efficiency Review (IEE) is only required for smaller projects. To minimise the burden of preparing an Environmental Impact Statement, it is logical that proponents would overestimate the project's power production, stating statements such as "the capacity is 49 MW.

Scoping

Instead of conducting in-person talks with stakeholders to obtain opinion and assess potential solutions, scoping is often conducted in the offices of consulting firms in Punjab (Khan et al., 2020a). In order to persuade others to accept their viewpoint, proponents of a certain place or piece of technology often mention the advantages of their preferred alternative. Also uncommon in Punjab is the practise of addressing the complaints of those adversely impacted by a project.

It is probable that the failure of the proponents to conduct full scoping is a consequence of the difficulties they experienced at this stage. There was agreement among official and unofficial supporters. According to four respondents, we avoid extensive involvement with the public since they generate a great deal of noise and lack awareness of the environmental challenges related with the project. Three respondents said that powerful people of the community influence public opinion against ecologically hazardous plans. However, these important individuals are driven by more than simply their professional ambitions. In one case, they may demand that the proponents sign contracts forcing them to purchase raw materials or loader trucks from their enterprises. After negotiating a deal with them, environmentalists have suddenly lost interest in the subject. In an effort to save money without sacrificing quality, five advocates have reported that the consultants they hire to do IEE/EIA studies often omit crucial processes such as scoping. Five proponents were unaware of the scoping process in the EIA despite its presence.

Reporting

The majority of supporters do poorly at this phase because they exclude crucial information from their reports. With the exception of the wait time at the EPA office, the problems cited by private and public proponents at this level were almost identical. Fifteen of the thirty-three respondents attributed the consultants' bad performance to their lack of ability. In addition, they cautioned that consultants' cases would be delayed if they failed to follow up with the EPA or did not get along with the authorities. Five respondents emphasised the need of speaking with a seasoned expert. Inadequate resources may hinder a consultant's effectiveness. As a result, consultants may limit field research, add fake laboratory data, refuse to recruit personnel with suitable expertise or abilities, etc. Relevant here are the investigations by Khan et al. (2018) and Chanthy and Grünbühel (2015). In an attempt to fulfil the expectations of project sponsors, consultants may rush the quality of their work (Morrison-Saunders et al., 2001; Macharia, 2005; Morrison-Saunders and Bailey, 2009; Chanthy and Grünbühel, 2015). Certain foreign consultants, particularly those in Kenya, Ethiopia, and Cambodia, have been accused of lacking professionalism. To wit: (Gebreyesus and colleagues, 2017) The dependability of consultants is contingent upon the degree to which their estimates match the desires of the larger public. If they are capable of doing so, their product is credible (Enriquez-de-Salamanca, 2018).

A private supporter's tale of attempting to organise a meeting with EPA officials struck us as especially irritating. Due of the lengthy wait periods, twenty-one out of fifty respondents said they never contact or see EPA employees. These businesses were all privately owned and operated on a national scale. This may be because multinational corporations hire specialists to assess their sites and get NOC on their behalf, as opposed to working directly with the EPA and other stakeholders. One national private contributor claimed that each matter was being evaluated by many agencies and that they had to start from begin each time they visited the Environmental Protection Agency. Due of these factors, proponents believe it is preferable to employ a consultant to complete all the groundwork rather than physically visiting EPA. The EPA is also a government entity, so perhaps its supporters didn't bring up the wait time because they assumed the EPA would treat all other government agencies with due respect.

Preliminary Scrutiny

During the role analysis, it became evident that the EIA was significantly affected as a result of the proponents' failure to provide all pertinent information with consultants and the EPA. When asked about their current concerns, six advocates cited the fact that consultants do not first request a thorough list of the EPA-required components as the reason why they do not give detailed information. Instead, they take a piecemeal approach to the issue, which drags down their arguments and wastes the time of proponents. Five respondents only had a positive experience with the consultants. The effectiveness of the advisors will influence the result. There were little differences between official and private advocates.

Additionally, several private advocates assert that the EPA often requests project-irrelevant information. Given that the EPA has just 10 days to conduct an inspection and a restricted number of workers, proponents say that the agency should be granted more time to investigate the matter by requesting further information. The notion that people who propose government initiatives must analyse and prioritise them.

Public Participation

An examination of proponent responsibilities revealed that proponents do not guarantee an open and effective public hearing and instead choose to ignore public concerns. Both government and corporate advocates raised similar concerns during this stage. Thirty-five interviewees came to the conclusion that job security is the top priority for the vast majority of people. If you provide the residents little possibilities for gainful work, they will be less likely to complain about environmental hazards. In addition, seven persons claimed that environmental concerns are only raised when a project is going to be built in close proximity to a residential area. People tend to be less worried if the project site is in an industrial area.

Reviewing

The variety of obstacles provided by fans at this level was remarkable. Private national proponents have raised each and every obstacle that has been raised at this time. Twelve firms from various nations agreed that national governments and international funders are accorded more weight than the conclusions of private enterprises. This accomplishment was credited by proponents to their staff of

educated advisers. Project sponsors were confident that their consultants' established networks at the EPA would result in rapid project approval, sparing them the hassle of constant follow-up. In addition, eight private advocates from throughout the nation have reported that EPA officials are unavailable for meetings and examine their cases unreasonably slowly. Supporters find this difficult and time-consuming. However, several respondents said that the environment has improved and that they have never had a problem with the helpfulness of EPA personnel, regardless of the number of times they have gone.

However, as they do not directly interact with the EPA, international campaigners did not raise this challenge. Advisors are compensated for handling all matters on their behalf. Government advocates did not report any difficulties communicating with EPA officials or waiting for evaluations. It was evident to them that their issues were given the highest importance.

Decision Making

During this phase, business and government proponents made opposing claims about the outcomes. Those who support the administration have an easier time passing their initiatives, thus they did not raise any difficulties. The vast majority of private proponents (28 respondents) claimed that the EPA prioritises government proponents and takes too long to consider their applications, despite the PEPA's statutory four-month approval timeframe. This may be the result of attempts by pro-government organisations to influence the EPA's review of the EIA via lobbying. Importantly, the fact that the EPA is a government body and so susceptible to political pressure may impair its openness to the public.

The supporters of the regime were aware of this prejudice. A respondent to the poll said that waiting for a decision was unnecessary since the government had already accepted their proposal. One government associate said, "we had the total support and ownership of the government," which meant that getting the NOC for the construction phase was a breeze. By the time they reached the NOC (normal operational condition), the ruling government had changed, making it very difficult to finish the project.

Seven respondents said in private that one probable cause is that environmental supporters use their influence to hasten Environmental Protection Agency (EPA) decisions. Unexpectedly, this stance's advocates justified their position by asserting that otherwise, cases would be unfairly delayed. One of the private national proponents asserts that the Environmental Protection Agency (EPA) is detrimental to the economy since it slows down the decision-making process, causing proponents to feel overwhelmed and spend their money elsewhere. There were thirty-six supporters who said that the obligation to physically transfer information between offices and provide paper copies of reports causes unnecessary delays. Government and business supporters of this cause were in agreement.

EIA Compliance Monitoring and Auditing

During this phase, several opinions from public and private activists were unearthed. Two national private advocates stated they were not informed of the EPA investigators' planned site visit. As a result, they are unready for the next inspection. On the other hand, the EPA can perform on-site inspections thanks to Section 17 of the IEE/EIA standards from 2000 (Government of Punjab, 2000). As a matter of public credibility, three multinational proponents have said that their firms must satisfy the NOC's approval criteria and address the EPA's concerns. They asserted adherence to international standards in addition to Pakistani norms. In addition, they stated that some EPA site inspectors were rude. They are used to functioning in an authoritarian manner because of their position or the limited collaboration of the majority of proponents. Additionally, three private proponents have asserted that the EPA punishes them for small offences while ignoring big violations on their side. It is probable that proponents are seeking to persuade EPA authorities to disregard the requirement for a site inspection due to their officials' behaviour.

Government proposal supporters did not voice any worries. A supporter of the administration said that trouble-free site inspections are the norm. Nationally, advocates have claimed that consultants seldom address their concerns when developing an EMP and providing cash for it. As a result, their EMP compliance is inadequate. However, keep in mind that, with the exception of huge multinational corporations, the majority of proponents do not check the papers created by consultants prior to submitting them to the EPA. This might also explain why advocates haven't seen the EMP's contents. The reluctance of government proponents to disclose negative interactions with other government agencies may be a result of their belief that they and their programmes are prioritised.

Opportunities for Improvement

Not only did the proponents highlight the flaws, but they also provided suggestions for how things might be improved. Following is a table that summarises the ideas made by supporters. In addition to describing the challenges, the activists also suggested potential solutions. This report also includes the complete, first-person testimonies of six individuals who were interviewed. Supporters argue that the EPA should tighten up its IEE/EIA screening standards. A project should not only be evaluated based on its cost and potential production, but also its projected effects. Due to the high cost of the new factory, its proponents have emphasised the need of performing a comprehensive Environmental Impact Assessment prior to implementing any modifications or adding any new production lines to the current company's manufacturing process.

Supporters also wanted the EPA to teach project backers and their experts about scoping, so that the impact assessment could reduce as much as possible any negative effects on people or the environment caused by the project's unanticipated results. Supporters say that the EPA should set up an online system for getting reports, reviewing them, and deciding what to do with them, as well as a way to keep track of what steps are done in response to complaints. Khan et al. say that the EPA's human review process, which is slow and hard to do, came from within the agency. (2020b). In Greece, for example, the EIA Law says that all EIA-related information, like inspection data, guidelines for evaluating reports, and a register for choosing external judges and paying fees, must be kept in a "National Electronic Environmental Register." (Pediaditi et al., 2018). Also, an online method can be made sure to be open to everyone. The expert panel's report on what to do is also put online in the Netherlands. British researchers Bennett et al. found that EIA partners thought that a single source of data that included their experiences with tracking, mitigating, and using EMP could also help improve EIA. (2016).

In addition, they advised that the government should create business-friendly conditions to keep investors from leaving. We feel the issue may be resolved if a method for submitting and evaluating EIAs online were implemented. Overall, EIA has been simplified by eliminating stages or modifying existing ones in order to boost efficiency. Consider nations such as Brazil, the Netherlands, the United Kingdom, India, Columbia, the United States, South Korea, and Germany, among others (Fonseca and Rodrigues, 2017). Although Environmental Impact Assessments (EIAs) should not be a barrier to progress, the present shortness of Pakistan's procedure shows that streamlining the process may no longer be necessary. Instead, EIA may be reinforced by more rigorous implementation, a better explanation of the advantages to advocates, and business and academic engagement. The study of Leeney et al. demonstrates that cooperation between activists and researchers that focuses on sharing information and ideas has the potential to enhance EIA and advance the discipline (2014). Consultants in Khan et al. (2020a) and Khan et al. (2020b) cite this study (2018). In 2017, the Punjab Environmental Protection Agency (EPA Punjab) continues to regulate the licencing of consultants. However, the registration procedure has not even begun. China and Belgium are among the many nations that need consultants to register or get accredited (Bond et al., 2017).

Several proponents concluded by recommending that the EPA interact with companies and expand the IEE/EIA reviewing staff's exposure to industry in order to improve report analysis and commentary.

Table No. 2 Improvement opportunities suggested by proponents

S. no	Suggestions	Number of interviews who mentioned it	Related to EIA step
1.	Update screening criteria	10	Screening
2.	Educate proponents/ consultants	2	Scoping
3.	Establish online system	18	Reporting, reviewing, decision making, follow-up
4.	Register IEE/EIA consultants	7	Overall EIA quality
5.	Train the EPA staff	3	Reviewing

DISCUSSION

This article analysed the issues faced by Punjabi drivers. The issues were identified via semi-structured interviews. In certain instances, authorities or notable proponents initiate projects without first conducting an EIA. In some instances, you may use IEE instead of an EIA. The scope was not adequately defined. When proponents do not supply consultants with all the necessary information, the preliminary review process is slowed down and the quality of the resulting reports is diminished. The great majority of public hearings are biased towards the project's supporters. In an effort to quiet the public, proponents of the project often send an overwhelming number of speakers to the hearings. Consequently, open meetings lack equality and clarity (Khan et al., 2020a, 2020b). While proponents may sometimes influence the assessment and decision-making process, they almost never agree to adhere to the permission's terms.

Primarily, proponents complained about the long review and decision-making procedures, the disparate treatment of government and private proponents by the EPA, the dearth of competent consultants, and outmoded rules.

There are five primary conclusions that must be addressed. Priority number one is to begin a project prior to completing an EIA. This is not unique to Pakistan, as shown by its occurrence in Sri Lanka, Turkey, Armenia, Georgia, and Brazil, among other nations (Zubair, 2001; Karakitapoglu, 2015; Garcia and Fonseca, 2018; Kolhoff et al., 2018). However, each country's national regulatory body has the choice of adopting it or contesting it in court. The owner of the project will choose how the EPA responds in Punjab. If, after a site inspection, the EPA determines that the majority of private proponents have already initiated the project, the subject is sent to the Environmental Tribunal. The proponents of the project will be fined and building will be halted by the tribunal. Legal challenges to government-owned projects are possible, although the likelihood of success varies widely by political climate and official influence. Many nations struggle to meet the political expectations placed on EIA authorities, and not only when it comes to the punishment of lawbreakers. The decision to conduct an EIA is almost often made by a government agency or an elected politician, however this differs from country to country. Therefore, political control is inevitable. When a private person proposes a project in Spain, there is less pressure, but when the government does so, the idea is scrutinised more closely and is seldom denied (Enriquez-de-Salamanca, 2021). Due to its limited resources and political constraints, the Environmental Protection Agency (EPA) in Punjab is not the greatest at enforcing rules (Khan et al., 2020b). Many nations see robust and autonomous EPAs as obstacles to economic progress. Possibly for this reason, some powers are not enhanced (Kolhoff, 2016). Even in nations with robust government frameworks, proponents are aware that projects cannot avoid environmental impact evaluations. This may be the situation in Estonia and Georgia, for example (after a change of government in 2012; Heinma and Poder, 2010; Kolhoff et al., 2018).

Second, not telling anyone how much it costs to change from EIA to IEE. Prices are often too high, which is a common problem. According to studies done in the USA, Europe, and some developing economies, Flyvbjerg et al. (2002) found that the "most reasonable" reason for cost reduction in transportation infrastructure projects was that people lied to get the projects started and raise money. (Tenney et al., 2006). But lies could also be spread in other ways. For example, many people think that budget forecasts are inflated to get more money out of taxes. Flyvbjerg et al. (2002) said that if there was a high benefit-cost ratio, public projects could go on even if they were not economically possible. This would waste user money.

Third, there was a paucity of public engagement throughout the scoping and public participation stages. Neither the Maldives nor the "New Beijing Airport Project" sufficiently include civil society in the scoping phase (Brombal et al., 2017). Given that, according to the standards for the production and assessment of reports, only impacted parties should be informed and not the general public, it is appropriate that Punjab's level of public participation has been limited to far (Government of Pakistan, 1997a). Even while conditions are better in industrialised nations such as the Netherlands, the United Kingdom, the United States, Canada, and Flanders, etc., the minimal public consultation that must be conducted at this time is also being undermined (Fischer, 2014; Runhaar et al., 2019). Administration of the European Union and other stakeholders are engaged in setting the scope of the EIA report, which helps to identify potentially catastrophic environmental concerns early on. The European Union and Brazil are only two examples of nations striving to simplify EIA. Therefore, scoping is not required and may be ignored (Enriquezde-Salamanca, 2021). The purpose of public

consultation is to collect and consider citizen feedback prior to making major policy decisions. Public hearings have been attacked in Pakistan for allegedly encouraging prejudice rather than disseminating accurate information. Recommendations for new EIA law in Brazil would mandate just that project proponents tell the public about the project and its ramifications, rather than demanding public participation in the decision-making process. (Bragagnolo et al., 2017). It has been said that the average Chinese citizen has very little say in the country's political system. (Brombal et al., 2017). Since EIA is essentially political, it is equally crucial that all stakeholders have the legal means to participate as it is that they have the social, cultural, and political desire to do so. (Purnama, 2003; Tang et al., 2005). Many government activities in Bangladesh were analyzed, and the results showed that stakeholders had minimal input into policymaking. However, the EIA promotes more public participation through NGOs in countries such as Malaysia and Thailand. (Hasan et al., 2018).

In order to engage effectively and intelligently, the general public has to be aware of their environmental rights and be able to read and understand technical EIA paperwork. Public understanding is very low in several countries, including Pakistan, Yemen, Uzbekistan, and others. Two independent research groups support this. (Khan et al., 2018; Kolhoff, 2016).

Insufficient effort was made into checking in and ensuring that everything was done correctly. In the United Kingdom, Canada, Slovakia, India, Uganda, Malawi, Egypt, Ghana, Mauritius, China, and South Africa, researchers have discovered low project compliance and post-completion follow-up rates (Zvijakov'a'et al., 2014; Machaka et al., 2016; Chang et al., 2018). Literature accessible to the public indicates two key obstacles that impede appropriate EIA follow-up. As there is no legal basis for future action, no further action may be done. The Iranian Environmental Impact Assessment Law, for example, has no sanctions for offenders (Khosravi et al., 2019). Garcia and Fonseca (2018) argue that the administrative fines imposed by Brazilian law on mining enterprises are excessively mild given the enormous resources available to the project's sponsors. The second concern is the absence of a mechanism to demand future communication. In this regard, having a law on the books is insufficient, as are the competence and dedication of the officials charged with executing it. The degree of follow-up reported by different local administrations in China varies considerably. In Ireland, McKay also identified a lacklustre application of punishment (2007). EPA's lack of appropriate equipment Punjab has been identified as a contributor to the inadequate follow-up (Khan et al., 2020b). According to reports (Zvijakov'a'et al., 2014; Gebreyesus et al., 2017), Kenya, Ethiopia, and Slovakia have the same difficulty of implementing authorities to carry out the legislation.

Fifth, the EPA exclusively favours supporters from the public sector over those from the private sector. This may be related to the EPA's incapacity to make independent choices. The Environment Minister appoints the EPA Secretary, who reports to the EPA Director General. Therefore, legislators and other government agencies have an excellent opportunity to influence EPA policy. Even against the most serious violators, the implementing body in Northern Ireland is similarly unwilling to impose punishment. This is the case since most CEOs work for the government and are thus sensitive to unfavourable news coverage (McKay, 2007). The Netherlands Commission for Environmental Assessment is a good example of a neutral EIA assessment agency (Arts et al., 2012).

The results of this study, conducted at a time when the country is undergoing a severe economic crisis, are essential for creating policies that lower barriers for entrepreneurs and make it easier for them to do business. Consultants can use this information to better understand the challenges that project proponents encounter in working with them and to fulfil those needs in the future. Authorities can use this data to improve process management for environmental quality assurance on the ground by implementing more stringent quality control measures and, if required, creating or revising legislation.

CONCLUSION

Researchers in Punjab evaluated the contributions of advocates and found impediments. The focus of research has been on consultants, non-governmental organisations, and the Environmental Protection Agency, but not on the project's proponents. Consequently, our study will help address a substantial information vacuum by shedding light on the challenges encountered by investors. Since the country's economy is struggling, development projects are picking up speed thanks to the China Pakistan Economic Corridor project, and the EIA system isn't particularly effective at fulfilling its goals, this

research is more relevant than ever. It will bring to light the problems that activists have with the EPA, making it possible to fix them. More research is needed since this study did not compare the difficulties faced by proponents in different Canadian provinces. While the scope of the research is limited, we argue that the goals and objectives of enterprises are universal, regardless of location. This indicates that the study's results, including the highlighted obstacles and possibilities, are not unique to Pakistan. As a consequence, the study will equip EIA systems throughout the globe with crucial lessons.

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