

The Roles of Environmental NGOs in the Public Participation Procedures of Environmental Impact Assessment : A Case Study of the Waste Landfill Project at the Fujimae Tidal Flat in Nagoya City

Authors: Jehong Ryu and Sachihiko Harashina

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Research Summary

Environmental Impact Assessment is a system designed to investigate, predict and evaluate the potential environmental impacts of development projects before implementation and to minimise those impacts through better planning.

For EIA to function effectively, however, assessment should begin as early as possible in the planning process. Meaningful participation by residents, environmental organisations and other stakeholders is also essential.

This is particularly important when the first victims of a proposed development are wildlife and natural ecosystems that cannot speak for themselves. In such cases, environmental NGOs can represent ecological interests, provide environmental knowledge and help ensure that those interests are considered in decision-making.

This study examined the proposed waste landfill project at the Fujimae Tidal Flat in Nagoya City. It aimed to identify the roles played by environmental NGOs before and after the beginning of the EIA process, examine cooperation among NGOs, and analyse the changes their activities produced in the behaviour and decisions of project proponents, government agencies, review committees and other stakeholders.

The Fujimae Tidal Flat was an internationally important habitat for migratory birds. Nagoya City proposed reclaiming part of the tidal flat to create a final disposal site for municipal waste. The original proposal involved approximately 105 hectares, but the planned area was subsequently reduced several times in response to flood-control concerns and growing awareness of the ecological importance of the tidal flat. The EIA was ultimately conducted for a reclamation area of approximately 46.5 hectares.

The case was selected for three principal reasons. First, the project site was a migratory bird habitat of international conservation value. Second, the activities of environmental NGOs extended beyond opposition to the project and included independent scientific surveys, the provision of local environmental information and policy proposals. Third, local NGOs worked with broader

regional and national environmental organisations from an early stage and played a leading role in public participation.

The study classified the organisations involved as local environmental NGOs, primarily led by Nagoya residents, and regional or national environmental NGOs, whose activities extended beyond Nagoya.

Interviews were conducted with representatives of the project proponent, government officials responsible for the EIA and environmental NGOs. Newspaper articles, NGO newsletters and related documents covering the period from the formulation of the project in 1984 to the completion of the EIA procedure in August 1998 were arranged chronologically. This enabled the study to analyse NGO activities, cooperation among organisations and causal relationships between those activities and subsequent changes.

The analysis identified a wide range of NGO activities before the EIA began, including public marches, signature campaigns, domestic and international symposia, birdwatching and ecological surveys, proposals for waste reduction and recycling, and petitions to local councils and government agencies.

These activities were grouped into six broad categories: shaping public opinion; environmental education and awareness raising; scientific research and evidence building; information provision; the creation of cooperative NGO networks; and the submission of requests and policy proposals to government and project proponents.

Local environmental organisations initially concentrated on the conservation of migratory birds. They later broadened their networks to include groups involved in waste reduction and recycling. Cooperation was subsequently extended to organisations such as WWF Japan, the Japan Wetland Network and the Wild Bird Society of Japan.

Regional and national organisations supported local NGOs by providing research funding, organising nationwide surveys, participating in domestic and international symposia, submitting comments and resolutions, and raising the issue with local and national government authorities.

A significant feature of the Fujimae case was that much of this network had already been formed before the formal EIA process began. This allowed environmental NGOs to coordinate public campaigns and policy proposals from an early stage.

The first important change observed before the EIA concerned Nagoya City's waste-management policy. Environmental NGOs and citizens' groups did not focus solely on protecting the tidal flat. They also proposed waste reduction, separate collection and recycling policies that could reduce the need for a new landfill.

Their continued proposals and campaigns contributed to the adoption of a basic waste-reduction plan and a subsequent implementation plan. They also encouraged the city to recognise citizens and private organisations as partners in waste-reduction policy rather than simply as recipients of administrative decisions.

A second change concerned the reduction of the proposed reclamation area. Environmental NGOs collected approximately 108,000 signatures and submitted petitions to the city council. Their continuing public campaigns, combined with the involvement of regional NGOs and approaches to government authorities, increased political and social attention to the ecological value of the Fujimae Tidal Flat.

Although several factors contributed to the revisions, the study found that the public opinion generated by NGO activities and their sustained requests were important influences on the gradual reduction of the proposed reclamation area.

After the formal EIA process began, NGO activities became more closely focused on the official participation procedures. Environmental NGOs reviewed the draft Environmental Impact Statement, organised study meetings, submitted written opinions, requested a public hearing, made statements at the hearing, conducted independent surveys of birds and benthic organisms, demanded additional surveys and called for rigorous review by the EIA committee.

The public hearing was made possible partly because environmental NGOs helped local residents understand the procedural requirements and encouraged them to submit the necessary application. In this respect, NGOs acted as intermediaries between the formal EIA system and residents who might otherwise have found it difficult to participate.

Environmental NGOs also presented evidence showing major discrepancies between the proponent's survey data and the results of independent investigations. The draft EIS reported low use of the tidal flat by migratory birds and relatively small quantities of benthic organisms. NGO surveys, however, indicated substantially higher bird-use rates and much greater benthic biomass.

These scientifically grounded findings provided review committee members and residents with persuasive alternative information. They also raised questions about the reliability of the survey methods and calculations used in the draft EIS.

As a result, Nagoya City conducted additional autumn surveys of birds and benthic organisms. The bird survey used additional methods, while the benthic survey examined deeper sediment layers. The additional investigation found approximately three times the quantity of benthic organisms identified in the earlier survey.

The final Environmental Impact Statement consequently acknowledged that reclamation could

affect the habitat of migratory birds and reduce the water-purification functions of the tidal flat.

Environmental NGO activities also contributed to changes in the EIA process itself. Because the review committee's deliberations had initially been closed to the public, speculation and criticism grew among NGOs and the media. During the final stage of deliberation, the committee began disclosing summaries of its discussions to the press, improving the transparency of the process.

The final EIS proposed that reclamation work should proceed in stages, with the effects of tidal-flat restoration experiments being reviewed before construction moved to the next section. The proposed use of the reclaimed land was also revised: some recreational facilities were removed, and a nature-observation area designed to reduce disturbance to waterbirds was included.

These changes reflected the recognition of environmental concerns raised by NGOs regarding migratory birds, water quality and the ecological functions of the tidal flat.

The study reached two principal conclusions.

First, the early formation of networks between local and broader regional environmental NGOs enabled public-awareness campaigns and policy proposals to be pursued more effectively. These activities contributed to changes before the EIA began, including a more active waste-reduction policy and a reduction in the planned reclamation area.

Second, environmental information accumulated through long-term surveys by local NGOs provided persuasive evidence to residents, review committee members and other stakeholders. This information contributed to the holding of a public hearing, additional environmental surveys, changes in the EIA review process and the preparation of a final EIS that formally acknowledged significant environmental impacts.

The study demonstrates that environmental NGOs are not merely opponents of development. They can serve as producers and providers of scientific information, facilitators of public participation, coordinators among different stakeholders, and important contributors to changes in environmental policy and project planning.

It also shows that NGO influence is strengthened when local, regional and national organisations establish networks at an early stage and combine their environmental knowledge, expertise, human resources and wider social influence.