



## POLICY AND PRACTICE

### Environmental Policies in Saudi Arabia

AHMAD AL-GILANI & SEAMUS FILOR

Department of Architecture, University of Edinburgh, 20 Chambers Street,  
Edinburgh EH1 1JZ, UK

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**ABSTRACT** *The experience of Saudi Arabia in environmental policies is relatively recent. However, the Government has established policy direction and administrative bodies to carry out its policy proposals. This endeavour to construct a framework for environmental policies has been hindered by several obstacles. The paper assesses government efforts in this field by reviewing environmental policy documents, the environmental administrative structure and the environmental decision-making process. A background of environmental policies and legislation is given in addition to categories of environmental agencies.*

#### Introduction and Background

This paper aims to review and discuss environmental policies in Saudi Arabia. The paper falls into five sections. The first gives a brief background of environmental laws and institutions since 1970. Environmental policy documents are discussed in the second section, while the third section outlines the administrative structure. Environmental decision making is described in the fourth section. The concluding remarks highlight areas where specific improvement to environmental policies in Saudi Arabia might be made.

Although the Kingdom of Saudi Arabia was established within the present boundaries in 1932, there was little formal government activity in the field of environmental policies until the 1970s. The first step to formalize environmental legislation after adopting the concept of five-year development plans in 1970, began in 1976, when the Animal Quarantine Law (CM/208 1396 H), the Plant Quarantine Law (CM/207 1396 H), and the Trade in Pesticide Law (CM/19 1396 H) were issued. In 1978, the Wild Animals and Birds Hunting Law (M/17/ 1389 H) was adopted, and in 1978 the Council of Ministers approved the Forestry and Rangelands Law, which was issued by Royal Decree (M/22 1389 H). During this decade the Ministry of Agriculture and Water (MAW) dominated the administrative arena as the main agency concerned with natural resources. In 1980 the Forestry and Rangelands section of MAW was upgraded to an independent Directory within MAW, and a new law was issued, the Water Resources Conservation Law (M/34 1400 H).

The main step to institutionalize Saudi environmental policies was taken in 1981, when the duties of environmental protection were granted to the Meteorology Agency, which became the Meteorology and Environmental Protection Administration (MEPA). This introduced pollution as a major factor in local environmental issues which had previously been limited to wildlife and natural resource conservation. The early 1980s also marked the first attempt to co-ordinate the activities of all agencies involved in environmental issues, by establishing the Environmental Protection Co-ordination Committee (EPCC) in 1981. Environmental standards were approved for the first time in 1982, mainly dealing with air and water qualities, and a new law (8/1182 1405 H) was issued in 1985 specifying forest land ownership. In 1986 the National Commission for Wildlife Conservation and Development (NCWCD) was established as a result of diminishing game animals. Marine environments (which had come under severe pressure) were included in (M/9 1408 H) of 1988, which dealt with marine conservation. In 1990 the Ministerial Committee for the Environment (MCE) was established to serve as the national body responsible for drawing up environmental policies at national and international levels, and to co-ordinate environmental policy making between the involved agencies and ministries. EPCC, however, continued to function as a Preparatory Committee for MCE (PCMCE). The National Contingency Plan for Marine Pollution Control, NCPMPC (CM/157 1411 H) was approved in 1991. This plan established the procedure for tackling marine pollution incidents, especially oil spills. The Wildlife Reserves Areas Law (M/12 1415 H) was approved in 1995. Table 1 lists the major environmental events and laws in Saudi Arabia.

### **Environmental Policy Documents**

Several government documents have addressed environmental issues, and attempted to formalize a framework for national environmental policies with varying degrees of success. These included development plans; state of environment reports; policy proposal reports; and government organized conferences. The following section briefly discusses and assesses these documents.<sup>1</sup>

#### *Development Plans 1970–2000*

The Kingdom of Saudi Arabia began its programme of development plans in 1970 with the first five-year plan (1970–75). The Fifth Plan (1990–95), contained the most comprehensive assessments of environmental policies. Section 15.4 of the plan entitled *Development and the Environment* discussed the environmental issues in relation to development policies, and presented the ideological and moral position of the Kingdom's policies towards the environment:

Development and environmental protection should not be perceived as separate or conflicting challenges; both are inexorably linked. Development cannot flourish upon a deteriorating environmental resources base; neither can the environment be protected when development ignores the cost of environmental destruction. If economic growth were to take place at the expense of ever deteriorating environmental

**Table 1.** Major environmental events and laws in Saudi Arabia

Legislation	Year
Fishing in the Red Sea Coast Law	1931
First Commercial Oil Production	1938
Abolishment of the <i>Hema</i> System	1957
Animal Quarantine Law (CM/208 1396 H)	1976
Agricultural Quarantine law (CM/207 1396 H)	1976
Trade in Pesticide Law (CM/19 1396 H)	1976
Uncultivated Land Law (M/26 1388 H)	1978
Wild Animals and Birds Hunting Law (M/17/ 1389 H)	1979
Forestry and Rangelands Law (CM/22 1389 H)	1979
Water Resources Conservation Law (M/34 1400 H)	1980
Forest and Rangelands Section Upgraded to a Separate Directory	1980
Establishment of MEPA (7/M/8903) and EPCC	1981
The First National Park: Asir National Park	1981
Environmental Standards (01-1409)	1982
Obligation to Use the Best Available Technology to Reduce Pollutant Emissions and to Reclaim Quarries and Dispose Waste (CM/271 1404H)	1984
First State of the Environment Report, SoE-84	1984
Forest Land Ownership and Conservation Law (1182/8 1405 H)	1985
Protection of Public Utilities (Wadis and Water Installation) from Waste Disposal (CM/225 and M/62 1405 H)	1985
Establishment of NCWCD	1986
Prohibition of Clay Mining from Wadis (M/1114 1407 H)	1987
Living Marine Resources within the National Waters: Fishing, Investment and Conservation Law (M/9 1408 H)	1988
Establishment of MCE (5/B/5635)	1990
Conference on Environment and Development in Saudi Arabia	1990
Gulf War: Kuwait Oil Spill	1991
The National Contingency Plan for Marine Pollution Control (CM/157 1411 H)	1991
The National Report to UNCED—Rio	1992
Hazards Waste Disposal Standards 1413-03	1992
Wildlife Reserves Areas Law (M/12 1415 H)	1995
From Sea to Sea: Conference on Marine Environment	1995
Agenda 21: Saudi Arabia (CM/78 3/7/1415 H)	1995
Saudi Environmental Awareness Project	1995
First National Conference on Environmental Pollution and Health	1996

Source: Compiled by the authors.

resources and conditions, the quality of life and the well-being of people (the ultimate goal of development) would be seriously affected. Environmental neglect destroys assets that are vital to life itself. (MCE, 1992, Appendix 1, p. 1.)

The plan gave an excellent account of existing problems through its “Key Issues” and established a clear policy direction for environmental issues (see Table 2). In general the Fifth Plan presented a constructive assessment of national environmental issues, followed by a list of policy and programme proposals aimed at solving existing deficiencies. Unfortunately most of the proposed policies were not achieved during the plan period.

**Table 2.** Environmental issues: Fifth Development Plan, 1990–95*Environmental Standards*

There is need for a clear set of environmental standards, regulations, specifications and guidelines that must be observed in industrial, agricultural, commercial and urban activities affecting the environment. In this regard, the review, consolidation and appropriate amendment of all existing rules and regulations concerning licensing, monitoring, inspection, implementation and enforcement will be carried out to protect the environment.

*Environmental Impact Assessment*

Should become an integrated part of feasibility studies for new projects and programmes. Until now there has been no general system for the inclusion of environmental impact assessment and social cost-benefit analysis in programme and project decision making.

*Environmental Awareness*

Public awareness of the environmental implication in all aspects of everyday activity is not adequately developed. This requires the co-operation of various public and government agencies through education and more widespread dissemination of information about the effect of public behaviour on the environment. The citizen's role and co-operation in conserving and preserving the environment is essential and has no substitute.

*Enforcement of Environmental Regulation*

Enforcement of existing environmental regulations is inadequate, because there is no clear definition of mandates, responsibilities and authority to enforce these regulations. This is all the more serious in the absence of a sense of awareness and voluntary co-operation on the part of the general public. Violators of environmental codes should be made aware of the penalties for violation, which should help in their enforcement.

*Environmental Monitoring*

There is a need to develop and implement an active system of monitoring parameters and environmental degradation.

*Co-ordination of Environmental Activities*

The activities of many government ministries have direct effect on the quality of the environment, including the ministries of: Agriculture and Water; Defence and Aviation; Municipal and Rural Affairs; Petroleum and Mineral Resources; Industry and Electricity; Interior; Health; Communications; Commerce; and Planning; other public sector agencies include: the Port Authority; the Standards Organization; the High Commission for the Development of Arriyadh; and King Abdulaziz City for Science and Technology. There is a lack of co-ordination between MEPA and these other decision-making bodies involved in the planning and implementation of environmental work. Positive steps should, therefore, be taken to remove these obstacles to enhance co-operation among relevant agencies.

Source: MCE (1992, Appendix 1, p. 1).

One of the Sixth Plan's (1995–2000) "Basic Strategic Principles" was devoted to environmental issues. It proposed to:

Safeguard and enhance the natural environment and prevent pollution by implementing the following policies:

- 1- Protecting the environment and safeguard its natural characteristics, in addition to the maintenance of natural resources;
- 2- Protecting and developing wildlife in the Kingdom, together with preserving the natural equilibrium of its ecology in terms of the genetic diversity of its zoological and botanical makeup;
- 3- maintaining continued equilibrium with regard to optimal population distribution and environmental integration—taking into consideration the impact of population growth and consumption patterns on natural resources. (MOP, 1995. p. 430.)

The environment was also included in chapter 3 "Main Objectives and Key Issues of the Sixth Plan". Section 3.5.3 entitled "Environment and Development Issues", suggested that government environmental policies are integrated with development policies rather than conflicting with them. The plan stated that "the kingdom's basic environmental strategy integrates the planning, institutional and management dimension" (*ibid.*, p. 101). Nevertheless, this claim is not accurate, as the overall structure of environmental policies in the Kingdom is lacking these integrated planning, institutional and management activities. This is in addition to the large gap left by not advocating and enforcing environmental impact assessment (EIA) of development projects.

Chapter 14 of the Sixth Plan covered environmental issues. A list of major environmental achievements was given, though without reference to the failure to implement the environmental policies and programmes proposed in the Fifth Plan. Once more "Key Issues" which formed section 14.2 gave a good and clear assessment of some environmental problems, in addition to proposed policies to solve the prescribed defects. It is noticeable that several issues which were part of "Key Issues" in the last plan are not included in this list. It is difficult to speculate on the reasons for excluding such issues despite the fact that the proposed policies were not satisfied. It might be that such issues are not seen as of concern at this stage and environmental emphasis is shifting to new areas. On the other hand it does not seem that such policy proposals carry much weight with environmental agencies and listing new issues is a matter of form to avoid repeating the old list.

Section 14.5.2 contained the Saudi environmental policies during the Sixth Plan period (see Table 3). It is noticeable that agricultural and urban projects were included in the proposed (EIA) system. This system is long overdue especially when considering the impact of intensive commercial agriculture on the environment, and the depletion of underground aquifers. On the other hand there is no indication that strategic environmental assessment (SEA) is considered in evaluating the impact of national development policies. This will prove to be a major gap in the Sixth Plan's environmental policies. Evaluating environmental impact of national policies can be useful in avoiding downstream environmental problems, hence incorporating the concept of SEA with the proposed EIA system will improve national co-ordination of environmental impact in the long term. The plan failed to suggest specific solutions for the lack of co-ordination between environmental agencies, which is a major obstacle in implementing environmental policies. The proposed policies need to be more focused and include a time limit, e.g. to adopt the national system for environmental impact assessment within the first two years of the plan to avoid dragging it into a third plan period.

#### *State of the Environment Reports*

The first State of the Environment Report (SoE) in Saudi Arabia was published in 1984. The report, which was prepared by a foreign consultant SRI International and sponsored by MEPA, is characterized by an analytical and critical attempt to indicate environmental problems and their causes. The information provided gives a good reference for evaluating the success of environmental policies and management which took place after its publication. In 1989 MEPA issued the second SoE in Saudi Arabia, the bulk of this report consisted of

**Table 3.** Environmental policies: Sixth Development Plan, 1995–2000

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- Adopt a preventive approach that avoids or reduces environmental deterioration and pollution.
  - Issue a national system for environmental impact assessment (EIA) to be adopted in projects undertaken in the various development sectors through the kingdom, especially the industrial, agricultural and urban projects.
  - Draft and complete an integrated set of environmental standards and specification, and update them according to need and progress, within the context of an integrated environmental system at national level.
  - Taking environmental consideration into account in the various stages of development projects (i.e. planning, design, construction, operation) in all sectors especially the producing sectors of agriculture and industry, whereby all projects shall be subject to environmental impact assessment.
  - Take appropriate measures to maintain bio-diversity, preserve wildlife and conserve and manage natural resources according to the concept of sustainable development.
  - Enhance environmental management and coordination at national level through: (1) completion and issuance of national environmental code; and (2) studying the feasibility of establishing an environmental unit within each environmental related agency to co-ordinate the environmental tasks within the agency and between the agency and the general secretariat of the Ministerial Committee for the Environment and MEPA.
  - Encourage the private sector to participate in environmental protection and pollution control activities, and encourage investment in environmentally oriented activities and industries, such as waste treatment and recycling plants, and to encourage the use of environmentally sound technologies.
  - Develop manpower resources in the field of environmental science and attract qualified national manpower into the government and private sector.
  - Establish and manage the set of protected areas in a way that protects and develop the Kingdom's wildlife and preserves the diversity of botanical and zoological species and other natural resources.
  - Support research and studies related to the proliferation and breeding of various wildlife species, in order to ensure their continuity and re-settlement in their natural habitat.
  - Prepare a comprehensive national environmental awareness plan.
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Source: MOP (1995, p. 410).

coloured photographs of wildlife and the Saudi landscape; the text provided no information on the state of the environment. This edition of SoE did not aim to provide information on the environmental conditions and stress, but to make available a colourful booklet advertising MEPA and NCWCD activities. In 1992 MEPA drafted an SoE report (SoE-92) which was not officially issued. However, it was redrafted to be published as the National Report to the United Nations Conference on Environment and Development (NRUN). This is discussed in the next section.

#### *Policy Proposals*

Other policy documents included the recommendation of an MEPA sponsored conference on Environment and Development in Saudi Arabia held in 1990. This conference was the first attempt to bring together all involved agencies to discuss and debate national environmental policies. The NCWCD prepared a plan for nature and wildlife conservation *A Plan to Protect Areas in Saudi Arabia, 1990*. The Plan was prepared with the co-operation of IUCN, and was published in 1990 by the Commission. It included a proposal for a national system of

protected areas and strategic action plan, in addition to management proposals for the protected areas. Unfortunately this comprehensive effort was not officially approved. Nevertheless the NCWCD gained approval of its proposed Wildlife Reserves Areas Law (M/12 1415 H) in 1995 which might be a step to implement *A Plan to Protect Areas in Saudi Arabia* by gradually avoiding direct clashes with other agencies.

In 1992 the MCE prepared a report based on SoE-92 to be submitted to the UNCED held at Rio in 1992, *The National Report to the United Nations Conference on Environment and Development, Rio 1992* (NRUN). This report is characterized by its official language and, with the exception of a few cases, lacks the critical perspective found in the SoE-84, SoE-92, and the Fifth Development Plan of 1990. Nevertheless, it provided a good up-to-date source of information which never existed before within one document. *Agenda 21-Saudi Arabia* is a policy document based on the Rio 1992 recommendations. The Saudi version was approved in 1995. However, no evidence is available to indicate that it will be implemented in the near future.

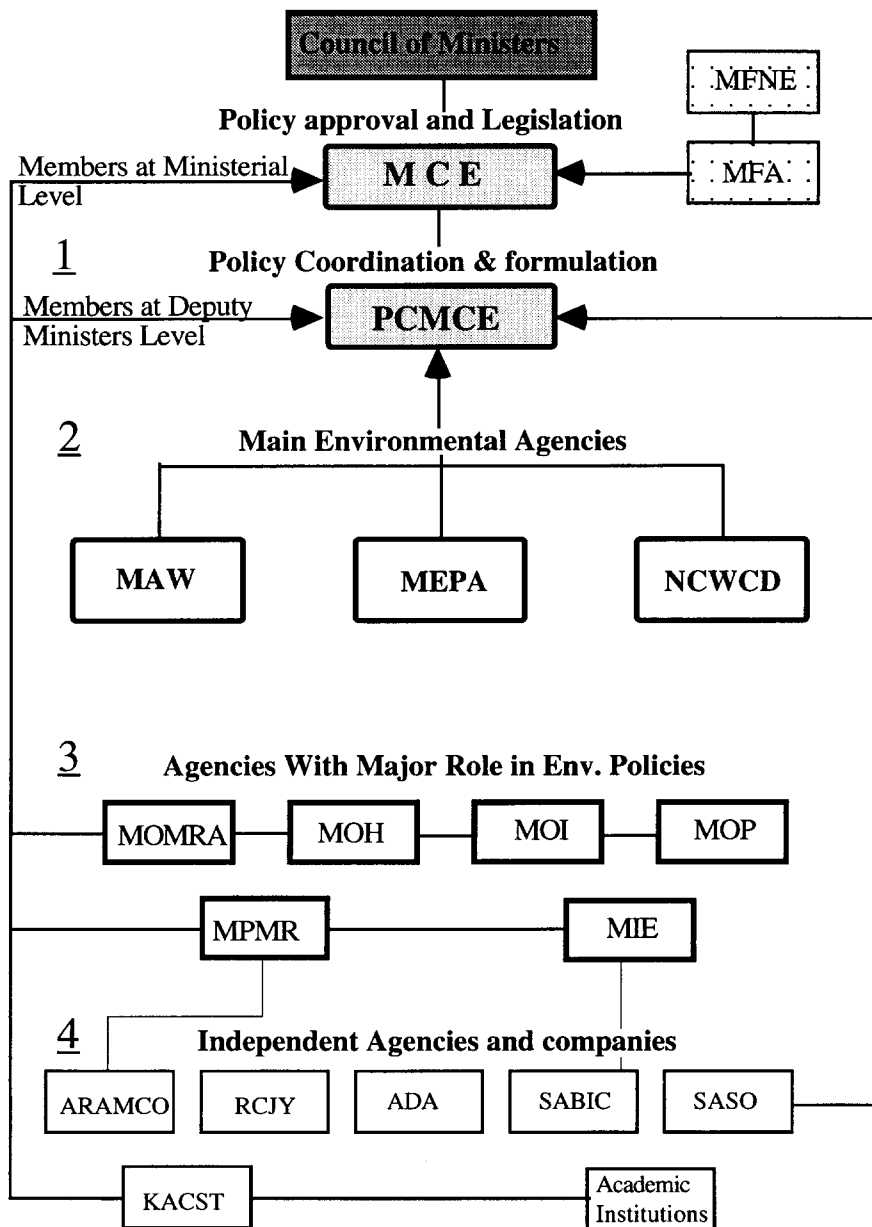
In addition to these documents, the General Law of the Environment is in the revision stage. This document is being prepared by MEPA, and is expected to provide the legal base for environmental policies and laws in Saudi Arabia. However, it was halted in the decision making processes for several years, with opposition from other agencies such as MAW and the Ministry of Municipal and Rural Affairs (MoMRA).

### **Administrative Structure**

The administrative configuration in relation to environmental issues in Saudi Arabia can be classified into four categories. The first is policy formulation and co-ordination committees. Main environmental agencies form the second category, while the third category consists of ministries with a major role in environmental policies and implementation. The fourth category consists of independent government agencies and corporations. This categorization is based on the scope of activities and the role played in formalizing environmental policies, in addition to administrative rank and membership of PCMCE and MCE<sup>2</sup> (see Figure 1).

#### *Policy Formulation and Committees for Environmental Co-ordination*

Governmental bodies within this category are involved in formalizing policies, and co-ordinating environmental activities of all agencies and ministries involved with environmental issues. This category is headed by the Council of Ministers (CM), which is the legislative and executive authority for the country.<sup>3</sup> All environmental policies and legislation are submitted for approval to the Council of Ministers by the involved agencies and ministries, after the approval of the Ministerial Committee for the Environment (MCE). The establishment of MCE in 1990 resulted from the increasing involvement in international commitments and agreements. The members of this committee are at ministerial level and are chaired by the Minister of Defence, HRH Prince Sultan. The Kingdom's position in international conferences takes a major part of the MCE's activities, in addition to reviewing international agreements and declarations and approving local policies and laws.



**Figure 1.** Categories of government agencies and ministries involved in environmental policies. Source: compiled by the authors. Key to abbreviations: MCE, Ministerial Committee on the Environment; PCMCE, Preparatory Committee for MCE; MAW, Ministry of Agriculture and Water; MEPA, Meteorology and Environmental Protection Agency; NCWCD, National Commission for Wildlife Conservation and Development; MOMRA, Ministry of Municipal and Rural Affairs; MOH, Ministry of Health; MOI, Ministry of Interior; MOP, Ministry of Planning; MPMR, Ministry of Petroleum and Mineral Resources; MIE, Ministry of Industry and Electricity; MFNE, Ministry of Finance and National Economy; MFA, Ministry of Foreign Affairs (see text for category 4 abbreviations).

Most policy proposals and draft legislation are discussed and negotiated by the Preparatory Committee for the Ministerial Committee on the Environment (PCMCE), formerly the EPCC. The members of this committee are at deputy minister level and meetings are chaired by the Deputy Minister of Defence for Civil Aviation HH Prince Fahad bin Abdullah (personal communication, 1995b). NRUN-92 specified that the president of MEPA is the chairman of EPCC-PCMCE (MCE, 1992, p. 77). On the other hand, SoE-89 stated that HRH the Second Deputy Prime Minister is the chairman of EPCC (MEPA, 1989, p. 11). The bulk of EPCC's initial mandate indicates that it is a policy committee for MEPA. However, co-ordinating environmental activities is their most vital role, since overlap of authority and rivalry between agencies increased in the 1980s. No official document other than that of the EPCC mandate is available to specify the duties of the PCMCE. It is not clear if a voting system is applied in the PCMCE meetings, and if the Secretary General has any overruling power. The wide range of conflict of interests in this 13-member committee has managed to stop some important legislation and policy proposals; on the other hand it is fair to say that this committee has managed to bring all involved parties to the same table, which is a first step towards co-ordinating environmental activities in Saudi Arabia.

#### *Main Environmental Agencies*

The second category of environmental institutions and agencies consists of the following three agencies:

- the Meteorology and Environmental Protection Administration (MEPA);
- the Ministry of Agriculture and Water (MAW);
- the National Commission for Wildlife Conservation and Development (NCWCD).

These three agencies dominate the environmental arena in Saudi Arabia, each with its own mandate and authority. However, as is the case in most countries, rivalry and overlap of activities do exist. MEPA is the main national environmental agency with wide ranging authority as specified in the *Guide of Duties and Authorities of MEPA* issued by the Higher Committee for Administrative Reformation in 1981 (HCAR, 1981). This includes environmental surveys and studies; proposing environmental laws; managing and monitoring pollution levels; marine and terrestrial nature reserves; and establishing environmental standards. MEPA's activities and plans suffer from disputes with other players in the environmental arena such as MAW and MOMRA. It also lacks sufficient resources and trained personnel to carry out its duties, especially environmental monitoring. MEPA has failed to act as a co-ordinator of environmental activities as specified in its mandate, leading to a vacuum in the administrative structure and ever-increasing rivalry between agencies.

MAW is involved in a wide range of environmental activities including, protection and management of forest and rangelands; water resources conservation and management; fisheries and marine environment management; and national parks. MAW has lost some of its influence in environmental policy making and implementation over the last 10 years to MEPA and more significantly to the NCWCD. It suffers from lack of finance and qualified personnel to carry out conservation monitoring and technical surveys. MAW

faces the problem of conflict of interest in many of its activities, e.g. water management and subsidizing wheat production which deplete valuable aquifers. The National Commission for Wildlife Conservation and Development (NCWCD) was established in 1986 as a response to the increasing threat to native wildlife, especially game animals. Concentrating first on reintroduction programmes of Houbara bustard, an important game bird for falconers, the commission managed to expand its role to become the main agency responsible for nature reserves and wildlife conservation. The commission managed to establish several nature and wildlife reserves; however, the socio-economic impact of such reserves needs to be evaluated especially on rural communities and nomadic tribes.

#### *Agencies with a Major Role in Environmental Policies*

The third category includes all ministries with a major role in environmental policy initiation, formulation, and implementation; those are:

- the Ministry of Industry and Electricity (MIE);
- the Ministry of the Interior (MoI);
- the Ministry of Municipal and Rural Affairs (MoMRA);
- the Ministry of Petroleum and Mineral Resources (MPMR);
- the Ministry of Planning (MoP);
- the Ministry of Health (MoH).

All these ministries are members of the PCMCE and MCE, and play a vital role in formulating environmental policies through their membership, in addition to their assigned mandate and authorities. MoMRA, for example, is in charge of all municipal activities for both rural and urban communities including water, sewage and waste disposal.

#### *Independent Governmental Agencies and Companies*

The fourth category consists of independent agencies and government-owned corporations with a vital role in environmental issues. With the exception of King Abdulaziz City for Science and Technology (KACST) and (SASO) these agencies and companies are not members of PCMCE or MCE. This category includes: King Abdulaziz City for Science and Technology (KACST); Saudi Aramco; the Royal Commission for Jubail and Yanbu (RCJY); Arriyadh Development Authority (ADA); Saudi Arabian Basic Industry Company (SABIC); Saudi Arabian Standardization Organization (SASO); and academic institutions (see Figure 1).

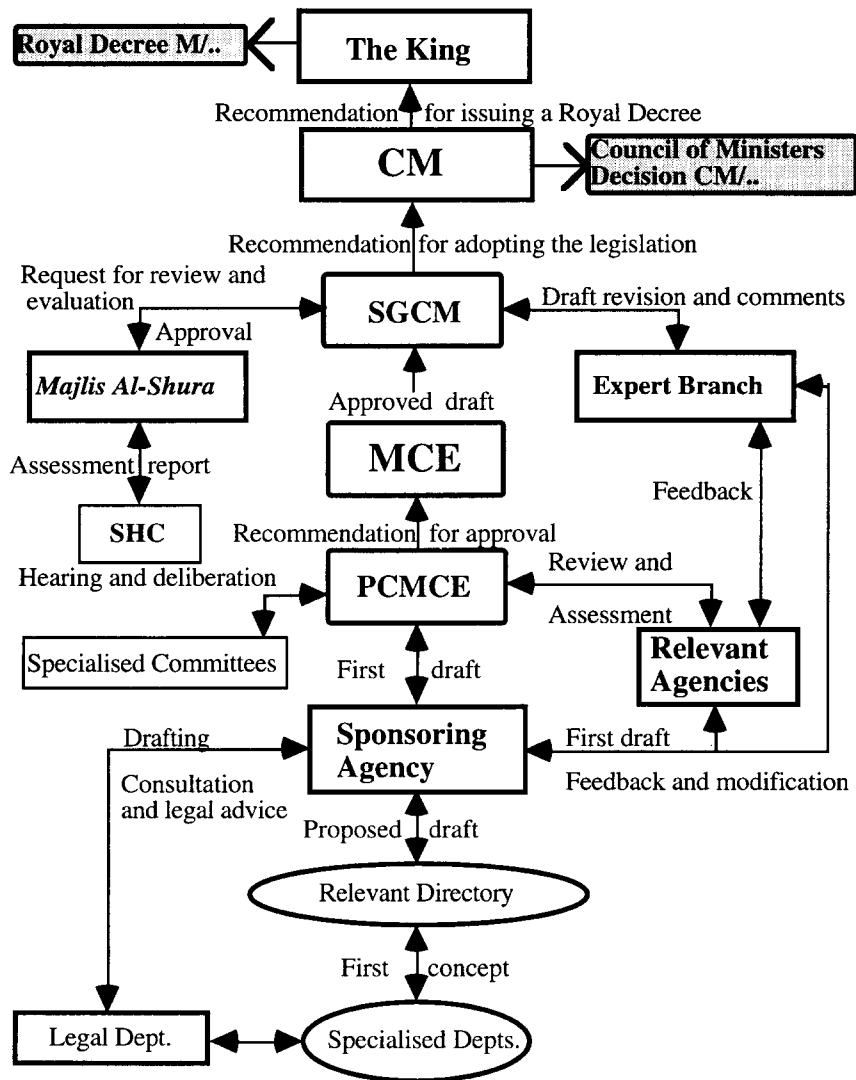
#### *Environmental Decision Making*

As is the case in other countries, the process of environmental decision making in Saudi Arabia is complicated by the diversity of players involved in the process, and influenced by the political system and prevailing administrative culture. The classical path of formalizing environmental policy in Saudi Arabia starts from departments within environmental agencies or ministries involved in environmental issues. However, when considering the overall scope of policy making in the Kingdom, Development Plans provide the general base for policy

initiation and proposals. The Fifth and Sixth Plans are good examples of initiating environmental policy proposals.

When the concept of the policy/law proposal receives initial approval from the sponsoring agency, a draft proposal is prepared and submitted to the director or general manager, who will pass it to the board of directors, as in the case of NCWCD, or deputy minister, as in the case of MAW, for discussion and assessment. The approval of the head of the agency or the minister is the final step before the proposal can be submitted to PCMCE, where all agencies and ministries involved in environmental policy and management are represented. The PCMCE will discuss the proposal and in all cases will distribute copies to member agencies for assessment and feed back. It might also refer some cases to specialized committees for further expert opinion, which takes the process to the technical staff and expert opinion level. The overlap of authority is of major importance to environmental agencies at this stage, in addition to any loss of authority and conflict of interest. It is the case that most of the discussion and argument in PCMCE covers the overlap and loss of authority by any proposed policies, legislation and programmes. The incertitude of the MEPA proposal of an EIA law by MAW and MoMRA can be partially attributed to this reason. If the policy, law or management proposal is approved by PCMCE, a process which might take several years, it will be submitted to MCE for final approval and then officially adopted by the relevant agencies and ministries. If not, it might stay at this level of decision making for some time or be withdrawn for further study and modification. This process is the model path for environmental policy making and legislation, and it is agreed upon by all ministries and agencies involved. However, until recently, proposals might be submitted to the Council of Ministers without any comments or feedback from other players (personal communication, 1995b) This usually took the conflict to a higher level in the decision-making process. The establishment of MCE in 1990 helped in bringing the involved parties together to solve their conflicts before any proposal reaches the CM.

If the proposed legislation passes through the MCE, the sponsoring agency will officially submit the proposed legislation to the Council of Ministers for discussion and approval. This stage starts with the Secretariat General of the Council of Ministers (SGCM) which administers the work of the Council. The draft policy/legislation will then be passed to the Consultative Council (*Majlis Al-Shura*) for discussion and suggestions. Within the Council, the Social and Health Committee will discuss and deliberate over the proposal. The committee might recommend the holding of a hearing on the topic to listen to expert opinion in the field.<sup>4</sup> It then will submit its report to the council for discussion and approval.<sup>5</sup> The Council will send their approval or/and recommendation for any amendments to the Council of Ministers. The proposed policy/legislation will then be passed to the Expert Branch for study and comments, which might include a discussion with representatives of the involved agencies or ministries. After the recommendation of approval by the Consultative Council and the Expert Branch comments and revision, the SGCM will recommend the Council of Ministers to adopt the proposed legislation, and to issue a "Council of Ministers Decision", e.g. the Wildlife Reserve Areas Law (CM/128 1415 H). The final shape of the policy/law can take the form of Royal Decree in addition of the CM decision (see Figure 2).



**Figure 2.** Process of environmental decision making in Saudi Arabia. Source: compiled by the authors. Key to abbreviations: CM, Council of Ministers; SGCM, Secretary General of the Council of Ministers; MCE, Ministerial Committee on the Environment; PCMCE, Preparatory Committee for MCE; SHC, Social and Health Committee.

*Concluding Remarks*

The review in this paper of Saudi environmental policies has shown that the Government has attempted to address environmental problems by drafting policy proposals in addition to legislative efforts to constitute a comprehensive set of environmental laws and policy proposals. This effort is faced with several problems, including the inconsistency of policy proposals and failure to implement the proposed policies, such as those of the Fifth Development Plan. Furthermore, legislation is not yet comprehensive, and several important areas

still need to be covered especially in the environmental health sector. The failure to pass the environmental assessment laws is a striking example of a long overdue law stopped by authority conflicts in the policy-making process.

There is a gap in governmental documentation in relation to environmental qualities and conditions. The existence of only one comprehensive State of the Environment Report is evidence of the inability of MEPA to carry out one of its main duties. On the other hand the NRUN-1992 was a good joint effort resulting from international environmental politics. The regular issuing of state of the environment reports is of vital importance. These should aim to educate the public about environmental conditions and health, as well as providing the Government with baseline information when reviewing policy proposals and drafting new laws. A mechanism to follow up policy implementation is needed. Theoretically the Consultative Council members can play a role in questioning environmental agencies about policy and programme implementation, which might place some pressure on agencies to submit progress reports for their programmes.

The establishment of EPCC and later PCMCE-MCE helped in bringing together all involved players to one table which facilitated the process of environmental decision making. However, these co-ordinating bodies also became a place of conflict, where each agency sought to maintain and, if possible, expand its authority. This power struggle resulted in disrupting the process and in some cases blocking important policies and legislation. The problem can be attributed to the lack of decisive authority in the process, as all major agencies have similar ranks, or the political power to counter-attack any effort to reduce their authority. Independent agencies (the fourth category), in having the advantage of an independent policy making process, managed to establish their own environmental policies and management programmes. These have proved to be more efficient when compared with those of MEPA and MOMRA. Environmental activities and the implementing authorities needs a redistribution, including a restructuring of MEPA to enable it to function as a monitoring and co-ordinating body. MAW's conflict of interest is another area in urgent need of evaluation and study. The process of environmental decision making can benefit from more public participation. Increased public awareness and access to information are necessary conditions for such participation, and their useful involvement in environmental issues will help keep policy makers aware of genuine public concern.

## Notes

1. Access to governmental documents was in some cases difficult, and the discussion is based on the available documents at the time. It is possible that other documents do exist but were not available to the authors, for example a classified report prepared by the World Bank dealing with environmental policies and institutions. Child & Grainger (1990) listed an unpublished 1985 State of Environment Report in their bibliography.
2. The Ministry of Finance and National Economy (MFNE) and the Ministry of Foreign Affairs (MFA) are both members of MCE. However, their role is limited to specialized issues such as international declarations and budget allocation. Neither was classified within the suggested categories (see Figure 1).
3. For more information on the Saudi political and administrative system see Dhlan (1990); Bulloch (1993); and Al-Tawail (1995).

4. No access was available to find out the mechanism of deliberation over environmental issues. The above assumption is based on the duties and authority of the *Majlis*. In the case of the Wildlife Reserves Areas Law (M/12 1415 H) the Royal Decree referred to *Majlis Al-Shura* decision No. 10/9/14 on 26/12/1414 H without reference to the recommendation of the *Majlis*. This can be assumed as a recommendation for approval.
5. For example in 12/3/1415 H the Council discussed the report of the SHC regarding the proposed law of Trade in Endangered Species and its Products which was proposed by NCWCD (see *Al-Nadwah Newspaper*, 1995).

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