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PUBLIC PARTICIPATION AND INPUT FRAMING IN
ENVIRONMENTAL DECISION MAKING:
LESSONS FROM SOUTH AFRICAN STRATEGIC ENVIRONMENTAL
ASSESSMENTS

THESIS BOOKLET

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1. INTRODUCTION

Public participation has become an established component of environmental decision-making. The growing emphasis on citizen participation is reflected in major global sustainability milestones, including the Rio Declaration, Aarhus Convention and the Escazú Agreement. These instruments recognise access to environmental information, participation in decision-making, and access to justice as fundamental procedural environmental right (ECLAC 2018, Sharman 2023, United Nations 1992). Similarly, European Union directives such as the Access to Environmental Information Directive (2003/4/EC) and the Public Participation Directive (2003/35/EC) formalise these principles within regional governance systems (Ene 2014, Stec and Jendroška 2019, Lopez-Cubillos et al. 2022, Wesselink et al. 2011). In addition, the institutionalisation of public participation reflects recognition that environmental decisions involve not only technical and scientific considerations, but also different forms of knowledge, interests, values and societal concerns (Carrick et al. 2022, Sharman 2023, O’Faircheallaigh 2010).

The formal recognition of public participation, however, does not imply that participation has a single or universally defined purpose. The literature identifies normative, substantive and instrumental rationales for public participation, reflecting different expectations about the role of stakeholders and the public in environmental decision-making (Wesselink et al. 2011, Sharman 2023). Participation may be understood as a democratic or procedural entitlement, as a means of incorporating knowledge and perspectives into decisions, or as a practical mechanism for addressing competing interests, building agreement and supporting implementation (Carrick et al. 2022, Höppner 2009, Sharman 2023). These rationales may coexist within the same governance framework or participatory process, while their relative emphasis may differ across contexts (Suškevičs 2019). Examining these differences is therefore important for understanding what participation is intended to achieve and how these purposes are articulated across environmental governance.

South Africa provides a particularly relevant context in which to examine these questions. Following the transition to democracy, public participation became firmly embedded within the country's constitutional and environmental governance framework. The Constitution and the National Environmental Management Act (NEMA) establish

principles and procedures that support public involvement in environmental decision-making (NEMA 1998), while environmental assessment processes provide formal opportunities for interested and affected parties to contribute to decisions. At the same time, participation occurs within a society characterised by substantial socio-economic inequality, differences in access to resources, knowledge, expertise and competing interests (Ndlovu and Muringa 2026, Boakye and Akpor 2012, Khan 1998). These conditions make the purposes attributed to participation and their expression in environmental decision-making an important area of inquiry.

This study focuses specifically on Strategic Environmental Assessment (SEA) as the empirical context for examining public participation in practice. SEA provides a setting in which environmental, social and economic considerations are incorporated into the development of policies, plans and programmes. Unlike project-level Environmental Impact Assessment, SEA operates at a strategic level and can provide opportunities for stakeholders to contribute knowledge, concerns and perspectives during planning and decision-making processes (Abaza, Bisset, and Sadler 2005, Fundingsland Tetlow and Hanusch 2012, Matome 2023). The role assigned to participation within SEA therefore provides an appropriate context for examining both the purposes attributed to participation and the treatment of individual stakeholder contributions.

The study addresses two related aspects of public participation. The first concerns why participation is undertaken. Although participation has become institutionalised across environmental governance, the purposes attributed to it are not necessarily uniform. Different rationales may be emphasised across international environmental governance instruments, national policy and individual environmental assessment processes. Examining these levels provides an opportunity to consider how participation is justified and whether particular rationales are consistently reflected as participation moves from international environmental governance into national policy and environmental assessment practice.

The second gap concerns the treatment of individual stakeholder contributions once they enter environmental decision-making processes. Existing research has examined participation effectiveness and the relationship between participation and decision-making outcomes, while recent research has drawn attention to the intermediate stage

between stakeholder submissions and subsequent decision-making outcomes (Eriksson, Fredriksson, and Syssner 2022, Ulibarri, Scott, and Perez-Figueroa 2019, Grote 2024), with Eriksson et al. (2022) conceptualising this stage as the “black box” of participatory planning. However, comparatively less attention has been given to whether observable characteristics of individual stakeholder inputs, including the stakeholder group making the submission and the way in which the input is framed, are associated with differences in their documented treatment within Strategic Environmental Assessment processes.

The study addresses these gaps through two complementary lines of analysis. First, it examines the articulation of participation rationales across selected international environmental instruments, South African participatory policy and selected Strategic Environmental Assessment processes. Second, it examines individual stakeholder submissions within selected South African Strategic Environmental Assessments and considers whether stakeholder group and input framing are associated with differences in documented responses to those submissions.

The study is situated primarily within environmental management, while drawing on concepts from governance and communication studies. Its central aim is to examine public participation in environmental decision-making by identifying the rationales underpinning participation within international environmental governance and examining whether observable characteristics of stakeholder inputs are associated with different patterns of observed responses within Strategic Environmental Assessments.

Research Questions

1. What rationales underpin public participation in selected international environmental governance instruments, and how are these reflected in South African participatory policy and practice?
2. Are different forms of stakeholder input framing associated with different patterns of documented response within Strategic Environmental Assessments?
3. Are different stakeholder groups associated with different patterns of documented response to stakeholder inputs within Strategic Environmental Assessments?

2. THEORETICAL AND CONCEPTUAL BACKGROUND

2.1 Strategic Environmental Assessment and public participation

Environmental assessment provides a means of incorporating environmental considerations into development decision-making. While Environmental Impact Assessment (EIA) is generally associated with defined projects, Strategic Environmental Assessment (SEA) extends environmental assessment to policies, plans and programmes. SEA therefore addresses environmental and sustainability considerations at an earlier strategic stage, before individual projects are fully defined and strategic choices become firmly established (Abaza, Bisset, and Sadler 2005, Matome 2023, Runhaar 2016, Souloutzoglou and Tasopoulou 2020, Retief 2007).

Public participation forms part of this broader environmental decision-making context. Within SEA, participation provides opportunities for stakeholders to contribute information, knowledge, perspectives and concerns to strategic planning and assessment processes. The relevance of participation to SEA is linked to the need to consider diverse forms of knowledge and perspectives when addressing environmental, social and economic considerations associated with development choices.

The present study focuses on SEA because it provides an appropriate setting for examining both the purposes attributed to public participation and the treatment of individual stakeholder inputs. The study is therefore concerned with what participation is intended to achieve and how stakeholder contributions are communicated and addressed within the assessment process.

2.2 Rationales for public participation

Rationales provide the theoretical justification for public participation by defining its underlying purpose, the objectives it seeks to achieve and the principles guiding participatory processes. The rationale underpinning participation can also affect how participation is designed, including who participates, when participation occurs, what forms of knowledge are considered relevant and the extent to which participants are able to contribute to decisions (Glucker et al. 2013, Höppner 2009, Wesselink et al. 2011, Suškevičs 2019).

The literature commonly distinguishes between normative, substantive and instrumental rationales (Delgado, Lein Kjøberg, and Wickson 2011, Glucker et al. 2013, Höppner 2009, Sharman 2023, Stirling 2009, Suškevičs 2019, Wesselink et al. 2011). These rationales are analytically distinct but are not mutually exclusive; a single participatory process may pursue more than one purpose.

The normative rationale views participation as a democratic right. Participation is justified because individuals affected by decisions should have an opportunity to express their views and participate in decisions affecting their lives and communities. It therefore emphasises fairness, inclusion, transparency, accountability, equity and democratic legitimacy (Bidwell and Schweizer 2020, Höppner 2009, Laurian and Shaw 2009, Sharman 2023).

The substantive rationale views participation as a means of improving the quality of decision-making. It emphasises the contribution of stakeholder knowledge, information and perspectives to the substance of decisions. From this perspective, environmental decisions can be strengthened by incorporating scientific, local, experiential and value-based knowledge rather than relying solely on technical expertise (Glucker et al. 2013; Wesselink et al. 2011; Sharman 2023; Suškevičs 2019).

The instrumental rationale views participation as a means of achieving broader policy and decision-making objectives. It is associated with objectives such as improving public acceptance, reducing conflict, building agreement, strengthening legitimacy and facilitating implementation (Höppner 2009; Stober et al. 2021; Suškevičs 2019). Participation may therefore be used to identify concerns, address opposition and support the implementation of decisions.

These distinctions provide an important conceptual basis for the first part of the study. The study examines how normative, substantive and instrumental rationales are articulated across international environmental governance instruments, South African participatory policy and selected SEA processes.

2.3 Framing of stakeholder inputs

The second part of the study moves from why participation takes place to how stakeholder contributions are communicated. Framing theory provides a conceptual lens for examining how stakeholders present environmental issues and concerns. The way information is packaged and presented can shape how an issue is understood, including which aspects are emphasised and which are given less attention (Chong and Druckman 2007).

The study draws on the distinction between diagnostic, prognostic and motivational frames developed in the framing literature (Benford and Snow 2000, Feront and Bertels 2019, Mendelsohn et al. 2024). Diagnostic framing identifies or defines a problem, including its causes or responsibility. Prognostic framing goes further by proposing solutions, alternatives or recommendations for addressing the identified issue. Motivational framing seeks to encourage action by appealing to values, emotions or moral responsibility (Benford and Snow 2000, Feront and Bertels 2019, Mendelsohn et al. 2024)..

The empirical analysis adapted this framework because no stakeholder inputs in the dataset corresponded to motivational framing. A separate informational framing category was therefore used for inputs that primarily communicated information, raised concerns or sought clarification without explicitly defining a problem or proposing a course of action.

Framing theory is particularly relevant to the present study because it provides a basis for examining whether different ways of communicating stakeholder concerns are associated with different patterns of documented response within SEA processes.

2.4 Stakeholder salience

Framing alone does not account for differences between the stakeholders presenting the inputs. Stakeholder salience theory provides a complementary perspective by addressing why some stakeholder claims may receive greater attention than others. Building on stakeholder theory, Mitchell et al. (1997) propose that stakeholder salience is determined by three attributes: power, legitimacy and urgency. These attributes shape the degree of attention decision-makers give to competing stakeholder claims. Power may arise through

legal authority, political influence, financial resources, scientific expertise or the ability to mobilise support. Legitimacy concerns whether a stakeholder's involvement or claim is regarded as appropriate or justified, while urgency concerns the time sensitivity and criticality of the claim (Mitchell, Agle, and Wood 1997). Stakeholders possessing different combinations of these attributes are consequently expected to command different levels of attention.

Within this study, stakeholder salience provides a complementary lens to framing theory. Framing concerns the characteristics of the input itself, how a concern is communicated, whereas stakeholder salience concerns characteristics of the stakeholder presenting the input. The two perspectives provide the conceptual basis for examining whether variation in documented responses is associated with both the form of stakeholder communication and stakeholder characteristics.

3. RESEARCH METHODOLOGY

3.1 Research design

The study employed a two-phase research design combining qualitative content analysis and quantitative analysis. Phase I examined the rationales underpinning public participation in selected international, regional and South African environmental governance instruments. Phase II examined public participation within two selected South African Strategic Environmental Assessment (SEA) processes, including the purposes attributed to participation and the characteristics and documented responses to individual stakeholder inputs.

The two phases address complementary dimensions of public participation. The first examines how participation is conceived and justified within environmental governance frameworks, while the second examines how participation is articulated and documented within SEA processes and how stakeholder inputs are treated within those processes.

3.2 Phase I: Analysis of participation rationales

Phase I examined selected international, regional and South African environmental governance instruments to identify the rationales underpinning public participation. The documents were selected according to the criteria specified in the study and analysed using directed qualitative content analysis.

The analysis applied a deductive coding framework comprising three rationale categories: substantive, normative and instrumental. Because a single contextual instance could contain more than one rationale, the analysis distinguished between contextual instances and rationale occurrences. The coded material was tabulated to examine the distribution of rationale categories within individual documents, across source groups and across the complete document set.

3.3 Phase II: Analysis of public participation in selected SEAs

Phase II examined public participation within two Strategic Environmental Assessment processes conducted in South Africa. The analysis extended the rationale framework from Phase I to the selected SEA processes and examined stakeholder inputs and their documented responses.

The empirical material was obtained from the documentary records of the two selected SEA processes. The SEA reports and associated public participation records were

obtained from the Council for Scientific and Industrial Research (CSIR) and the Department of Forestry, Fisheries and the Environment (DFFE). The selected cases provided variation in geographical scale, type of strategic development and participation context, while both contained documented stakeholder inputs and responses required to address the research questions.

A total of 100 stakeholder inputs meeting the specified selection criteria were identified and constituted the full dataset used in the quantitative analysis.

3.4 Analysis of stakeholder inputs

Stakeholder inputs were analysed according to their content, stakeholder type, framing type, sector and documented response. Content was coded into six categories, with individual inputs permitted to receive more than one category where they addressed multiple issues. Frequencies and percentages were used to describe the distribution of issues across stakeholder inputs and stakeholder groups.

Framing was classified into three categories: diagnostic, prognostic and informational. Stakeholders were classified according to the stakeholder categories recorded in the SEA reports. Government departments and agencies participating in the SEA process were classified as government agencies, distinct from institutions responsible for commissioning or conducting the SEA. Other stakeholder categories included local residents, NGOs and NPOs.

Documented responses were classified according to whether the SEA documentation indicated a substantive or non-substantive response to the stakeholder input.

3.5 Logistic regression analysis

Binary logistic regression was used to examine whether characteristics of stakeholder inputs were associated with the likelihood of receiving a substantive documented response. The analysis used the 100 stakeholder inputs as the empirical dataset. Categorical variables were numerically coded for the regression analysis, and the dataset was reviewed for completeness and consistency before statistical analysis. The primary model examined framing type, stakeholder type and sector in relation to documented substantive response. A supplementary model replaced stakeholder type with a stakeholder-type-based salience score. The substantive findings relating to framing remained unchanged in the supplementary model, while the salience result was

interpreted cautiously because the goodness-of-fit test indicated evidence of lack of fit.
The quantitative analysis was conducted using R.

4. SCIENTIFIC RESULTS OF DISSERTATION

The findings provide insight into public participation at two related levels: the purposes attributed to participation and the treatment of individual stakeholder inputs within SEA processes. The results indicate that participation is not characterised by a single purpose or a uniform form of stakeholder contribution. Rather, variation occurs both in the rationale associated with participation and in the way stakeholder inputs are framed and addressed.

4.1 Variation in participation rationales

The first component of the study found that substantive rationales were most frequently represented across the selected environmental governance instruments, followed by normative and instrumental rationales. This suggests that participation is frequently justified in terms of its potential contribution to the substance of environmental decision-making, including the incorporation of knowledge, information and stakeholder perspectives.

At the same time, the findings show that the emphasis placed on participation differs across governance contexts. The international environmental governance instruments contained substantial representation of both substantive and normative rationales, while the South African participatory policy framework reflected all three rationale types. The two SEA cases displayed a more differentiated pattern, with the REDZ SEA emphasising instrumental purposes and the SKA SEA emphasising substantive purposes.

The contrast between the two SEA cases is relevant because it illustrates that the institutional provision of participation does not necessarily translate into a uniform understanding of its purpose in practice. In the REDZ SEA, participation was associated with agreement, buy-in and commitment, whereas in the SKA SEA it was associated more explicitly with the consideration and use of stakeholder knowledge and inputs. However, given the examination of only two SEA cases, these differences should be understood as contextual variation rather than evidence of a general relationship between SEA context and participation rationale.

4.2 Stakeholder inputs as differentiated contributions

The analysis of the 100 stakeholder inputs further shows that participation generated a diverse set of substantive concerns. Spatial, land-use and property issues were most frequently identified, alongside environmental and technical issues, followed by socio-

economic and livelihood, infrastructure and development, and participation, governance and rights issues. The distribution of these concerns varied across stakeholder groups. This indicates that stakeholder brought different substantive priorities into the SEA processes. NGO inputs were particularly associated with environmental concerns, local-resident inputs more frequently addressed socio-economic and livelihood, infrastructure and development, and participation-related issues, while government inputs were more frequently associated with technical and spatial concerns.

4.3 Input framing and documented response

A central finding of the study concerns the relationship between how stakeholder inputs were framed and how they were addressed. Prognostic framing was the most common form of input overall, but its distribution differed markedly across stakeholder groups. Local residents predominantly submitted informational inputs, whereas NGOs overwhelmingly used prognostic framing.

The documented responses also varied according to framing. Informational inputs were predominantly associated with non-substantive responses, while prognostic inputs were predominantly associated with substantive responses, with diagnostic inputs occupying an intermediate position. The regression analysis provides further support for this relationship. After accounting for stakeholder type and sector, informationally framed inputs had significantly lower odds of receiving a substantive documented response than prognostically framed inputs.

This finding is important for understanding the participatory process because it suggests that the form in which a stakeholder contribution is communicated is associated with how that contribution is subsequently addressed. The result does not establish that framing causes a particular decision response. Rather, it identifies an association between the characteristics of stakeholder communication and the observed treatment of those inputs within the examined SEA processes.

4.4 Stakeholder characteristics and response

The descriptive findings also showed differences in documented response across stakeholder groups. Substantive responses were more frequently recorded for NGO and government agency inputs than for local-resident inputs.

These differences are consistent with the relevance of stakeholder characteristics considered through the stakeholder-salience perspective. Stakeholders may differ in

attributes such as power, legitimacy and urgency, which can affect the attention given to their claims. However, the regression results do not provide a basis for interpreting stakeholder type alone as a consistent predictor of substantive response. Most stakeholder-type coefficients were not statistically significant in the primary model.

The supplementary analysis incorporating stakeholder salience provided some indication of a positive association between salience and substantive response, but the model's goodness-of-fit limitations require this finding to be interpreted cautiously. It therefore provides suggestive rather than conclusive evidence regarding the relationship between stakeholder salience and documented response.

5. Conclusion

This study examined public participation at two related levels; the rationales underpinning participation within environmental governance frameworks, and the documented treatment of individual stakeholder inputs within Strategic Environmental Assessment processes.

The first part of the study examined how established rationales for public participation are expressed across international environmental governance instruments, South African participatory policy, and SEA practice. The analysis identified substantive, normative and instrumental rationales across these sources, but their relative emphasis varied across contexts. International instruments and South African policy reflected particularly strong substantive and normative orientations, while the selected SEA cases illustrated that the purposes attributed to participation in practice may differ between assessment contexts. The REDZ SEA placed greater emphasis on instrumental purposes associated with agreement, buy-in and commitment, whereas the SKA SEA reflected a substantive orientation towards the consideration of stakeholder inputs and local knowledge. The findings show that the emphasis placed on these rationales differs across the international, national and SEA contexts examined.

The second part of the study focused on what happens to stakeholder contributions once they are submitted. The analysis of 100 stakeholder inputs showed notable variation in the issues raised, the stakeholder groups presenting them, the manner in which they were framed, and their documented treatment. The content analysis showed that stakeholder inputs addressed a diverse range of issues, with differences in the issues emphasised by

stakeholder groups. NGO inputs were particularly associated with environmental issues, local-resident inputs more frequently addressed socio-economic, infrastructure and participation-related concerns, and Government inputs were more frequently associated with technical and spatial matters. This finding establishes the range of concerns represented in the SEA processes and the different priorities brought by stakeholder groups. The analysis of framing showed clear differences in how stakeholder groups expressed their inputs. Local-resident inputs were predominantly informational, while NGO inputs were predominantly prognostic. These framing differences were also reflected in the pattern of documented responses, with prognostically framed inputs more frequently receiving substantive responses than informationally framed inputs. The regression analysis provided further evidence of an association between framing type and the likelihood of receiving a substantive response, after accounting for stakeholder group and sector.

The regression analysis showed a statistically significant association between stakeholder input framing and substantive response. Informationally framed inputs had substantially lower odds of receiving a substantive response than prognostically framed inputs, and the inclusion of framing type significantly improved the model relative to a model containing stakeholder type and sector alone. The finding however, does not establish that framing causes a particular response, nor does it imply that prognostic contributions are more valuable than informational or diagnostic inputs. Rather, it indicates that the way in which a stakeholder input was framed was associated with variation in how that input was treated within the SEAs examined.

An input may contain an important concern without expressing that concern as an explicit recommendation or proposed course of action. Therefore, the observed relationship between framing and documented response draws attention to what happens to stakeholder contributions after they are submitted and how they are interpreted within the assessment process. The finding suggests that the responsiveness of participatory processes may be partly connected to how the concerns contained within stakeholder contributions are recognised and translated into forms that can be addressed within assessment processes.

Although the descriptive analysis showed differences in documented response across stakeholder groups, stakeholder type did not provide a consistent statistically significant

explanation for variation in substantive response in the primary regression model. The supplementary salience analysis provided suggestive evidence of a positive association between stakeholder salience and substantive response, but due to lack of model fit, this finding has to be interpreted cautiously. The results therefore do not support a straightforward conclusion that particular stakeholder groups systematically receive more substantive responses. Instead, they suggest that stakeholder characteristics may also be associated with variation in documented response, but their role was less consistent than that observed for framing.

The study provides another perspective on the intermediate stage between the participation process and decision outcomes by examining individual stakeholder inputs and their documented treatment within the assessment process. This provides a basis for considering what stakeholders contribute, how those contributions are presented, who presents them, and what can be observed about their subsequent treatment.

5.1 Addressing research questions

The first research question asked what rationales underpin public participation in selected international environmental governance instruments and how these are reflected in South African participatory policy and practice. The international environmental governance instruments examined reflected particularly strong substantive and normative rationales, while South African participatory policy similarly incorporated these rationales. The selected SEA cases showed variation in how the purpose of participation was articulated in practice. The REDZ SEA placed greater emphasis on instrumental purposes whereas the SKA SEA reflected a substantive orientation towards the consideration

The second research question was concerned with whether different forms of stakeholder input framing are associated with different patterns of documented response within SEAs. The findings provide evidence of such an association. In particular, informationally framed inputs had significantly lower odds of receiving a substantive documented response than prognostically framed inputs. The finding indicates that the manner in which stakeholder concerns are framed is associated with their documented response.

The third research question asked whether different stakeholder groups are associated with different patterns of documented response. The findings provide more limited evidence. Although descriptive differences were observed between stakeholder groups,

stakeholder type did not consistently explain variation in substantive response in the primary regression model. The study therefore does not support a simple conclusion that stakeholder group are associated with how stakeholder inputs are treated.

5.2 Scientific contribution

The study contributes to research on public participation in two ways, firstly, the study provides an empirical comparison of participation rationales across international environmental governance instruments, South African participatory policy and selected SEA practice. This shows how normative, substantive and instrumental purposes coexist but may receive different emphasis across contexts. Secondly, the study shows that input framing is associated with documented response. In particular, the substantially lower odds of substantive response for informationally framed inputs compared with prognostically framed inputs identifies framing as a relevant characteristic for understanding variation in how stakeholder contributions are treated.

5.3 Limitations

This study examined two selected Strategic Environmental Assessment cases, and the findings therefore reflect the specific institutional and contextual characteristics of these cases. In addition, the analysis was based on documented stakeholder inputs and responses, and therefore reflects what could be identified and traced in the available SEA documentation.

5.4 Recommendations and future research

The findings suggest a need for attention to how stakeholder inputs are interpreted and addressed after they are submitted. Informationally framed inputs were substantially less likely to receive a substantive documented response than prognostically framed inputs. This finding raises the possibility that the form in which stakeholder concerns are communicated may be relevant to how they are addressed within the assessment process. Assessment practitioners could therefore focus on identifying the concern contained within each input, including where concerns are expressed through questions, requests for clarification or information. More systematic documentation of how individual stakeholder concerns are considered and addressed could also make their treatment more transparent and traceable within the SEA process.

This study also identifies several areas for further research. Firstly, the relationship between framing and documented response could be examined using larger datasets covering a greater number of inputs or SEAs. Secondly, the role of stakeholder characteristics and salience requires further investigation. The supplementary model provides suggestive evidence that higher salience may be associated with greater odds of substantive response, but the model's lack of fit means that this finding cannot be treated as conclusive. Future research could develop more detailed measures of power, legitimacy and urgency using information about individual stakeholders and their institutional positions rather than assigning attributes primarily according to stakeholder category. Finally, future research could examine whether the documented treatment of stakeholder inputs is reflected in assessment outputs or decisions. Following these inputs through revisions, recommendations, mitigation measures or final decisions could extend the analysis by examining whether documented substantive responses are later reflected in observable changes to assessment outputs or decision outcomes

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