



Article

What Are the Main Challenges Impeding Implementation of the Spatial Plans in Egypt Using Ecotourism Development as an Example?

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Abstract: In Egypt, highly technical plans are drawn up, but nobody puts them into practice. They always end up gathering dust on the shelves of national agencies or local government without being utilised to make improvements to local economic or environmental well-being. This is because such plans did not reflect the stakeholder interests nor deal with their conflicts. The collaborative planning approach is exalted as one of the best methods to help reach a consensus between the stakeholders about the issues and to advance shared solutions and then increase the likelihood of successful implementation of a plan. However, the stakeholder collaboration and engagement practice in Egypt remains ineffective. This research seeks to investigate and understand the challenges and barriers that have hindered the efficiency of stakeholder engagement during ecotourism planning as a sectorial case study by focusing on two case studies, and critiquing existing experiences of ecotourism development planning based upon a conceptual framework for investigating and understanding those challenges. Evidence was drawn from a critical documentary review, and combined with observation and semi-structured interviews with 56 ecotourism experts and stakeholders. The analysis suggests that the stakeholder engagement was tokenistic, and the central government was still dominant. This is a result of three groups of challenges including deficiencies in operationalising stakeholder engagement and challenges associated with the government and non-government stakeholder groups.

Keywords: spatial plans implementation; planning process; collaborative approach; ecotourism and stakeholders engagement

1. Introduction

The inadequacies of the traditional planning approach for such a complex domain as spatial development is seen as one of the most critical factors impeding the implementation of plans in Egypt. However, the planning system is still based on a top-down process that suffers from centrality and a central government monopoly of decision-making in most of the steps. The process of producing plans focuses on high technical quality, based on consultants' experiences and successful case studies in other developing countries. But such plans rarely meet relevant stakeholders' interests. Therefore they are not put into practice and end up gathering dust on the shelves (Bonilla 2008). The main flaws in the current plan-making process are centred on the main stakeholder groups not being involved during the process and the majority of the participants in the consultation workshops being governmental employees (Kenawy 2015). In Egypt, the lack of negotiation between the relevant stakeholders with competing interests in the same location has led to conflict and overlap between different, often sectionally focused, development plans for the same area. There are multiple and frequent plans for the same place under different names and responsibilities, which has led to incongruous proposals for land use and failure

of decisions about appropriate (type and scale) development, and the subsequent degradation of environmental asset and a loss of potential economic benefits. For example, Fayoum Governorate is a typical development region that has fourteen development plans: six plans prepared by the Tourism Development Authority (TDA), three plans prepared by each of General Organization for Physical Planning (GOPP) and Egyptian Environmental Affairs Agency (EEAA) and a plan prepared by each of Ministry of Planning and International Cooperation (MPIC) and Governorate in association with Cairo University. Unfortunately, the majority of these agencies prepare plans without critically evaluating the previous or synchronous plans in order to build a new one based on their results which would therefore have added value.

Further to this, to identify an appropriate way to improve the implementation of plans in Egypt, an informal survey was conducted by the authors with nine key Egyptian experts and consultants in spatial planning. Most of the interviewees asserted that enhancing the planning process, through the participation and collaboration of the relevant stakeholders, as the key positive contribution that could be made for addressing most of the critical factors which are impeding the implementation of plans. This collaborative process could also help provide the financial resources for implementation from the stakeholders themselves or enable them to seek other resources to put into practice the plans that meet their interests.

Likewise, a rich body of literature on planning implementation, such as [Gray \(1989\)](#); [Mazmanian and Sabatier \(1989\)](#); [Kenawy and Shaw \(2014\)](#), has pointed out that the key drivers of implementation success are: clear and consistent objectives; causal linkages between objectives and actions; designation of a sympathetic stakeholder with adequate resources to prepare and implement the plans; strong public support; and then a commitment to implementation. Additionally, [Albert et al. \(2003\)](#) asserted that successful plan implementations are (a) more likely to have stakeholder support and (b) they comply with a plan with which the stakeholders were involved in developing. Their research also concluded that active engagement of a wide range of stakeholders in the planning process will increase the likelihood of successful implementation of a plan.

According to [Kenawy \(2015\)](#) and [Kamarudin \(2013\)](#), the collaborative planning approach (CPA) is exalted as one of the best methods to promote the communication and collaboration within and between institutions as well as broadening stakeholders' participation. It can resolve the conflicts between stakeholders and produce more shared and equitable solutions.

Egyptian ecotourism development (ED) is used as a case study for new development. This is because: (i) such plans are being developed in highly sensitive regions, both environmentally and culturally, and there is a wide spectrum of stakeholders who are affected and influenced by any ecotourism development ([Preskill and Jones 2009](#)); (ii) ED planning is a complex issue; no single actor has required the knowledge and information to resolve an issue; (iii) ED is seen as being important for Egypt in mitigating the issues of mass-tourism strategies which have led to Egyptian tourism products being perceived as low-price and low-quality ([Chemonics 2006](#)); (iv) well planned and implemented ED could maximise the benefits from the Environmental Sensitive Areas which represent more than 20% of the country's total area ([Ibrahim 2011](#)); and (v) ED also provides opportunities to expand the Egyptian share of the global tourism market and recover its recent drop in competitiveness ranking from 58th out of 124 tourism countries worldwide in 2007 ([WEF 2007](#)) to 75th out of 139 by 2011 ([WEF 2011](#))¹.

Therefore, this research seeks to identify the potential of collaborative planning approach (CPA) to address the problems in the current planning process and then understand the deficiencies and challenges that have prevented an acceptable level of stakeholder participation during the planning process of two Egyptian ecotourism initiatives. This understanding would be a big step toward

¹ The effects of the recent political turmoil are not captured by the data discussed within this report because it was completed by March 2011.

mitigating these challenges and increase the likelihood of successful implementation of plans in Egypt. The paper can be divided into three main parts. The first one, after the introduction, to sketch the main element of Egyptian planning system; the second part develops an idealised conceptual framework for understanding the challenges that have hindered the efficiency of stakeholder engagement during ecotourism planning based upon an analytical review of the relevant literature. Two ecotourism planning process case studies are then evaluated in the third part to identify the challenges that have prevented an acceptable level of stakeholder collaboration in Egyptian ecotourism planning.

2. Planning system in Egypt

The planning system in Egypt can be characterised as top-down whereby the state adopts full control of the planning process through centralised planning institutions. These have the upper hand in decision-making, in order to achieve nationally determined goals and policies (Shalaby 2012). Limited responsibility, if any, is given to the regional and local governments (El-Barmelgy 2002). Although there have been many state initiatives designed at least theoretically to try and transfer power to a more decentralised planning system (bottom-up process), they have all failed. This is due to the budget still being controlled in a top-down manner and the creation of hybrid intergovernmental structures. This has led to more duplication and conflicts between agencies. Local government offices have been given responsibilities but without any decision-making power or budgetary responsibility (Loughlin and Nada 2012). Furthermore, the deficiencies in the institutional planning system have been attributed to a separation of economic planning from spatial planning in different institutions, the Ministry of Planning and International Cooperation (MPIC) and GOPP respectively. They base their planning decisions on different sets of regulations². This means that the economic and spatial planning plans have not been combined to create one comprehensive national plan for development in Egypt (MPIC 2012). Furthermore, none of the proposed spatial plans and projects have ever been given any budget for implementation.

The strategic planning approach has been adopted since 2006 to mitigate the deficiencies of the comprehensive approach. The strategic approach is based on an ever-evolving vision, rather than being static, according to the Strengths, Weaknesses Opportunities, Threats (SWOT) analysis for existing situations. Furthermore, the strategic planning steps are intertwined and flexible to allow the path, in any phase of planning process, to be corrected and enhanced because they incorporate a continuous process of survey and analysis (Bayoumy 2007). Since the Building Law was issued in 2008 to regulate the planning activities, Egypt focused on widening the role of public participation in strategic planning and tried to prevent centralised decision-making and promote public participation in the planning process. But this has remained largely tokenistic. Therefore, Egypt needs to transfer from token public participation (the state is manipulating participation) to real participation and inclusion of different stakeholders to increase networks, partnerships, information sharing and practical strategies (Hassan 2010).

The Building Law (No. 119/2008) identified governmental institutions concerned with spatial planning, which also include many of the key actors involved in ecotourism planning. They are:

- The Supreme Council for Planning and Urban Development (SCPUD), headed by the Prime Minister, according to Law No. 119/2008, with membership consisting of ministers and authorities competent in issues regarding spatial development, and includes ten non-government experts specialising in relevant issues (Government, Egyptian).
- The General Organization of Physical Planning (GOPP) is mandated to develop the national policy for preparing the strategic spatial plans at the different levels. GOPP has seven Regional

² The legal basis for planning in Egypt stems from two different key laws: the Planning Law No. 70/1973, which regulates the process of developing the national socio-economic plan; and the Building Law No. 119/2008, which regulates the process of strategic spatial planning at different levels.

Planning Centres (RPCs) for spatial development. Each centre acts as a decentralised arm of GOPP by preparing, implementing and monitoring strategic plans within the regions. The RPCs cooperate with the Governorates and their local authorities, providing them with the required technical support and assisting in preparing, reviewing and implementing detailed plans (Government, Egyptian). Additionally, in each Governorate, there is an Urban Planning Directorate (UPD) in charge of the implementation of plans and programmes prepared by the GOPP and its RPCs, including taking enforcement action. Each UPD is also responsible for preparing local detailed plans for the area which falls into its Governorate’s boundaries, based on the adopted strategic plans (Government, Egyptian; GOPP 2013).

In the case of ecotourism planning, as this research focus, two further governmental institutions groups need to be involved (see Figure 1).

- The first group is tourism agencies and includes the Supreme Council of Tourism (SCT), and the Ministry of Tourism (MOT) and its units—Egyptian Tourist Authority (ETA) and Tourism Development Authority (TDA). TDA, which is seen as the key actor in this group, is mandated as being responsible for development planning of tourism regions and supervising the execution of development plans.
- The second group is the environmental agencies and encompasses the Ministry of State for Environmental Affairs (MSEA) and its executive arm, the Egyptian Environmental Affairs Agency (EEAA). EEAA is seen as the key actor in this group and is mandated as being responsible for protecting and promoting the environment. Its primary role is the implementation of national environmental plans by coordinating activities with competent administrative authorities.

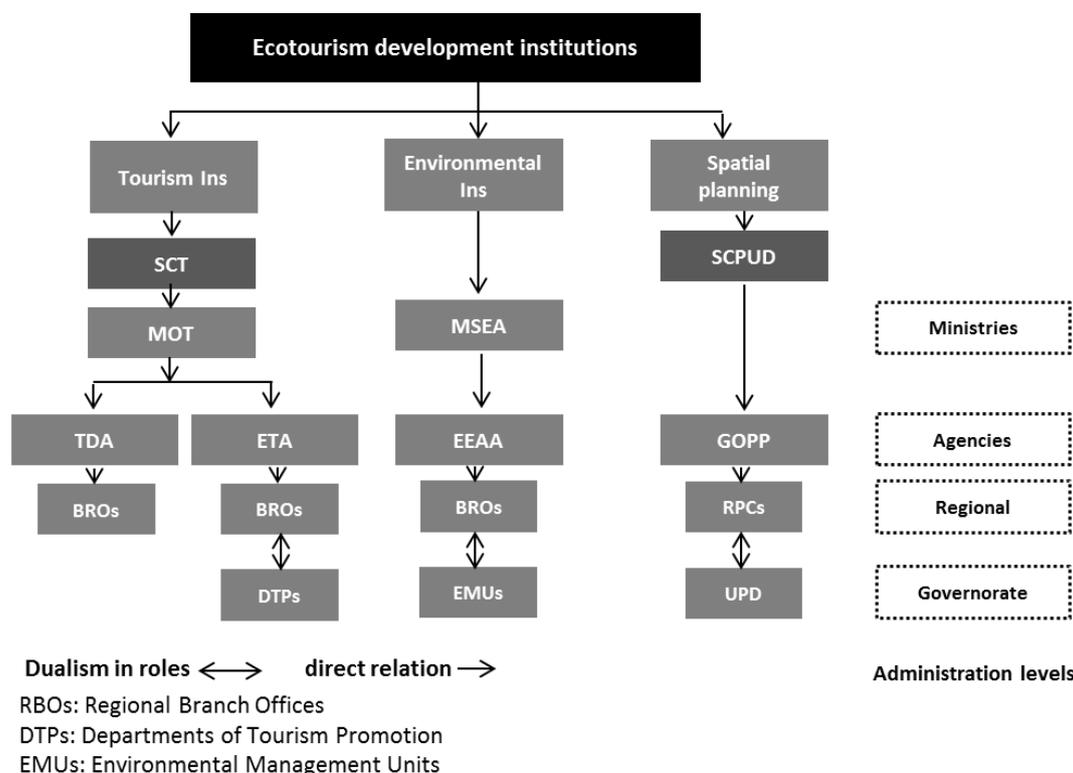


Figure 1. Ecotourism development institutions in Egypt. Source: The author.

3. Research Methodology

In order to address the research objectives, the methodology consists of two main stages. These stages are as follows:

Developing the conceptual and analytical framework through two main parts. The first part discusses the potential of collaborative planning approach to address the challenges in the traditional approaches. The second part seeks to identify the main challenges to apply an effective stakeholder involvement and collaboration in the developing countries. The conceptual framework, for understanding these challenges during planning process was experienced in the Egyptian context; it will be developed based upon an analytical review of the relevant literature.

Evaluating CPA in practice: this stage focuses on understanding the challenges for effective stakeholder engagement during the spatial development process. This will be explored by evaluating the planning process that was practiced in two chosen case studies based on the conceptual framework (outlined in the prior step). The source evidence for evaluating the case studies was: review of the documentation of Egyptian ecotourism planning initiatives combined with overt observations carried out in the focal government bodies before conducting interviews. This overt observation was conducted through a number of informal visits to the governmental bodies in order to develop a holistic understanding of the process of development planning and the relationships among and between stakeholders. During these observations, the interview questions were developed using terms that make sense to the interviewees. The interview was an effective method designed to provide people with an opportunity to explain their opinions and experiences about the research issues. Fifty-six ecotourism experts and stakeholders were interviewed in two rounds for each case study, as detailed below. Both rounds were conducted in a face-to-face manner. The interviews were semi-structured to provide answers to a fixed range of questions as well as to allow a more in-depth discussion to help understand each interviewee's interpretation of the planning process. The respondents were selected using a linear snowball technique³ initially based on the stakeholder mapping exercises drawn from the documentary review, observation and the researchers' existing networks. All interviews were conducted in the Arabic language, which is the official language in Egypt. This gave the interviewees the best opportunity and ability to explain and discuss their experiences of ecotourism planning. The efficiency and effectiveness of the interviews were further enhanced by piloting the interview to test its structure and the questions. As a result, several changes were made.

Content analysis was used to analyse the collected data using classifications as an appropriate strategy. The conceptual framework was utilised as a reference for these classifications.

4. Developing a Conceptual Framework

4.1. The Potentials of Collaborative Planning Approach to Address the Challenges in the Traditional Approaches

In developing countries, the pressures on the environment and local communities are increasing; at the same time, the state's abilities to mitigate these pressures and solve social problems are shrinking. These situations require a transformation from a mono-institutional process and control from the top (hard system approach) to collaboration and alliance with a wide range of relevant stakeholders (soft system approach) to increase the likelihood of commitment to and support for development (Kim 2002; Imran et al. 2011). This is because no single actor, public or private, has the knowledge and abilities to solve complex and dynamic issues such as spatial development for new settlements in general and for environmental sensitive areas in particular (Jarvis 2007). Without effective negotiations and the building of consensus between the relevant stakeholders during planning process, those stakeholders may proactively resist the implementation of plans that do not meet their needs (Bonilla 2008). All these requirements can be addressed by CPA, which considers the relationships between the stakeholder groups and tries to bridge the gaps between them by recognising mutual interdependences in their interests and working together to make and implement shared decisions to

³ A snowball technique was the most appropriate approach for this research because not all ecotourism stakeholders were appropriate for interview. It was also necessary to ensure that each interviewee had enough experience to provide high-quality information to build an interpretive understanding about ecotourism planning in Egypt.

solve the issues that brought them together (De Araujo 2000). CPA also improves the legitimacy and quality of decision-making as well as building integration among, and between, governmental and non-governmental stakeholders through the processes of inclusiveness, communication, openness, trust and consensus building (Jarvis 2007).

Further to this, CPA has been widely recognised as an essential ingredient for development planning for many reasons: (a) stakeholder collaboration encourages sustainability of the resources by recognising the variety of stakeholder interests and negotiation takes place between them (Kim 2002); (b) CPA evolves power from the governmental agencies by providing stakeholders with responsibilities during both planning and implementation stages (De Araujo 2000); (c) it provides educational opportunities thereby improving stakeholder skills in dealing with planning issues; (d) CPA offers continuous and open accountability between the stakeholders (Kim 2002); (e) the participation of multiple stakeholder groups provides broad support for the plans, thus enhancing the likelihood of successful implementation (Albert et al. 2003); and (f) CPA also offers intangible benefits such as improving the stakeholder relationships, the sense of ownership between the actors that advances the plans and the willingness from all to implement them (Monjardin 2004).

From the many efforts that have been made to define the CPA concept, the research drew together an operational definition relating to the objectives of the research. CPA is a collective process for resolving conflicts and advancing a shared vision involving a wide range of stakeholders working together through face-to-face dialogue (Gray 1989; Kim 2002). Several common principles of collaboration can be extracted from this definition, which will be useful to conceptualise this term and understand its key characteristics. Firstly, CPA deals with development potentials in a holistic and multi-disciplinary manner to try to achieve 'win-win' solutions by expanding the pie rather than focusing on how the pie is divided to solve the disputes between the stakeholders and agree a workable solution reflecting and respecting different interests (Monjardin 2004). Secondly, CPA should be horizontally and vertically structured. The process should involve a wide range of stakeholders at different levels of governance who have a stake in, and are affected by, the issue (Godwin 1999). This should produce a better plan and increase the likelihood of successful implementation (Albert et al. 2003). Stakeholders should be involved throughout the whole process and have a voice both in framing the problem and shaping the solutions (Godwin 1999). Thirdly, face-to-face dialogue provides a good opportunity to listen, to learn from each other and then identify common goals, build trust, and seek consensus (Margerum 2011). Furthermore, verbal communication helps to discuss and understand different points of view, as well as to create social and intellectual capital (Gray 1989). However, it requires an effective facilitator to support the negotiation process in a way that allows participants to work through a process smoothly, efficiently, and deliberatively. The better the deliberations and communication during the consensus-building process, the greater will be the confidence and commitment to the plan during implementation phases (Imran et al. 2011; Margerum 2011).

4.2. Challenges to the Stakeholders Involvement and Collaboration in the Developing Countries

Although the CPA is seen as a valuable approach for resolving conflict and advancing shared visions for complex issues, such as ecotourism development (Gray 1989; Healey 2006; Kansas 2013), there are many barriers and challenges that create hurdles to the effective participation of relevant stakeholders (Aref and Redzuan 2008). Understanding and anticipating these barriers are significant in minimising their effects and promoting individual and organisational involvement during the planning process (Dukeshire and Thurlow 2002). If these challenges and barriers are ignored, stakeholder participation may raise levels of conflicts rather than identifying shared solutions that meet stakeholder needs. This section investigates the main barriers that may prevent an acceptable level of stakeholder participation during the ecotourism planning processes.

Tosun (2000) and Dogra and Gupta (2012) have asserted that most developing countries are characterised by three main structural deficiencies: (i) socio-economic factors, which includes

low standard of living, lack of service from a welfare state, low economic growth rate, and high unemployment; (ii) political factors, which encompass features such as high centralisation in the public administration system, elite domination and high level of favouritism and nepotism; and (iii) cultural features like widespread illiteracy and most people living in highly stratified societies. These kinds of deficiencies create challenges and barriers in the process of stakeholder participation and limit the success of the development process.

A number of authors on collaborative planning in sustainable tourism development, such as (Kenawy and Shaw 2014; Tosun 2000; Choi 2005), have tried to classify these challenges to facilitate a better understanding of these effects on stakeholder participation. The main barriers discussed can be separated into two broad groups: (i) structural barriers, which relate to the institutional limitations and inefficiencies in the administration of the public system; and (ii) stakeholder barriers, which relate to attitudes, perceptions and capabilities of each stakeholder group towards ecotourism development in particular and participation and collaboration between themselves (Aref and Redzuan 2008; Choi 2005). From the literature review and discussion of the critical factors for facilitating the effectiveness of stakeholder collaboration, it can be emphasised that operationalisation of stakeholder engagement is the most critical issue for a successful collaborative planning approach. This operationalisation concerns stakeholder identification: widening stakeholders involved in the process; building the relationships between them; ensuring that defining the stakeholder roles and responsibilities in the process, and how their confidence can be built, including regular follow-up for engagement actions (Brooks et al. 2007).

Consequently, the limitations in the operational process need to be added as a third barrier to stakeholder engagement processes during the lifetime of the projects. Furthermore, to facilitate more scope for finding solutions and overcoming the barriers, the challenges to the stakeholder involvement and collaboration will need to be discussed more systematically using the categorisation outlined below.

Deficiencies in Operationalising Stakeholder Engagement and Collaboration during Ecotourism Planning Include:

1. Insufficient stakeholder network is as a result of:
 - Deficiencies in identifying the relevant stakeholders at the outset may lead to marginalisation of key stakeholders who may be important for the planning and implementation process;
 - The lack or poor analysis of stakeholders is one of the main reasons for a limited understanding of the diversity of their power and the relationships between them. This can lead to inappropriate roles being defined and levels of participation for each stakeholder group being misunderstood (Schmeer 2001;)
2. Inadequacies in stakeholder engagement within the planning process is as a result of:
 - Late stakeholder engagement during the planning process is often cited as a critical reason why stakeholders are resistant to the plan and its implementation because they believe that the decisions have already been made (Tseng and Penning-Rowsell 2012;)
 - Inappropriate and insufficient methods of stakeholder involvement in each stage of the planning process.

Deficiencies in government: From a review of the literature, it can be emphasised that the main barriers associated with the structure of the governmental institutions and the way they operate during the planning process include:

- A lack of coordination and highly fragmented government agencies lead to significant overlap and duplication in their plans and activities for the same resources;
- A lack of resources including information, financial resources, and human capacity leads to an inability to put the development plans into practice (Wafik 2002); and

- The lack of an appropriate legal framework leads to dualism in functions and conflicting roles between the authorities charged with ecotourism development (Choi 2005).

Deficiencies in non-government include:

- A lack of trust in the government as a result of previous unmet promises;
- A lack of awareness about participation requirements and process during ecotourism planning; and
- Widespread illiteracy and a low standard of living within the communities means that individuals are more concentrated on meeting daily needs and providing the basic public services, rather than looking forward to an aspiring future (Dogra and Gupta 2012).

Consequently, the analysis of the ecotourism initiatives based on the conceptual framework contains three main groups of deficiencies, as Figure 2 shows.

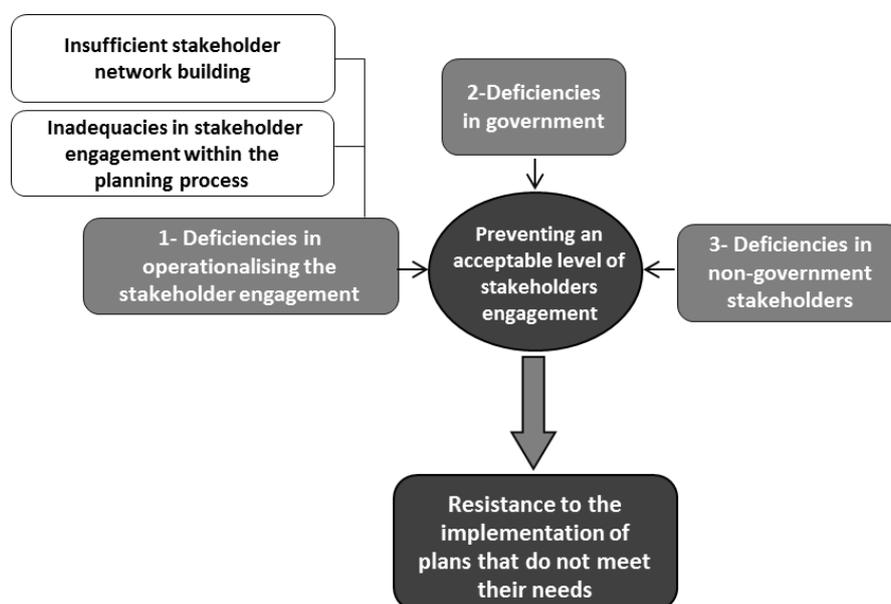


Figure 2. The conceptual framework. Source: The authors.

5. The Egyptian Ecotourism Initiatives

Dozens of initiatives have been prepared to promote ecotourism development in Egypt but they have not been successful in achieving their objectives. This is because in Egypt, the tensions between and among the stakeholder groups not only prevented such benefits occurring in practice but also led to: i) continuing degradation of tourism destinations; and ii) marginalisation of local people from any fair benefits from the tourism development, then abuse of the natural assets through informal and unregulated activities, e.g., selling souvenirs to visitors, thereby further degrading the environment (Kenawy 2015).

Two of these initiatives were chosen as case studies for this research based on: (i) identifying ecotourism initiatives in Egypt; and (ii) classifying the planning methodologies of these initiatives. The case studies are:

- Fayoum Ecotourism Development Plan 2005–2015 (FEDP) covered the total area of the Fayoum Governorate plus the parts of Qarun Lake, Wadi El-Rayan and Wadi E-Hitan protected areas. The total budget of the FEDP was €1.311 million, which was funded by the Italian government and an Italian NGO, CISS, which focuses on sustainable development more generally and ecotourism in particular. Each contributed half of the initiative budget as a grant to the Egyptian government (CISS 2013). The FEDP lasted three years (2005 to 2008). The FEDP outcome was designed to

provide the Fayoum Governorate with an overall assessment of the existing condition of resources related to ecotourism development and to put forward an action plan to increase the capacity for ecotourism in the Fayoum Governorate (CISS and EDG 2008).

- Ecotourism for Sustainable Development in the New Valley Governorate (ESDNVG) was initiated to improve the livelihood of communities through ecotourism development and a more effective management of environmental and cultural resources. The main outcome was proposed future ecotourism development projects based on the results of the inventory and analytical phases.

Both are located in the western desert, which includes nature, culture and heritage-based activities which provide a unique personal experience for ecotourists as Figure 3 shows.

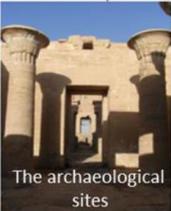
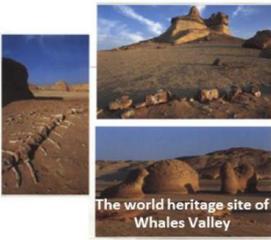
Cases Context	ESDNVG	FEDP
The Location		
	It was located in the Farafra, Dakhla, and Kharga Oases	It covered the total area of the Governorate plus the parts of three protected areas
The project life time	30 months (1/2010-6/2012)	3 years (2005-2008)
Prepared by	CISS, TDA and Italian Egyptian Debt for Development Swap Program (DDSP)	CISS and Fayoum Governorate
The Budget	€527,000 was funded by the Italian Egypt DDSP	€1.311 million was funded by Italian cooperation and the CISS
Focal attractions	 The white desert park  The archaeological sites	 The world heritage site of Whales Valley
Secondary attractions	 Natural cool and hot springs  Local handicrafts	 Wadi El-Rayan lake

Figure 3. The contexts and locations of the case studies CISS: Cooperation Internationale Süd-Süd. Source: The author based on (CISS and EDG 2008, 2012).

6. Evaluation and Analysis of Egyptian Ecotourism Planning Initiatives

6.1. Deficiencies in Operationalising the Stakeholder Engagement; Two Key Deficiencies in the Way the Planning Process Works Have Been Identified

6.1.1. Insufficient Stakeholder Network Building was as a Result of

(a) *Omission in identifying appropriate stakeholders*: The internal stakeholder lists, for both initiatives, did not include all the relevant groups. Several governmental agencies such as GOPP, statutory organisations, universities and research centres were excluded from both initiatives. In this respect, one of the interviewees claimed that “*The stakeholder lists for both initiatives excluded important and relevant agencies such as GOPP, who had prepared several recent spatial plans and therefore had an up-to-date database for the key infrastructure in each location*” (PS-14)⁴. Similarly, the local planning offices and Environmental Management Units (EMUs) in Governorate administrations were not included even though these bodies are, in theory, charged with implementing plans (EC-29). Further to this, the conveners were often not successful in engaging the most appropriate individuals to represent various stakeholder groups. Representatives from the public sector were nominated exclusively by the chief of each agency without any criteria. In this regard, the planning team leader of the FEDP initiative remarked that “*We cannot put any criteria for nominating governmental agency representatives because we did not have any idea about the hieratical positions nor employee skills in each one. The chairmen of these agencies would not accept the FEDP or any external person nominating a specific employee within their organisation for any task*” (EC-1). Therefore, often their nominated representative had little or no knowledge of ecotourism development. Furthermore, their participation through the process was not effective because they had no decision-making authority and were in effect only observers. Moreover, the local officers that were charged with following-up these initiatives had not asked to be involved during the processes and did not understand the agreements.

With regard to the local community representatives, can be made from Table 1, in the FEDP initiative, they were identified by the planning team through living with the local people and sharing their food, popular activities and occasions. But not all communities of the Governorate were included in these interviews or field investigations. In particular, communities that were adjacent to the main centre of existing ecotourism provision were omitted (PS-5). In the ESDNVG initiative, the local community delegates were nominated using a snowballing technique. There, as reported, “*New Valley Tourism Authority (NVTA) invited directly the key persons from the three main oases, Kharga, Dakhla and Farafra, to an initial meeting and asked them to nominate other interested and active people to participate in the planning activities*” (EC-26).

The conveners, in both initiatives, involved non-experienced NGOs in ecotourism planning, in spite of the fact that experienced NGOs, such as Nature Conservation Egypt had already contributed to activities in the proposed project area (NG-2). These more qualified NGOs could have played a more pivotal role during the ecotourism development process, like training, raising the awareness of stakeholders, and giving advice regarding technical information. There was a weakness in private sector representation, and this group was often underrepresented in the process. Furthermore, often the conveners ignored pre-existing networks that may have provided them with knowledge or experience as to how to contact the key representatives for each group. For example, in the private sector the Egyptian Tourism Federation (ETF) and Chamber of Commerce could have been more heavily engaged, because these organisations have vast databases and excellent relations with key personnel from the tourism industry bodies.

⁴ (PS-14) A reference to the interviewee/s: the acronyms refer to the interviewee groups: EC= Experts & Consultants in ecotourism development or participatory planning, PS = An employee in the Public Sector, NG = A member of NGO boards, LC = A member of the key persons of the Local Communities; and the number refers to the serial number of the interviewee in each group.

In addition to inadequate analysis of appropriate stakeholders, an analysis of stakeholders should be a crucial step in building the network to prioritise their engagement and define their role during the process. *“The Egyptian initiatives did not use the level of the stakeholder interest or influence on ecotourism development to categorise, and then prioritise their involvement during the planning process, but instead used their level of seniority”* (EC-26). However, the conveners assumed the stakeholders had the same degree of power and interest in the development and classified them based on either the level of position (top executive, first level of decision-makers and regional/local executive employees) or sector (public, private, local community and NGOs). This technique maintained the conflict of interests between the various stakeholder groups, and any success in the negotiations between the different groups was based mainly on the convener bringing different stakeholder views together. Further to this, one interviewee commented that *“The main reason behind using this method was the wide range of education, background culture and positions between and among different stakeholder groups—particularly, the craftspeople could not understand the language of top executive employees”* (EC-20). Consequently, the classification approach used in both initiatives could be helpful as a first stage of the process to develop consensus between the stakeholders. Following this stage, these separate groups really needed to be brought together in order that true collaboration and real mitigation of the conflicts of interests could be achieved as the foundation for building joint commitment for the plan’s implementation (EC-29). However *“The conveners could not combine all stakeholder groups together because there was need to have a manageable number for discussion [in the smaller groups]. So the stakeholders should be classified based on their power and interest to represent different stakeholder interests in each subgroup”* (EC-3).

(b) *The exclusion of external stakeholders*⁵: Although there are several international governmental and non-governmental organisations working on synchronising the ecotourism initiatives who were interested in assisting the ecotourism development in Egypt—whether from a technical or financial perspective, such as UNDP and UNESCO—these initiatives did not really include any external actors, whether global or national, except ETF (which is an example of a national NGO), during the FEDP process. However, even in this case, the convener did not define those aspects of the process that the ETF could contribute to or support (Kenawy and Shaw 2014). Instead, *“The convener dealt with ETF as a normal stakeholder. It did not utilise the potentials of the ETF in the media or among its broader networks to expose and market Fayoum resources as an ecotourism destination”* (PS-11).

(c) *Limited interaction between stakeholder representatives and their agencies* although it is crucial in enhancing support and commitment for any final agreements. Individuals who were invited to represent the interests of local people, handicraft groups or NGOs tended to only offer their personal opinions without engaging in dialogue with other group members. Hence, as one of the interviewees noted, *“Although Betah and Tunis NGOs have regular meetings with their members, there is no discussions with their representatives about the FEDP, whilst their relations with the project have finished once the planning meeting ended, because of their limited experience in the same development projects”* (EC-25). Moreover, the dialogue between the governmental representatives and their parent authorities was not good. The normal communication technique was simply a written summary report from the departmental representative to their boss, after each meeting had been completed, without any feedback or guidance to the representative in terms of what, if anything, they should say as part of future negotiation (PS-11).

⁵ They are governmental and non-governmental organisations that are interested in, affected or influence by ecotourism but are located outside the initiatives’ boundaries

Table 1. Insufficient stakeholder network building during Egyptian ecotourism initiatives.

Critical Factors for Building a Stakeholder Network	Performance of Initiatives		Comments
	FEDP	ESDNVG	
Did the stakeholder list include all relevant groups?			Some relevant stakeholder groups such as GOPP & EMUs were excluded from both initiatives
Was there a clear technique for identifying the representative of each group of the internal stakeholder groups?	The representatives of local communities		In FEDP, they had been based on the survey and interview. In ESDNV, they had been based on the snowball technique by NVTA
	The representatives of the public sector		They had been nominated by the agency bosses without any criteria
	The representatives of the private sector		A few eco-lodge owners were involved in FEDP but representatives of hoteliers, tour operators and local guides were involved in ESDNVG
	The representatives of NGOs experienced in ecotourism development		No NGOs with any experience were nominated although several experienced NGOs had conducted activities in the initiatives' locations
Clear techniques and criteria of the stakeholder analysis			Stakeholders had not been analysed. The convener considered them all to be at the same level of influence and interest
External stakeholder			No global or national NGOs except ETF was involved in FEDP
Dialogue between SRs & their parent bodies	public sector		The dialogues were not good in the normal situation
	local communities and NGOs		There was no dialogue

Fully achieved
 Partially achieved
 Not achieved. Source: The authors.

6.1.2. Inadequacies in Stakeholder Engagement within the Planning Process

(a) *Inadequacies of participation levels and the stakeholder role in each planning process:* Stakeholder participation in both can be seen as tokenism, at least judged against Arnstein's ladder of participation (Arnstein 1969). They were largely confined to three levels only: informing, consultation and placation (beginning of interactive negotiation). However, there were still deficiencies in stakeholder participation and their roles in each level. The techniques for informing stakeholders were not adequate because they were written in English and therefore were often not accessible to the key audiences because either they were illiterate or could not understand English (EC-26). Whilst local communities were the main targeted groups in consultation meetings, they were not well represented in the majority of Egyptian initiatives. These initiatives did not adopt appropriate techniques to try to combat widespread illiteracy and poverty and therefore broaden local involvement in the consultation discussions (CISS and EDG 2008, 2012). Although documentation highlighted the importance of interactive negotiation in developing the solutions, in practice, many stakeholders were absent, and the governmental group dominated this stage. Furthermore, in ESDNVG, the planning team determined the final outcomes without returning to the stakeholders to explain or to seek their approval.

The main problem was that of no clear roles for the stakeholders (except for the focal actors of governmental agencies); often, "The funders defined the government agencies' responsibilities through a contract, early in the initiative, making them accountable during the process" (EC-24). In practice, the majority of stakeholders were involved at the informing level but only a minority in developing the plans and outcomes. According to Kansas (2013), in order to gain effective stakeholder participation

and support during the whole process, it is important to clearly define their responsibilities based on their interests, experience and responsibilities.

(b) *Inappropriate stakeholder involvement methods*: In both cases, the main methods of stakeholder engagement focused on informing and training the stakeholders rather than actively involving them so that they could have an input into decision-making (EC-29). These techniques alone could not fulfil the requirements of a collaborative or participatory approach. In relation to the inappropriate and insufficient methods used at each phase of the process, the following observations can be made from Table 2:

- Normally, the diagnosis phase comprised two main methods. The first was individual or group interviews and surveys. This was inappropriate for large-scale developments with geographically dispersed stakeholders, such as with the FEDP and the ESDNVG. Therefore “*the planning team needed to look at complementary techniques such as drop-in centres*” (EC-8). A second approach was the public meetings designed to introduce the initiatives to interested stakeholders. These took place, but were largely tokenistic because the meetings were dominated by the governmental representatives, and limited information was disseminated to the stakeholders and many enquiries remained unanswered (EC-20).
- The analysis phase also encompassed two main techniques. ESDNVG provided a good example of using workshops to involve the stakeholders during the analysis phase. One of the interviewees described that: “*the convener divided stakeholders into small groups (10–14 people) to prepare the SWOT analysis of ecotourism development in the NVG*” (PS-21). In addition, “*they used the role-playing techniques to encourage communication between the stakeholders and test their knowledge about the ecotourism development planning*” (EC-20). Secondly, a questionnaire has been used by ESDNVG. However, in practice this was not an appropriate technique to gain meaningful input during the analysis phase because the respondents’ answers were very brief and careless (EC-1).
- The workshops in the development phase of both initiatives involved a one-way direction of information (from the convener to the stakeholders). Also, one public meeting (a legal requirement) was insufficient to gain support for a large-scale development with geographically dispersed stakeholders. Feedback was very limited because the majority of participants did not know anything about the initiative beforehand (EC-24).
- Stakeholder involvement events after the plan had been completed were concerned with awareness-raising programmes and campaigns for running ecotourism activities. It was generally felt that they would have been better if they had been concerned with building the stakeholder commitment to the plan implementation (PS-12).

Table 2. Inappropriate and insufficient methods at each phase of the process.

The involvement methods in each phase	Diagnosis		Analysis		Development		After Plan Making
	Face-to-face interview	Public meeting	Workshop	Questionnaire	Workshop	Public hearing	Awareness-raising programmes
Appropriateness at the phases	✓	✓	✓	×	✓	✓	×
Sufficiency	×	×	*	×	×	×	×

✓ achieved; × not achieved; * It was sufficient during ESDNVG only. Source: The authors.

Further deficiencies related to how the meetings were actually organised and included:

- Agendas were often lacking, and there was no way of enabling stakeholders to shape the agenda to reflect their concerns;
- Often information was not presented in a clearly understandable manner to the audiences;

- The timing of the meetings was inappropriate for many stakeholders as they took place during normal working days, meaning many could not get time off to attend (NG-1);
- The structure of the meetings was organised in such a way that stakeholders did not have enough time to provide their inputs (EC-3); and
- There was a lack of follow-up, meaning that the stakeholders were not kept informed of meeting outcomes (EC-29).

(c) *Stakeholder motivation was often lacking*: ESDNVG was the only initiative that used two different material incentives to encourage engagement. Monetary incentives were provided to the local communities, for expenses and loss of income, and the private sector was provided with access to the database of NVG ecotourism resources (CISS and EDG 2012). However, neither was really sufficient. The monetary incentive was provided equally to all those who attended and was not linked to their needs and circumstances nor their inputs into the process. Furthermore, money was not really an appropriate incentive for community leaders. Providing real legitimacy for their engagement was more important (EC-3). The database available to the private sector was also insufficient because of timing—it came two years after the process had commenced.

(d) *Lack of stakeholder preparation*: In Egypt, ecotourism development characteristics were not well known, and many of the stakeholders were not really qualified to participate in the planning process, nor were they adequately prepared before their engagement in the planning process began. Most of the preparation events focused on awareness raising about running ecotourism activities. Moreover, such activities usually took place late, being located at the middle or at the end of the process (CISS and EDG 2008, 2012). Likewise, the local communities of these initiatives were predominantly traditional and indigenous, and they needed significant input to raise their awareness about ecotourism and determine their roles during the process. However, none of the initiatives really gave enough attention to this (PS-10).

6.2. Deficiencies in the Government

The deficiencies in government include five main barriers associated with the structure of the governmental institutions and their operation during the planning process.

- *A lack of coordination*: Although ecotourism development requires intensive coordination between concerned authorities, there was and remains considerable overlap and conflict of responsibilities, a lack of communication between authorities, and plans that are incompatible.

With regard to the horizontal dimension, there is a lack of coordination between the EEAA, TDA and Ministry of Antiquities (MOA), which are considered the primary national governmental stakeholders for Egyptian ecotourism development. For instance, one of the interviewees claimed that “Although there is a wide [amount of] land under authority of both TDA and MOA, there are significant conflicts within their respective plans. For example, the TDA planned to develop the northern coast of Qarun Lake and marketed its plan to investors. At the same time, the MOA discovered this location contained many prehistoric antiquities and devised a plan to catalogue and protect them. The MOA complained to the Cabinet to stop the TDA’s plan after exerting a lot of money and efforts to develop it” (PS-16). Moreover, there is wide overlap in the local and regional levels between responsibilities of the Governorates’ administrations and the RBOs of the EEAA and TDA. In this regard, one of the interviewees noted that “The EMUs in the Governorate and RBOs of the EEAA and the TDA have almost the same mandates for monitoring tourism activities” (PS-13). Similarly, another interviewee commented that “Although the Fayoum Tourism Authority and NVTA, under supervision of their Governors, have the same mandates of the Egyptian Tourism Authority under the Ministry of Tourism to promote tourism through marketing the tourism product, there is a lack of coordination or communication between them” (PS-20).

With regard to vertical fragmentation, within the same agency there is often a lack of coordination and communication between the central, regional and local offices. As noted by one interviewee:

“During the ESDNVG planning process, the RBOs of the TDA and the EEAA participated as delegates of their central office. However, the communication and coordination between them was rare” (PS-21). Furthermore, the central offices usually dominate and intervene without respecting the responsibilities of lower-tier government agencies.

The main reasons for fragmentation, based on the interviewees’ inputs, are:

- A lack of communication between and amongst the authorities where each one of them cannot ask about the plans of others so that they can be reviewed or considered in any future plans (PS-14).
 - The coordinating bodies such as National Centre for Planning State Lands Usage do not have any legal mandate to harmonise conflicts between different agencies (EC-7);
 - A lack of transparency in decision-making between government authorities; and
 - Each chairperson of these agencies is fighting for his/her personal achievements without thinking clearly about the public interest (EC-13).
- *Lack of information:* Information is seen as one of the most important resources both for the development process and a means to build consensus between the stakeholders. However, information about ecotourism development in Egypt is limited because the majority of the developments are located in peripheral areas and there are no detailed databases for many resources (EC-8). In the same way, one of the interviewees claimed that “There are several authorities concerned with collecting and analysing data, such as Information and Decision Support Centre and various information centres in each governorate. However, there is no integrated and updated database” (EC-3). Consequently, “Ecotourism initiatives consume more than 20% of their time and budgets to build their own information databases. It would be better if there was an integrated national information system” (EC-12). Further to this, the information was not disseminated comprehensively to allow stakeholders to participate effectively (EC-24).
- *Lack of financial resources:* Financial resources are probably the most significant ingredient for ecotourism development planning and effective stakeholder participation. Due to the limited financial capabilities of the state, there is a lack of financial resources to initiate and support the development planning process in general and ecotourism in particular (EC-5). This is because the stakeholder participation required high cost over a long time to cover preparing, motivating and then participating activities (EC-11).

As a result of this, all ecotourism development-planning initiatives were reliant on international assistance. Hence, one of the interviewees emphasised that “The plan implementation was trivial. International funds for the initiatives [were] totally oriented to plan making. No money was left to implement them” (EC-4). However, “There is no national mechanism for financing the implementation and follow-up of these initiatives so the process stopped once the funding ended” (EC-24). The government needs to seek other financial resources to enhance the implementation, such as adopting the private-public partnership (PPP) technique (EC-17). Hence, one of the interviewees remarked that “the government should motivate private foundations to contribute with projects funding, especially in implementation stages, as one aspect of the role of private sector toward the society” (EC-14).

- *Lack of Capacity* of the governmental staff was a significant challenge during the planning process. Although the TDA was the focal actor in ecotourism development, the majority of staff did not have any basic knowledge about ecotourism development because of a rapid turnover of staff leading to a lack of experience. Therefore, the TDA often hired experienced consultants to prepare these kinds of projects (EC-20). However “The staff in the specialist ecotourism department in TDA gained a good experience during the initiatives. As soon as the project ended they left to work in the private sector for better positions and salaries” (PS-4). As a result of this, in any ecotourism development initiatives, there has been a follow-up by the staff lacking relevant experience and knowledge of both ecotourism development specifically and the planning process in general. This adversely affects the final outcomes (EC-28). Similarly, there is a lack of capacity in the staff of the EEAA,

which is considered to be the main partner of the TDA in ecotourism development. In this regard, one of the interviewees claimed that *“The staff of EEAA believe that protected areas would be destroyed by any ecotourism development within them. They do not have any idea about international cases for appropriate development within the protected areas”* (EC-1). Further to this, they do not have any skills concerning how to compromise with, and accommodate, other authorities’ needs with respect to the regulations. Hence, one interviewee claimed that *“The main reason for the majority of conflicts between EEAA and TDA is the staff of EEAA insisting on their opinions being right. Several cases could have been resolved through negotiation but they refused. EEAA regulations could not be challenged or compromised”* (EC-5).

Furthermore, the lack of capacity in local government is also a big problem for Egyptian development in general and particularly in ecotourism development. In this respect, one interviewee commented that *“The RBOs of EEAA and TDA are understaffed and their staff are overloaded with other tasks, like monitoring the environmental impact of the existing activities”* (PS-13). Moreover, CISS and EDG (2008) highlighted newness of ecotourism as a concept in the Egyptian context. The majority of employees have never engaged in ecotourism planning, hence *“A major obstacle that faced both initiatives was the lack of trained staff in local government who participated in the planning process. Building a consensus between the stakeholders required a basic knowledge of both ecotourism development and negotiation procedures. Both were lacking”* (EC-20). These untrained and inexperienced staff required significant effort (time and money) to raise their awareness about ecotourism development and their skills in negotiation (EC-8). In the same way, another interviewee claimed that *“Raising awareness of the staff is not simply a number of theoretical sessions during the process but it is a continuous process of reflection to reach an acceptable level of understanding about ecotourism planning and negotiation process”* (EC-7).

- *Lack of an appropriate legal framework:* An appropriate legal framework is necessary to support ecotourism development and define the stakeholder roles during the process. Although there are a huge number of laws and decrees concerned with the tourism facilities and services individually, there is no overarching legislation concerned with sustainable tourism development plans or defining the roles of the stakeholders during the planning and implementation phases (PS-3). In this regard, another interviewee commented that *“The tourism facilities have been governed by various legislations such as environmental law (4/1994 and 9/2009), protected areas law (102/1983), local development law (43/1979) and the decree of TDA establishment (374/1991)”* (PS-8). Therefore, coherence and consistency between these different legislations are urgent priorities for enhancing the ecotourism development (EC-7). In the same way, another interviewee claimed that *“Until now, Egypt has not had legislation that includes a national definition of ecotourism, its types and activities, which areas are appropriate for ecotourism development and what ecotourism development features are acceptable”* (PS-10). There is also an urgent need for a legal framework to identify clear responsibilities for the authorities that are charged with tourism development and how any conflicts will be resolved (EC-10). Indeed, Hegazy (2010) has noted that a lack of clarity of responsibilities among the relevant authorities and agencies leads to weak regulatory compliance and enforcement. One interviewee confirmed this view by asserting that *“Unfortunately, each one of the relevant authorities assumes that it has [the] upper hand in the tourism areas. It needs to implement the laws from its understanding. Therefore, the legislation should clarify how actors will collaborate during the planning and implementation process to mitigate the conflicts”* (EC-15).

With regard to the participation of the local communities during the planning process, there is no legal base to support their roles. In this respect, one interviewee claimed that *“The Law No119/2008 acknowledges the importance of stakeholder participation in identifying the issues and the challenges for the development without providing guidance as to how define these stakeholders nor the mechanism of their participation”* (EC-7). In the same way, another interviewee claimed that *“The legislation mandated the Popular Local Councils (PLCs) to participate on behalf of the communities in approving or rejecting the final plans. However, these councils do not reflect the local people because the elections were unfair. So there is a need*

for a legal base for ensuring the participation of a wide spectrum of local communities during the planning and approval of the outcomes" (EC-14). Similarly, one of the interviewees remarked that "The participation through PLCs only is inadequate, because the majority of their members are the governmental employees (EC-17).

6.3. Deficiencies in the Non-Governmental Stakeholders; These Include:

Lack of trust: All the interviewees agreed that there is a lack of trust between the stakeholders and the Egyptian government. Three recurrent themes continually reinforce mistrust:

- Negative experiences and previous unmet promises. In this respect, one of the interviewees commented that "How can we trust in the government and participate with them after several failed attempts and many promises often going unmet?" (LC-1). The stakeholders, particularly the local communities, have negativity towards any governmental activities because they believe that the government only involves them to endorse its own decisions and complete donor requirements (NG-1). Hence, "The response of the local communities during the planning process of FEDP was negative because they had previously engaged similar initiatives before them without any real attempt to address their issues" (PS-18).
- A lack of transparency in government information and decision-making process. In this respect, a member of one of the local communities commented that "There is no transparency in the information provided by or decisions made by the government. They did not speak with us once about project budgets and how they are spent. What reasons explain the inability of plan implementation? At least they should involve us in trying to address any deficiencies" (LC-2). Another interviewee claimed that "The government did not respect our views. They always decided what they needed because they believed that we were not aware of all the circumstances of the project" (NG-3).
- Changing the decisions based on political adjustments rather than long-term visions. In this regard, one interviewee remarked that "There are no strategic decisions adopted by the government. Any change in the highest-ranking staff is always followed by total change in decisions. Therefore, we are not confident in any promises of the government" (EC-8).

Lack of awareness about ecotourism development and the procedures regarding participation during its planning process is one of the factors which affected the efficiency of their engagement. "Although the ecotourism development initiatives started at the beginning of the 1990s, basic knowledge about ecotourism development is not well known by the stakeholders, particularly in the local communities" (EC-1). Due to a lack of awareness about the importance of ecotourism development and the benefits of their participation, stakeholders were unwilling to contribute to its development. In the respect, one interviewee commented that "There is a passive attitude of stakeholders towards ecotourism because they believe that ecotourism is a restricted tourism form which will prevent their existing activities and limit their job opportunities" (EC-8). Another interviewee commented that "Apathy of the local communities toward ecotourism development is a direct result of their exclusion for a long time from affairs which have affected their life. Furthermore, they do not know how they can be active and effective participants" (EC-7). "The essential reason behind the lack of willingness to be involved during the ecotourism development is that local communities are not aware of future planning procedures and their attitude is to prefer a few immediate short-term benefits rather than more long-term and significant future returns". The same interviewee further argued that "The local communities' resistance to the change must be considered one of the most significant barriers to participation in the planning process" (EC-5). Hence, CISS and EDG (2012) emphasised that stakeholders needed continued effort to raise awareness of local communities about ecotourism development and importance of their involvement during the process in order to achieve effective participation and create new generations to support the ecotourism industry.

Widespread illiteracy and low standard of living: The majority of ecotourism development initiatives are located in peripheral regions whose local communities are characterised by high illiteracy rates, limited access to health, and basic infrastructure services. Thus, their major concern is with daily needs and provision of basic public services. This situation represents a significant obstacle to ecotourism

development and to effective participation (EC-6). Moreover, the low participation of the local communities and their inability to express their own views are inevitably the result of the poor education, low income levels and low levels of aspiration (EC-12). In the same way, one of the interviewees commented that “*The majority of local communities were uninterested in attending the planning activities because they were preoccupied with providing for their basic needs. How could they leave their daily work without compensation money?*” (EC-3). Similarly, another interviewee remarked that “*The local communities would be interested in being involved in planning activities if they felt that the process would enhance their life situations. So the planning team should build the local people’s trust in the initiative by providing actual job opportunities and enhancing their basic infrastructure*” (EC-23).

7. Conclusions

The research has tried to answer the question, what are the main challenges impeding implementation of the spatial plans in Egypt using ecotourism development as an example? Flaws in the traditional planning approaches, which are dominated by top-down processes, have been found to be critical. One way to address these challenges could be to promote more collaboration between and among a wide range of relevant stakeholders, using CPA, to increase the likelihood of commitment to and support for the plan implementation. However, the stakeholder engagement which was practiced in both Egyptian ecotourism initiatives remains tokenistic. Central government remains dominant but internally fragmented. This results in three kinds of challenges in enabling effective stakeholders’ engagement to be realised. The first includes two key deficiencies in operationalising stakeholder collaboration within the planning process; the second encompasses five main barriers associated with the structure of the governmental institutions and their operation during the planning process; third is the negative reactions of local communities based upon previous negative experiences and the numerous unmet promises—leading to a lack of trust.

However, better spatial plan implementation could be enhanced if these challenges were addressed. The central government power should be dispersed to a regional and local level. The role of regional governmental should also be maximised to harmonise the relationship between the national and local priorities and plans. Moreover, it is impossible to enhance the effectiveness of stakeholder engagement in the planning process without building public awareness amongst stakeholders as to why, when and how they can be active participants. Special attention should be given to the role of NGOs and local community-based organisations.

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