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**ENVIRONMENTAL IMPACT ASSESSMENT
AND
STAKEHOLDER INVOLVEMENT**

By

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Note:

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Environmental Impact Assessment and Stakeholder Involvement

By Ross Huges

There is a growing consensus that timely and broad-based stakeholder involvement is a vital ingredient for effective environmental assessment, as it is for project planning, appraisal and development in general. The World Bank has found that public participation in EIA tends to improve project design, environmental soundness and social acceptability (Mutemba, 1996). Mwalyosi and Hughes (1998) identified a similar experience in Tanzania. They found that EIAs that successfully involved a broad range of stakeholders tended to lead to more influential environmental assessment processes and, consequently, to development that delivered more environmental and social benefits. Conversely, EIAs that failed to be inclusive tended to have less influence over planning and implementation, and consequently resulted in higher social and environmental costs.

Placing sufficient emphasis on stakeholder involvement in the EIA process can also improve the predictive quality of environmental assessments. This is because the prediction of impacts using EIA often requires multi-year information and good quality baseline data. Yet one of the commonest problems with 'conventional' environmental assessment is that time and financial limitations, and project cycle schedules, constrain the collection of such data. Hence predictions are often based on a 'snapshot' picture which can be misleading or inaccurate. In contrast, assessments that involve different stakeholder groups, including those in local communities, have greater potential to access a wider information resource-base, and in some cases, generations of cumulative knowledge of their local environment.

In its guidelines for EIA, the UK Department for International Development (formally the Overseas Development Administration) identifies some benefits of stakeholder involvement (see Box 1).

But costs can also accrue as a result of not involving stakeholders adequately (see Box 2). In northern Tanzania for example, a commercial mining operation that failed to involve local, artisanal miners in design and benefit-sharing, was faced with years of (often violent) conflict with neighboring miners, and high recurrent costs for security (Mwalyosi and Hughes, 1998).

Box 1: Benefits of Stakeholder Involvement in EIA

- helps the EIA address relevant issues, including those perceived as being important by other sectoral agencies, public bodies, local communities, affected groups, and others;
- helps to harness traditional knowledge which conventional approaches often overlook;
- helps to improve information flows between proponents and different stakeholder groups, improving the understanding and 'ownership' of a project;
- enables project proponents to better respond to different stakeholders' needs;
- helps identify important environmental characteristics or mitigation opportunities that might be overlooked;
- helps ensure that the magnitude and significance of impacts has been properly assessed; and
- improves the acceptability and quality of mitigation and monitoring processes.

Source: ODA (1996).

Box 2: Some Potential Costs of Insufficient Public Involvement in the EIA Process

- Conflicts can emerge between levels of government, or between governmental agencies;
- Failure to garner local support;
- Risk of marginalising potentially valuable contributors to the decision-making process;
- Failure to tailor projects to local needs and priorities;
- Lack of accountability which can lead to ineffective or inefficient working practices and corruption;
- Failure to draw on local expertise and energy which represents a potential lost opportunity for making a good project even better;
- Weak or failed communication which can create divisions within local communities, and can breed resentment between local communities and project proponents;
- The overlooking or ignoring of important, and often locally-specific, social, environmental and health impacts in project design;
- Reliance on interventions by outside experts, limiting the learning of new possibilities by local stakeholders;
- Inability to prevent project benefits accruing to only a small number of influential beneficiaries.

Source: ODA (1996)

Who are the EIA ‘stakeholders’?

Howlett and Nagu (1997) define stakeholders as ‘*all those people and institutions who have an interest in the successful design, implementation and sustainability of the project. This includes those positively and negatively affected by the project. Stakeholder participation involves processes whereby all those with a stake in the outcome of a project can actively participate in decisions on planning and management. They share information and knowledge, and may contribute to the project, so as to enhance the success of the project and hence ultimately their own interests*’.

The Republic of Ireland’s guidelines provide a list of over one hundred stakeholder groups that should be considered as contributors to the environmental assessment process. These include government agencies, citizen’s groups, NGOs, recreational interest groups, expert groups, business affiliations and academic organizations (Irish EPA, 1995). Different types of stakeholders can contribute to the EIA process in different ways and, in most cases, inputs from a broad variety of stakeholders will complement the EIA process.

Stakeholder interests exist at different levels. For example, at the local project level, they might include land or water access rights, pollution or market opportunities. At regional or country levels, stakeholder involvement might focus more on issues concerning renewable versus non-renewable resource use (e.g. hydropower versus coal-fired power generation) or demand-side management (by setting energy prices to levels that discourage inefficient energy use; or by adopting more resource-efficient technology). At the international level, stakeholder interests may be more concerned with global climate change, deforestation, biodiversity loss, *etc.* Box 3 provides some examples of different stakeholder groups.

Consultation, participation and stakeholder involvement

There is great confusion in the use of the terms ‘*stakeholder involvement*’, ‘*consultation*’ and ‘*participation*’ in the EIA guideline literature. Despite important differences in the meaning of these terms, they are used interchangeably, or perceived and applied in ways that vary between user groups.

Here, we take *stakeholder involvement* to encompass the full spectrum of interaction between stakeholders (governmental, non-governmental, business/private sector, service providers, the public *etc.*) and the decision-making process. The term encompasses both *consultation* and *participation*. ‘*Participation*’ is used in this chapter to define ‘a process by which stakeholders influence decisions which affect them’¹ and is distinguished from ‘*consultation*’ by the degree to which stakeholders are allowed to influence, share or control the decision-making process. *Consultation* implies a process with little share or control over the process for consultees. Adnan *et al.* (1992) formulated an extremely useful typology of participation that has since been widely cited and adapted by others (see Box 4).

Confusion in the use of terminology often (and sometimes deliberately) obscures key issues and misrepresents environmental assessment activities to key decision-makers. In recent EIA literature, the term ‘*participation*’ has more commonly been used to describe information collection or PR exercises, than to describe interactive, empowering processes. Often too, ‘*participation*’ is used to put a respectable veneer on activities that could also be described as ‘*coercion*’. For example, a draft EIA for an aluminium smelter in Mozambique (O’Beirne, 1997) described the following activities as ‘*participation*’:

Box 3 : Examples of Key Stakeholder Groups in a Typical EIA

Organisations

- **Co-ordination:** Planning commissions and departments; government agencies at national, regional, district and village level;
- **Advisory:** Research institutes, universities, colleges;
- **Regulatory:** Government authorities at national, regional, district and village level;
- **Implementation:** Relevant ministries/departments at national, regional and district levels, training organisations, private companies, NGOs;
- **Funding:** Development assistance agencies, banks, entrepreneurs, taxpayers; and
- **Conservation:** Environment departments, museums, zoos, botanical gardens.

Public and community stakeholder groups

- **Political:** Members of Parliament (MPs), local councillors, party functionaries, lobbying groups;
- **Cultural:** Community and religious leaders, community service groups, community organisations/NGOs, traditional leaders;
- **Business:** Business leaders, Chambers of Commerce, trade unions, resource owners and those with tenure rights, common property resource users; and
- **Environment:** Community interest groups, international and local environmental NGOs, local experts.

Source: ODA (1996)

¹ This is broadly analogous to the definition adopted by the World Bank’s Learning Process on Participation (see World Bank, 1991).

Box 4: A Typology of Participation in EIA (adapted from Adnan *et al.*, 1992)

Type	Example of each type
1. Passive participation	Consultant or extension worker appears in village and tells villagers that an irrigation scheme will be constructed to 'improve' crop yields.
2. Participation in information giving	Consultant or extension worker appears in village and asks for information about their crops, and about seasonal water flows. Records their answers and leaves.
3. Participation by consultation	Consultant or extension worker explains that crop yields need to be improved, and that the government intends to build an irrigation scheme. They seek the views and responses of villagers (for example, how they feel it might increase soil erosion), and then leave.
4. Functional participation	Consultants or extension workers inform villagers that they intend to construct an irrigation project. The consultants then facilitate the development of a village committee to discuss particular aspects of the project (such as minimising soil erosion, downstream impacts on fisheries; or to agree on arrangement for water management).
5. Interactive participation	Local villagers identify their own needs, and external facilitators work with them to assist in finding solutions to potential negative impacts - and improving positive effects. In some cases, new institutions will develop at the local level, which might then play a role in the management of their own project and its impacts. Villagers then have a real stake in maintaining structures or practices.
6. Self-Mobilization	Villagers plan and identify their own irrigation structures, perhaps learning from experience in a nearby village. They may develop contacts with external institutions for resources and technical advice they need, but retain control over how resources are used.

- [to] 'identify and inform a broad range of I & APs [individuals and affected persons] about the proposed development ...'
- [to] 'obtain the buy-in of the I & APs for the EIA process per se, so that they will accept the findings of the EIA [emphasis added].

Adnan (1992) captured this confusion with some eloquence:

"... the meaning of the phrase [public participation] has become even more elusive after its professed adoption by the most unexpected quarters. It is often difficult to understand whether those talking about people's participation mean the same thing or simply use the phrase as a kind of magical incantation."

Constraints to Stakeholder Involvement in EIA

Stakeholder involvement in EIA can be constrained by many factors which may vary according to circumstance and context. So powerful are the imperatives to implement develop projects quickly, and at least cost, that they present a formidable challenge to EIA practice. In general, decision-makers and practitioners have failed to rise to this challenge (see Box 5)

Box 5: Stakeholder involvement in practice: reviews of experience so far

Mwalyosi and Hughes (1998) reviewed over 30 EIA processes in Tanzania. They found that only two incorporated a structured approach to public involvement as part of the EIA study and, in both cases, the level of involvement was 'consultative' rather than 'participatory'. A further eight EIAs included some component of interaction between the practitioners and local people, but most of these interactions consisted of *ad hoc* discussions between practitioners and those local inhabitants that happened to be present when the EIA practitioners visited the project area. The remainder included only a cursory or highly unsatisfactory level of public involvement, or none at all.

An Africa-wide review by the World Bank of 26 EIAs conducted between 1992 and 1994 found that in 12 of 14 examples reviewed, the EIA team merely informed affected groups of what they were going to do (Mutemba, 1995). An earlier study of 35 World Bank-supported projects in Africa, found that only ten had included some measure of public involvement, and only four of these met with the World Bank's operational requirements (Cook and Donnelly -Roark, 1992).

Constraints include:

- *Time and money*

Many stakeholders, whether local people, expert institutions or other government agencies, lack the time or financial resources to engage with EIA processes. Their involvement will generally incur an immediate cost in terms of time and sometimes money. Yet the benefits that their involvement might bring will rarely accrue for several months or years (if at all). These are particularly important considerations where local stakeholders are poor. In many cases, incentives or compensation will be required to secure their inputs.

- *Literacy, language and public presentation*

Non-literate groups are marginalised from EIA by the use of written media to communicate information. Unfortunately, EIA practitioners rarely use non-written means of communication, even in areas of low literacy. The lack of key materials in local language versions is a further barrier to the involvement of local stakeholders - the vast majority of impact statements are written in the language familiar to the practitioners, who are foreigners to the project area. Mass media, including local radio, television and newspapers, can help bridge such communication gaps, and have been used successfully in some circumstances. These channels will almost always need to be supplemented by techniques that do not assume that people have access to such media (e.g. because of poverty, illiteracy or choice). Public meetings are one of the most widely used ways of encouraging public involvement. Whilst they have some advantages as public fora, they often lead to selective and biased outcomes and tend to be dominated by influential and powerful groups. They are much favoured by practitioners working under time and financial constraints, as they can be used to satisfy demands for 'consultation' and 'public participation' at minimal cost and effort.

- *Education*

Low levels of education, and the 'technical' nature of many development-related issues, can be a major barrier to effective participation in EIA. For example, a villager in Bangladesh, when asked whether he had 'participated' in the EIA process for a major flood control and irrigation project that would radically alter his livelihood prospects, responded thus:

'If I were to be consulted what would I say? You see I'm just an ordinary man. I don't know anything. All I know is that one has to have meals every day'. (cited in Adnan et al, 1992).

- *Cultural differences*

These can be particularly acute where indigenous groups are stakeholders in the EIA process. Communication difficulties may arise not simply because of language and education, but also because indigenous groups often hold entirely different belief systems and ways of perceiving issues (Box 6).

Box 6: Communication barriers between indigenous and non-indigenous approaches

Indigenous and non-indigenous people may have trouble communicating because they have a vastly different fundamental understanding of the universe, and also different assumptions of what is and what is not fact. For example, some indigenous people pay strict attention to their elders, who have intimate knowledge of the truth. The elders usually speak in the form of metaphors and parables. Story-telling is often the single most important aspect of transmitting information and understanding as well as the reiteration of cultural values. Most anecdotes told by elders have many levels of meaning. The native listener understands this and uses the experience to become wiser. Often, instead of becoming more knowledgeable, the listener has been purposefully confused by specific information and is driven to go and discover answers for himself. The purpose of some of the anecdotes is to encourage self-enlightenment, not simply to pass on information.

Non-indigenous listeners may become frustrated and even angry when they try to get straightforward information from an indigenous person. Non-indigenous people have a long-established practice of answering questions directly, and are not accustomed to working their way through parables.... anger may arise because the listener feels he or she is being deceived or that some high degree of obfuscation is going on when it is not appropriate. Having no grounding in the symbolism of indigenous people's speech and thinking patterns, it is often enough to frustrate a non-indigenous listener.

Source: Centre for Traditional Knowledge (1997)

- *Gender*

Insensitivity to gender issues, and particularly to the lower status accorded to women in decision-making in many parts of the world, is a common constraint to effective stakeholder involvement. It is here that major changes in attitude and conventional approaches are required if impact assessment is to make a real difference to people's lives.

- *Physical remoteness*

It is costly and time consuming for practitioners to reach small, diverse and scattered groups in remote areas, and conversely, it is difficult for the inhabitants of such areas to gain access to information relevant to development plans and to EIA.

- *Political and institutional culture of decision-making*

In many countries and regions there is little or no culture of 'public' involvement in decision-making. In some cases, public involvement is perceived as a threat to authority and is viewed defensively by many government agencies and project proponents (in the North and South alike). In other countries, such as those emerging from prolonged periods of conflict or political uncertainty, the institutional mechanisms to involve governmental and non governmental stakeholder groups, especially at the local level, are yet to develop.

- *Pressures imposed by the project cycle*

Additional time and money are required during planning to achieve higher levels of stakeholder involvement. Both commodities are generally in short supply for environmental assessment. A recent survey of EIA professionals worldwide found that 81% of respondents believed time deadlines to be limiting, and 61% believed that budget constraints were generally very limiting (Sadler, 1996). Competitive tendering processes and commercial confidentiality considerations encourage proponents to adopt quick, cheap and minimal approaches to keep bids as low as possible. All too often, there are delays in the release of information perceived as being commercially confidential.

Where public involvement, or participatory planning exercises are used, decision-makers have sometimes found that the results of participation can be difficult to integrate into formal, mechanistic project cycles. It can create 'information overload' whereby it may become difficult to determine the amount and diversity of public perceptions that should be presented for decision-making¹.

- *Inertia*

Institutional inertia usually works against change. The World Bank has acknowledged this as a key constraint to encouraging a higher level of stakeholder involvement in Bank-supported projects in Africa. Economic and technical disciplines dominate staffing at the World Bank, and this is now seen from within as a key constraint to the rapid adoption of more interactive and learning-centred approaches to project implementation (Mutemba, 1995). Inertia is by no means limited to Bank practice. Experience in other development agencies shows that institutional organisation and behaviour constrain the adoption of participatory approaches advocated in guideline documents (see ERM, 1996 for an evaluation of the performance of EIA in EC development programmes; and Mwalyosi and Hughes, 1998 for an assessment of EIA performance in Tanzania).

¹ Some useful and innovative ways of addressing this problem are presented in FEARO, 1988.

- *Mistrust and elitism*

Mistrust often pervades the relationship between project proponents and different stakeholder groups. In some cases, this derives from past experience or conditioning. In other circumstances, proponents view EIA as a necessary evil and this attitude generally manifests itself in limited or minimal efforts to involve other stakeholders in the project design and implementation processes. Elitism or patriarchal approaches can also pose a constraint - many agencies and proponents adopt '*we know better*' approaches', and do not accept that stakeholder involvement can improve the quality of development initiatives. These attitudes are often held by both proponents and development planners in respect of local people, or exist between different levels of government.

- *Conflicting resource management rights*

Disputes over land and water rights and, more specifically, disputes over who has the right to sanction developments, are common in some regions of the world. Deep-rooted conflicts between customary and national land tenure rights in northern Tanzania, for example, have undermined several attempts to involve local people in local planning and development (Lane, 1996). EIA guidelines rarely provide pragmatic advice on how to address these issues in EIA practice.

- *Timing*

Involving different stakeholder interests in the project conception and development phase prior to the commencement of the EIA study (e.g. during screening and scoping) is important if their subsequent involvement within the EIA process is to be effective. If the EIA study is the first opportunity for stakeholder involvement, then most key decisions will already have been made. In these circumstances, there is a danger that stakeholder involvement aspects of EIA are perceived as fulfilling a reactive role - providing information on decisions that have already been taken, rather than providing opportunities for constructive dialogue or opportunities to influence design and decision-making. Within this context, environmental assessment may also have to assume the mantle of resolving conflicts that have already escalated to high levels.

- *Ambiguity in legislation and guidelines*

Unclear wording in legislation and guidelines is an important constraint to managing and encouraging more participatory environmental assessment processes. This is a problem in both the North and South (Box 7) (e.g. see Ebisemiju, 1993; WALHI, 1994).

Box 7: Minimal Approaches: The Experience of the US

The flexibility given to agencies under the requirements of the 1969 National Environmental Protection Act (NEPA) means that extreme cases of nearly no public involvement can and do occur. For example, an agency may simply request written comments on its Notice of Intent (NOI) to prepare an EIA. It would not be required to hear from the public again until the comment period when the draft EIS is issued. The agency's statutes might require it to hold a public hearing on the draft EIS, but these are sometimes considered to be a weak form of public involvement in the USA. Hearings are quite formal, and they do not make it easy for ordinary citizens to express their views comfortably and effectively. Much of the communication flows in one direction, from government officials to citizens. In contrast, many agencies have gone beyond the minimum, formal requirements for public participation and have introduced a variety of non-required approaches, particularly in the context of scoping.

(Source: CEPA, 1994).

- *Poor presentation of EIA findings*

A large, complex and highly technical EIS can make the results of an EIA inaccessible to stakeholder groups (including decision-makers!). Often EIA processes do not go to the trouble of presenting their draft findings in languages or forms relevant to the stakeholders concerned. As one villager in central Bangladesh observed:

'Oh yes, the bideshis [foreigners] were here one day, last month. But they only went to the school and spoke in English. We are not shikkhito [educated]. We could not understand' (cited by Adnan et al, 1992).

'Mystification techniques' - the use of sophisticated technical jargon to obscure potential or actual impacts of development projects - are frequently used by project proponents to impose authority by project proponents. Lane (1996) cites an example from a consultation process associated with a wildlife conservation area in northern Tanzania:

"We couldn't interpret what was in the plan and ended up just mouthing the words in Swahili. The language was hardly translatable..." (Metui Ailion, Albalbal Ward Councillor, northern Tanzania, commenting on the 'participation process' of the Ngorongoro Conservation Area General Management Plan).

- *Community burn-out*

There is a tendency for development practitioners to assume that people are only too willing to participate in research and analysis as an activity in itself. Reflecting again on experience in Tanzania, one EIA practitioner remarked:

"People have been subjected to so much social evaluation; people get fed-up. So people are not interested; they think that we are wasting their time and they have work to do..." (Mwalyosi, cited by Guilanpour, 1994).

In some areas, local communities have been overburdened with officials, planners, social scientists and researchers requiring their inputs. Often, perhaps usually, such communities have seen rather little in return for their inputs, and well justified skepticism and reluctance to engage further has been the end result. In such cases, the potential for future stakeholder involvement is significantly constrained and will require a prolonged phase of trust-building and commitment if these attitudes are to be replaced by one of open commitment.

- *Project size*

Achieving effective stakeholder involvement can be much more difficult for large projects. Adnan *et al.* (1993) describe a wide array of issues raised by massive proposals for flood control, drainage and irrigation projects in Bangladesh, many of which relate to the scale of the development plans involved, and consequently, the number of potentially affected people. However, experience shows that scale should not always prevent fair, open and accessible approaches to public involvement. The Mackenzie Valley Inquiry in Canada provides a good example (see Box 8).

Box 8: The Mackenzie Valley Inquiry

The inquiry was directed to examine the regional social, environmental and economic impacts of a project to transport natural gas south from Prudhoe Bay, Alaska by pipeline down the Mackenzie Valley from the Mackenzie Delta in the Northwest Territories, Canada. A consortium of 27 Canadian and American companies stood ready to build a gas pipeline some 3,860 kilometres in length. The inquiry was conducted by Mr. Justice Thomas Berger in the early 1970s, who described the process as follows:

At the formal hearings of the Inquiry in Yellowknife (the capital of the Northwest Territories), I heard the evidence of some 300 experts on northern conditions, northern environment and northern peoples. But, sitting in a hearing room in Yellowknife, it is easy to forget the real extent of the North. The Mackenzie Valley and the Western Arctic is a vast land where people of four races live, speaking seven different languages. To hear what they had to say, I took the Inquiry to 35 communities - from Sachs harbour to Fort Smith, from Old Crow to Fort Franklin - to every city and town, village and settlement in the Mackenzie Valley and the Western Arctic.

The experience of the Inquiry proves that even a massive, seemingly uncontrollable environmental assessment process can be managed in a way that works in the interests of local communities.

Source: Pallen (1996)

Stakeholder Involvement and EIA Guidelines

Guidelines vary enormously in their treatment of stakeholder involvement and, on the whole, they do not advocate the types and level of stakeholder involvement that are likely to yield meaningful results. In preparing this directory, we reviewed a broad sample of guidelines. Of these:

- 36% failed to mention participation altogether;
- 12% advocated that practitioners should only 'inform' stakeholders;
- 38% advocated some form of 'consultation'; and
- only 13% advocated more interactive forms of stakeholder involvement.

A number of common features appear to undermine their value as guidance tools for process managers and practitioners:

- lack of clarity;
 - confusing (and sometimes contradictory) use of terminology;
 - a paucity of practical guidance; and
 - lack of proactive support for stakeholder involvement in EIA.
-
- *Guideline clarity*

Guidelines should clearly explain why different stakeholders should become involved, at what stage in the EIA process, and how their involvement can be made effective. Most national and state-level government agencies have compiled guidance information on the environmental assessment process, but these documents are often poorly presented, use technical and inaccessible terminology and are not distributed widely. Guides for those required to plan, manage, conduct, review and participate in environmental assessment processes can help such users to interpret legislation, clarify roles and identify opportunities for the involvement of different stakeholders.

Ambiguity in the wording of guidelines often provides scope for agencies and practitioners to avoid or minimize the extent of stakeholder involvement (Box 9). Clearly, national, sectoral and agency guidelines should provide clear and explicit guidance on minimum standards and procedures for stakeholder involvement.

- *Confusing use of terminology*

Donor guidelines and international agencies use the term 'participation' extensively, but almost always in an inappropriate way. In reality, most agencies, including the World Bank, advocate *consultative* or *extractive* forms of involvement, i.e. they advocate

Box 9: Guidelines and EIA Under-Performance in Indonesia

In reviewing the EIA process in Indonesia, WALHI (1994) found that ambiguity and lack of clarity in official guidance and legislation provided opportunities for abuse of the system by government officials responsible for making EIA decisions, and cited this problem as a key reason for the poor performance of EIA in Indonesia. It is clear in the national EIA legislation that Indonesia's lawmakers intended EIA to be applied as a 'public process'. Unfortunately, the wording of this legislation has left ample scope for proponents to minimize such involvement. The existing guidelines do not specify, for example, that public involvement should be sought at the earliest possible stage of the environmental assessment process, only that some form of public inputs should be sought before the finalization of the EIS. Invariably, this means that public involvement does not take place until it is too late to be effective.

Source: WALHI (1994)

that external practitioners should 'interview', 'consult with', and 'take into account the views of...' the public and affected groups (see Box 10). An exception is the guidelines of FINNIDA which hint at the concept of devolving responsibility and influence over 'decision-making' ("...public participation should aim to effectively influence decision making") (FINNIDA 1989).

Box 10: Excerpts from the guidelines literature

- "The Bank requires the borrower to take the views of affected groups and local non-governmental organizations into account in the preparation of environmental assessment reports" (AsDB 1993).
- "The key factor that distinguishes consultation from participation is the degree to which those involved are allowed to influence, share or control decision-making. The World Bank requires *consultation* with affected groups as part of the EA preparation process..." (World Bank 1993).
- "Consultations do not reduce the decision-making authority of the borrower, but are a valuable way to improve decision-making, to obtain feedback on the EA process and draft report, and to increase community co-operation in implementing the recommendations of the EA" (World Bank 1991).
- "... involve public consultation with interested parties and the affected population" The Commission of the European Communities (CEC, 1993).

"In order to obtain valuable information about the project region, consultation with local target groups and NGOs is essential to EIA" (DGIS, 1993).

- *Paucity of practical guidance*

A common complaint is that EIA guidelines fail to provide adequate pragmatic guidance on stakeholder involvement in EIA practice. EIA process managers need specific guidance on stakeholder involvement when commissioning an environmental assessment. Staff responsible for ensuring that EIAs are

undertaken to a sufficient standard require guidance on how to ascertain that stakeholder involvement has been addressed adequately during the EIA process. With some exceptions, existing guidance on stakeholder involvement is not of an adequate standard to be useful to EIA practice.

Recent literature indicates that some of these shortcomings are now recognized and are being addressed. For example, recent guidelines on the incorporation in EA of traditional environmental knowledge (TEK) of indigenous peoples (Centre for Traditional Knowledge, 1997) provide practical and innovative guidance for the way in which indigenous peoples, corporate organizations and government can interact and negotiate to address critical cultural, environmental, social and economic issues (see Box 11). Different types of guidance will be required to assist practitioners to engage with other stakeholder groups, such as the private sector and business interests, local government bodies, and other line ministries. The acid test will, of course, be the extent to which these are adopted and implemented within relevant national guidelines, and those of development assistance agencies.

Box 11: Guidelines on Environmental Assessment and Traditional Knowledge of Indigenous Peoples

These innovative and useful guidelines focus on the incorporation of indigenous peoples' traditional knowledge into environmental assessment practice. They provide clear and practical guidance, not only for government (as regulators and planners) and corporations (as private sector proponents), but also to assist indigenous peoples to engage constructively and effectively in EA processes for proposals that could impact on the environment and resources on which they depend. In reality, the 29 guidance points presented in the document apply equally well to broader-based stakeholder involvement, such as the involvement of local communities and other stakeholders that would not necessarily be regarded as strictly indigenous.

The guidelines were developed by a team involving the Canadian Centre for Traditional Knowledge, the World Council of Indigenous People, Environment Canada, and the Canadian International Development Agency. They draw attention to the frequent inadequacy of conventional, scientific approaches to EA such as the limitations of using short-term scientific procedures to collect reliable and adequate information on which to base predictions and analysis. They also explore the difficulties inherent in balancing the very different perceptions of environment and development that are held by non-indigenous and indigenous stakeholders.

Source: Centre for Traditional Knowledge (1997)

- *Lack of proactive support for stakeholder involvement in EIA*

Constructive stakeholder involvement in EIA will rarely occur spontaneously. A proactive approach ideally should include incentives for involvement and will often be required, especially where significant costs will be incurred for stakeholders to take part in dialogue processes. Incentives are now an integral component of EIA frameworks in a

number of national guidelines, e.g. the federal guidelines for Canada (see Box 12) and Australia.

Box 12: The Environmental Assessment and Review Process in Canada

Public participation in the federal assessment process is promoted through:

- providing opportunities for public involvement in project screenings, comprehensive studies, mediation and panel reviews;
- the establishment of a public registry for each project undergoing any type of environmental assessment. Members of the public wishing to take part in the process can obtain copies and review most documents relating to assessment; and
- a Participant Funding Program designed to provide limited funding to interested individuals and groups both for and against a project to participate effectively at key stages of mediations and panel reviews.

Conclusions

This chapter has argued that greater attention to stakeholder involvement during the EIA process leads to better environmental assessment, and thus to the formulation of projects that deliver more social benefits, fewer environmental costs and greater economic and financial benefits. Yet the language of stakeholder involvement is peculiar in the degree to which it is abused - too often are 'stakeholders' perceived synonymously with 'local people', and too often are highly extractive forms of interrogation camouflaged under the cloak of 'participation'. It is one thing to be engaged in a two-way and transparent dialogue, but quite another to be accosted on a street by a clipboard-wielding foreign consultant. Sadly, the latter remains the norm, and not the exception. Proponents and their consultants continue to avoid engaging meaningfully with different stakeholders, including government agencies and the business community, other than at the most superficial level. Furthermore, they continue to engage with a very narrow range of possible stakeholder groups.

Do guidelines contribute to better practice, and do guidelines help foster approaches that pay more attention to process and consensus-building between stakeholders? There is little evidence to suggest they do, and much to suggest they don't. This analysis suggests that existing guideline literature mirrors the weaknesses that we observe in EIA practice, most notably the emphasis on consultancy-driven 'outputs' and confusion in the use and understanding of key terminology and concepts. Why is this the case? In most cases, guidelines appear to have been formulated to support 'one-shot' consultancy exercises and, like many EIA studies, they simply fail to promote engagement with the different stakeholders that should be involved. A round-table approach in 1998 to guideline formulation in the UK, facilitated by the

Institute of Environmental Assessment, provides an interesting exception to this pattern.

Effective EIA guidance on stakeholder involvement will only emerge from institutional learning processes and critical reflections on past performance. These processes will themselves need to involve the stakeholders that EIA is supposed to serve. Without this change in direction, we can expect to see a continuation in the expansion of EIA guidance literature, but little change in institutional behaviour and attitude. More process, and less product is what is needed now.

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