



Public Consultation in the EA Process: A Strategic Approach

This EA Sourcebook Update describes good practice in the planning, implementation, and monitoring of public consultation in the EA process. It focuses on thinking strategically about public consultation in order to more efficiently deliver improved project sustainability and to protect the interests of affected communities, especially the poor and vulnerable.

This document also replaces the EA Update no. 5, published in October 1995, "Public Involvement in Environmental Assessment: Requirements, Opportunities, and Issues."

SECTION 1 — CONTEXT

Since 1989 the Bank's Operational Directive (OD) 4.01 **Environmental Assessment** and its successor documents OP/BP/G 4.0 have required that affected groups and nongovernmental organizations (NGOs) be consulted as part of the environmental assessment of projects and particularly those with potentially significant impacts (Category A). The primary purpose of this provision is to protect the interests of affected communities, especially the poor and vulnerable. Experience has shown a strong link between project sustainability and effective public consultation.

Because of the OP's public consultation requirements, public concerns are now recognized at an early stage in the planning of major project environmental assessments (EAs). EA reports now usually include a record of consultations, and are made available for public scrutiny (see box 1.1).

Task team leaders should use the EA process to build consultations into project planning, so that information can be exchanged with stakeholder groups early enough to influence each key stage of the project cycle. Strategic planning is required to reconcile this aim with the inevitable constraints on time and financial resources. Team leaders must also identify the occasions that offer an opportunity to take effective action, since these will vary according to the funding organization's role in project financing and the stage of the EA process (see table 1.1).

Box 1.1 Strengths and Weaknesses of Consultations in Recent Bank Group Projects

Strengths

- More open and interactive communication
- Frequent involvement of NGOs
- Consultation extended to several phases of project planning
- Overall compliance with minimum requirements of the OP.

Priority areas for improvement

- Providing adequate documentation of the consultation process
- Ensuring that minority/disadvantaged communities or groups are involved
- Ensuring involvement of communities at the early planning (scoping) stages of the EA
- Ensuring that expertise in effective consultation techniques is employed
- Using systematic approaches to identify and include all stakeholders
- Providing effective and timely disclosure of information to all stakeholders
- Ensuring that the concerns of stakeholders are reflected in the design of the project
- Ensuring that separate consultations are held on resettlement vs. environmental issues.

Table 1.1 Consultation objectives during the EA process

<i>Stage in EA Process</i>	<i>Consultation goals</i>	<i>Strategic considerations</i>
Validation of environmental procedures and standards	Review national law and practice relating to consultation	Is there a need/Are there opportunities for capacity building?
	Ensure compatibility with Bank requirements	
Screening: assign an EA category	Identify stakeholder groups; secure proponent commitment to consultation program	Is there a commitment to consultation from project proponents and the relevant authority?
	Agree on extent and mode of consultation	
Scoping: Agree on EA TOR and schedule	Identify stakeholders	What resources are needed and available? Who is responsible for implementation, monitoring, and evaluation? Are there potential conflicts between the needs of the developer and those of the public?
	Disclose relevant project information	
	Determine stakeholder concerns and include them in the TOR	
Environmental analysis and production of draft EA reports (including social assessment and resettlement plan, as appropriate)	Disclose information on study methods and findings	What methods are appropriate for reaching different stakeholder groups?
	Agree on proposed mitigation measures with stakeholders	
Production of final reports	Let stakeholders determine whether their concerns are adequately addressed	Are mechanisms in place to ensure ongoing consultation and compliance with agreements?
	Finalize mitigation plan and disclose to stakeholders	
Implement the Environmental Management Plan (including environmental monitoring)	Inform the public about scheduling of potentially disruptive events	What role can stakeholders play in monitoring?
	Disclose results of environmental monitoring	
	Maintain effective complaints procedure	
Final evaluation	Assess effectiveness of consultation process	Were any lessons learned that might be transferable to other projects?
	Consult stakeholders for their assessment	

- Affected people can influence the project to reduce adverse impacts, maximize ancillary benefits, and ensure that they receive appropriate compensation
- Additional opportunities will arise during project design to ensure that vulnerable groups are given special attention, that equity issues are considered and that the needs of the poor receive priority
- Environmental Management Plans which result from the EA process are more effective.

Box 1.2 provides examples from several recent World Bank-funded projects in which public consultation has contributed substantial added value.

The Costs and Risks of Public Consultation

Although consultations offer significant benefits to all stakeholder groups, they also involve real

costs, which may fall disproportionately on one group—usually the proponents or sponsors of a project. Such costs include:

- The monetary cost of research and of communicating with the public
- Extra time and resources to manage consultation
- The cost of delays and/or uncertainty that may be caused by dealing with issues raised during consultation and building these into the schedule of project activities.

The Benefits of Public Consultation

Stakeholder group's benefits from public consultation may include for example:

- Fewer conflicts and delays translate into improved profitability for investors
- Governments improve decisionmaking and secure greater transparency and accountability
- Public agencies and NGOs may gain credibility and further understanding of their mission

Box 1.2 Impacts of Public Consultations

In a *Solid Waste Management Project* for the Organization of Eastern Caribbean States, negative environmental impacts of a proposed landfill site in Grenada which the EA team had missed were identified through public consultation, leading to the protection of an endangered species.

Public consultations on a *Water Management Project* in Espirito Santo, Brazil, served to identify adverse social impacts and helped in the development of appropriate mitigation measures to protect an artisan community's access to clay deposits and prevent a decline in the living standards of a nearby urban neighborhood.

In the *Colombia Energy Sector Technical Assistance Project*, changes to the national power sector strategy were agreed upon by a wide range of stakeholders, both within and beyond the sector, through a national-level consultation program, helping to build consensus.

Public consultation in the EA of the *Albania Forestry Project* identified the need for a program of meaningful public consultation in the management of state forests and helped to identify the major issues to be resolved before such a program could be implemented.

Consultation with groups affected by a flood control project in the *Ecuador Lower Guayas Flood Control Project* resulted in changes to the alignment of flood evacuation canals, despite higher costs, to save an important wetlands area.

As part of the *China Henan Highway Project*, detailed analysis of questionnaires distributed among local residents served to identify concerns about land acquisition, relocation, and resettlement. The EA recommendations included increased dissemination of information and consultation efforts.

Moreover it is not possible—or desirable—for the proponents of a project to retain complete control of the consultation process, once it is underway. Strongly felt stakeholder concerns and the activities of special interest groups, justified or not, are among the wide range of factors that may divert the process into unanticipated avenues. Conflicts may arise that prove difficult and costly to reconcile or that cannot be addressed within the scope of the project.

Such risks and their cost implications can be minimized, but never entirely eliminated, by careful preparation and management of the process. The risks are balanced by the fact that, overall, the process is likely to enhance the project's long-term sustainability. It is the responsibility of the task team leader to assess the costs and risks of consultation, weigh them against immediate and long-term benefits, and ensure that the balance is positive. This assessment should take account of the wider context of global concern for environmental

sustainability and the contribution of international agencies and NGOs.

SECTION 2 — DESIGNING AND IMPLEMENTING A PUBLIC CONSULTATION PLAN

Many countries do not share the traditions of public debate, transparency, and accountability that have become central to the Western model of democratic decisionmaking. Indeed there may be resistance to broad consultation in centrally planned or culturally conservative societies. Thus gaps or contradictions may arise between the Bank's legal and policy requirements and those of the client country. It is important to identify such gaps early so that they may be addressed in the consultation plan.

It may also be the case that not all members of the EA team fully appreciate the benefits of consultation. In such cases a clear strategy, a systematic methodology carried out by a well-integrated team, facilitates the understanding of the benefits of public involvement and may influence the outcome of the EA process in favor of the affected parties.

Key Issues in Developing a Strategy

A number of issues must be considered when planning a strategy for consultations.

Define goals clearly. The general goals of consultation are described above but, in addition, consultation programs may provide excellent opportunities to achieve goals associated with the wider development aims of the Bank and the client country. These may include building capacity, encouraging NGOs, or improving decision-making. The success of the program depends on having clear, well-defined goals that are understood by all major players.

Accommodate local legislation. As meaningful consultation in environmental decisionmaking in its diverse forms wins acceptance worldwide, basic legal requirements for access to information and consultation have been instituted in many countries. The consultation plan must therefore consider the legal requirements of the country in question and examine the extent to which they complement or coincide with World Bank policies and procedures. Conflicts may arise not only about the *need* for consultation, but also about the timing, scope, funding, methodology, and the use of the findings. Additionally, international conventions may apply. A dialogue to accommodate differing requirements and resolve potential conflicts should be initiated early in the process.

Secure commitment to effective implementation. The success of a consultation exercise requires that local authorities and project proponents (if they are different) understand its purpose and are committed to its success. Their positive attitude will give the process credibility and play a large part in securing the trust and cooperation of the public at large. Moreover, the quality and follow-through of the process are enhanced if those who are investing time and money are convinced that resources are being well spent.

Determine responsibility for implementation. The target area may not have institutions with the capacity and skills to collect and analyze data, interact effectively with the public, and interpret findings for decisionmakers. It may be possible to increase capacity through systematic training programs (see box 2.1), or it may be necessary to engage local or international consultants.

In any case it is vital that responsibilities for undertaking consultations and producing outputs are clearly defined, and that appropriate public authorities accept (and are equipped to play) a role in quality assurance. When more than one agency is involved in the project there is potential for conflict over the implementation of the public consultation plan. It is critical to determine which institutions will be responsible for overseeing implementation of the plan and which will be responsible for monitoring and evaluation (see section 4).

Plan consultation timing and phasing. Conflicting imperatives may arise in regard to the timing of consultations. Private developers often require confidentiality (to avoid possible competition) and may wish to avoid potential conflict until they are reasonably certain of their intentions. Where possible, public consultation should begin before major decisions are finalized. In these cases the aim will be to build a consensus about the direction of the wider development effort based on the informed involvement of stakeholders. Where the Bank has been approached after technical decisions have been taken, consultation measures may focus more on mitigating negative impacts and resolving or containing opposition. Each stage of the EA cycle may require a different approach to consultation, supported by the appropriate level of detail and involving a distinct group of stakeholders. The process may take several years for very large projects, particularly in some developed countries where greater resources and experience in consultation coincide with a demanding public, as demonstrated in box 2.2, which describes the complex consultation process for the Channel Tunnel Rail Link in England.

Provide adequate resources. The scale and scope of the consultation process must take into account the avail-

Box 2.1 Building Capacity for Consultation

Technical EA work is most often carried out by the private sector (developers or consultants). The public sector is usually more concerned with regulatory requirements and the scope, quality and implementation of mitigation measures. When regulatory agencies are aware of the utility of consultation, are required to hold public hearings, and are able to technically review the process, they can improve the quality and effectiveness of consultations and feedback to project design implementation.

In Georgia in 1994, the World Bank included training in public consultation as part of a Municipal Infrastructure Rehabilitation Project. Representatives of the Ministry of Environmental Protection (MEP), municipal authorities, and NGOs were introduced to:

- The wider benefits and practical value of consultation
- Methods of stakeholder identification
- Appropriate communication techniques
- How to use the information gained during consultation
- How to evaluate the outcome of consultation exercises.

Particular emphasis was placed on examining case studies to see where consultation could have improved project design or helped avoid implementation difficulties.

In 1997 an EA was conducted in Georgia in regard to an unrelated project; the construction of a major oil pipeline. Previous developments had been subject to review by officials and experts on behalf of the public, but the attitude towards actual consultation with the affected communities had been to “let sleeping dogs lie.” For this project, however, the approach was transformed. MEP officials recommended a local NGO be part of the social survey team. In addition, with full MEP support, the NGO community took part in the scoping of the EA and the review of the report. Before the project was submitted for consideration by the authorities, the pipeline route had been amended to take account of local sensitivities. As a result the potential for protest and political controversy was avoided, the process of obtaining permits was smoother, and the final project design was better.

ability of financial resources and specialized technical skills required. Expected benefits should be commensurate with costs, and weight should be given to the needs of disadvantaged groups. Professionals with backgrounds in sociology or anthropology, or with experience in public consultation, conflict resolution, or meaningful community consultation will usually be needed to design and implement a consultation plan. Fees for such professionals should be foreseen in the project budget, as should expenses for local costs, which

Box 2.2 Phasing of Consultations

The Channel Tunnel Rail Link

Extensive consultation was built into the planning of a rail link between London and the Channel Tunnel on the south coast of England. All feasible routes had to pass through some of the most highly valued landscapes and most populous suburbs in England.

Each stage of design involved different stakeholder groups. Each such group was approached with methods appropriate to its particular needs and interests and to the purpose of the project at that stage.

At the earliest stage the many local authorities were consulted about local factors affecting feasibility, future development plans in the area, and likely environmental impacts. Institutions and interest groups with responsibilities or interests along each route were identified and asked for comments. The information gained assisted in narrowing the choice to three main routes.

Maps were prepared and distributed by direct mail to residents close to route alternatives. A preliminary Environmental Impact Assessment (EIA) was prepared and distributed, the environmental constraints affecting each route were mapped for easy comparison, and public meetings were staged to explain the analysis.

Once a single route was selected, engineers could begin to identify and map with more precision the land to be purchased and public areas that might be suitable worksites. Detailed maps were published in sections, showing each residence and public building affected. A full EIA was published, explanatory leaflets were issued, and residents were invited to discuss issues of concern. Disputes remaining unresolved were debated in public in front of the national parliament.

During construction, due to commence in 2001, contractors will be required to publish their work plans and to make arrangements to receive, record, and respond to complaints; the developer will maintain a 24-hour telephone hotline.

may include “sitting fees” for government officials in some countries. Where funds and expertise from external sources are necessary, the availability of such resources throughout the process should be assured.

Be aware of site-specific sensitivities. Difficulties often arise when carrying out consultations associated with a particular location. They may be related to political or cultural factors in the affected communities such as restrictions on women or ethnic prejudices, or to the geography of the area (inaccessibility, poor communications, or diffuse settlement over a wide area). Such constraints must be identified when designing a consultation strategy so that approaches can be developed to

overcome them or to minimize their effects upon the process.

Often different values inform local versus national perceptions of the future. Also the particular values of culturally distinct minorities (for example indigenous people) and the conservation of cultural diversity may clash with the strategic priorities of the nation (more electricity or irrigation water for example). In such cases the task of the consultation strategy may be to educate and inform stakeholders of each others’ views and find acceptable compromises rather than attempting to reconcile fundamentally differing value systems.

Be aware of the historical context. The public’s past experience with authorities, developers, or site operators is likely to affect its response to efforts to create a dialogue. Past broken promises or mismanagement often leave a legacy of mistrust that can frustrate communication. In such cases trust-building mechanisms (independent mediation, written outputs) must be included in the consultation strategy.

Recognize the interests of developers/proponents. It is axiomatic that a properly designed Bank-sponsored project should have an overall positive social and environmental effect, and that, potential adverse effects will be avoided, minimized, or mitigated. Meaningful public consultation improves projects by helping to reduce the uneven distribution of costs and benefits and by maximizing opportunities that may arise for additional unplanned gains. With this in mind, it is important that the consultation strategy take account of the needs and interests of project proponents, so that perceived risks (in terms of cost, delays, future commitments) do not endanger project viability.

Be prepared to hear different views of the world

Political context. Another unanticipated cost of public consultation is that associated with inflated expectations in response to investment decisions. Land invasions, rent-seeking activity, and unfair advantage, will need to be addressed as will the particular individual concerns and positions of the powerful and politicians. Consultations will need to analyze the public value of those investments and weigh them against the value to particular interest groups. The consultation process is a major pillar on which transparency and accountability can be strengthened and with which corruption can be countered. Recognize that a consultation process can never be politically neutral and that it is about the negotiation between different sets of values with different access to

power and resources—another reason for ensuring the effective representation for those who would otherwise remain voiceless—the poor and the vulnerable. Recognize that while it may be necessary to identify all relevant stakeholders there are certain stakeholders with whom one will not want to encourage consultation.

Planning the Consultation Process

Principals of planning

The planning process should take full account of the strategic concerns outlined above, as well as the following key planning tasks:

- Identify all stakeholder groups (typically integrated with social assessment)
- Identify the key issues around which consultation will be needed (scoping)
- Understand the decisionmaking process
- Determine the necessary level of consultation
- Identify key consultation points
- Select consultation techniques
- Define a communication methodology
- Develop a budget.

Identifying stakeholder groups

This is a critical element. Failure to identify all relevant stakeholders can invalidate the entire process and lead to conflicts that become intractable—although they might easily have been avoided or resolved at an earlier stage. In general the basic questions to consider in identifying affected populations and stakeholders (see box 2.3) are:

- Who will be directly affected?
- Who will be indirectly affected?
- Who might have an interest or feel that they are affected?

Many of the techniques and methodologies that are used in social assessment can help identify stakeholders and assess how and to what extent a project affects them. Social assessment can help to determine what interests each stakeholder group has in the project, how those interests compare in importance, and which groups have the most influence or control. For instance, social assessment methodologies can help collect data on language and dialects, ethnic mix, division of gender roles, cultural traditions, environmental decisionmaking mechanisms, recent history with development projects, and key local concerns and priorities—all important in adequately identifying the variety of stakeholder groups (see box 2.4).

Scoping

The first step in designing a plan is to gain an understanding of the key issues and the areas where most of the effort needs to be directed, including:

- Environmental and social issues (such as indigenous peoples or resettlement) or decisions at stake
- Key organizations and interested parties involved
- Local authorities and the agencies involved
- Size of the issue or importance of the decision
- Urgency and time frame.

Understand the decisionmaking process

The next step is to understand how environmental decisions are made: that is, to identify which parties (such as government, sponsors, or financing institutions) make which decisions (scope of the EA, site consents, building permits, or emission limits for example), and at what points in the project cycle.

Box 2.3 Directly and Indirectly Affected Stakeholders

The industrial area of San Joachim, Santiago, Chile

The Government of Chile is implementing a policy of relocating industrial sites away from urban areas. An EIA was commissioned to examine the effect of relocating the heavy industry from the San Joachim area to a designated industrial zone on the outskirts of Santiago.

Directly affected stakeholders included farmers and residents at the new site whose land was acquired, and occupants of any nearby homes, public buildings, or businesses that might be affected by pollution or nuisances (traffic, noise, odor). Also directly affected were the businesses that would have to move to the new locations and whose workers would have a longer daily commute.

Indirectly affected stakeholders included small enterprises around the urban site that provided services to the industries; workers who would lose their customer base; residents of properties adjacent to the industries, who would benefit from a reduction in pollution; and nearby homeowners, who might benefit from an increase in property values.

Stakeholders with a direct interest in the planned move also included municipal authorities in both the original and proposed sites, who stood to lose or gain substantial local tax revenues.

Box 2.4 Potential Costs of Inadequate Stakeholder Identification

One of the consequences of failing to identify and consult stakeholders is that incomplete, misleading, or false information may reach them through other means, creating long-lasting, unwarranted hostility to the project.

Municipal authorities in Riga, Latvia, received technical assistance to conduct a site survey for a new sanitary landfill. Consultation and social survey work was planned after site selection during the full EA study. During site evaluation the local media discovered that one of the shortlisted sites was very close to a pre-World War I battle site of great cultural significance. The veterans association became involved and questions were raised in parliament. The Minister of the Environment assured parliament that the site would not be used.

Through the EA process, the EA team discovered that the actual battle site need not be affected by the development. The veterans association confirmed that their concerns could be addressed by minor modifications to the project design. Application of the criteria for site selection confirmed that this site was the most economical option then available. Reviving the issue, however, risked raising a storm of political protest, and the site was disallowed on that basis.

Considerably more attention was paid to consultation from that point onward. Information was disseminated through newspapers, television, community associations, and local government. A series of public meetings established that a large reservoir of public mistrust and hostility to waste-disposal schemes remained from the former Soviet government's poor site management. This issue became a major consideration in site selection and the eventual decision not to develop a new waste-disposal site, but to upgrade the existing dump.

Determine the necessary level of consultation

Public consultation and meaningful consultation typically take place at three different levels: conveying information to the public, listening to the opinions and preferences of the public, and involving the public in making decisions. The nature and size of the project, combined with both the nature and number of stakeholders and the status of national legislation will largely define when, where, and what level of public consultation is required for an EA and its Environmental Management Plan (EMP).

For instance, if the aim is to inform the public about a project or important issues the initial number of people to contact will be quite large but the interaction may be limited. If public preferences are being sought, closer contact and

dialogue will be required, but with a smaller number of people. If the public's direct input to decisionmaking is being sought, this will likely involve ongoing discussions with a small group of representatives of stakeholder groups. Site-specific factors, such as a history of local opposition to similar projects in the area, will also be important in determining the level of consultations (see box 2.5).

Identify key consultation points

According to the OP consultation is required, at a minimum, shortly after the EA category has been assigned (during scoping) and again once a draft EA has been prepared. Timely disclosure of information is key (see section 1) and it may be useful to develop systems to ensure that stakeholders receive information (including scientific reports) on time and in an accessible format.

Box 2.5 Using a Variety of Consultation Techniques to Reach a Diverse Audience

The Ghazi Barotha Hydropower Project is a major run-of-the-river power project designed to meet energy needs in Pakistan. Because of the expected environmental and social impacts, a thorough EA was conducted. The EA team faced the challenge of informing diverse public stakeholder groups about the layout and workings of the project and listening to their concerns. In order to reach the range of affected groups, therefore, the EA team devised a public consultation strategy that mixed a variety of techniques:

- A survey of a sample of 15 villages that would be affected by the project was conducted early in the preparation process. Consultation techniques included surveying and structured interviews.
- A survey of women in the project area was carried out by a female sociologist in order to learn the particular concerns of women.
- Scoping sessions with national and provincial assemblies, representatives of the district administration and district councils, and national and international NGOs provided opportunity for debate with civil society.
- A focused census and sample survey was undertaken to determine, as precisely as possible, the actual number of people to be affected by the project, their socioeconomic status, and the pattern of impact on various groups.
- A Project Information Center was planned for the project area to disseminate information to the public and respond to inquiries. The center will have available material written in the local language that will provide answers to common questions and it will provide access to project staff for face-to-face conversations.

While it is important that consultation take place before major decision points, the aim should be to facilitate consultation throughout the preparation and implementation phases. This implies that consultation will often be necessary as part of the research effort of the EA and in the development of mitigation measures during the analysis phase of the study.

Develop a budget

Whatever the approach to public consultation it will involve direct investment costs in terms of time and materials. Determination of the budget should take into consideration such factors as the complexity of the project, the diversity of the stakeholders, and the importance of the effects, as well as such constraints as the availability of skilled practitioners, availability of funds and project deadlines. The principal cost elements vary widely according to the context of the project but are likely to include some of the following:

- Consultants fees
- Hiring and outfitting of meeting venues
- Public opinion surveys
- Preparation and distribution of materials
- Staff time preparing, attending, and keeping records on public meetings
- Maintenance of channels of communication (telephone hotline, radio announcements, or other means)
- Travel expenses.

The budgets of the consultation exercises described in boxes 2.1 through 3.3 ranged from US\$25,000 to US\$1.5 million, or approximately 0.0025 percent of total project costs.

Select techniques

A variety of techniques is available to achieve meaningful consultation. The most effective programs will make use of a range of techniques for conveying information, listening to opinions or concerns, and involving the public in decisionmaking (see box 2.6). Determining which technique is most appropriate will depend on:

- The number of stakeholders and their characteristics including average level of education, environmental knowledge, and social and cultural status
- The nature and, in particular, the technical content of the information to be conveyed
- The institutional situation of the country concerned, particularly the types of skills and financial resources available for the project.

Box 2.6 Targeting Communication Methods to Specific Stakeholder Groups

Stakeholder groups receive information about the outside world from widely differing sources. To reach all affected parties a suite of communications media may be necessary. Special efforts may be required to reach disadvantaged people or groups marginalized because of tribal affiliation, caste, religion, gender, or geography. The most effective way of involving some stakeholder groups may only become apparent after a study of local culture and customs. A number of EAs have demonstrated innovative ways of disseminating information in such circumstances, as may be seen in the following examples.

The *Manantali Energy Project* involved hydropower generation in western Mali and its transmission to Senegal along a 1,000-kilometer transmission line route running through Mali and Mauritania. Given the diversity and dispersion of stakeholders, consultation was achieved through a series of small meetings organized with the assistance of village elders along the entire route. These were attended by most of the male population. When it became clear that most women did not feel free to attend these meetings, much less to voice dissenting opinions, a series of women-only meetings (moderated by a female consultant) was held in parallel. Project implementation was modified to include compensation arrangements agreed upon at the general meeting and to avoid activities during vegetable growing season, as the women requested.

In Bangladesh, *Occidental Petroleum Corporation* entered into a production-sharing contract with the Bangladesh National Oil Corporation to explore and develop gas fields in the northeast of the country. The International Finance Corporation (IFC) provided some of the capital investment, and an EA was produced in accordance with IFC guidelines. Investigation showed that the most common way for local news to be distributed was by two people on a moped, with the passenger announcing news through a megaphone. News of the development was broadcast in this way in addition to the use of more conventional media.

Section 3 lists commonly used techniques, offering comments on their applicability to various situations. The activities selected should be scheduled to fit in with the overall decisionmaking framework. Enough time should be allowed for people to receive information, digest it, and comment sensibly, bearing in mind that consultees are for the most part volunteers and cannot be expected to meet tight deadlines.

Achieving Openness and Transparency

Communication methods should be transparent and open to review. Some general principles for achieving this include notification, record keeping, and feedback.

Appropriate treatment of the Consultation proceeds in the EA report is summarized in box 2.7.

Notification. Clearly the target groups must be notified how, when, and where they can participate. In general, effective notification is highly visible to the target audience, delivered early, uses more than one medium to reach the target groups, and is repeated shortly before major events.

Record-keeping. A record of the types of consultation activities held, the target groups and numbers reached, the information conveyed, and the stage at which the information was provided should be kept and analyzed to reveal:

- Summaries of views by type of stakeholder
- A summary of points of agreement, disagreement, issues raised and options discussed
- Analysis of the validity of the concerns and issues raised by different stakeholders
- Recommended responses to valid comments
- Discussion of the implications and options for decisionmakers.

Feedback should be provided to the public, clearly explaining the response to their concerns, describing the decisions made and why they were made, and explaining how the information they provided was used. Otherwise participants may feel that their input had no impact on the decision and some of the benefits of the process may be lost, and effective consultation may become more difficult in the future.

SECTION 3 — TOOLS AND TECHNIQUES FOR PUBLIC CONSULTATION

Communication during environmental assessments involves seeking information, imparting information, or

reaching agreement through dialogue. Available approaches and tools may conveniently be categorized according to their suitability for:

- Conveying information to the public
- Listening to public opinion
- Involving the public in decisionmaking.

Matching Tools to the Immediate Purpose of Communication

Tables 3.1 through 3.3 outline the tools commonly used during EAs for each purpose.² Tools appropriate to any particular project will vary according to the type of project and its setting, but an effective consultation plan will usually make use of one or several items from each of the three menus as part of an integrated program. Conveying information to the public and listening to

Box 3.1 Conveying Information to the Public

Developers in a Central Asian country wanted to construct a factory and had selected a site near to the city center. A local NGO was concerned about the site, and encouraged the developer to carry out a full EIA which included public consultation. Working together, the factory management and the NGO mounted a display and created a public opinion video providing information about the design and location plans and the potential environmental impacts.

The display provided general information on the proposed project, including photographs and maps of the proposed location, literature on the environmental impacts and proposed mitigation measures, and the design and architectural plans. The display was set up at the local town hall for a period of three weeks, approximately eight weeks before the beginning of any project activity. The NGO analyzed the results of written notes left by the public and discussed them with the project developers. The display proved to be an excellent communications tool for all concerned. It informed certain sectors of the public that otherwise may not have known about the factory development, and the public was able to voice concerns about the proposed site.

Box 2.7 Discussion of Public Consultation in an EA Report

Among the key issues related to public consultation that should be addressed in an EA report are:

- Methodologies used to inform and involve the public in the EA process
- Analysis of the data and information gathered
- Discussion of the strategic issues presented in section 2
- Documentation of public meetings and interviews, including dates, names, topics of discussion, and important outcomes
- Recommendations on how the project might address or mitigate issues raised during public consultation
- Recommendations for ongoing public consultation during the EMP.

public opinion are specifically required by the OP, while involving the public in decisionmaking is fundamental to quality EA. Building consensus often has the added value of building trust and ownership, leading to partnership during EMP implementation.

Conveying Information to the Public

Table 3.1 summarizes some of the most commonly used techniques for conveying information to the public and lists some of the advantages and disadvantages of each. Box 3.1 provides a practical example of the application of diverse techniques to achieve different communication objectives.

Table 3.1 Techniques for conveying information

	<i>Key Points</i>	<i>Advantages</i>	<i>Disadvantages</i>
<i>Printed materials</i>	<ul style="list-style-type: none"> • <i>Information bulletins, brochures, reports:</i> Text should be simple and non-technical, in the local language where possible, and relevant to the reader • Provide clear instructions on how to obtain more information 	<ul style="list-style-type: none"> • Direct • Can impart detailed information • Cost-effective • Yields a permanent record of communication 	<ul style="list-style-type: none"> • Demands specialized skills and resources
<i>Displays and exhibits</i>	<ul style="list-style-type: none"> • Can serve both to inform and to collect comments • Should be located where the target audience gathers or passes regularly 	<ul style="list-style-type: none"> • May reach previously unknown parties • Minimal demands on the public 	<ul style="list-style-type: none"> • Costs of preparation and staffing • Insufficient without supporting techniques
<i>Print media</i>	<ul style="list-style-type: none"> • Newspapers, press releases, and press conferences can all disseminate a large amount and wide variety of information • Identify newspapers likely to be interested in the project and to reach the target audience 	<ul style="list-style-type: none"> • Offers both national and local coverage • Can reach most literate adults • Can provide detailed information 	<ul style="list-style-type: none"> • Loss of control of presentation • Media relationships are demanding • Excludes illiterates and the poor
<i>Electronic media</i>	<ul style="list-style-type: none"> • <i>Television, radio, and video:</i> Determine the coverage (national or local), the types of viewer, the perceived objectivity, and the type of broadcast offered 	<ul style="list-style-type: none"> • May be considered authoritative • Many people have access to radio 	<ul style="list-style-type: none"> • Time allocated may be limited • Costs can be high
<i>Advertising</i>	<ul style="list-style-type: none"> • Useful for announcing public meetings or other activities • Effectiveness depends on good preparation and targeting 	<ul style="list-style-type: none"> • Retain control of presentation 	<ul style="list-style-type: none"> • May engender suspicion
<i>Formal information sessions</i>	<ul style="list-style-type: none"> • <i>Targeted briefing:</i> Can be arranged by project sponsor or by request, for a particular community group, firm, or industry association 	<ul style="list-style-type: none"> • Useful for groups with specific concerns • Allow detailed discussion of specific issues 	<ul style="list-style-type: none"> • May raise unrealistic expectations
<i>Informal information sessions</i>	<ul style="list-style-type: none"> • <i>Open House, Site Visits, Field Offices:</i> A selected audience can obtain first hand information or interact with project staff. Visits should be supported with more detailed written material or additional briefings or consultations. 	<ul style="list-style-type: none"> • Provide detailed information • Useful for comparing alternatives • Immediate and direct • Useful when the project is complex • Local concerns are communicated to staff • May help reach non-resident stakeholders 	<ul style="list-style-type: none"> • Attendance is difficult to predict, resulting in limited consensus-building value • May demand considerable planning • Field offices can be costly to operate • Only reach a small group of people

Box 3.2 Listening to the Public

Occidental Petroleum Corporation's Experience in Bangladesh

Occidental Petroleum Corporation (Oxy) entered into a production-sharing contract with the Bangladesh National Oil Corporation to explore and develop gas fields in the Northeast of the country. The International Finance Corporation (IFC) provided some of the capital investment, and an EA was produced in accordance with IFC guidelines. Several aspects of the local culture demanded an innovative approach to social assessment.

A physical survey that they carried out of the environment around the proposed site identified small clusters of dwellings in areas mapped as tea plantations, inhabited by a tribal minority group with ethnic origins in India, who live in closed communities within the tea growing area to provide labor for landowners. These people had been severely disturbed by noise and light from previous gas-well testing, which had occurred without warning in the middle of the night. Their main requirements—easily accommodated by the developer—were to be warned of testing in advance and that testing be restricted to daylight hours. Oxy also made provision for local community members to be hired as casual labor and to be permitted to collect and “recycle” some of the detritus created during site clearance.

Listening to the Public

Table 3.2 summarizes some of the most commonly used techniques for determining public opinion on a particular issue and lists some advantages and disadvantages of each. Box 3.2 provides a practical example of the innovative approaches sometimes necessary to ensure that all stakeholder groups are represented during a consultation exercise.

Involving the Public in Decisionmaking

Table 3.3 summarizes some of the most commonly used techniques for involving the public in making environmental decisions and lists some advantages and disadvantages of each. Box 3.3 provides a practical example of the use of a mediator during a particularly controversial and high profile project.

SECTION 4 — MONITORING AND EVALUATION

Need for Monitoring

The theoretical benefits of consultation are well understood but as described in section 1 they have been elusive in many Bank projects, even when compliance with

Box 3.3 Use of a Mediator to Resolve Conflicts

The government of the Lao People's Democratic Republic requested financial support from the World Bank Group for the Nam Theun II Hydroelectric Project. The main features of the project are a dam on the Nam Theun river, a reservoir, a powerhouse, and transmission lines. The project will have substantial social and environmental impacts, including the relocation of 4,500 people and the inundation of over 400 square kilometers of the Nakai Plateau, 30 percent of which is forested and home to several important species.

Because of the magnitude of both the environmental and social impacts, public consultation took place at the local, regional, and national levels. Due to the international profile of this project, an unusually high percentage of the budget was allocated to national and international consultation. At a certain point in the project design process, environmental NGOs, the government, and the private developer could not come to agreement on how to address some of the most sensitive issues. Consultative meetings between the groups were unproductive and sometimes confrontational.

In the face of this seeming impasse and the need to reach decisions that all parties could live with and stand behind, the parties agreed to hire an independent moderator to facilitate the discussions. The skilled moderator who was hired, was able to keep subsequent discussions focused and to lead participants through brainstorming exercises that identified a range of options for action. The moderator was also able to frame the interests of different stakeholder groups, so that each group could envision areas of potential agreement as well as areas where compromise would lead to an acceptable outcome. On the basis of this series of discussions, agreement on a plan of action and mitigation was reached.

the OP has been achieved. Monitoring and evaluating progress throughout the implementation of the consultation plan can provide valuable lessons for future projects, as well as demonstrate to stakeholders the value of their investment of time and resources. In addition, the very existence of systematic monitoring can act as an enforcement mechanism and incentive for developers to fulfill the commitments made during project preparation at the implementation stage.

Use of a Logical Framework

Experience has shown in a variety of contexts that monitoring compliance with a complex set of procedures requires the use of objectively measurable indicators. If the indicators are to be useful, there must be a means of verifying or measuring them. This can be achieved by using a logical framework that helps to make connections among objectives, outputs, activities, and indicators.

Table 3.2 Listening to the Public

	<i>Key Points</i>	<i>Advantages</i>	<i>Disadvantages</i>
Survey techniques	<ul style="list-style-type: none"> Interviews, formal surveys, polls and questionnaires can rapidly show who is interested and why May be structured (using a fixed questionnaire) or non-structured Experienced interviewers or surveyors familiar with the project should be used Pre-test the questions Open-ended questions are best 	<ul style="list-style-type: none"> Shows how groups want to be involved Allows direct communication with the public Helps access the views of the majority Less vulnerable to the influence of vocal groups Identifies concerns linked to social grouping Statistically representative results Can reach people who are not in organized groups 	<ul style="list-style-type: none"> Poor interviewing is counter-productive High cost Requires specialists to deliver and analyze Trade-off between openness and statistical validity
Small meetings	<ul style="list-style-type: none"> Public seminars, or focus groups create formal information exchanges between the sponsor and the public; may consist of randomly selected individuals or target group members; experts may be invited to serve as a resource. 	<ul style="list-style-type: none"> Allows detailed and focused discussion Can exchange information and debate Rapid, low-cost monitor of public mood A way to reach marginal groups 	<ul style="list-style-type: none"> Complex to organize and run Can be diverted by special interest groups Not objective or statistically valid May be unduly influenced by moderators
Large meetings	<ul style="list-style-type: none"> Public meetings allow the public to respond directly to formal presentations by project sponsors. Effective meetings need a strong chairman, a clear agenda, and good presenters or resource people. 	<ul style="list-style-type: none"> Useful for medium-sized audiences Allow immediate response and feedback Acquaint different interest groups 	<ul style="list-style-type: none"> Not suitable for detailed discussions Not good for building consensus Can be diverted by special interest groups Attendance is difficult to predict
Conferences	<ul style="list-style-type: none"> Technical experts and representatives of interest groups may be brought together. 	<ul style="list-style-type: none"> Impart specialized technical information Promote data sharing and compromise Resolve technical issues 	<ul style="list-style-type: none"> Time and effort needed to prepare Cost if experts are hired
Community organizers/advocates	<ul style="list-style-type: none"> These work closely with a selected group to facilitate informal contacts, visit homes or work places, or simply be available to the public. 	<ul style="list-style-type: none"> Mobilize difficult-to-reach groups 	<ul style="list-style-type: none"> Potential conflicts between employers and clients Time needed to get feedback

Monitoring and evaluation of public consultation in the context of environmental assessment takes place at several levels:

- Monitoring implementation of the plan
- Monitoring the efficiency with which the plan is implemented

- Evaluating the effectiveness of the plan and its activities
- Evaluating the impact of the plan on the project.

Responsibility for each level of monitoring should be determined during the planning of consultations, may

Table 3.3 Involving the public in decisionmaking

	<i>Key Points</i>	<i>Advantages</i>	<i>Disadvantages</i>
<i>Advisory groups</i>	<ul style="list-style-type: none"> • Task forces: Set up task groups to focus on a single technical issue. Define the limits of the group's authority and lifetime; ensure that all interests are represented and that contact with the public is maintained. 	<ul style="list-style-type: none"> • Can address highly technical problems • Helps prioritize and reach consensus 	<ul style="list-style-type: none"> • Rarely represents all interested parties • May replace wider consultations • Often focuses too much on procedures
<i>Problem-solving techniques</i>	<ul style="list-style-type: none"> • Brainstorming: Designed to enhance creativity and generate ideas quickly. Selection of the facilitator and participants is critical. 	<ul style="list-style-type: none"> • Helps groups break out of the obvious • Provides insights for decisionmaking 	<ul style="list-style-type: none"> • Difficult to include a full range of views • May yield too many ideas to evaluate
<i>Consensus-building techniques</i>	<ul style="list-style-type: none"> • Unassisted negotiations, mediation: Voluntary processes by which representatives of affected organizations make decisions by consensus, to be ratified by parent organizations. Parties either agree on decision-making procedures at the outset or use an experienced mediator 	<ul style="list-style-type: none"> • A forum for jointly identifying solutions • Puts responsibility on the disputants to identify common ground. • Robust agreements with broad support • Quick resolution of contentious issues 	<ul style="list-style-type: none"> • Not all parties will participate • Parties may drop out before the end • Requires good faith • May take too long • Highly skilled mediators are scarce
<i>Arbitration</i>	<ul style="list-style-type: none"> • A process by which conflicting parties seek a solution through an impartial mediator. It can be binding, by prior agreement, or all sides may reserve judgment until the outcome. 	<ul style="list-style-type: none"> • Impartiality from an uninvolved party • Difficult to oppose the arbitrator's recommendation. 	<ul style="list-style-type: none"> • All parties must stand to gain • Difficult to identify an acceptable neutral party

differ at each stage, and may include the project proponents or their EA consultants, NGOs, government agencies, and funding agency staff.

Monitoring implementation of the plan

Key questions to consider include:

- Were the activities performed in a timely manner?
- Were the activities performed within the agreed budget?
- Were the funds distributed efficiently?
- Were vulnerable groups dealt with adequately and appropriately?
- Were the resources (time and money) that were expended commensurate with the results?

Monitoring implementation efficiency

Evaluation, which is based on monitoring, tells managers whether they are moving toward or away from

project goals, and why. Evaluation essentially involves answering two questions:

- Has the activity met its objective (from the viewpoint of different stakeholders)?
- What accounts for its level of performance?

Evaluating effectiveness

The effectiveness of public consultation activities should be evaluated. Findings may indicate ways in which remaining activities should be re-planned or may provide valuable lessons for future projects. Key questions to consider include:

- Were the intended outputs achieved? (Were stakeholders able to acquire the information they needed to participate meaningfully? Were stakeholders given the opportunity to have their views heard? Did stakeholders have a realistic opportunity to influence the design and implementation of the project?)

- Were all the stakeholder groups involved? Was a special effort made to include vulnerable groups? How many people were involved?
- Were activities appropriately phased to achieve the intended results?
- Did consultation occur sufficiently early in the process to influence key decisions?
- What were stakeholders' perceptions of the process? Was it fair?

Evaluating the impact of the plan on the project

Finally, the issue of whether the public consultation plan improved decisionmaking and project performance also needs to be carefully evaluated. This will help identify lessons to be applied in the design of future consultation plans.

Specifically, the following questions should be considered:

- Has the consultation exercise positively influenced the design and implementation of the overall project?
- If so, how and to what extent has it contributed to improved sustainability?
- Were the activities of other actors (government, other donors) influenced?

SECTION 5 — CONCLUSION

The public's right to be informed of and comment upon developments that affect their lives is basic in a democratic society, and is fundamental to the Bank's development objectives. The value of public consultation in the environmental assessment of large development projects goes far beyond this, however, to include improving project design, facilitating implementation and, ultimately, assuring sustainability. Investment in consultation may therefore pay for itself many times over in improved efficiency and material project benefits.

To have the greatest chance of success, consultation needs to be fully integrated into an EA and begin at an early stage, while critical project design decisions are still amenable to change. Strategic planning should identify any barriers to effective consultation and design

approaches to overcome them. A process should be defined for exchanging information with stakeholders at critical points throughout the project. A set of tools should be selected that is appropriate to the project setting, the nature of the stakeholders, and the purpose of the interaction. Finally, the implementation of the plan should be monitored and the outcome evaluated.

Resources

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Notes

1. The term "consultation," is used here, as in the title of the OP, rather than the term participation—which implied some formal measure of control. OP/BP/G 4.0 does not require formal control by the public but seeks to promote meaningful consultation, that will lead to public involvement in project planning design.
2. These tables, extensively abridged, were adapted from the World Bank's *The Public Participation Handbook* (1996), which contains full versions of the tables and extensive supporting text describing each tool.

This *EA Sourcebook Update* was prepared by Environment Resource Management, a private consulting firm in Washington, DC, under the direction of Nightingale Rukuba-Ngaiza. It is a joint publication of the Social Development Department and the Environment Department. The *EA Sourcebook Updates* provide guidance for conducting environmental assessments (EAs) of proposed projects and should be used as a supplement to the *Environmental Assessment Sourcebook*. The Bank is thankful to the Government of Norway for financing the production of *Updates*. Please address comments and inquiries to Colin Rees, Managing Editor, *EA Sourcebook Updates*, Environment Department, The World Bank, 1818 H St. NW, Washington, D.C., 20433, Room No. MC-5-143, (202) 458-2715.