I. Introduction

1. The Social Development Department (SDV) carried out a review of public consultations in the environmental assessment process on Bank-financed category A projects, fiscal 1995–96. The review was a follow up to the Second Environment Assessment Review (1996) which analyzed category A projects carried out in FY 1994/95. Earlier reviews on environmental assessments (EA) consultations had concluded that public consultations were still weak. The main objectives of the review were (a) to examine the Bank’s practice on public consultations in the EAs and assess whether any progress had been made, and (b) to identify obstacles and provide practical solutions for improving the consultative process as part of a larger effort to improve the quality of the EAs and incorporate participation in projects.

2. The sample of projects mainly was mainly from the Asia region and much of the recent work (since FY 96) on social assessments that has had an impact on public consultation strategies and streamlining of participation in the Bank’s operations is not reflected in the review. Nevertheless, the findings to a large extent reflect the state of public consultations in the EA process in FY 1995/96.

3. The main finding of the review were that there has been a slight quantitative improvement in the number of EAs with public consultations; however, institutional challenges still hinged on increasing the number of projects in which results of the public consultations are integrated into the decisionmaking process, ensuring that consultations on projects with resettlement also focused on environmental impacts, and devising strategies to ensure that both Bank staff and clients view public consultations as a major mechanism (as opposed to an institutional requirement) that merits strategic planning in order to improve project effectiveness and sustainability.

4. The review makes a number of procedural and substantive recommendations based on the EAs with good consultations as well as suggestions from task team leaders (TTLs). Of the recommendations delineated in section III, the need for strategic planning for consultations was the most important. One of the outputs of this review that responds to planning for consultation is an EA Sourcebook Update, which outlines how EA consultation plans can be developed, implemented, and evaluated. Strategic planning for public consultation also entails budgeting for the consultations as part of the EA and
projects costs, developing concise terms of reference (TORs) and recruiting professionals with participation skills.

5. In order to encourage TTLs to ensure that the borrower conducts the consultations, the review recommended that the Bank should provide borrowers with incentives. Likewise, in order to change the attitudes of the government officials toward consultations, the value added by EA consultations should be conveyed to them through various mechanisms, including training. In this regard, they will begin to perceive EA consultations as an effective planning tool and not solely as a World Bank requirement.

6. Section I of the report provides an introduction to the review, scope, and methodology. Section II describes the findings, which include both lessons learned from the good EAs and overall constraints to consultations. Section III contains the recommendations and Section IV the conclusions.

A. **Background**

7. Public consultations in the environmental assessment (EA) process are designed to ensure that the knowledge, views, and preferences of affected groups, nongovernmental organizations (NGOs), and other interested parties are taken into account in environmental decisionmaking. The underlying objectives are rooted in the increasing number of delayed and failed projects because of misunderstandings with the public as well as the increasing demand of local communities and NGOs to participate in development projects. In a growing number of countries, consultations during the EA process are required by law.

8. The Bank’s Operational Directive on Environmental Assessment (OD 4.01, to be released as OP 4.01) requires the borrower or EA preparer to conduct public consultations as part of the EA for Bank-financed projects that may have significant effects on the environment. These projects are classified as either category A or category B. The former requires a detailed EA with an environment management plan (EMP), and the latter calls for an environmental analysis.

9. The OD requires that the views of “affected persons,” including NGOs, be taken “fully into account in such assessments.” The views of the affected groups and NGOs are obtained through a consultative process that occurs at two stages during project preparation:

(a) After the assigning of the EA category during the scoping of issues and preparation of draft TOR

(b) After a draft EA has been prepared.

10. A number of studies to assess public consultation and participation in the EA process in Bank-financed projects have been carried out in the Africa, Latin America and Caribbean, and Asia (East and South) Regions of the Bank. The Bank’s second EA review
also assessed the EAs on a Bank-wide level. It was the main finding of all the reviews that public participation and consultations in the EA process were improving. They based their findings on project success in promoting some degree of public participation and consultations as well as improvements in project designs that resulted from participation and consultative processes.

11. Nevertheless, the second EA review, which followed these earlier reviews, found that “many EAs were still characterized by . . . weak public consultations.” It also pointed out that despite the recent improvements in the consultative process, women and the poor were still to a large extent excluded from the consultative process. Therefore much more progress was required to “fully implement the letter and spirit of OD 4.01.”

The East and South Asia review pointed out that with the exception of a few cases, public consultation had not resulted in project alterations.

B. Scope and Methodology of SDV Review

12. This review covers the post–July 1995 EAs (fiscal 1996), as well as EAs in fiscal 1995 listed in the former Environment Land and Water Division (ENVLW) database. Earlier studies that analyzed public consultations and participation in the EA process covered the period between October 1989 and July 1995. EAs in fiscal 1995 are included in this review because the second EA review, which analyzed them, looked at the EA process in its entirety and did not pay specific attention to public consultations as such. EAs of projects that were funded by the Global Environmental Facility (GEF) are excluded from the study because of earlier comprehensive reviews of public consultations in GEF–financed projects. As illustrated in Figure 1, there are 41 EAs in the review, of which 32 are from Asia (22 from East Asia and the Pacific and 10 from South Asia), 2 from Latin America and the Caribbean, 4 from Sub-Saharan Africa, 2 Europe and Central Asia, and 1 from the Middle East and North Africa. Two of the EAs are missing, and in the case of two projects, only EA summaries and staff appraisal reports were reviewed (For details on EAs reviewed according to regional representation see Annex A).
13. The study was primarily a desk review of category EAs for category A projects prepared in fiscal 1995–96 and was supplemented by interviews with some task team leaders (TTLs) and or other Bank staff who were involved in the participation and consultation component of the project. The review also includes findings of previous studies by the World Bank on participation and consultation in the EA process. A summary of findings on each EA was sent to TTLs to confirm the findings of the review, and their suggestions were incorporated into the final report. Because of the disparity in numbers of EAs according to the regions, no regional comparisons were carried out in the review.

14. The review is cognizant of the fact that the level of consultations on strategic EAs, sectoral EAs, as well as project-specific EAs varies. Public consultations on the strategic EAs are normally not required and necessary because the consultations are expected to take place in the EAs of the subprojects. Likewise, in sectoral EAs, it is not always possible to consult representatives of all potentially affected people because sectoral EAs cover an entire national or subnational context before investment decisions are made. On
the other hand, consultations with the local NGOs and affected groups on the project-specific EAs are necessary.

C. Criteria for Evaluating Public Consultations

15. The evaluation criteria in this review were based on the OD requirements. The OD requires that “affected groups and local NGOs” be consulted by project proponents or EA preparers at the scoping phase of the EA and after preparation of draft TORs. Prior to the consultations, the “local NGOs and affected groups” should receive information in a “timely manner.” At the scoping, or preparation of draft TORs, stage, the information should consist of a description of the project, and after preparation of the draft EA, a summary of the conclusions. The OD further requires that the views of the affected groups and local NGOs should be “taken fully into account.” Good practice dictates that consultation be carried out throughout the project cycle. Therefore, consultations should also be carried out on the final EA, environment management plan (EMP) and any other studies pertinent to the project.

16. Although not part of the OD requirements, other factors that improve consultations include (a) early planning by developing a consultation plan with appropriate communication strategies for the various stakeholders, (b) conducting a social analysis (SA) to identify stakeholders and issues pertinent to the project, and (c) linking the findings of the SA to the consultation plan.9

17. In analyzing consultations, the EAs were considered to have exceeded the OD requirements if they met both the OD requirements and complied with other factors outlined in the Review Framework in Annex 1. The EAs were categorized as meeting the OD requirements if the consultations complied with the OD or as falling short of the OD requirements if they only partially conformed to the OD or did not meet the OD requirements on consultations at all.
D. Review Findings

18. The key findings relate to the number of EAs with consultations, the extent to which consultations influenced project design, and the level of consultations on EA issues when the project involved resettlement. Other pertinent findings relate to the extent to which EAs had strategically planned for consultations and lessons learned from the EAs, the role of national legal frameworks on consultations, and constraints to successful consultations.

II. Findings

A. Key Findings

(i) Slight increase in the number of EAs with consultations

19. It was the overall finding of the review that consultations had increased from the average 50 percent reported in the earlier EA reviews to 54 percent. Out of 39 EAs, 21 conducted public consultations. Out of the 18 EAs that did not carry out consultations, 2 were strategic EAs that laid out plans for consultations at the subproject level. 10 Despite the modest improvement in the number of consultations, consultations were still nonexistent in 16 projects.

20. The OD requires that consultations be carried out at the scoping and draft EA phase. It is also prudent to carry out consultations on the environment management plan (EMP) and final EA phase. However, out of the 21 EAs, 16 carried out consultations at the scoping phase and 15 at the draft EA phase. Only 7 carried out consultations at the final EA phase. The EMP consists of both the mitigation and monitoring plans, most consultations were carried out on the mitigatory issues and not on the monitoring plans. Consultations on the monitoring plans were mainly carried out with the technical experts from academic and research institutes and not the affected groups and local NGOs.

(ii) Limited number of EAs that influenced project design

21. The OD requires that the views of affected groups and local NGOs be “taken fully into account.” The review found that in a limited number of EAs, the views of the affected groups were integrated into project design in order to mitigate the potentially adverse environmental impacts and to minimize resettlement. Examples where this occurred are noted in Box 1.
Box 1 Consultations and Influence on Project Design

India: Bombay Sewage Disposal Project—Consultations revealed fishing communities concerns about the impact of the marine outfalls on fish yields. A comprehensive awareness program on the need for project, technical and social issues, and environmental benefits was recommended.

India: Second Madras Water Project—Consultations led to the development of rules to protect irrigation rights of farmers.

China: Ertan Hydro II—Changes were made to abandon one site on the basis of the consultations.

China: Shaanxi Highway Project—Design and engineering plans were modified to add more passages over line bridges and relief roads to reduce resettlement in response to concerns raised during public consultations.

China: Zheijang Power Development—Electricity transmission line route modified on basis of consultations.

Pakistan: Ghazi Barotha Hydro-Power Project—After a series of scoping sessions with local people and government and public representatives, large volumes of spoil from the power channel were disposed of as irrigated spoil on banks, which was economical.

(iii) Lack of or minimal consultations on environmental impacts in projects with resettlement

22. The second EA review found that consultations in projects were strongest when linked to involuntary resettlement. A close scrutiny of the consultations indicates that the quality of the consultations was significantly better on the resettlement issues than on the environmental issues.

23. In the few cases in which the EAs with resettlement focused on environmental issues, the questions or survey forms had a general statement asking what the people’s views on possible environmental impacts in the project area were. This is in marked contrast to the questions concerning resettlement, which were well directed and quite specific. Consequently, most of the discussions focused on compensation and alternative site selection and not on the environmental impacts of the proposed projects. One TTL indicated that the preference is to limit the consultations on the environmental issues to the professionals and the social issues to the public. Another TTL explained that the resettlement issues were accorded more attention than the environmental issues because the resettlement action plan is like a contract and becomes part of the legal documents. He also explained that people who are about to be relocated are less concerned about the ecological and environmental impacts of the project.
(iv) **Minimal strategic planning for consultations**

24. Among the numerous benefits of strategically planning the consultations are proper identification of stakeholders and employing the appropriate communication strategies to disseminate the information. The lack of a defined strategy for consultations in most EAs undermined initiatives to break down stakeholders into distinct social categories such as women, youth, poor, and other disadvantaged groups. The various categories of the stakeholders could have led to employing different communication strategies and public involvement techniques in order to promote more effective consultations.

25. In the EAs where information was disseminated to stakeholders, the methods for disseminating the information included public announcements in newspapers, exhibition of reports at designated centers, distribution of consultation forms, TV and radios. However, what is lacking in the EA reports is information on lifestyles of the stakeholders to justify use of the selected communication strategies. These standard communication techniques and the media need to be tailored to particular audiences, language skills, and cultural traditions.¹¹

**B. Lessons Learned**

26. Out of the 16 EAs that planned the consultations, only four offered innovative approaches to planning the consultations. They were the Albania Forestry, Yunan (China) Environment, India Infrastructure Leasing and Financial Services (ILFS), and Pakistan Ghazi Barotha projects. These projects outlined the objectives of the consultations, laid out methods and techniques for their implementation, and systematically identified the stakeholders. They emphasized that the views and perceptions of the marginalized groups had to be an integral part of the outcome of the process and would be one of the evaluative criteria.

(i) **India: Infrastructure Leasing and Financial Services Ltd, (ILFS)**

27. The India ILFS project has a good EA that strategically plans the public consultations. ILFS is a financial intermediary set up by the government of India to finance a number of subprojects. It approached the World Bank for a line of credit. At the outset, it was clear from ILFS that unless the environmental and social concerns were tackled up front the project would be an investment risk. Hence, ILFS developed a plan that integrated the Bank’s EA requirements and social assessment (SA). The plan requires a multidisciplinary team, development of TORs for social assessment, public opinion surveys, and consensus on the scope of the SA. The TORs for the SA required the identification of stakeholders, including project beneficiaries, directly and indirectly affected persons, as well as the special needs of marginalized and vulnerable groups. It also outlines the different methods for public involvement and various communication strategies for implementing the consultations. A number of subprojects funded by ILFS have complied with these requirements.¹² This strategic planning prior to conducting the
EA on each specific project is an innovative way of planning for the EA process as a whole and public consultations in particular.

(ii) Albania: Forestry Project

28. The Albania forestry project also had a multidisciplinary team of experts, including a social scientist and a legal expert. They identified stakeholders and the issues posed by participation that had to be addressed in the plan. In terms of social analysis, the EA stressed that it was important to establish whether the villagers would be able to articulate their concerns to strangers, and whether individual and collective action and social cohesion existed among the consulted. The TORs required that the final EA reflect the comments from the public. As a result, a stakeholder review workshop was held on the final EA.

29. The success of the Albania forestry project can be traced to its community-based pilot, which has been successful at the implementation phase of the project.

(iii) China: Yunan Environment Project

30. The China Yunan environment project espoused the same principles and methodologies that were reflected in ILFS and Albania. The Yunan project recruited a multidisciplinary team and used a good stakeholder analysis. Stakeholders included specialist stakeholders that addressed more complex issues. In the Yunan environment project, some consultations were carried out with affected groups, even though the government of China preferred consultations to be carried out with local authorities and other representative organizations. This EA also documented the surveys, responses, analysis, and key results of the consultations and therefore serves as a good example of the documentation of the consultative process.

(iv) Pakistan: Ghazi Barotha Project

31. Lastly, the Pakistan Ghazi Barotha project reflected the same type of strategic planning. Through a focused census and use of an integrated team of professionals, including social scientists, the project determined the actual number of affected groups, their socioeconomic status, and patterns of impact. The experts noted that the women in the project area were not fully involved in the formal public consultation process because of cultural constraints. A female sociologist conversant with the culture and social issues was hired to foster their participation. All in all, these projects emphasized the methods, organization, and key results of the consultations as integral to the consultative process.
C. Other Findings

(i) A need for a thorough documentation of the consultative process

32. The Operation Evaluation Department (OED) study on EAs and NEAPs, and the second EA review found that poor documentation of the consultative process was one of the weakest aspects of the EA process. This review confirms that finding. As a result of the poor documentation of the consultative process in the EA process, relevant information had to be obtained from project files or through interviews with Bank staff, and in some cases from the consultants who conducted the consultations. Occasionally, the annexes contained the list of participants, questions, and responses, but the reports lacked a meaningful analysis of the discussions or consultations.

33. The EAs that clearly documented the consultative process had good descriptions of country legal requirements and how they related to the public consultation process, information on the consultation plan in which a broad range of stakeholders were identified, the type of information disseminated, and where translation of information into the local languages was necessary. Also included in the EA reports were copies of notices for the meetings and consultations, lists of participants and dates of attendance, the questionnaires and survey forms, responses and analyses. Documentation of the consultative process should take into consideration the political and cultural context in which the EAs are conducted. In some cases, ensuring the anonymity of the respondents may be essential.14

(ii) Poor or lack of reporting on statutory frameworks for public consultations

34. The existence of a statutory framework in a country is one of the indicators of a government’s normative commitment to participation and consultation. The OD requires that information on country legal requirements on the EA process be documented in the EA report. Out of 39 EAs, 16 had EA laws that specifically required public consultations in the EA process. Two of the EA reports carried out in the same country by two different consultants provided inconsistent information on country legal requirements on public consultations.15 In the rest of the EAs, the information was either incomplete or inadequate. Hence laws were listed or summarized without a discussion of the relevant provisions and how they related to consultations or the EA process as a whole.16

D. Constraints to the Consultative Process

35. Constraints to the consultative process are due to factors both within and outside the Bank. Outside the Bank, constraints to consultations were demonstrated in a number of projects. In the China Zhejiang power project, Project-Affected Persons (PAPs) refused to participate in the consultations because they were not accustomed to being consulted and were also of the view that their perceptions on the project were irrelevant, since decisions on the project had already been made by the government. In the China Yangtze Basin water project, many of the respondents were uneducated, and the majority did not
want to be included in the survey for consultation. The Sri Lanka solid waste project experienced similar constraints.  

36. Within the Bank, TTLs pointed out that consultations were the responsibility of the borrower, and usually time and money were not included in the project budget. TTLs commended the good consultations in projects like the Pakistan Ghazi Barotha and Laos Nam Theun II projects; they pointed out that these were costly and the initiatives could not be replicated in their own work. It was not possible to get information from the TTLs on the costs of the EAs and the consultation components. Since EA review teams within the Bank receive the EA for clearance after the public consultations are completed, at this point, it is usually too late to take corrective measures.

III. Recommendations

37. Previous EA reviews recommended that the value added by consultations needed to be documented. Their recommendations on improving participation and consultations in the EA process included conducting social assessments; developing precise TORs; ensuring a proper mix of professionals, including local social scientists; and proper identification of all stakeholders. This review subscribes to these recommendations.

38. Clearly, some of the factors that were recommended by previous EA reviews are reflected in the EAs with the best consultations. These factors are both procedural and substantive and are the main recommendations of the study. They are recommended for projects that did not comply with the OD requirements, as well as for those that just met the OD requirements and need to improve the quality of the consultations.

A. Procedural

(i) Recruit multidisciplinary teams to address social and environmental issues

39. Although information on the professional mix of consultants preparing EAs was not available in all reports, the EAs with the good consultation strategies had teams of environmental scientists, local social scientists, resettlement and participation specialists, as well as legal experts. As a result, they developed good consultation plans with information on the relevant country legal requirements, selected appropriate communication strategies, identified relevant stakeholders, and elicited information that is reflected in the EAs. In the Pakistan Ghazi Barotha project, the involvement of a local female sociologist fostered the effective involvement of women. The remarkable amount of planning that went into selecting the professionals was reflected in the good consultation strategies.
(ii) Prepare detailed terms of reference

40. TORs were not available in all the EAs; however, the TORs in the good EAs were detailed enough to apprise consultants of the Bank’s EA requirements and offer concrete steps on what is required to comply with the OD. For example, the TOR for the India Second Madras Water Project required consultants to conduct reconnaissance visits and assemble information on the customs, aspirations, and attitudes of the different socioeconomic groups. Hence, the TORs need to be detailed and require the consultants to develop consultation strategies and plans and the tools and techniques for their implementation. TORs should also require that information in social analysis be incorporated into the EA design and that criteria for assessing effectiveness of the consultations be developed by consultants. Examples of good TORs on consultations in the EA process should be posted on the EA knowledge node.

(iii) Develop and promote execution of a strategic consultation plan

41. An effective consultation strategy not only lays out a plan for effective consultations, but provides an evaluative framework against which the quality of the consultations can be assessed. It takes into consideration the variations in culture and language and literacy levels among the various stakeholders. In some countries, a review of documents by ordinary persons is not typical. Hence, different communication processes may be necessary to ensure that information is received and understood by the targeted stakeholders. The project information and a summary of the conclusions that are provided to the PAPs may sometimes have to be translated into local languages and be visual or oral, depending on the literacy levels.¹⁸

(iv) Early review of EA consultation plans and strategies

42. Since EAs are reviewed in the Bank after consultations are already completed, it is imperative to plan consultations at the earliest opportunity in project preparation and seek guidance from the EA review team. Another option is to establish a systematic arrangement within the project-implementing units responsible for the development of a strategic framework for encouraging information dissemination, developing an appropriate communication strategy, and providing relevant information to ensure informed consultation and participation.

(v) Document the consultative process

43. Documentation of the design and execution of the consultative process is apparent in the good EAs. In these EAs, locations and dates of meetings and descriptions of affected persons are described in the reports. Prior to signing off on the EAs, Bank staff should review the information and, where it is lacking, require EA preparers to provide information on the consultations.
B. Substantive

(i) Provide incentives to TTLs

44. The second EA review pointed out that some TTLs view consultation as a hurdle. In the present review, interviews with TTLs on projects that prepared and executed good consultation strategies demonstrated TTLs’ appreciation of the benefits of consultation. They emphasized that early consultation saves time and minimizes costs. They also pointed out that conducting consultations is prudent business practice. These findings are, to a large extent, similar to those in the International Finance Corporation (IFC) review on EA consultations and public disclosures. The IFC review found that the project sponsor’s appreciation of the benefits of consultations and disclosure influences the level of commitment, time, and resources allocated to the process.\textsuperscript{19} A change in attitude may have to be fostered through incentives that reward good consultations in the EAs or more accountability for lack of or for poor consultations. These measures would also improve the documentation of the consultative process.

(ii) Promote government and local leadership commitment to participation by disseminating good practice

45. In projects with institutional constraints, consultations were carried out because of the commitment of government leadership. This varied from sector to sector. The value added by the EAs in the project has to be communicated to the borrower through either training or other mechanisms so that the EA is seen as an effective planning tool and not a Bank requirement. The Environment Department (ENV) earlier initiative on EA harmonization could be an entry point in which the message of the value of the EA process is conveyed to government officials.\textsuperscript{20}

(iii) Link the resettlement action plan and environment management plan

46. In the EAs with good consultations, consultations on resettlement issues did not preclude a discussion or an inquiry into the environmental factors. As a result, there was a good balance between the consultations on the resettlement and environmental factors. This good balance could partly be attributed to an effective consultation strategy in which questionnaires and survey forms inquired into both the environmental and the social impacts of the project. It is therefore recommended that the EA team work closely with resettlement specialists to maximize the opportunity to address environmental issues at the same time resettlement issues are being addressed.
(iv) Disseminate EAs with good practice on consultations

47. EAs that conducted good consultations should be posted on the EA knowledge and participation nodes for Bank-wide use. They should also be used in EA training.

(v) Provide TTLs with information on statutory requirements

48. In addition to the OD requirements, TTLs can point to country legal requirements on consultations to encourage the borrower to carry out consultations. Information on the country’s requirements has sometimes not been included in EAs. In order to provide TTLs with this information, a compendium of EA laws (both national and international) on public consultation and participation in the EAs should be prepared and disseminated. A supplement to the compendium should be attached to the EA report and be periodically revised to reflect changes in the laws. This information can be kept by the country lawyers who are designated to those countries within the Bank and be accessible to TTLs.

IV. Conclusion

49. From the foregoing discussion, it is evident that lessons emerging from the detailed review of the 39 EAs demonstrates that some progress on consultations in the EA process is taking place. This is illustrated by the increasing number of EAs with consultations and a few innovative EAs that are developing consultation strategies to promote compliance with the Bank’s OD requirements. Some of these projects, such as the India Infrastructure Lending Financial project, have developed model EA plans that incorporate the Bank’s environmental and social requirements. The Albania forestry project developed a pilot to test the feasibility of its proposed public participation strategy. In countries with institutional constraints that preclude direct consultations with affected groups, progressive leadership in some sectors has enabled a dialogue between the affected groups and the government to take place.

50. Despite these improvements, the quality of consultations on the environmental impacts is still weak. This is demonstrated by the lack of or weak local consultations on the environmental issues in projects that involve resettlement, lack of a strategy to conduct effective consultations, fewer projects in which consultations influence project design, and poor documentation of the consultative process. In order to increase and improve the overall quality of consultations in the EA process, the EA has to be seen by both the borrowers and Bank-staff as integral to project effectiveness and sustainability as opposed to an institutional requirement. This will in turn promote strategic planning so that consultants with appropriate skills and training are selected for EA preparation, detailed TORs to comply with Bank requirements are developed, and consultation plans with evaluation criteria are drawn up to collect the views of those who are “traditionally excluded from the consultative process.”
## Review Framework

### Category A Projects

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| 1. | **Statutory framework on public consultations**  
   *is one of the indicators of a government’s normative commitment to participation and consultation and sets the parameters within which consultations occurs. OD 4.01 requires that information on country legal requirements on the EA process be documented in the EA report.* |
| 2. | **Consultation plan or strategy**  
   *demonstrates that consultations have been systematically designed and is the basis for evaluating the extent to which the consultations meet or exceed the OD and country-specific legal requirements. These should include: Social analysis Identification of stakeholders*  
   Dissemination of information and communication strategies* |
| 3. | **Good consultation practice**  
   *dictates that consultations be carried out throughout the project cycle, which includes the scoping, draft EA, final EA and environment management Plan (EMP), and supplemental studies.*  
   Scoping of issues*  
   Draft EA*  
   Final EA  
   Environment management plan  
   Other studies pertinent to project |
| 4. | **Documentation of consultative process** |

* Connotes the requirements of OD 4.01 which was the operational directive at the time of the Review.  
* The environment management plan includes both the monitoring and mitigatory plans.
### Annex 2

#### Selected Projects by Region Included in the Review

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<th>Region/Country</th>
<th>Project</th>
<th>FY</th>
<th>Sector</th>
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<td><strong>Africa</strong></td>
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<td>Côte d’Ivoire</td>
<td>1. Private Electricity</td>
<td>95</td>
<td>Energy</td>
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<td>Ghana</td>
<td>2. Highway Sector Investment Program</td>
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<td>Central African Republic</td>
<td>4. Livestock Development and Rangeland Management Project</td>
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<td><strong>East Asia &amp; Pacific (EA1)</strong></td>
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<td>5. Ports Development and Environment Project</td>
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<td>6. Waste Disposal Project</td>
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<td>Thailand</td>
<td>7. Clean Fuels and EA Quality</td>
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<td>8. Lam Takhong Pump Sto.</td>
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<td>Thailand</td>
<td>9. Second Gas Transmission*</td>
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<td>Vietnam</td>
<td>10. Highways V</td>
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<td>Transport</td>
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<td>11. Irrigation Rehabilitation</td>
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<td>12. Power Sector Rehabilitation</td>
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<td>China</td>
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<td>14. Xinjiang Highway I</td>
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<td>16. Zhejiang Power Development</td>
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<td>17. Ertan Hydro II</td>
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<td>Energy</td>
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<td>China</td>
<td>18. Gansu Hexi Corridor**</td>
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<td>Agriculture, Irrigation &amp; Drainage and Environment</td>
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<td>Asuncion sewerage*</td>
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</table>

EAs analyzed in the review were only those found in the Public Information Center and the Internal Documents Unit as of August 30, 1998.

* Only EA summaries and staff appraisal reports were reviewed because the EA report was unavailable.
** Unavailable or missing and therefore not reviewed.
For a detailed discussion of preparation and execution of good public consultation plans in the EA process, see *EA Sourcebook Update* (upcoming), January 1999.


Examples include Albania, Bangladesh, Brazil, Colombia, India, Indonesia, Mexico, and Thailand.


The review did not make a distinction between sectoral and project-specific EAs. However, it was cognizant of the *EA Sourcebook* October 1993, observation that sectoral EAs cover an entire national or subnational context before investment decisions are made. It is therefore not always possible to consult representatives of all potentially affected people. Sectoral EAs offer an excellent opportunity for identifying various stakeholders at different levels, including those who will be involved in a project-specific EA.

*EA Sourcebook*, October 1993

The earlier EA reviews and second environment assessment review (1995) found that poor documentation was one of the weakest aspects of the EA process.

Sri-Lanka Private Infrastructure Development Project and India, ILFS-Infrastructure Leasing Project.


Delhi-Noida, Vadodra-Halol, and Ahmedabab-Messana road projects as well Tiruppur water management and Devas water supply projects.

See “Circular on Strengthening Environmental Impact Assessment Management for Construction Projects Financed by International Financial Organizations,” June 21, 1993, (China), which provides that in projects financed by international organizations, public consultations should be carried out
with representatives of the local people’s congress, local political consultative groups, local mass organizations and academic groups, or other public representatives in the areas. The circular further provides that it is these entities which will have the responsibility for collecting the information from the affected groups.


15 Primary sources of law should be reviewed. The review relied on the EA reports, which are secondary sources of information and may sometimes not accurately reflect the country legal requirements on public consultations.

16 The Latin American EA review found that there was no link between the legal framework on public consultations and the quality of consultations. The review attributed the quality of the consultations to the determination of the task managers.

17 A country’s record on human rights and freedom of expression in particular is likely to affect the level citizen’s participation in environmental decision-making.

18 The new OP replacing OD 4.01 requires that information be in a form that can be understood by illiterate members of the affected groups.


20 Through the EA harmonization seminars, Bank staff and government officials review the country EA requirements against the Bank OD in order to ascertain the differences and similarities to harmonize them. Kazakhstan, Zambia, Zimbabwe and Uganda have already gone through the process.