

Starting at the end: a proposal to improve ESIA effectiveness

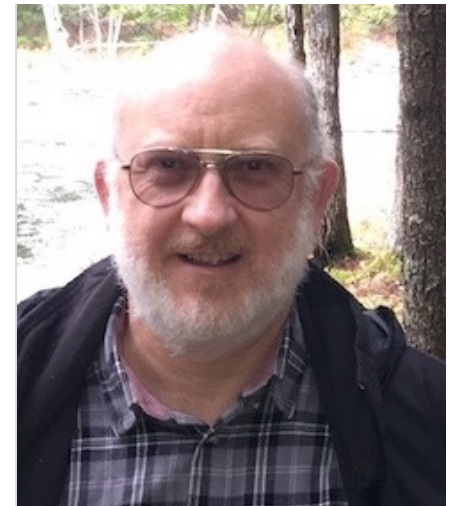


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Prepared jointly with Sarah Murfitt from SMC Limited





Sarah Murfitt, SMC Ltd

Environmental and Social (E&S) Consultant with over 20 years of experience advising clients on international E&S financing requirements for development projects.

Was a Partner at ERM before starting her own company in 2015.

Works globally, experience extends across a range of industry sectors.

Works with Development Financial Institutions (DFIs), commercial banks, private equity firms and project developers.

Involved in many ESIA's as ESIA team member/manager and as Client advisor.



Stephen McIlwaine, QUB

Chartered Engineer, with 30 years experience at addressing the environmental and social challenges of infrastructure projects.

Senior Lecturer at Queen's University Belfast, works with SMC on project-basis.

ESIA/ESDD experience in many countries.

Provides E&S advice to project developers and financial institutions. Project experience with the World Bank, EBRD, and other lenders.

Involved in many ESIA's as ESIA team member/manager, and as Client advisor.

Resources often focused on costly baseline data collection

Production of very lengthy reports

Management plans (MPs) often light, done last minute. Yet are only surviving part of the ESIA

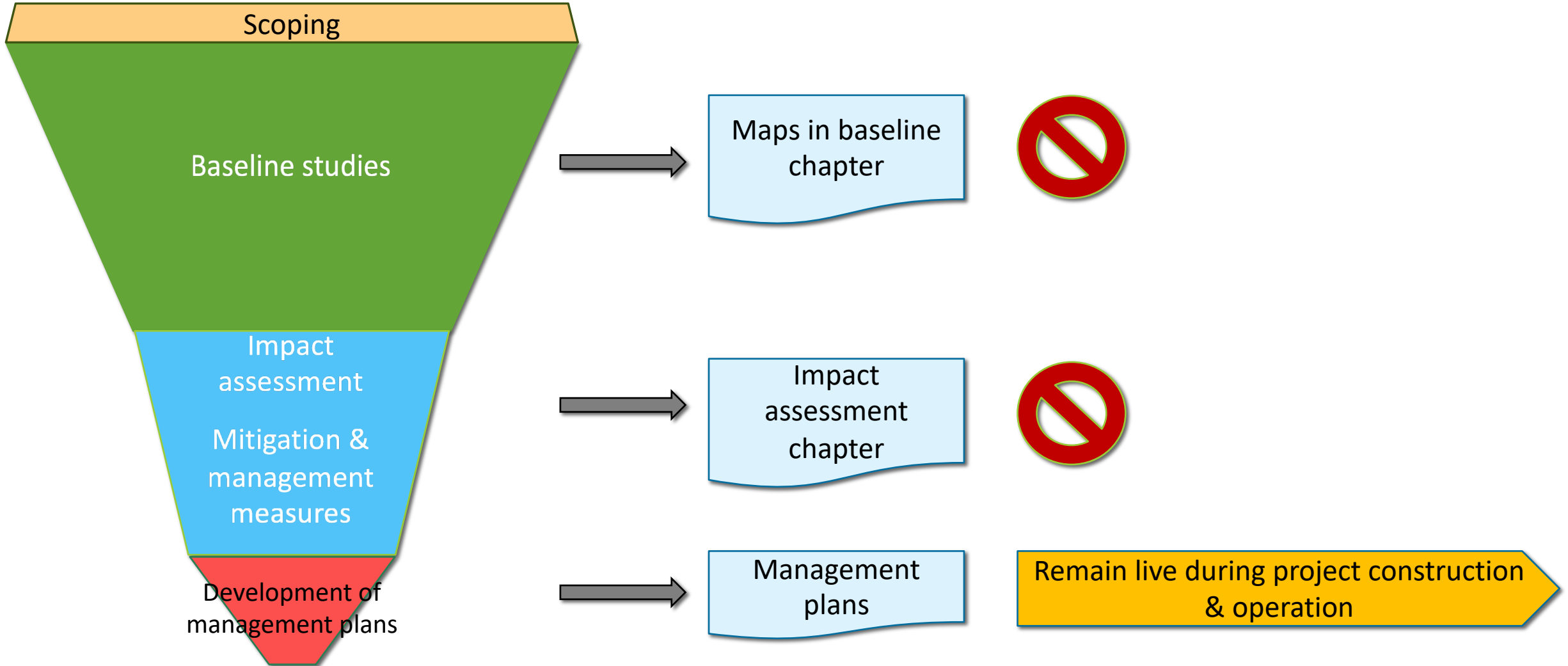
Many MPs general, non-specific and rarely capture spatial detail of baseline. 80% could have been written before the ESIA study was done?

MPs often drawn up wholly by the ESIA team, without involvement from the project specialists

Often no consideration of project's ability to implement MPs, written without understanding of the project schedule, procurement plans, capacity.....



No.	Phase of Operation	Theme	Impact	Action	Action Plan Timeframe	Frequency	Performance Indicator	Responsible Parties	Estimated Cost
Management Objective: Mitigate air and dust impacts. Reduce GHG emissions.									
3.	Construction	Haul road maintenance.		<ul style="list-style-type: none"> The condition of haul and access roads must be inspected to determine areas requiring re-grading / maintenance. 	Duration of construction activities	Weekly inspections	Road inspection reports with corrective actions.	Site Manager	Included in Contract
4.	Construction & Operations	Transportation and storage of material for Construction and Operational (maintenance) activities requiring dust suppression.		<ul style="list-style-type: none"> Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques or local extraction, e.g. suitable local exhaust ventilation systems. Apply dust suppression methods such as: <ul style="list-style-type: none"> Wet suppression on all access roads with water, especially close to sensitive receptors. Speed control and the institution of traffic calming measures to reduce vehicle entrainment. Wet suppression during materials handling activities and site fencing, barriers and scaffolding. Load wet suppression of materials transported by road 	Project lifetime	Weekly inspections	Visual inspection of compliance logbooks.	Implementation: Site Manager (Construction) O&M Manager (Operations) Monitoring: Site Environmental Officers (Construction) EHSS Manager (Operations)	Included in Contract / routine maintenance activities



Case A. Mine Project 1 Africa



EIA approved for previous operation

1. EMP found to have been copied from different project
2. EMP irrelevant & too complex to be implemented
3. No linkage between EIA and EMP
4. EMP could not be used effectively to manage E&S risks

Case B. Mine Project 2 Africa



EIA approved

1. EIA and EMP have no spatial detail, only general statements, despite clear understanding by project team of spatial constraints
2. EMP could not be used effectively to manage E&S risks

Case C. Highway Project Europe



EIA approved

1. OEMP implementation not under control of project client and neither budget nor actions could be guaranteed.
2. No involvement of client in EMP finalisation/budgeting
3. No consideration of capacity to implement EMP

Case D. Linear infrastructure Africa



ESIA under development

1. Poor scoping meant baseline not well focused
2. Detailed ESMP but without consideration of differential impacts along– baseline findings not reflected in ESMP
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3. No client understanding or capacity (human or financial) to implement

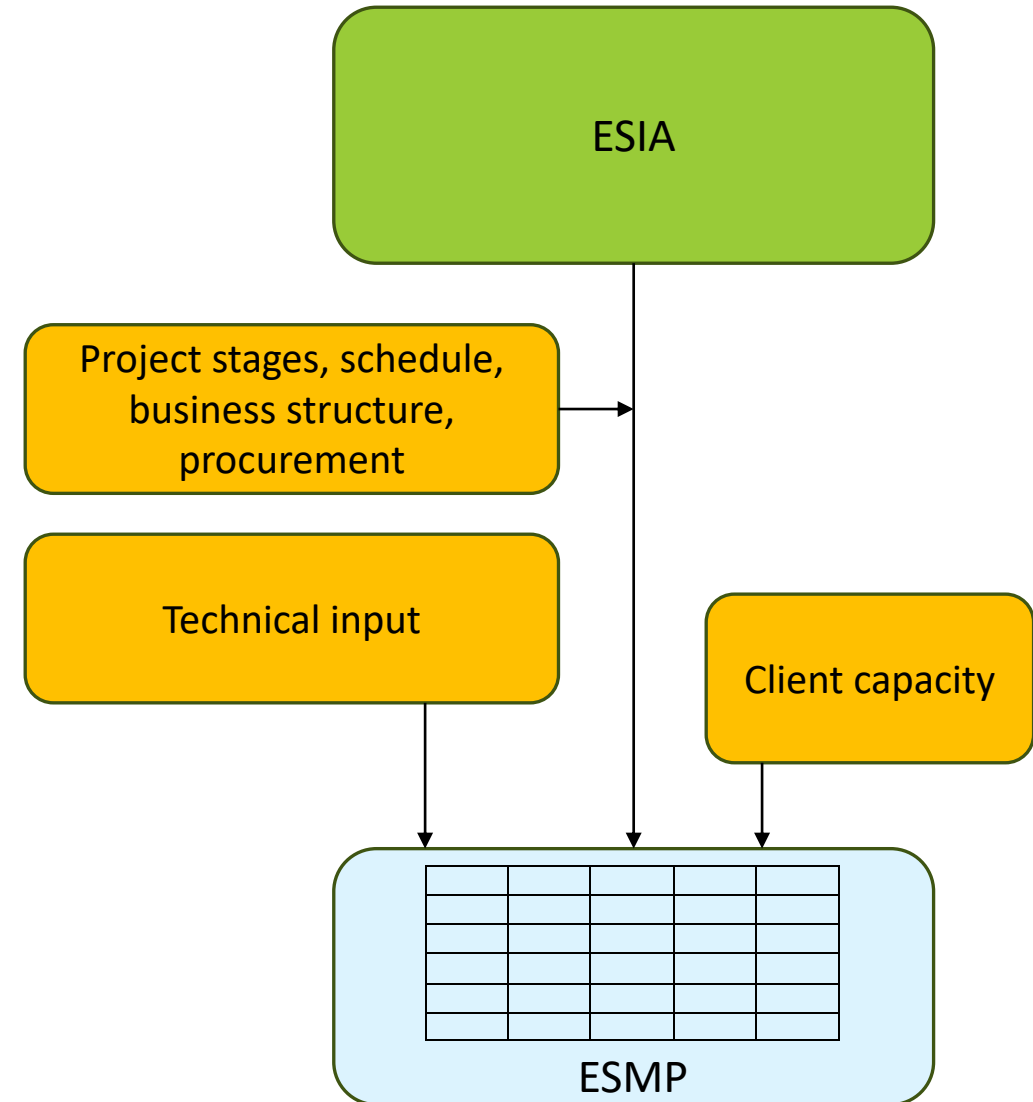
Stronger connection between impact assessment (incl baseline) and ESMP

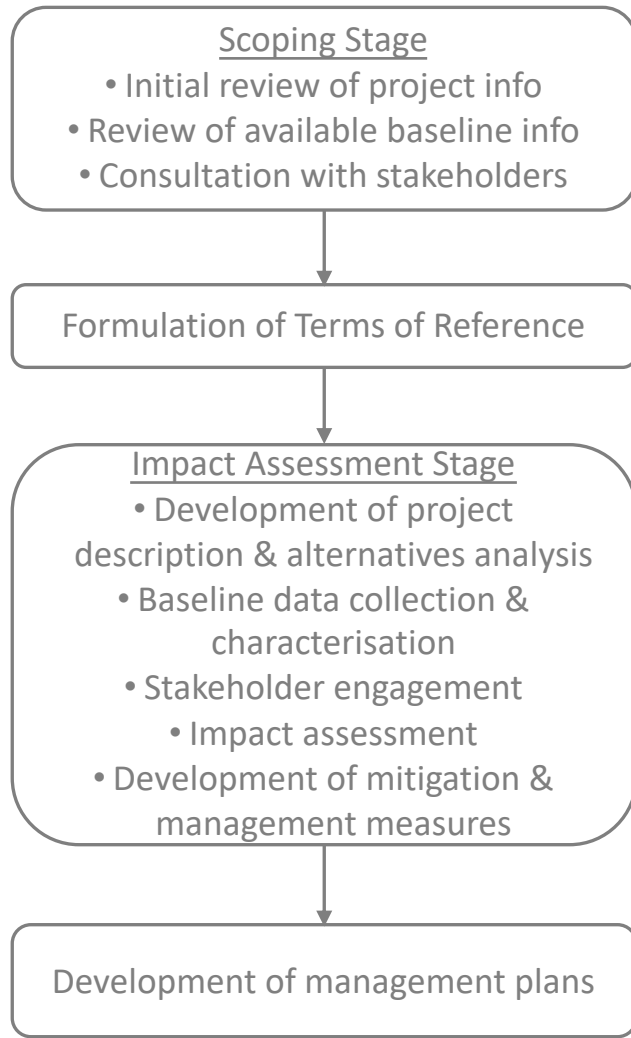
Emphasis on ESMP as key output.

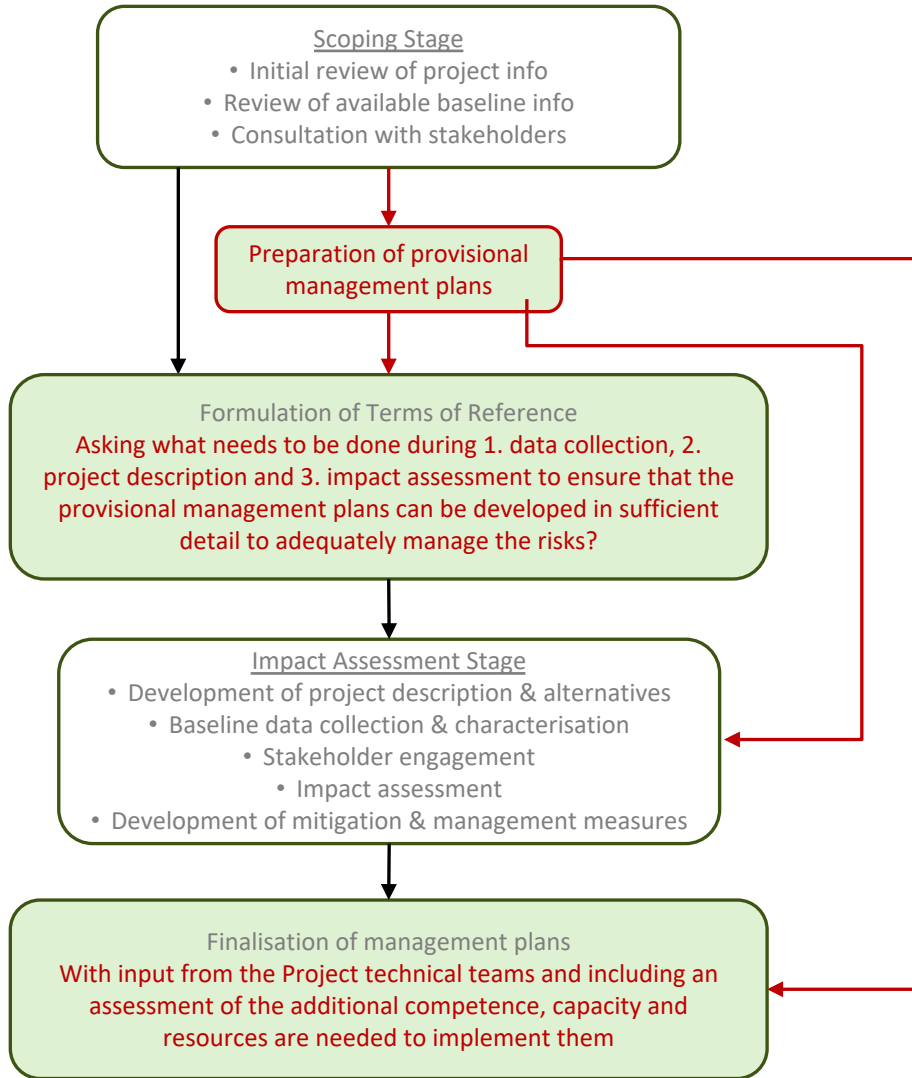
ESMP must reflect better understanding of the project and how ESMP will be implemented. Smarter, adaptive

Plans to be developed in conjunction with Project owner's technical team

ESMP must reflect understanding of capacity of project owner to implement the actions and identify any shortcomings or support needed







Provisional MPs produced at the outset - scoping stage

Focus of study orientated more towards: *‘What information do we need to design appropriate management controls for the project to enact?’*

Provisional MPs inform the TOR and scope for baseline, and the IA stages

More focus on detail required for MPs, and more input from technical teams

Consideration of how the MPs will be implemented

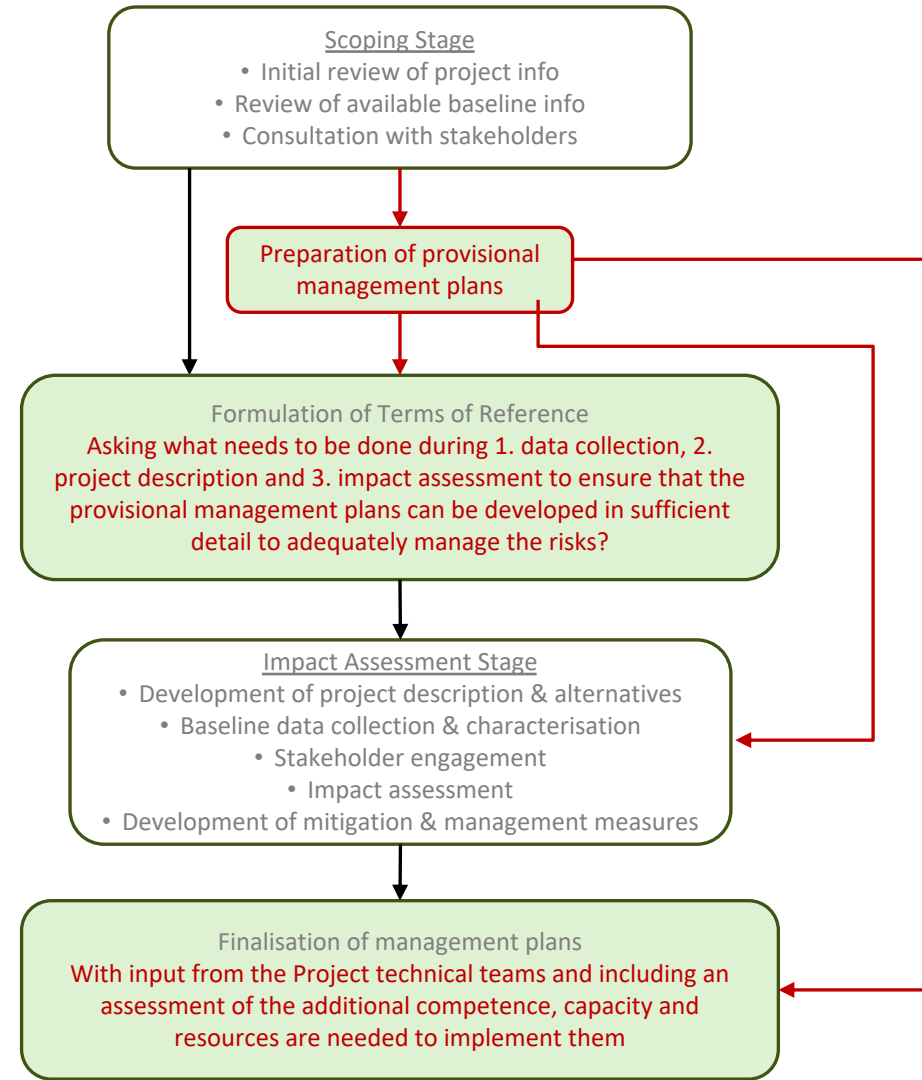
Identifies gaps in baseline understanding – focuses on extra info needed to detail the MPs

‘How could this project potentially affect its environment?’ becomes ‘What do we need to know to design the management measures this project needs to enact to manage the E&S risks?’

More project-focused ESIA, smarter, shorter?, less unwieldy, focused on management plans

Highlights inputs needed from project team, on project, implementation, procurement, capacity...

Asks about capacity of project team to implement MPs



1. Impacts need to be identified before mitigation measures are proposed, so the ESIA study should not preclude identification of effects not known at scoping stage
2. It is risky to reduce focus on the baseline data collection, and many regulators are comforted by large data collection campaigns
3. ESIA study often conducted too early in the process to identify management measures and develop management plans in detail

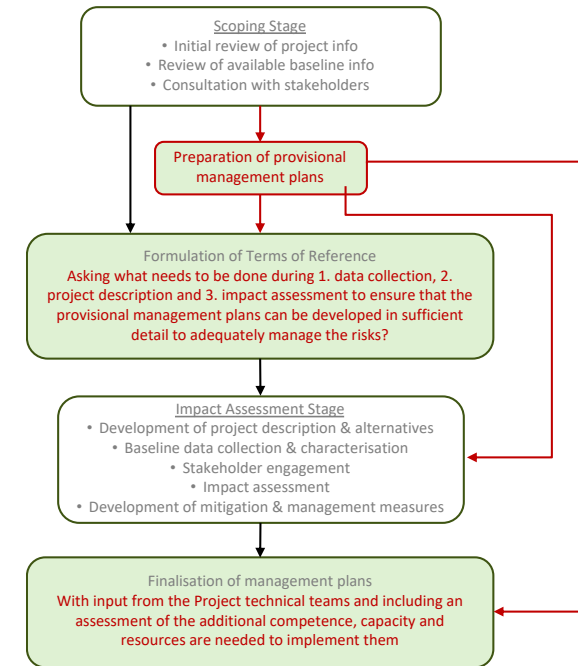
Fair, but how often totally unforeseen effects identified if using experienced consultants?
Resources are limited and secondary data often exists, so study should focus primary data collection on known knowledge gaps.

If primary baseline information collected does not alter ESIA conclusions and does not inform MPs, was it really needed?

If purpose is permitting, fine. But if purpose is risk mitigation, then specific controls are needed. If not arising from ESIA, then what is process to detail these?

A. Clients to produce ESIA Terms of Reference, with new requirements:

1. Provisional management plans to be developed during scoping
2. Provisional plans to inform the ESIA Terms of Reference and each subsequent stage of the work – used to identify data gaps, and information needed on project and plans
3. Strengthen emphasis on workability and outcomes of the final management plans
4. Require client input into management plans and carefully consider implementation capacity



B. Monitor how this innovation changes or improves the process

Let's continue the conversation!

Post questions and comments in the IAIA24 app.



#iaia24

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