

EA follow-up: The End of the Beginning

*Annual EIA Event, Iceland
Keynote presentation
Tuesday 11 June 2024*



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Environmental Assessment and EA follow-up



Churchill (10 November 1942):

“Now this is not the end.

It is not even the beginning of the end.

But it is, perhaps, the end of the beginning.

I believe this is where we are today”

Message of this presentation:

EA is not the end, EA is not even the beginning of the end,
but EA is perhaps the end of the beginning (= the consent decision).

The real impacts start in the EA follow-up stage,
moreover, EA follow-up is often the start of a new cycle.

Content presentation:

background, what, why, practice, how, challenges, future avenues, conclusions

Background EA and follow-up

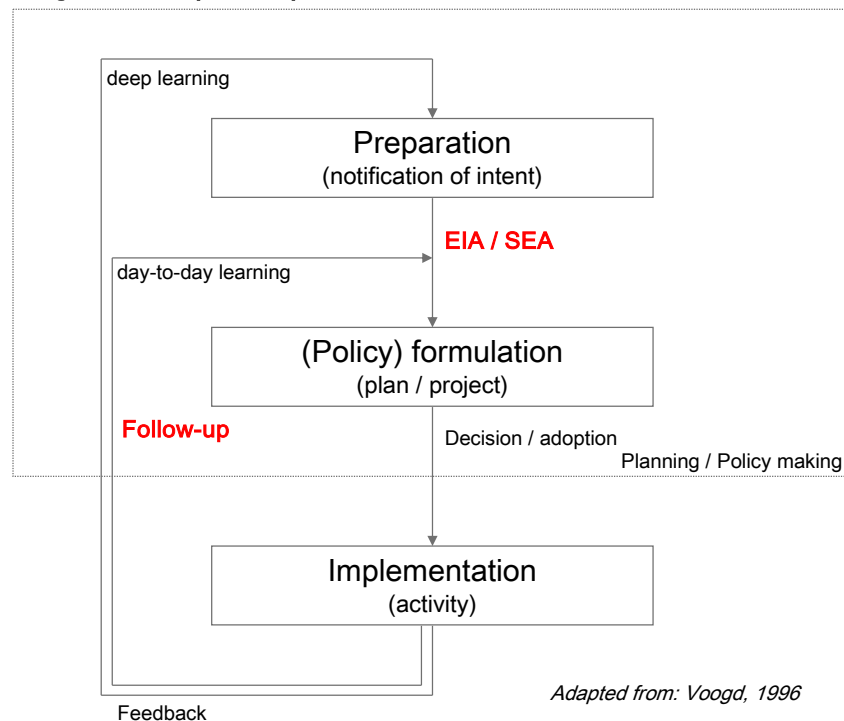


Environmental Assessment (EA):

- Dealing with uncertain impacts on the environment
=> “think before act”
- with more info and systematic analysis better decisions
=> concept of rational planning!
- Environmental Impact Assessment for projects (EIA) +
Strategic Environmental Assessment
for plans, programs, policies (SEA)

EA Follow-up

- Why EA follow-up?
Allow for feedback
- Dealing with uncertain impacts,
gaps in knowledge risks!



What is EA follow-up

Definition: EA follow-up is understanding the outcomes of development projects / plans subject to EA

More specific:

the monitoring and evaluation of the impacts of projects / plans for management of, and communication/engagement about, the environmental performance of that project or plan.

Including the governance arrangements for managing the follow-up process itself.

5 key elements of EA follow-up:

- **monitoring** – collection of activity and environmental data relevant to project/plan performance determination;
- **evaluation** – of monitoring data in light of performance standards, objectives, predictions, expectations;
- **management** – making decisions and taking appropriate actions in response to issues arising from monitoring and evaluation;
- **engagement and communication** – with stakeholders on all aspects of IA follow-up;
- **governance** – processes and arrangements enabling implementation of the IA follow-up activities.



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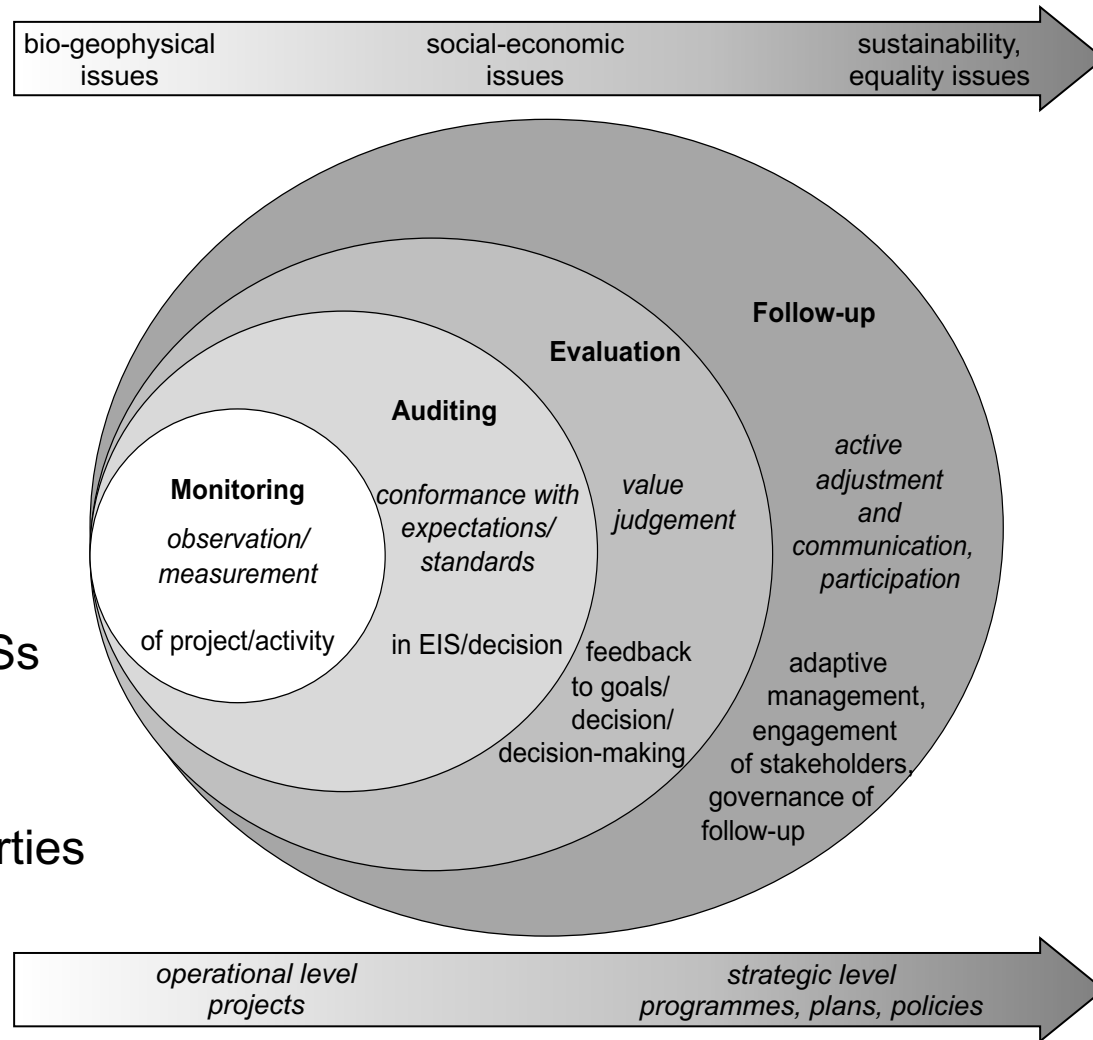
What is EA follow-up

Not only measuring and appraising but also action (adaptation, management of risks) and communication, engagement (information, learning).

Shift of issues

in the development of follow-up:

- accuracy predictions, quality of EISs
- project implementation
- mitigation and management
- communication, roles/stakes of parties



Why EA follow-up?

Dealing with uncertainty!

- => *Learn from experience* to improve practice
- => Get a *grip on uncertainties* intrinsic to planning
- => Bridge the *implementation gap*

Objectives:

- **Control** projects / plans and their impacts
- Maintain decision-making flexibility and promote **adaptive management**
- **Learning**, improve scientific and technical knowledge ('Theory of Change')
- **Communication**, improve public awareness and acceptance
- **Overview**, integration with other information

- Regarding linking SEA and EIA (= 'tiering'):
follow-up of the preceding IA can **inform** (the scoping of) a subsequent IA.
By such tiering the various strategic and operational planning stages
(of policies, plans, programs and projects) can be linked enhancing
the deliberate, organized transfer of information and issues.



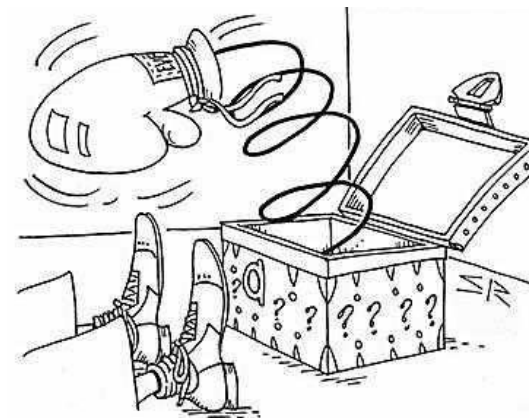
“There’s a lot of uncertainty out there these days. Or not. Who knows?”

Practice of EA Follow-up

Theory clear, Practice is misty/missing, reasons?

- Deficient analysis techniques, inadequate use
- Missing data (deficiencies in EIS)
- Establishing causality is difficult (intervention - effect)
- Dynamic context: what is the frame of reference, assessment framework
- Long time periods between preparation/EIA and implementation/operation stages
- (too) Limited resources (time, money, capacity) and experience
- Lack of: interest, external pressure, enforcement
- Low priority: no 'carrot', potentially threatening ('stick')
- Unclear added value
- "New plan syndrome"

Fear for opening 'Pandora's Box' of planning again



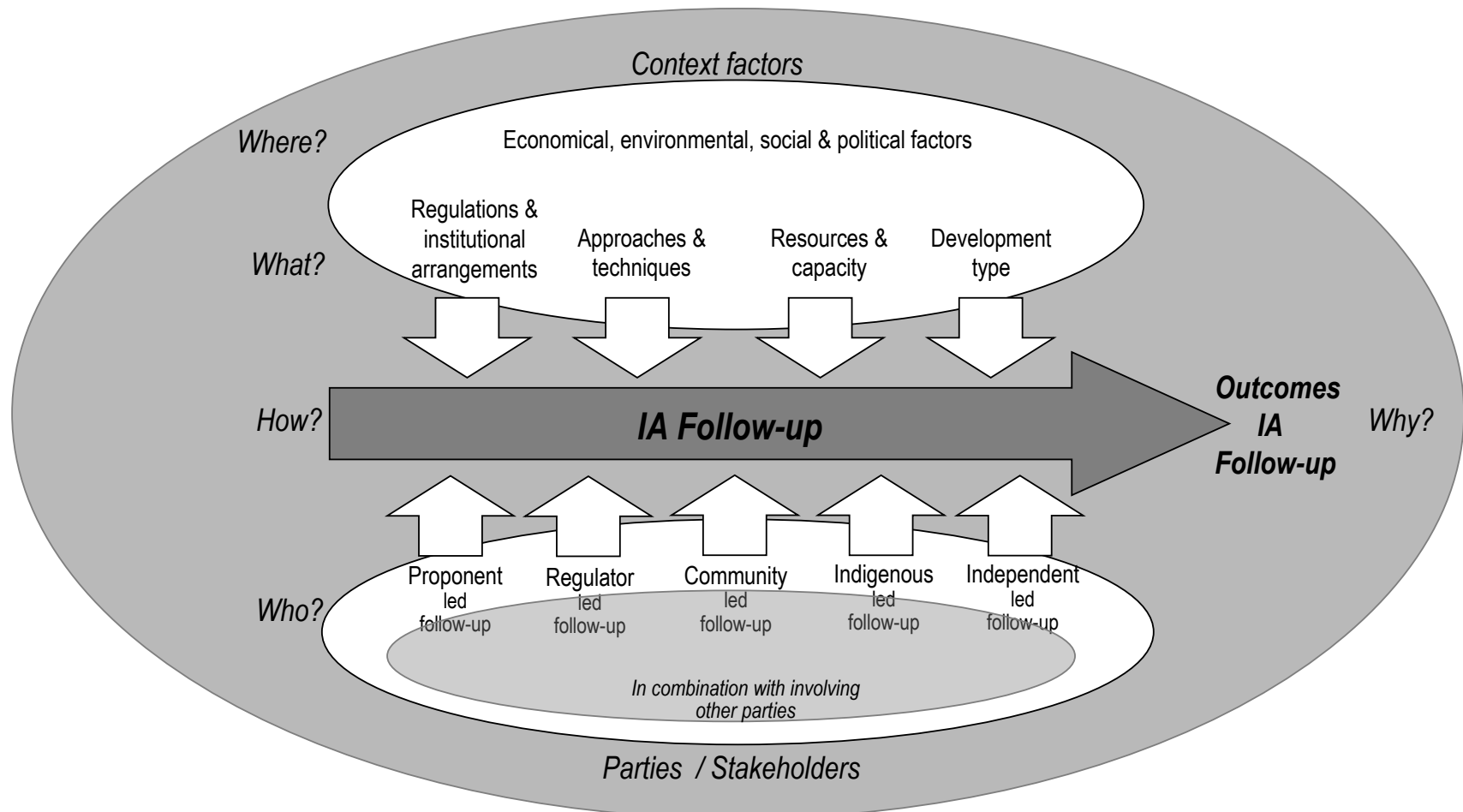
PANDORA'S BOXING GLOVE

Successful follow-up ?



No single 'recipe' for EIA follow-up, lesson:

Success depends on consideration of **Contextual Factors** and **Stakeholders**



Who should do EA Follow-up ?

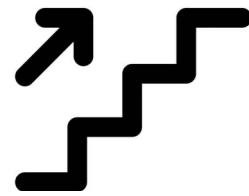
Five types of follow-up related to who takes the lead:

- **Proponent-led** – consistent with the polluter-pays principle that underpins follow-up (EMS, adaptive management, liability, green profile, future development proposals);
- **IA regulator-driven** – emphasis typically on ensuring that proponents comply with EA approval conditions, learning from experience to improve future EA processes
- **Community-led** – communication concerns, addressing nuisance, enhancement local knowledge, and being independent of both proponents and regulators, ‘participatory monitoring’,
- **Indigenous-led** – Indigenous Peoples monitor and evaluate, recognizing their inherent rights (relevant to Iceland?)
- **Independent-led** – independent parties (e.g., auditors, experts, academia) are engaged to carry out IA follow-up directly or to verify the work of others.



"There's nothing about your performance that you need to change ... other than everything."

How to do EA follow-up ? 8 steps



1) Screening

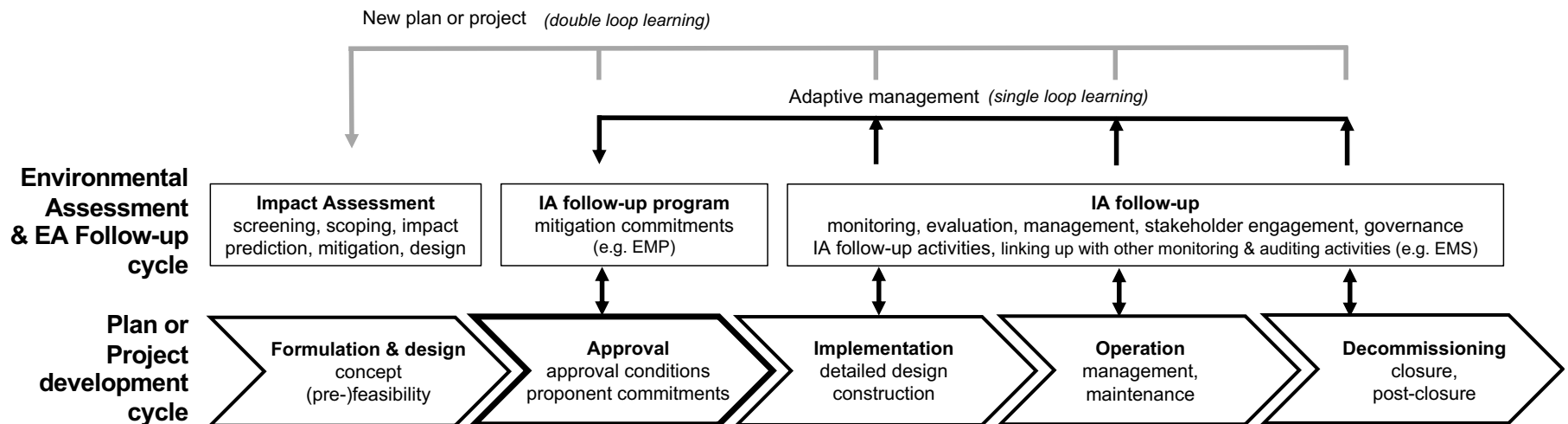
- Determine need and necessity of follow-up (uncertainty, sensitivity, complexity)

2) Scoping

- Determine objectives (adaptive management, learning, communication)
- Determine follow-up topics (issues)

3) Preparing follow-up program

- Determine indicators, methods / techniques
- Establish organization: roles/tasks/responsibilities
- Reservation of resources (budget, time, capacity)

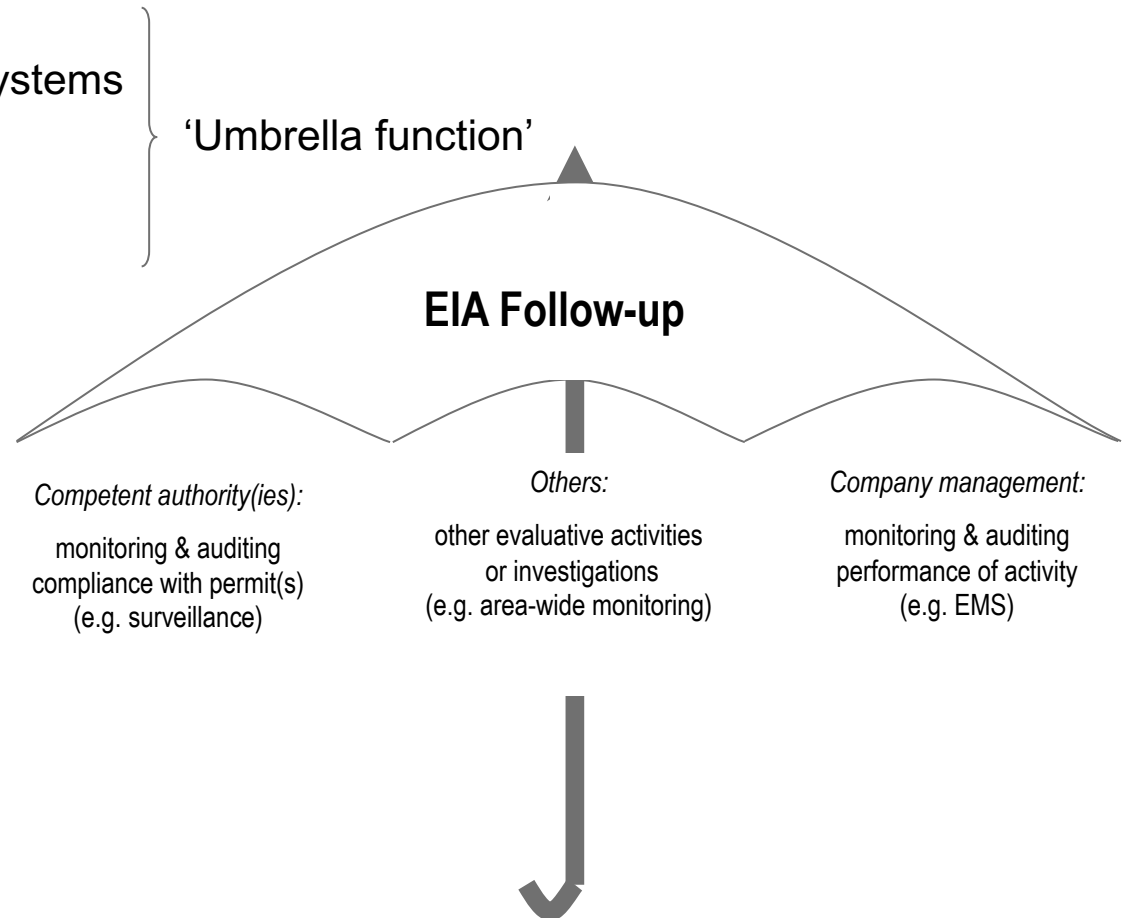


How do EA Follow-up



4) Follow-up study:

- Collecting data, linking up with other evaluations and existing activities (monitoring & auditing)
- Many activities already done in post-decision stages
 - Permit requirements
 - Environmental Management Systems
 - Policy impact studies
 - General monitoring networks
 - complaints mechanisms



How to do EA Follow-up:

5) Evaluation of results

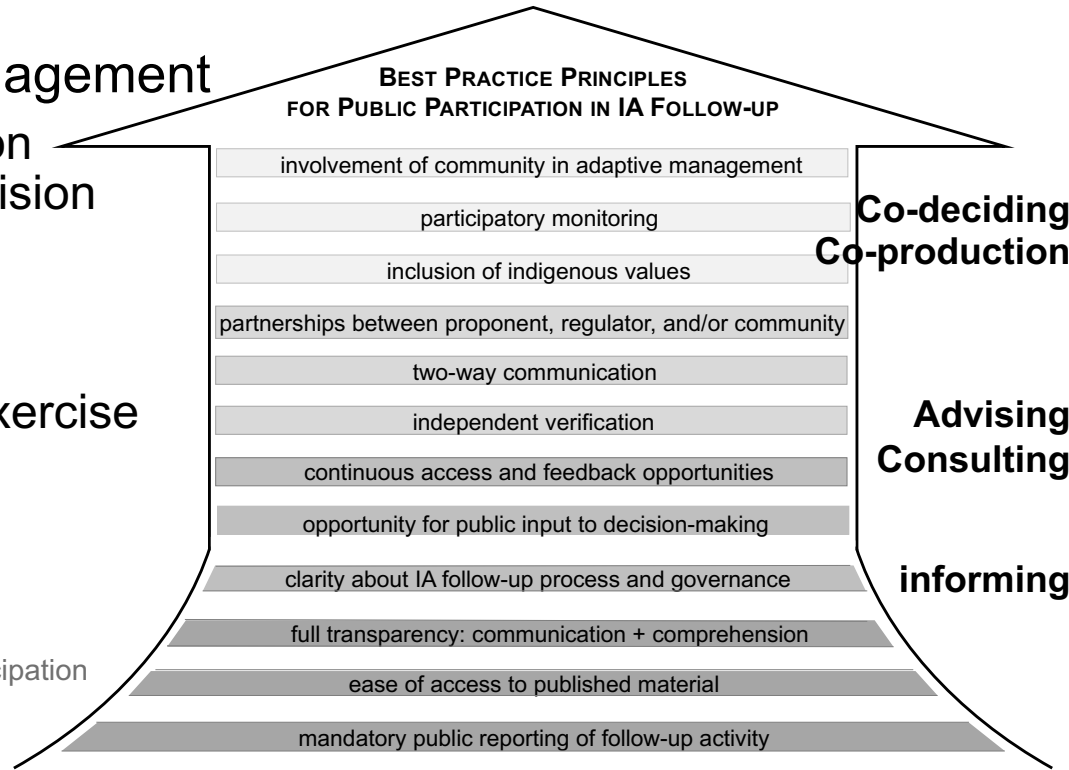
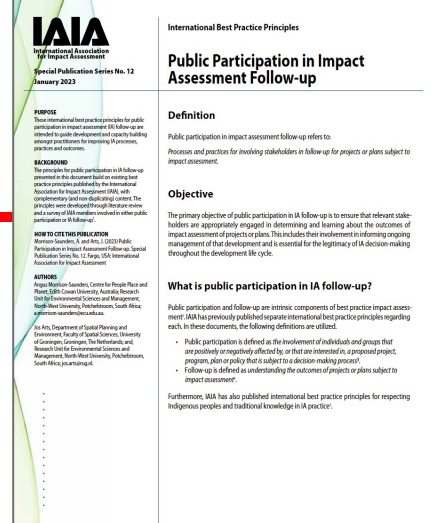
- Comparison with expectations (EIS!), requirements of decision, legal standards
- Decision-making about (adaptive management) actions

6) Preparation of follow-up report

- Clear, complete, topical

7) Informing, communicating, engagement

- Public participation often focused on planning process until consent decision => not well followed-up
- Public participation in follow-up not well developed => often a rather technical, legal exercise



How to do EA Follow-up

8) Implementing actions, (adaptive) management:

- Adjustment approach, methods, procedures/processes
- Additional measures, additional, more detailed studies
- Starting planning of a new project / plan

⇒ Start new planning / policy cycle (ex ante evaluation!)
good ex post evaluation comprises useful ex ante elements



"The sequel is never as good as the original."

Tiering of EA: follow-up of SEA

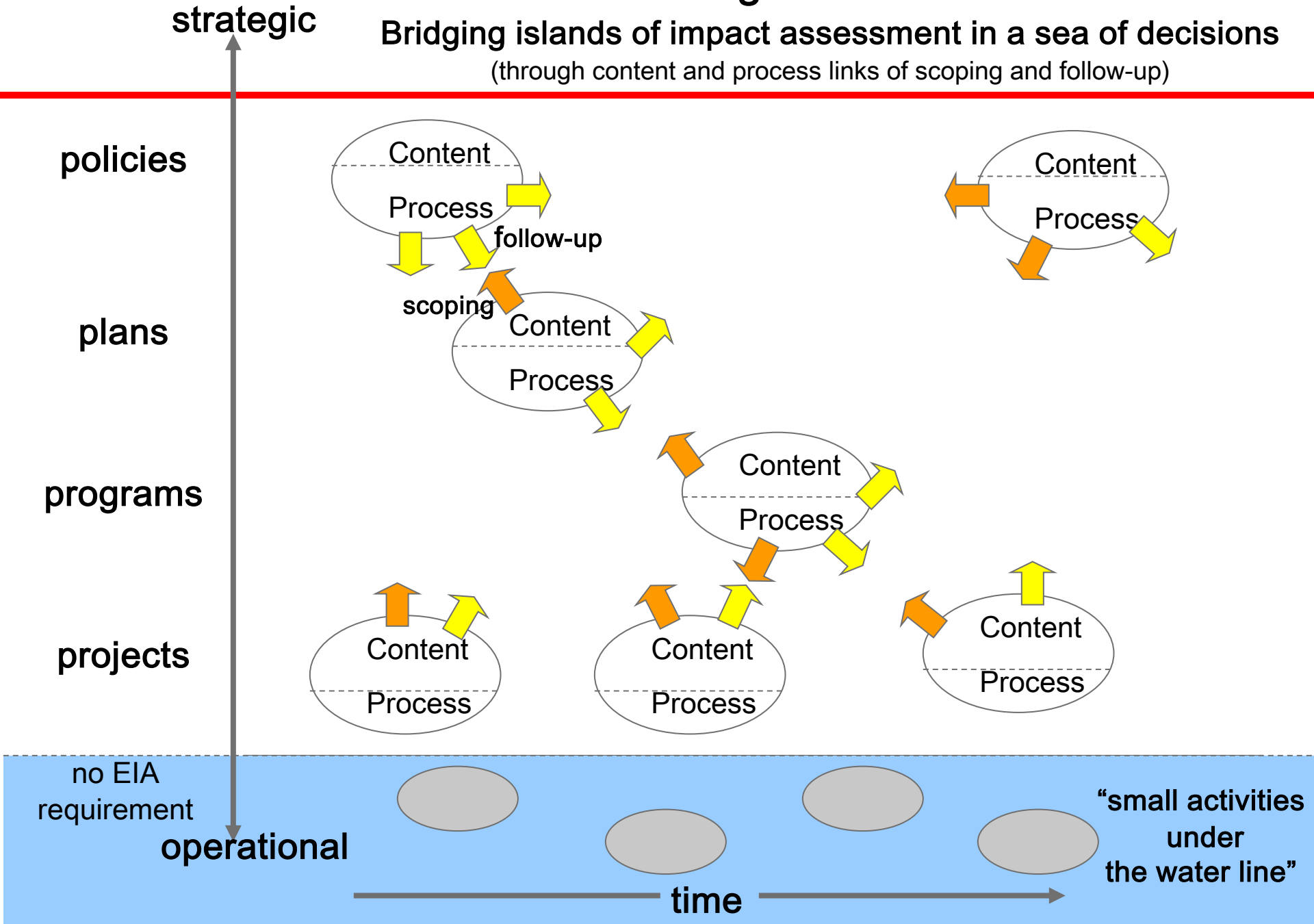
- EIA often a snapshot in time => foreclosure and postponement => SEA!
- Fitting EA better with dynamic planning => EAs at different planning levels

- Need for linking SEA and EIA = tiering

"The systematic and deliberate transfer of information and issues from one planning level to another (in an associated policy, plan, programme and project framework), supported by IA."

Tiering SEA and EIA

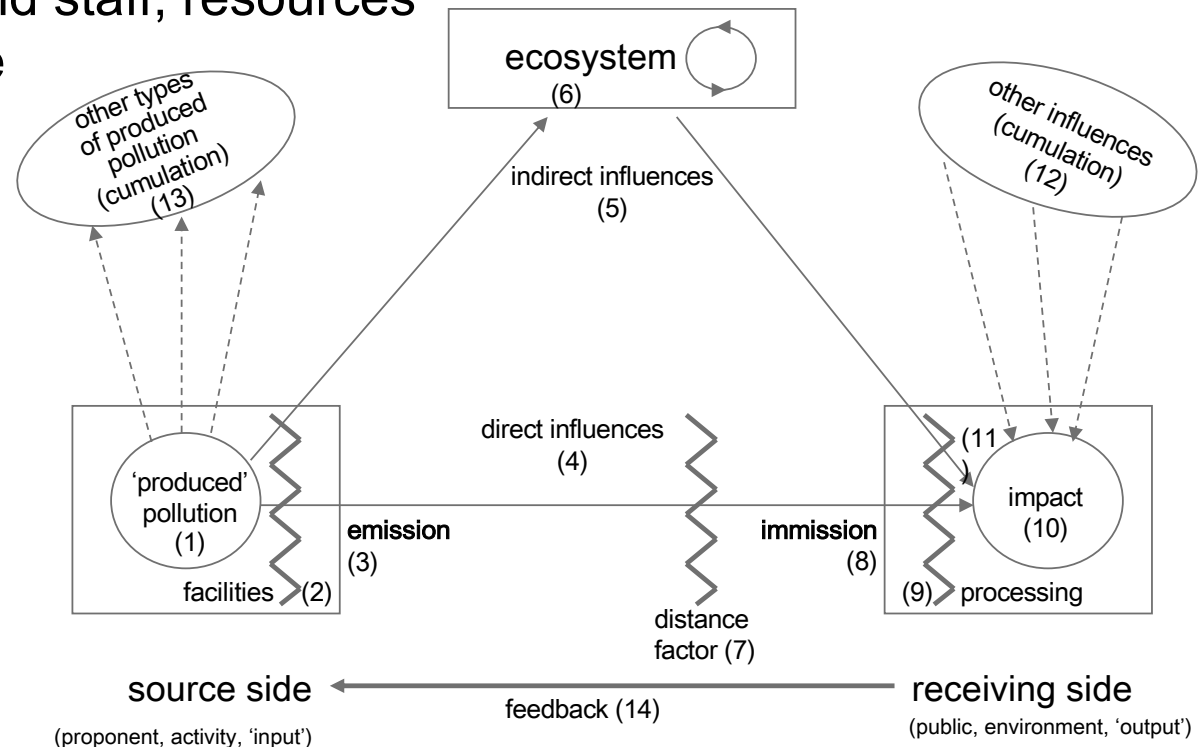
Bridging islands of impact assessment in a sea of decisions
(through content and process links of scoping and follow-up)



Challenges in EA Follow-up

Issues in EA Follow-up

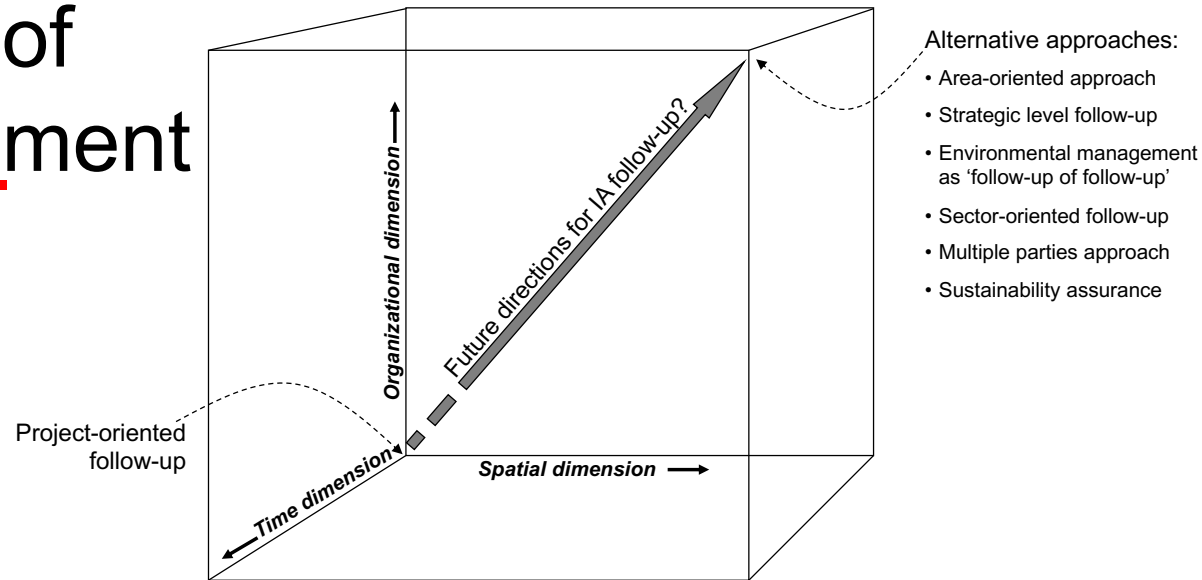
- Uncertainty what to look for? “Unknown unknowns”
- Deficiencies in EISs good baseline monitoring, causality issues
- Lack of guidance: see IAIA Guidance Document (2024)
- Legal deficiencies: a legal requirement (‘stick’) helps
- Demands on financial and staff, resources
=> much is already done



Beyond follow-up of individual development

Potential ways forward:

- **Area-oriented follow-up** focused at regional scale and multiple projects
- **Strategic level follow-up** (SEA follow-up) dealing with aggregate, long-term, large-scale effects (transcending individual projects)
- **Environmental management** as follow-up of follow-up, blending into regular management of proponent
- **Sector-oriented follow-up** valuable for multiple projects of the same type (focus on specific theme / issue)
- **Multiple party follow-up** in which proponents, regulators, and/or the community are collaborating to better address general environmental interests and specific (community) interests
- **Sustainability assurance approach** addressing all 3 dimensions of space (here vs. there), time (now vs then, intergenerational equity), and organisation (us vs them, intra-generational equity)

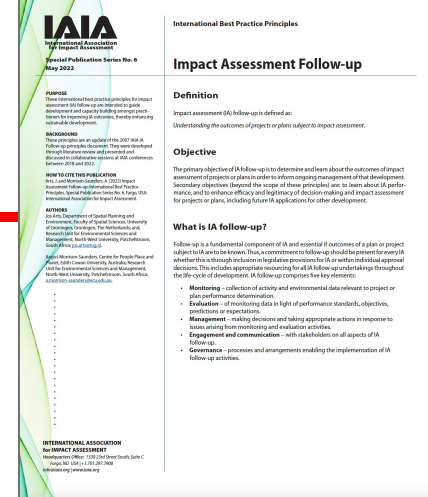


International Principles & Guidance

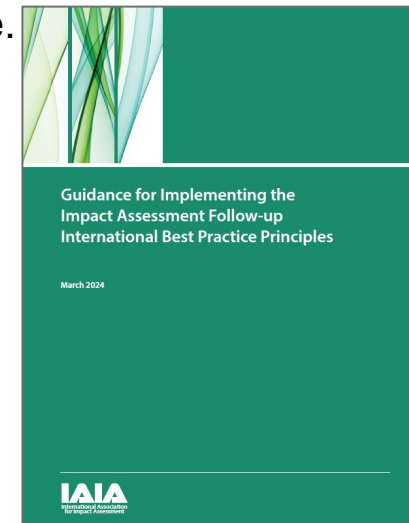
IA follow-up should be guided by **these 15 best practice principles:**

1. State the objective of each follow-up activity and the overall program.
2. Be tailored to context.
3. Commence early in the IA process.
4. Be carried out throughout the project or plan life-cycle.
5. Be transparent.
6. Be accessible to all IA stakeholders.
7. Provide clear accountability for IA follow-up responsibilities.
8. Provide clear, pre-defined and well-justified performance criteria.
9. Specify enforcement provisions.
10. Promote continuous learning from experience to improve future practice.
11. Facilitate adaptive management.
12. Be flexible according to emerging needs.
13. Inform, and be informed by, follow-up for other relevant activities at different levels of decision-making (tiering)
14. Address cumulative effects.
15. Consider the overall effects of the project or plan.

=> International guidance document to support practice (2024)
Based on worldwide practices with IA Follow-up at IAIA website.



https://www.iaia.org/uploads/pdf/SP6_2%20Follow%20up_converted.pdf

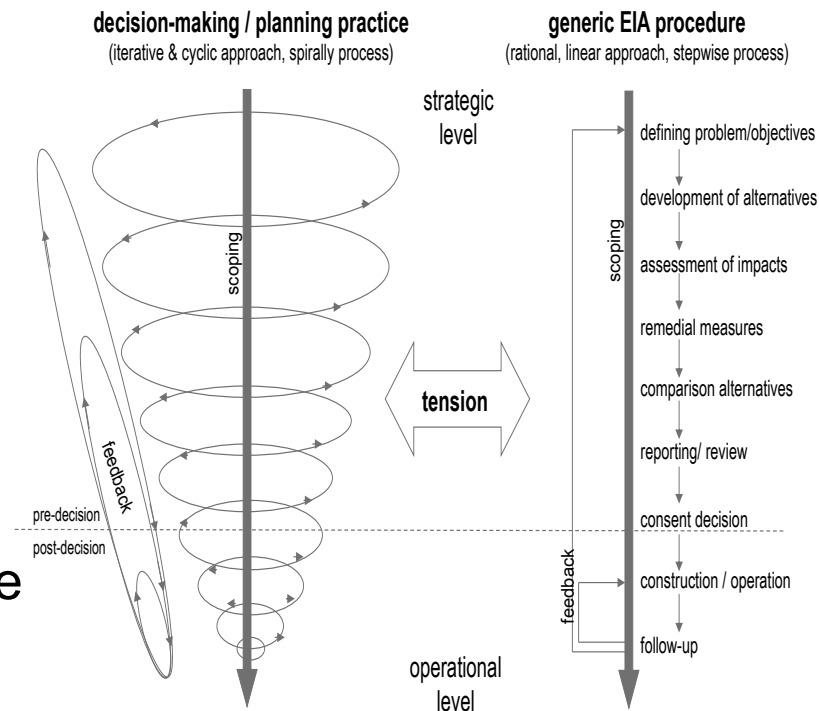


<https://www.iaia.org/reference-and-guidance-documents.php>

Some conclusions



- EA follow-up lacks as can be costly and open Pandora's Box of planning... but is also vital to well-considered planning & decision-making (> snapshot in highly dynamic and complex planning processes)
- Need for multiple assessments during process of planning and decision-making
- What is the carrot?
- No single 'recipe' for follow-up => specific & tailor-made
- Resources: monitoring can be costly
- Pragmatic approach: use of existing info integrating this (umbrella function)
- Useful ex post evaluation has ex ante value => new planning cycle



**EA follow-up is not the end,
EA Follow-up is not even the beginning of the end,
but EA follow-up is perhaps the end of the beginning**

To be followed-up

Questions?

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