



Communications and Consultation

This guideline expands on what is expected by the criteria statements in the Hydropower Sustainability Tools (HST) for the Communications and Consultation topic, relating to assessment, management, stakeholder engagement and conformance/compliance. The good practice criteria are expressed for different life cycle stages.

In the Hydropower Sustainability Assessment Protocol (HSAP), this topic is addressed in P-1 for the preparation stage, I-1 for the implementation stage and O-1 for the operation stage. In the Hydropower Sustainability ESG Gap Analysis Tool (HESG), this topic is addressed in Section 10.

Hydropower projects involve a range of stakeholders. Effective stakeholder communications and consultation throughout the life of the project is an important element of good practice. Benefits for the developer and owner/operator can include: a better and earlier understanding of project risks and opportunities

arising in the external environment and changes in these factors over time; an increased ability to find management solutions that are supported by stakeholders; and, ultimately, the avoidance of delays and additional costs arising from poor communications.

A **stakeholder** is defined as anyone who is interested in, involved in or affected by the hydropower project and its associated activities. Project stakeholders can consist of a broad range of different groups, such as affected communities, government agencies, partners, contractors, suppliers, financiers, catchment residents, the media, academics and experts, civil society, and Non-Government Organisations (NGOs). A stakeholder does not have to be directly affected to meet project stakeholder definition and anyone with an interest should be able to have access to mechanisms for communication and engagement.

The intent is that stakeholders are identified and engaged in the issues of interest to them, and communications and consultation processes establish a foundation for good stakeholder relations throughout the project life.

Assessment

Assessment criterion - Preparation Stage: Stakeholder mapping has been undertaken to identify and analyse stakeholders, to establish those that are directly affected, and to establish communication requirements and priorities, with no significant gaps.

The first step towards good practice for communications and consultation is **stakeholder mapping**. Stakeholder mapping involves the identification of all project stakeholders in meaningful groups (e.g. project-affected communities, regulators, contractors, etc.). Once stakeholder groups are identified, progressive levels of communications and consultation analyses and planning can be undertaken.

A project may affect a community with several thousand members, but within that community there are likely to be various sub-groups with different interests and views on the project. All groups of stakeholders, their interests, and the most appropriate means for engaging with them should be identified.

Stakeholders that are directly affected by the project, versus those indirectly affected by or with an interest in the project, should be identified. **Directly affected stakeholders** are those stakeholders with substantial rights, risks and responsibilities in relation to the project or issues it affects. These stakeholders may be inside the project affected area (e.g. project affected communities) or outside the project affected area (e.g. government regulators, finance institution representatives, investment partners, NGOs). They may live downstream and be at risk of effects that will not emerge for a number of years. Indirectly affected stakeholders usually include those with second order impacts, such as those affected by changes in the activities of a local project supplier or tourists passing through the region.

The following are examples of stakeholder groups based on rights, risks and responsibilities:

- based on rights – e.g. those with land or water rights potentially affected;
- based on risks arising from the project – e.g. those potentially affected by a specific impact area such as adverse water quality, increased traffic hazards, or damage to cultural heritage artefacts;

- based on risks to the project - e.g. those with key roles in the supply chain; and
- based on responsibilities - e.g. government institutions, regulatory agencies.

Community-level consultation workshops, interviews, and baseline surveys will contribute to the identification of local-level stakeholders. In the preparation stage, the identification of stakeholders should be part of, or closely linked to, the Environmental and Social Impact Assessment (ESIA) process, although communications in general should not be left solely to ESIA consultants. A continuous presence of project staff in local communities will best assist in identifying stakeholders, analysing requirements and priorities, and building relationships that are well set up for the life of the project.

Stakeholder analyses should be undertaken for all groups. These should involve: evaluating the relative influence of the project on different stakeholder groups or individuals, as well as their influence on the project; evaluating related risks and level of risk; identifying issues of interest; and planning the most effective mechanisms for engagement.

Important considerations in defining communications requirements for different stakeholder groups include:

- literacy;
- language, especially with ethnic minorities and indigenous peoples;
- cultural norms and courtesies;
- accessibility to various forms of information, e.g. internet access, transport access to public meetings, or locations of signposted information;
- gender, as women in the same stakeholder group may have different issues and impacts compared to the men and may not be included amongst community representatives unless the consultation is deliberately designed for this;
- appropriate project representatives for the various consultation approaches and groups (e.g. in terms of ethnicity, age, gender, acceptability);
- methods needed within groups to consider information and give meaningful inputs; and
- timing, e.g. time needed for consultation, when those stakeholders are available, time needed for responses, and fit with important information updates and availability of the project.

Assessments to inform communications and consultation plans at the preparation stage should include what kind of and when information should be shared with regards to the progress of the project (see the Integrated Project Management guideline). Important information sharing points in the project development timeline include: periodically during development of the Environmental and Social Impact Assessment (ESIA) studies; on the draft ESIA report; during development of the Environmental and Social Management Plan (ESMP); and at regular intervals during implementation to see if measures are effective or if issues are arising.

Assessment

Assessment criterion - Implementation Stage: Communications and consultation requirements and approaches have been identified through an assessment process involving stakeholder mapping, supported by ongoing monitoring.

Assessment criterion - Operation Stage: Ongoing or emerging issues relating to hydropower facility communications and consultation have been identified; requirements and approaches are determined through a periodically updated assessment process involving stakeholder mapping; and effectiveness is monitored.

Further to the above guidance, stakeholder mapping, analysis, and accompanying databases should be developed at an early stage of project development and maintained and updated through all project stages. These processes should be developed at any project stage if they have not previously been completed as they will always add value whenever developed. Keeping these current is important through the implementation and operation stages as both communities and stakeholder groups and their needs and issues evolve over time.

Information needs at the implementation stage are diverse. Stakeholders affected by construction and implementation activities will want to be kept well informed on many aspects, which may include project work plans, impacts and risks, mitigation measures, monitoring and review. Public safety communications are critical. Water safety will need a lot of communications attention both at the time of reservoir filling and testing and with commissioning of the power station and related assets.

Stakeholder interests and communications needs can differ again at the operations stage. Important information areas for the operations stage might relate to, for example: flood warning, spill management, drought management, downstream flows, reservoir uses and rules, water offtake rules, coordination with other hydropower facilities and water users in the river basin, notifications of outages, major operational changes under consideration, and crisis communications. Stakeholders will also be interested in the effectiveness of management plans, as well as the status shown by monitoring data on the environmental and social values that have been flagged as important during the preparation stage.

Monitoring during implementation and operations should be oriented towards testing that:

- stakeholder maps and associated information are up-to-date;
- communications and consultation approaches are effective; and
- stakeholders are getting the information they are interested in (which is likely to change over time).

At all project stages, the developer and owner/operator should be able to demonstrate that stakeholder groups are receiving the information intended for them and are able to effectively access the consultation mechanisms designed for interactions with them. Periodic surveys, questionnaires, feedback requests, and seeking suggestions for improvements can be useful techniques to test the effectiveness of existing approaches. This is especially important because communications and consultation requirements and stakeholder interests can extend over long periods of time, from years to decades.

Management

Management criterion - Preparation, Implementation and Operation Stages: Communications and consultation plans and processes, including an appropriate grievance mechanism, have been developed at an early stage applicable to project preparation, implementation and operation that outline communication and consultation needs and approaches for various stakeholder groups and topics.

Once the stakeholder mapping is established, the analyses undertaken should help define the most appropriate engagement strategies between the project and the various stakeholder groups. These should be embedded in communications and consultation plans and processes.

Typically, a project would establish an overarching communications and consultation strategy or plan, setting out the methods, frequency, and responsibilities. These may be supported by sub-plans for particular groups of stakeholders, for example a media communications plan or affected community consultation plan. Communications plans might include content such as: the vision, principles and values of communication; objectives; responsibilities and structures; communications channels; institutional branding; and processes to be followed. They may also be underpinned by a corporate stakeholder relations policy or communications policy. Consultation plans should include objectives, participants, locations, notifications, forms of information, timing, time allowances for questions and feedback, method of recording or documenting, etc.

At the implementation stage, contractors may have separate community relations plans and processes. Responsibilities and expectations for communications and consultation amongst the different parties involved in project delivery should be well articulated in all relevant plans, including in the integrated project management plans.

The initial stakeholder map can be expanded into or supplemented by a database of contacts, including contact details, responsibilities for maintaining contact, and frequency and timing of contact. A database may be a central database including all project stakeholders, or there may be separate stakeholder maps and databases for individual stakeholder groups. Approaches to stakeholder identification and analysis may be managed by different parts of a business for different groups of stakeholders.

Communications and consultation processes should include how the project proponent collects feedback on stakeholder issues and responds to issues raised, and how these issues are addressed in decision-making. Process requirements should include the need to take, distribute, and keep copies of minutes of meetings. Plans and processes

should make it clear how gender considerations and the inclusion of vulnerable social groups (e.g. ethnic minorities) have been given careful consideration, as well as how individual needs such as transport, accessibility, logistical constraints, timing, disabilities, language, literacy and cultural considerations are taken into account.

Consultation at the community level typically involves meetings and workshops, which can be numerous during the preparation and implementation stages, or public consultation meetings or hearings, some of which may be a formal regulatory requirement. The establishment of groups that regularly meet, such as liaison committees, can be a useful means of consulting with groups of stakeholders. Communications activities are normally carried out by a social or community liaison team, government liaison team or officers, and/or a public relations team. Dedicated community liaison officers, often one or two per community, are a frequently used method for local communications. In remote areas, community runners/messengers from the local communities can be appointed and provided with transport to provide a function of keeping communities informed and making arrangements for meetings. Larger projects may maintain the presence of communications agents in all affected communities. Other forms of communication could include, for example: project information centres; a physical project model; printed information in many forms; stakeholder visits to the project site; local media articles and programmes; and a project website.

Good practice requires the establishment of grievance mechanisms. **Grievance mechanisms** refer to the processes by which stakeholders are able to raise concerns, grievances and legitimate complaints; the project procedures to track and respond to any grievances; how issues will be escalated if they cannot be easily resolved; commitments to inform stakeholders of status or outcomes; and legal recourse avenues. Grievance mechanisms should be formally developed, easily accessible, and well understood by relevant parties, particularly those who are intended to have access to them. Grievances can be collected in many forms, for example verbally or in writing, through an intermediary (e.g. a village chief), etc. Procedures should include excellent records management. Processes to be included in grievance mechanisms may differ depending

on the context, community norms, degree of development or remoteness, etc. They may include, as appropriate:

- a community liaison office;
- community liaison officers;
- a dedicated telephone line for raising grievances, preferably a toll-free line;
- an online contact form;
- a dedicated email address, post box, or local government office drop box for raising grievances;
- a centralised grievance database;
- the appointment of a grievance redress officer focused solely on documenting and facilitating resolution of grievances; and
- an ombudsman or arbitrator to resolve disagreements.

In some areas, a formal government channel or a channel using traditional authorities may be used alongside the project's grievance mechanism. In all cases it is necessary that grievances are logged and dated, and the dates by which they are acknowledged, answered and resolved are recorded. If there are multiple databases, these should inform a centralised database from which statistics can be gathered for regular reporting. Records need to be well maintained by the developer and the owner/operator so that parties who raise grievances and are unsure of the outcome, or want to remind themselves after many years, can get the relevant documentation.

Stakeholder Engagement

Stakeholder Engagement criterion – Preparation, Implementation and Operation Stages: The project preparation, implementation and operation stages have involved appropriately timed communications and engagement, often two-way, with directly affected stakeholders on topics of interest and relevance to them; engagement is undertaken in good faith; ongoing processes are in place for stakeholders to raise issues and get feedback.

Stakeholder engagement is part of the implementation of communications and consultation plans. Important elements of good practice relate to timing, two-way methods, focal areas for engagement, good faith, issues identification, and feedback.

Appropriately timed means that engagement is early enough in the relevant stage that the project can respond to the issues raised, stakeholders can respond before the project or facility takes decisions, and engagement occurs at times that are suitable for relevant stakeholders to participate. Stakeholders should be supportive of the timing of engagement activities. Business or government stakeholders have their own decision-making processes that need to be coordinated, such as board or committee meetings. Communities need sufficient time to receive information, discuss it openly with the project representatives, then go through their own community dialogue processes before forming a consolidated community view to relay back into the evaluation processes.

Two-way means the stakeholders can give their views on considerations relevant to the communications focal area and not just be given information without any opportunity to respond. Examples of two-way processes are public meetings and hearings, public comments on studies and options assessment documents, interactive participation in workshops, negotiation, mediation, and focus groups. Whilst provision of information by the developer, owner or operator is important, it is not sufficient to meet good practice and there needs to be evidence that feedback on that information is obtained in a meaningful way.

Good faith engagement refers to the quality of the discussions held. The project and the stakeholders should engage honestly, as equals, with willingness to listen to each other's points of view, and the intent to reach agreement. Seeking stakeholder input into the design of engagement processes is often indicative of good faith engagement. Other indications could include examples of two-way participatory processes showing negotiation or evidence that the developer has responded to issues raised by stakeholders in development decision-making.

Processes in place for stakeholders to raise issues at any point in the life of the project or operating facility may happen through a formal grievance mechanism as described above or through less formal means. These could include, for example: a contact person and/or a 'contact us' space on the company website; periodic public briefings or question/answer opportunities; participation of company staff on stakeholder or catchment committees; and regular meetings and issue-raising mechanisms developed in liaison with local government authorities.

Feedback on stakeholder issues could be demonstrated by means such as emails, records of telephone conversations, written correspondence, meeting minutes, media releases, or provision of responses to frequently asked questions on the company website. Good practice requires a register to be kept by the developer and owner/operator detailing the source, date and nature of issues raised, and how and when each was addressed and resolved. Closure of issues with the stakeholder who raised them is essential.

Conformance/Compliance

Conformance/Compliance criterion – Preparation, Implementation and Operation Stages: Processes and objectives relating to communications and consultation have been and are on track to be met with no major non-compliances or non-conformances, and any communications related commitments have been or are on track to be met.

Good practice requires evidence that communications and consultation measures are compliant with the relevant legal and administrative requirements for public disclosure and consultation, which may be expressed in licence or permit conditions or captured in relevant legislation. Compliance requirements may relate to, for example: the number, timing and type of community consultation sessions undertaken as part of project preparation; the standards

to be demonstrated by the project grievance mechanism; or public disclosure of certain project documents such as monitoring reports on key issues.

Conformance refers to delivering what is in the plan. Examples relevant to communications and consultation could include budgetary allocations, designation of roles and role expectations, resource provisions, provision of internal training, meeting schedules, support mechanisms, response times, and record keeping.

Commitments may be expressed in regulatory requirements for addressing communications and consultation, in relevant policy requirements of the developer or owner/operator, or in any relevant company statements made publicly or within management plans. For example, the company CEO may make a statement in the press that transportation will be made freely available for community members to attend the public meetings about the project. The grievance mechanism may contain commitments to certain time targets for issue acknowledgement, response, resolution, and feedback. Evidence of adherence to commitments could include, for example internal monitoring and reports, government inspections, and independent review. Variations to commitments should be well-justified and approved by relevant authorities, with appropriate stakeholder liaison.

The significance of not meeting a commitment is based on the magnitude and consequence of that omission and will be context-specific. For example, a failure to demonstrate delivery of a stakeholder consultation process required under the relevant legislation is likely to be a significant non-compliance, whereas a slight delay in publication of a monitoring report could be a non-significant non-conformance (depending on the consequence of that delay).