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Gulakov, Ilya; Vanclay, Frank; Ignatev, Aleksander; Arts, Jos

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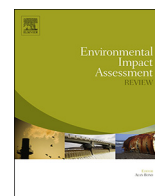
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Challenges in meeting international standards in undertaking social impact assessment in Russia



Ilya Gulakov^{a,b,*}, Frank Vanclay^a, Aleksander Ignatev^b, Jos Arts^a

^a Urban & Regional Studies Institute, Faculty of Spatial Sciences, University of Groningen, the Netherlands

^b Ramboll CIS, Russia

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ABSTRACT

Implementing good practice social impact assessment (SIA) that meets international standards in countries in transition is problematic. We reflect on the challenges faced when undertaking SIA in the Russian Federation. These challenges restrict meaningful SIA processes from being undertaken and limit public participation and the effective community engagement of project-affected local people. Based on the self-reflexive professional experience of two Russian-based social practitioners, and their discursive interactions with two leading academics in environmental and social impact assessment, as well as on in-depth interviews with prominent Russian and international experts, we identified the key challenges that prevent effective SIA from being implemented in Russia: a lack of understanding of the international standards; discrepancy in the determination of the social area of influence between the national requirements and international standards; difficulties in combining national and international impact assessment processes; and a tendency by companies to restrict stakeholder engagement to the minimum. We hope that by having an awareness of these limitations, improvements to SIA practice in Russia and elsewhere will be made.

1. Introduction

Social impact assessment (SIA) is a concept and practice that is well established and elaborated internationally (Esteves et al., 2012), having agreed values and principles (Vanclay, 2003), and guidelines for practice (Vanclay et al., 2015; Kwam, 2018). SIA is required by multilateral development banks and other international financial institutions, notably the International Finance Corporation (IFC) (IFC, 2012a) and ostensibly by all banks that are signatories to the Equator Principles (<https://equator-principles.com/>) and thus most project financing institutions (Vanclay, 2017a; Vanclay and Hanna, 2019). SIA is primarily about managing the social issues of projects (Vanclay et al., 2015; Vanclay, 2020). SIA can be done voluntarily by companies, but also because it is required by national law (in this paper 'national SIA'), or demanded by international standards, either as a condition of project financing or because of the requirements of an international collaborator (in this paper 'international SIA').

International SIA is implemented across a wide range of different social contexts, with countries having their own expectations of what SIA is and how it should be implemented (i.e. national SIA). There can be many discrepancies between international and national expectations. This is especially the case for countries in transition, where

democratic procedures are typically not fully understood or implemented, and national policies, procedures and practices for SIA and environmental impact assessment (EIA) may not be well developed, elaborated, or complied with (Cherp and Golubeva, 2004; Kovalev et al., 2009; Glucker et al., 2013; Gulakov and Vanclay, 2018, 2019). In this paper, we reflect on the challenges that emerge from implementing international SIA in the context of countries in transition, specifically in the Russian Federation. To our knowledge, there has been little or no discussion of such challenges in Russia. The paper is primarily based on the self-reflexive experience of Gulakov and Ignatev, who are social practitioners based in Russia, as well as on their interviews with 5 leading practitioners in Russia.

2. International best practice social impact assessment

Internationally, SIA is now a well elaborated concept, with clear understandings, values, guiding principles, theories and methods (Vanclay, 2003; Howitt, 2011; Esteves et al., 2012; Franks and Vanclay, 2013; Vanclay et al., 2015). There are many ways by which SIA is implemented, with SIA being a fully independent process in some jurisdictions (Parsons et al., 2019). However, even though SIA is conceptually independent from other forms of impact assessment (Vanclay,

* Corresponding author.

E-mail address: gulakov.ilya@gmail.com (I. Gulakov).

2015), contemporary practice is to integrate it with the assessment of other impacts in an Environmental, Social and Health Impact Assessment (ESIA or ESHIA) (Dendena and Corsi, 2015).

Democratic principles are embedded in the contemporary approach to SIA (Vanclay, 2003; Vanclay et al., 2015; Aucamp and Lombard, 2018; Gulakov and Vanclay, 2018, 2019), and SIA includes consideration of human rights issues (Kemp and Vanclay, 2013; Götzmann et al., 2016; Esteves et al., 2017; van der Ploeg and Vanclay, 2017, 2018). The fundamental values of SIA include that people have a right to be involved in decision making about the planned interventions that will affect their lives and that this decision making should be just, fair and transparent (Vanclay, 2003; O'Faircheallaigh, 2010; Hartz-Karp and Pope, 2011; Salomons and Hoberg, 2014). Decision making should not only be the prerogative of experts, but should be taken as close to the affected people as possible, in other words, subsidiarity (Vanclay, 2003). SIA is intended to strengthen democratic processes and improve decision-making (Vanclay, 2003, 2012; Hartz-Karp and Pope, 2011).

Traditional approaches to SIA tend to accord affected people with little influence in decision-making processes, often with the only form of engagement being limited forms of consultation. A typical method used by traditional SIA is public hearings, usually performed as a once-off event. Even though academic analyses of traditional SIA are dismissive (Lockie, 2001; Hartz-Karp and Pope, 2011), the traditional approach is still in use in some jurisdictions (Gulakov and Vanclay, 2019). Contemporary SIA requires development projects to have legitimacy, and to be broadly acceptable to the members of affected communities, in other words, to have a social licence to operate (Dare et al., 2014; Jijelava and Vanclay, 2017, 2018).

The contemporary understanding of SIA advocates that projects must contribute to development and development outcomes (Vanclay, 2002, 2003, 2020; Esteves et al., 2012; Vanclay et al., 2015). The approach that sees SIA as only intended to mitigate adverse project impacts is conceptually outdated. Contemporary SIA promotes community development, capacity building, poverty reduction, and requires investigation of ways to turn impacted peoples into beneficiaries (Vanclay et al., 2015; Vanclay, 2017a, 2017b).

Over the past decade or so, internationally-financed development projects in Russia and elsewhere would normally be expected to comply with international standards. Depending on the specifics of the particular project, one or more of the following standards would apply (for a longer discussion of international standards, see Vanclay and Hanna, 2019):

- Environmental and Social Sustainability Policy and related Performance Standards of the International Finance Corporation (IFC, 2007, 2012a, 2012b);
- Environmental and Social Policy and related Performance Requirements of European Bank for Reconstruction and Development (EBRD, 2014);
- Guidelines for Confirmation of Environmental and Social Considerations by Japan Bank for International Cooperation (JBIC, 2015);
- OECD Guidelines for Multinational Enterprises (OECD, 2011);
- OECD Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (OECD, 2016);
- Equator Principles (EP, 2013).

It should be noted that, among all these standards, the IFC Performance Standards (PS) serve as the key benchmark (Vanclay and Hanna, 2019). Although internationally the *United Nations Guiding Principles on Business and Human Rights* would be considered a key document (Götzmann et al., 2016), there has been little reference to this in Russia to date.

Specific requirements in these international standards are intended to ensure detailed consideration of a wide range of aspects typically

addressed in ESIA, including public participation, and assessment and management of the potential negative and positive effects on local communities. The impact assessment process that is expected to be followed is outlined in the various international standards and other documents, e.g. the Guidance Notes for each IFC Performance Standard (IFC, 2012b). The IFC Performance Standards ensure that there is sufficient reflection on: labour and working conditions (PS2); resource efficiency and pollution prevention (PS3); community health, safety and security (PS4); land acquisition and involuntary resettlement (PS5); biodiversity conservation (PS6); Indigenous peoples (PS7); and cultural heritage (PS8). Special attention must be paid to vulnerable communities, their needs and aspirations. Following the assessment of impacts, project proponents are expected to establish an ongoing monitoring process and have a social and environmental impact management system in place. The IFC Performance Standards also provide a definition of the area of influence, including impacts of the intended project, associated facilities, as well as cumulative impacts (IFC, 2012a).

Various other documents also inform preparation of impact assessments, notably including: "Social Impact Assessment: Guidance for assessing and managing the social impacts of projects" published by the International Association for Impact Assessment (Vanclay et al., 2015); the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (UNECE, 1998); and various guidelines published by the International Council on Mining and Metals (ICMM, 2012, 2015a, 2015b), IPIECA (2011, 2015, 2019), and the IFC, 2007, 2012 – including guides related to promotion of development outcomes from projects (IFC, 2000, 2010; ICMM, 2012).

3. Methodology

Two of the four authors of this paper (Gulakov and Ignatev) are native Russians who work as social consultants for Ramboll CIS, the lead environmental and social consultancy firm in Russia. The lead author (Gulakov) previously worked for another Russian consultancy firm, Branan Environment. They each have around 10 years of professional experience in Russia, collectively working on over 50 different projects. This paper is primarily based on analysis of completed SIAs, or components of them (e.g. reviews of SIA materials, Stakeholder Engagement Plans, minutes of meetings). It is also based on analysis of interactions the Russian authors had with colleagues and project collaborators, including staff in civil administration and companies, and analysis of correspondence such as emails and official letters, and conference calls and meetings. The analysis of materials and interactions was supplemented by the self-reflection of the Russian authors on their experiences. Self-reflection is a well-established research method in the social sciences (Spry, 2001). Self-reflection was based around the following issues: what challenges occurred in the most problematic projects in which the authors were involved?; are these challenges typical for Russia?; what are the key reasons for their occurrence?; and how were similar issues addressed in other projects? In their reflections, they identified several key challenges that are discussed in this paper.

To counter any potential for bias in the self-reflection process, the paper is also based on in-depth interviews with five leading national and international practitioners (experts) who work in Russia, and on active debate between the two Russian authors (Gulakov and Ignatev) and two EIA/SIA academics (Vanclay and Arts), who are co-authors of this paper and the supervisors of Gulakov's PhD research as an external student at the University of Groningen, The Netherlands.

The key challenges identified by the two Russian authors formed the basis of the interviews with the expert practitioners. The issues covered in the interviews related to SIA practice in Russia generally, stakeholder engagement, the potential to combine the national and international impact assessment processes, as well as any other significant issues related to SIA practice in Russia. The interviewees were asked to give their opinions on the challenges identified by the Russian authors, and

to share their own insights.

Four of the five interviews were done with both Gulakov and Ignatev being present, and one was done by Gulakov alone. Two interviews were with the general directors of two consultancy firms in Russia, Branen Environment (Julia Kamenskaya) and Ramboll CIS (Ivan Senchenya), while three were with foreign practitioners who work in Russia: Ron Bisset (Ramboll UK), Frederic Giovannetti (freelance consultant), and Jane Upperton (Upperton Associates, UK). All interviews were done in a manner consistent with ethical social research (Vanclay et al., 2013). The interviewees confirmed that they were happy to be named, and were provided with a draft version of the paper prior to publishing.

The interviews were done in person or via Skype between October 2018 and August 2019. They were done in Russian or English at the choice of the interviewee. Each interview lasted from 60 to 90 min. All the interviewees were informed about the topic of the interviews in advance. Since the interviewees are experienced SIA specialists and familiar with the Russian context, there was no confusion about the purpose of the research. Each interview followed a previously-prepared guide with detailed notes being taken by both interviewers (thus the interviews were not recorded). The interview guide was structured in accordance with the key challenges previously identified by the two Russian authors and contained several open-ended questions allowing in-depth discussion with each interviewee. Following each interview, the two Russian authors conferred to discuss the implications of the interview for the general understanding they had previously developed. The lead author was primarily responsible for writing this paper, although the content was much influenced by the discussions with the two PhD supervisors, one of whom (Vanclay) did major editing.

4. Specific requirements for SIA in Russia

In Russia, social issues are considered to be part of the EIA process, which is regulated by *The Provisions for Environmental Impact Assessment (Russian Federation, 2000)* (hereinafter: The Provisions). The Provisions provides general requirements for the EIA (and SIA) process, requiring that “social, economic or other impacts that are related to the environmental ones” be considered (Article 1.5). The impact assessment process is mainly focused on environmental impacts, considering social impacts only in a secondary way. The Provisions gives only limited specification on how to deal with social impacts, but outlines general requirements for the impact assessment process. For example, it says that the assessment should be based on valid baseline information, have an appropriate level of detail to address potential project impacts (Article 1.5), and nominate relevant mitigation measures (Articles 1.1 and 3.2.2). The results of the impact assessment process are submitted to various governmental agencies.

Even though having a broad, general framework for considering social impacts might be appropriate, it does not really work as part of the EIA process in Russia for several reasons. In practice, EIAs have poor social baseline information, often with questionable relevance to the project's area of influence or to the project affected communities. Few if any social impacts are considered, and there is no clear link between the social baseline, social impacts, social impact mitigation and impact management of the project (Gulakov and Vanclay, 2018). In reality, the EIA process in Russia does not adequately identify or address social impacts.

Although the Provisions only includes vague requirements for identifying and addressing social impacts, they outline precise requirements about the stakeholder engagement process. In general, the stakeholder engagement process should be organised by the local municipal authorities with support from the proponent. In Russia, the stakeholder engagement process consists of two stages: an initial stage associated with development of the Terms of Reference for the EIA that is to follow, and the impact assessment stage. For both stages, a proponent needs to make notifications in the mass media, disclose the

materials, and collect comments from the public. The impact assessment stage includes the public hearing stage, which is usually a once-off event performed by authorities together with the company in a municipal center. This event culminates with preparation of the protocol, which is signed by the involved parties and attached to the EIA materials. After that, the EIA materials are submitted to the government's review process.

Although the described stakeholder engagement process is straightforward and manageable, it reveals that the Russian EIA is a typical example of traditional SIA. It lacks proper stakeholder identification and engagement planning (and therefore is not project-specific), and it provides limited opportunities for affected communities and other stakeholders to fully participate in decision-making (Gulakov and Vanclay, 2019).

The Russian practice of SIA has much room for improvement. There are various examples of SIAs performed as part of ESIA processes according to international requirements that show it is possible to conduct proper SIA in Russia, and to meet international standards – e.g., the ESIA materials developed for South Stream Offshore Pipeline Project in Russia (South Stream 2014a and 2014b) or for Yamal LNG project (Yamal LNG, 2014). However, application of international practices in a specific national context does not always go smoothly (van der Ploeg and Vanclay, 2018).

5. Challenges encountered when performing international SIA in Russia

Here, we reflect on the key challenges that emerge when attempting to implement international SIA in the Russian context. As described in the Methodology section, the challenges were identified from the authors' reflections as practitioners, and relate to the ways in which the Russian SIA requirements and practice are inconsistent with international requirements. The challenges were discussed in the interviews with key informants to validate and/or refine them. Five key challenges were identified, which we discuss below: (1) a lack of understanding of international standards and practice by company staff; (2) tension between the international and national standards; (3) discrepancies in determining the social area of influence; (4) the complexity of combining the national and international impact assessment processes; and (5) limited requirement or practice in effective stakeholder engagement.

5.1. Challenge 1: lack of understanding of international standards and practice

One of the biggest challenges to implementing international SIA in Russia is the lack of understanding of the international standards by company staff. The traditional way of looking at standards or requirements is to view them as regulations that specify what the project is obliged to do. This way of looking at them is promulgated by the traditional nature of the EIA requirements in Russia. For example, the Russian requirements prescribe the number of days for disclosure of EIA materials, the period when comments about disclosed materials must be received, the means of notification about the disclosure, etc. Although rigid, the EIA requirements are clear, straightforward and easy to apply. They give precise instructions for the company to follow. Importantly, they also imply that anything beyond what is prescribed is excessive and unnecessary.

Having such an understanding of the national requirements and having much experience in their application, Russian companies tend to use a similar approach to international SIA. However, applying such a traditional understanding to the international requirements is inherently flawed and counter to their intention. The international standards are not prescriptive or restrictive, instead they provide a framework which companies can utilize to manage the potential social impacts an intended activity might pose. They do not prescribe specific

details such as the number of press announcements to be made. However, they do require that affected communities and other stakeholders be sufficiently informed about the project. It is up to the proponent and/or their consultants to select and tailor the methods to ensure adequate information sharing and engagement. As one interviewee noted, the international standards indicate the principles to be followed, whereas the Russian requirements prescribe the specifics of the processes. Another interviewee suggested that by being too focused on the details prescribed by the national regulations, company personnel sometimes lose sight of the big picture. Another interviewee mentioned that some employees viewed extensive stakeholder engagement and international SIA as a “waste of time”.

One company requested that Free, Prior and Informed Consent (FPIC) (IFC, 2012a; Hanna and Vanclay, 2013) be obtained from potentially-affected Indigenous peoples by getting “some sort of paper” signed by their representatives at a very early stage in the project. In discussions with the company about this, it became clear that the company had a very poor understanding about FPIC and that they just wanted a short list of simple actions to follow. Another example of the simplistic implementation of SIA was when a company representative requested removal from the ESIA of the section describing the project's social area of influence arguing that the IFC requirements do not prescribe it. Because social impacts are usually different to environmental impacts, it is typical for the social area of influence to be different to the area of influence for the assessment of environmental impacts (Vanclay et al., 2015). In both examples, the issue was similar, that is, the client understood the requirements as a set of literal dos and don'ts, did not comprehend the difference between the spirit and letter of the Russian regulations and international guidance, and probably did not understand the meaning and intention of these activities.

In comparison to environmental issues, for the reasons discussed below, social issues tend to receive less consideration (Hanna et al., 2016a, 2016b; Mottee et al., 2020). Whether for good or bad, SIA in Russia is practiced within the EIA framework. Therefore, it is normally managed by the environmental specialists in companies, although some interviewees noted that this situation is changing now that companies are becoming more familiar with international requirements. When a company attempts to perform international ESIA, by default it applies the national EIA practice-based approach; hence the social impacts are managed by the environmental specialists. Since the social issues are typically outside their primary scope of interest, and as the requirements about how to manage them are not precise or clear, the social aspects are often considered unnecessary and therefore are only poorly addressed. A lead environmental specialist for a large mining company said “Do you know how much work an environmental specialist in a mining company has to do?”, and indicated that he was too busy to take responsibility for additional and ‘strange’ social obligations that were being imposed on him. Obviously, if such a person had to reduce costs or ‘cut corners’, this would be at the expense of social considerations.

5.2. Challenge 2: the tension between international and national standards

In addition to meeting the IFC requirements, IFC clients must also comply with applicable national law (IFC, 2012a, 2012b, Overview, art. 5). However, sometimes there are discrepancies between national law and IFC requirements. In one large oil & gas project in Russia, the company representative insisted that the stakeholder engagement to be undertaken for the international ESIA process should be performed according to the national requirements. However, this is problematic, because the stakeholder engagement procedure for the national requirements is quite simple and would not meet IFC expectations.

The national procedure is as follows. The proponent makes a request to the municipal administration. Based on this request, the administration issues an order stating the date and place where the public hearing for the project will be held. Stakeholder engagement is performed according to the prescriptions in the EIA Provisions, which is

not compliant with the IFC requirements.

As one interviewee noted, the EIA Provisions view stakeholder engagement as just one of the procedural steps in the permitting process and that, by having signed minutes of a public hearing, a company ostensibly ‘obtains a permit’ from the public. Thus, the process is not aimed at ensuring meaningful engagement or participation in decision-making. This way of doing stakeholder engagement has many problems. First, it is problematic for the company doing the ESIA to hand over responsibility for stakeholder engagement to an external party (i.e. the municipal administration) over which it has no influence. Second, it is highly probable that the administration will only conduct a public hearing as a once-off event in a municipal center, which is an inadequate way of engaging affected communities (Hartz-Karp and Pope, 2011; IFC, 2007, 2014). Third, the local administration often only undertakes public hearings in a brief, perfunctory manner without any real input from local people. Sometimes various tricks and distortions are used. For example, at one public hearing, the administration increased the number of people attending by requesting local educational institutions to ensure that their students attended the event. The students did attend the meeting; however, they demonstrated zero interest in the topic spending the whole time looking at their phones waiting for the event to finish. Fourth, public hearings might not be the most appropriate form of engagement and are best avoided. Finally, performing ESIA stakeholder engagement according to the national requirements will lock the company and ESIA developers into a rigid timeframe with no flexibility: when an administration sets a certain date, it will not be easy for a company to change it. A company will also need to comply with the strict timeframe requirements of the EIA provisions with respect to making press announcements, etc. As a result, trying to comply with the EIA Provisions will put the ESIA stakeholder engagement in a process that is inappropriate and inflexible, and over which the company will have very limited influence.

The rigidity of the Russian regulatory framework poses a danger for project developers since it can lead to them having conflicts with local communities. This can be illustrated by the case of a large mining project where the mine site was surrounded by several small villages, including some that were to be resettled. The company ran stakeholder engagement strictly in compliance with the national requirements: it made the required press announcements, disclosed project materials for receiving feedback, and held a single public hearing. As a result of the limited engagement, the company received thousands of grievances opposing the project, and the public hearing experienced many participants whistling, stomping, or jeering. The company then had constant conflict with the local communities. It was clear that more extensive stakeholder engagement was necessary than was prescribed by the national requirements.

A company needs to engage with the local municipal administration. However, it would be more appropriate not to give all responsibility for stakeholder engagement to a third party. Otherwise, the attempt to respect national law may result in stakeholder engagement being conducted in a manner that was not consistent with international requirements, and may even lead to conflict with local communities. This is one reason why some international companies operating in Russia tend to perform stakeholder engagement for national EIA and for international ESIA as two separate processes.

Some company representatives make vigorous attempts to comply with the national law without understanding the risks of pushing the stakeholder engagement process as part of international ESIA into the unsuitable Russian legislative framework. This can perhaps be explained by the familiarity and relatively ease of the Russian framework, and partly by the lack of understanding of international standards by company personnel.

The issue of coordination of the national and international requirements is a worthy issue to consider while performing the international ESIA. For some companies, this discussion considers the issues of the form but not the essence. As noted above, some company

representatives argued that if the IFC standards say that national law should be respected, they should act strictly according to the national law. Often this is the only argument during the discussion on how the stakeholder engagement process should be framed. Such a dialogue does not typically involve discussion of the essential constituents of community involvement planning: on the most appropriate methods of notification of the affected communities, on more inclusive forms of engaging them or, in the end, on what these affected communities are as the national EIA process does not request to identify them. The argumentation is quite straightforward: “If the national requirements prescribe the documents to be disclosed for 30 days, it is obligatory to do this”. The fact that these materials might be disclosed in inappropriate premises, or that affected communities might be not aware of the disclosure, etc. appears to be a secondary issue for at least some of company representatives in Russia. Unfortunately, for some people, a stamp on the protocol of the public hearings seems to be more important than the actual engagement.

5.3. Challenge 3: discrepancies in determining the social area of influence

An important difference between the Russian EIA and international ESIA relates to how the scope of the assessment is determined. Perhaps this is most evident in that the international standards require the ESIA to consider impacts of associated facilities, but the Russian requirements do not. Associated facilities are defined as “facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable” (IFC, 2012a, 2012b, PS1, art.8). These facilities typically include construction camps, pipelines, electricity transmission lines, access roads, etc. In an international ESIA, the social impacts of the project and of all these facilities must be considered. It would be expected that there would be a single social area of influence for the project, since separating-out the social impacts of the interrelated facilities from one another can be difficult and arbitrary. Vanclay et al. (2015) argued that the social area of influence is the total area comprising all project-affected communities, including those whose location may not neatly align with the geographic boundaries of the project and its associated facilities.

The national approach to determining the scope of the assessment is somewhat different. In particular, the way the ‘project area of influence’ is determined can cause controversy especially by the common practice of dividing up a large project into many small subprojects, with separate impact assessments being done for each subproject. Each assessment usually only addresses the direct impacts of the specific minor subproject, and they typically have separate stakeholder engagement processes and public hearings. There is much duplication of effort, and an increased burden on the community, leading to much skepticism about the process.

In one situation, a major company opted to manage a complex project by creating several subsidiary companies, each of which was involved in a different subproject. Each subproject involved extracting, processing and transferring fossil fuels from the oil and gas field owned by the parent company. One subproject, a production unit occupying only a small amount of land, was seeking international financing, hence an IFC standards-compliant ESIA was necessary, in which the different activities and their impacts would form a single social area of influence. Inclusion of three subprojects in the area of influence was considered indispensable for the ESIA, as the subprojects potentially would heavily influence the livelihoods of local communities. However, the proponent demanded that the social area of influence be changed. On the basis of the need to limit company liability, the proponent was reluctant to make any mention of impacts from the associated facilities. This segmented approach potentially could lead to leaving many major impacts out of the assessment.

5.4. Challenge 4: the complexity of combining the national EIA and international ESIA processes

When a project is in its early stages and the proponent is seeking international financing, the project will generally require both national EIA and international ESIA. Thus, the issue of combining these two processes arises. Can these two processes be performed together? Are they largely the same, or are they so different that they should be conducted separately (or in parallel) rather than as a joint process?

At present, combining these processes is very difficult in Russia, if not impossible. As one interviewee stressed, some companies have attempted to combine them – but usually at some later point have come to the decision that not mixing them is more practical and pragmatic. The main reason for this is the discrepancy in determining the social area of influence. Russian law requires separate EIAs for each project facility, and the results of these EIAs might even undergo separate review processes. Conversely, the international ESIA requires an integrated assessment of all project components collectively. Thus, the proponent needs to prepare two different packages of documents, one to meet the lender’s expectations, and one to meet the needs of the national regulators. Combining them would be complex. This dual system has many implications, including additional cost and effort, and increased burden on the community.

In an attempt to simplify the process, some companies complete the national EIA according to national requirements and prepare a Supplementary ESIA to address the specific issues that are missing from the national EIA (for example, with respect to cumulative impacts). However, the SIA sections of the ESIA report generally have to be developed from scratch given the deficiencies of the national EIA with respect to social issues. Typically, the national EIAs only provide high-level social baseline data which has little relevance to the potentially affected communities, do not adequately consider all the social impacts (Gulakov and Vanclay, 2018), and therefore have little to contribute to the international ESIA process.

Another issue relates to the stakeholder engagement processes undertaken as part of the national EIA and international ESIA: can they be combined, or should they be conducted in parallel? We consider that both options are possible. However, in our experience in Russia, these processes are mostly run in parallel. A critical issue is that for the national EIA, the stakeholder engagement activities are regulated and undertaken by the municipal administration within the strictly prescribed framework, whereas when undertaken as part of international ESIA stakeholder engagement is conducted by the proponent, who then has some flexibility with respect to the timing, number and form of the engagement activities. Our experience shows that when municipal administrations lead the engagement process according to the national requirements, they can also support performance of the ‘additional’ ESIA engagement process led by the project proponent.

There are cases when the stakeholder engagement processes for the national EIA and international ESIA were combined. For one large petrochemical project in Russia, public hearings were the only consultation activities done for the national EIA process. However, these were also some of the events held for the international ESIA process, which were supplemented by two additional meetings with residents of the affected communities so they would comply with the international requirements. It should be noted that representatives of this company were very collaborative and effective with respect to organisation of stakeholder engagement events (such as making press announcements and arranging venues for consultations).

Combining stakeholder engagement processes as part of the national EIA and international ESIA process therefore might be an appropriate decision. However, it requires the ESIA developers to meet the deadlines set by the administration for the EIA stakeholder engagement process, which holds certain risks. From a consultant perspective, such a procedure may be feasible when company representatives are collaborative and assist consultants to arrange

stakeholder engagement activities. However, when company staff are not collaborative or do not comprehend the justification for more extensive ESIA consultations and/or try to limit them, it is advisable to run EIA and ESIA stakeholder engagement in parallel.

5.5. Challenge 5: limited stakeholder engagement

The typical approach of traditional SIA in Russia was to limit the extent of stakeholder engagement and/or make it as simple as possible. The attitude of companies was often that the smaller the number of participants in engagement activities, the less questions, and therefore the more smoothly the engagement proceeds. This mentality is a key reason why some companies limit stakeholder engagement as much as possible. Companies can use many strategies to minimize the disclosure of information. Often, they avoid disclosure of materials online. Restricting online access means that stakeholder groups have no option but to travel (often to another city or region) to access the materials, which usually are only available during the opening hours of the public reception office where the printed materials are disclosed. Given the vastness of Russia, such travel can be very inconvenient and costly. Furthermore, some companies prohibit stakeholders from making photocopies of the materials to limit the extent to which they can be shared.

Even though some companies do make targeted notification to specific stakeholder groups by e-mail, another strategy is not to attach digital copies of the ESIA materials and/or fail to notify the stakeholders of the possibility to receive digital copies. One company argued that “the notification letter contains contact details and if a stakeholder wishes to request the materials, they will find a way to do this”. Thus, a stakeholder would need to ‘solve a riddle’ to find the materials on which they are entitled to comment.

The way some companies deal with stakeholder engagement is similar to the situation described by Douglas Adams (1979, pp.9-10) in *The Hitchhiker's Guide to the Galaxy*, about the impending demolition of Arthur Dent's house for a bypass:

‘But, Mr Dent, the plans have been available in the local planning office for the last nine months.’

‘Oh yes, well, as soon as I heard I went straight round to see them, yesterday afternoon. You hadn't exactly gone out of your way to call attention to them, had you? I mean like actually telling anybody or anything?’

‘But the plans were on display....’

‘On display? I eventually had to go down to the cellar to find them.’

‘That's the display department.’

‘With a flashlight.’

‘Ah, well the lights had probably gone.’

‘So had the stairs.’

‘But look, you found the notice, didn't you?’

‘Yes,’ said Arthur, ‘yes I did. It was on display in the bottom of a locked filing cabinet stuck in a disused lavatory with a sign on the door saying Beware of the Leopard.’

A company might refuse to disclose more than the required single copy of each document in a public reception office even though this copy may be misplaced, taken away or damaged. A company might disclose only limited information from the ESIA, for example only the Non-Technical Summary instead of the full ESIA package. Another way to hamper disclosure is to disseminate the ESIA only at one venue while only disclosing the Non-Technical Summary in other venues. However, providing that each affected community has access to the disclosed documents, we do agree that this might be acceptable in small

communities where there is no suitable location to place the full ESIA package, especially when it runs to thousands of pages. We are familiar with an extraordinary case where the project representatives asserted to local communities that the full ESIA package was available, even though it was not actually provided at any location. Even though notifications of the ESIA disclosure were made in the press and by e-mail to certain stakeholder groups, the company only disclosed the Non-Technical Summary.

By taking a traditional approach to stakeholder engagement and having limited capacity to undertake stakeholder engagement, some companies are unwilling to embrace meaningful engagement. Some companies pay more attention to the formal requirements of the engagement process (getting the stamps, signatures, etc.) than to the genuineness of the process or the outcomes of the meeting.

Poor stakeholder engagement is usually associated with inadequate grievance management. For example, one company representative was not pleased about receiving a grievance from an NGO that was not initially informed of the ESIA disclosure. Companies with deficient stakeholder engagement processes tend to perceive grievances as an indication of a mistake or evidence of poor performance rather than being a normal part of the project lifecycle and an opportunity to improve. Grievances tend to be perceived as a jolt ‘out of the blue’. As some interviewees noted, Russian experience with grievance management is usually about managing internal grievances from workers, not those from communities or external stakeholders.

Some companies attempt to hide the conflicts they have. For instance, one project, which had received thousands of grievances from affected community members opposed to the project, requested its consultant to remove information about stakeholder views from a report in order to conceal what they perceived as negative information. Their rationale for this action was that some grievances referred to potential impacts it considered were very unlikely, over-exaggerated, or bizarre. It took much effort by the consultants to convince the company that proper procedure was to note all received grievances, make a response to them, and develop an appropriate stakeholder engagement program to allow meaningful discussion of the project's impacts to clarify misunderstandings.

6. Conclusion

Implementation of international SIA in the Russian context is usually not easy. A key challenge relates to the differences between the requirements of the national EIA and international ESIA procedures. The Russian EIA process is rather prescriptive, and is primarily about dos and don'ts. In contrast, the international ESIA framework establishes principles but does not provide precise specification of the expected process. It can be a challenge when company personnel, who are used to performing activities within the national EIA framework, extrapolate this approach to the international ESIA process.

It should be noted that, even though international institutions expect companies to comply with national law, in some cases performing international ESIA along with the national EIA requirements is problematic. Attempting to undertake SIA in line with national law will inevitably lead the company and/or SIA consultants to follow the rigid framework of the national EIA process, and give the key role of stakeholder engagement to the municipal administration, which will likely take a traditional approach not compliant with international standards.

Other important challenges relate to how the social area of influence is determined and the scope of the impact assessment process. The international SIA requires performing an integrated assessment of impacts associated with the project, its associated facilities, and cumulative impacts. In contrast, it is quite common in Russian practice to subdivide a large project into a number of subprojects, for which separate impact assessments and stakeholder engagement events are done. It would take much effort to persuade project proponents to accept responsibility for managing the impacts of associated facilities,

given their concern about liability. Dealing with the impacts of associated facilities is always complex, and it becomes a double challenge when there is resistance by company personnel, or when a company pretends the associated facilities are not there.

Given that the results of the national and international ESIA processes are submitted to different review processes and need to meet different expectations, combining them is challenging. Some interviewees insisted that there should be separate processes, while others suggested there should be more integration. Perhaps it would be feasible to undertake national EIA to meet the expectations of national regulators, and to compile a supplementary ESIA to meet the needs of lenders. Such an approach would help companies avoid duplication, thus saving cost and time. Stakeholder engagement for international SIA could potentially be integrated with the national EIA process by having additional meetings with affected communities. However, while there are some advantages to integration, there is a risk that performing stakeholder engagement activities in a way that would meet the requirements and procedures set by the local administration, and international good practice would be more problematic.

A key challenge to implementing international ESIA relates to company attempts to avoid or limit stakeholder engagement, on their presumption that the fewer participants in the engagement process, the easier the process will be. The practice of limited stakeholder engagement is supported by the national EIA requirements. As one interviewee noted, these requirements view stakeholder engagement as being a step in the permitting process and are not intended to ensure meaningful engagement or participatory decision-making.

The challenges described above may affect the integrity of the international SIA process in Russia, especially, in relation to the meaningfulness of SIA, and in the way affected communities and other stakeholders are involved in decision-making. As some interviewees noted, these challenges are relevant not only for Russia but also to other post-Soviet countries. This is confirmed by the experience the Russian authors of this paper have in countries such as Belarus (Eastern Europe), and Kazakhstan and Uzbekistan (Central Asia). However, the described challenges are likely also to be relevant to the broader context, and especially to other countries in transition.

Both the international ESIA process in Russia and the national EIA process should be more transparent, meaningful and participatory. Our interviewees argued that this may be facilitated by: (1) improving the national EIA requirements; (2) more active discussion about and application of best practice requirements among the SIA practitioner community rather than being enforced by top-down regulations; and (3) educating regulators and reviewers. Awareness of the challenges described above will assist practitioners in developing the practice of international SIA in Russia and other situations. SIA has considerable value for all countries, including Russia and other countries in transition.

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Authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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