

Environment Department The World Bank



October 1993 Number 5

# Public Involvement in Environmental Assessment: Requirements, Opportunities and Issues

The Bank's Operational Directive (OD) 4.01 on Environmental Assessment (EA) requires that affected groups and local NGOs be informed and consulted in a meaningful way as part of EA preparation (para 21). **Information disclosure** is a prerequisite for meaningful consultation. Proper **consultation** is a requirement for EA category A projects but is also useful for other projects as it helps (1) improve understanding of the potential impacts of proposed projects; (2) identify alternative sites or designs, and mitigation measures, to improve environmental and social soundness; (3) clarify values and trade-offs associated with these different alternatives; (4) identify contentious issues; (5) establish transparent procedures for carrying out proposed projects; and (6) create accountability and a sense of local ownership during project implementation. Public **participation** in project preparation, beyond consultation, is not an EA requirement except when a project involves involuntary resettlement or affects indigenous people; but public participation in decision-making strengthens local ownership and accountability.

This EA Sourcebook Update describes information disclosure, consultation and participation requirements in the EA process. The focus is on practical information, from descriptions of categories of affected people and their representatives to innovative techniques to the use of social scientists. The Update replaces the EA Sourcebook's Chapter 7, Community Involvement and the Role of Nongovernmental Organizations in Environmental Review, and can be inserted into Chapter 7 of the Update Binder.

#### **Types of Public Involvement**

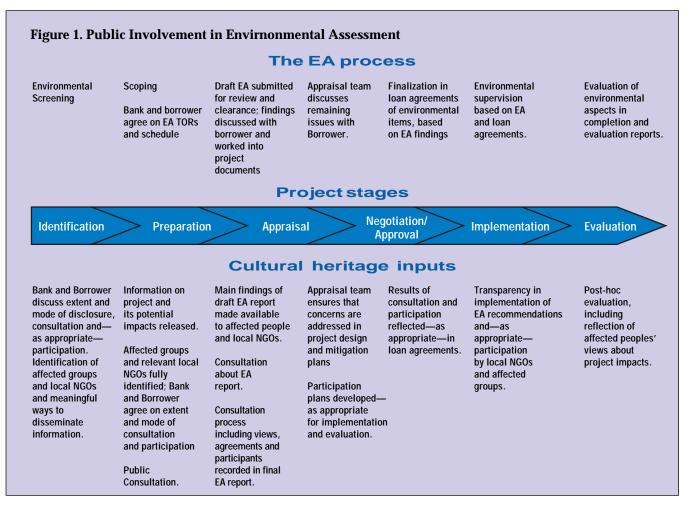
Public involvement in planning and implementing projects can be brought about through consultation and participation. The key factor that distinguishes consultation from participation is the degree to which those involved are allowed to influence, share or control decision-making. The World Bank requires *consultation* with affected groups and local NGOs as part of the EA preparation process. *Participation* is required during project preparation under certain conditions and is generally recommended as part of implementation. *Information dissemination* is a necessary precondition for consultation and participation. Figure 1 describes these events in relation to the Bank project cycle and EA process.

#### Information Dissemination

OD 4.01 states that "[in] order for meaningful consultations to take place between the borrower and affected groups and local NGOs, it is necessary that the borrower provide relevant information prior to consultations. The information should be provided in a timely manner and in a form that is meaningful for, and accessible to, the groups being consulted (para 21)." For the first round of consultations (*see* Figure 1) the information normally includes a summary of the project description and objectives, and the potential negative impacts from the proposed project.

Once the EA report for a category A project has been prepared, "a summary of its conclusions in a form and language meaningful to the groups being consulted" (para 21) should be disclosed to the consulted parties. According to the same paragraph, "[any] consultation should pay particular attention to those issues most likely to affect the people being consulted. In addition, the borrower should make the EA report available at some public place accessible to affected groups and local NGOs for their review and comment."

In developing countries, an effective information disclosure strategy should not assume that people have the time, willingness, organization and resources to



find EA information and make their views known to relevant authorities. Experience indicates that placing project descriptions and EA reports in public libraries does not reach the vast majority of people. Mass media, including local television, radio, newspapers and leaflets in local languages, are important means to reach those who will be affected. In some cases, particularly in Africa, the Bank has recommended that EA consultants and implementing agencies work through local traditional decision-making institutions and leaders to disseminate information. Information dissemination normally incurs costs, hence decisions need to be made regarding strategy and funding at an early stage. It is recommended that EA reports document these decisions.

#### Consultation

Consultation involves soliciting people's views on proposed actions and engaging them in a dialogue. Unlike information dissemination, consultation is characterized by two-way information flow, from project authorities to people, and from people to project authorities. While decision-making authority is retained by governments, interaction with people and eliciting feedback allows affected populations to influence the decisionmaking process by raising issues that should be considered in scoping; project design; mitigation, monitoring and management plans; and the analysis of alternatives.

OD 4.01 requires consultation with affected groups and local NGOs during at least two stages of the EA process: (1) shortly after the EA category has been assigned, and (2) once a draft EA has been prepared. In projects with major social components, such as those requiring involuntary resettlement, consultation on social issues and on EA should be linked. Increasing use is being made of regional EAs and sectoral EAs, and it is important that the consultative process also be integrated with them (see EA Sourcebook Update No. 4: Sectoral Environmental Assessment).

A review of Bank experience found that while an increasing number of EAs involved consultation with NGOs, consultation with local communities was more limited. Women and the poor were seldom reached except in the case of resettlement and when indigenous peoples were involved. When consultation had taken place, documentation of the process in EA reports was often incomplete. Bank staff reported they felt constrained by lack of in-country legislation, guidance, techniques and capacity for undertaking consultation; however, staff also felt that consultation, when carried out, improved project design, environmental soundness and social acceptability.

Consultation during EA scoping. Scoping involves consultation to identify key issues and to develop EA Terms of Reference (TORs) (see Box 1). In the past, TORs were typically developed by the relevant government department in consultation with the donor agency. OD 4.01 recommends that other government departments, local NGOs and affected groups participate in the discussions that lead to preparation of TORs for the EA. This usually occurs after a preliminary government inter-agency meeting that determines the parameters of the consultation process. Draft TORs are then disseminated, and follow-up meetings are held to discuss changes and additions to the issues already identified. In many cases, financial resources must be made available to the smaller NGOs and to community representatives to enable their travel to the meetings.

**Consultation during EA preparation**. Many EAs involve consultation with affected people during the EA process (*see* Box 2). The most common method of contact with directly affected populations has been through surveys. These have often been undertaken in the context of resettlement or when indigenous peoples would be affected.

Public consultation during EA preparation can help clarify misconceptions and enhance social acceptability. In a sewerage project in Cyprus, consultations helped allay concerns about odors from a treatment plant, and the relationship between the construction of the plant and future roads.

A wide range of people, including national, provincial and local officials, NGOs, private business groups

#### Box 1. Malawi: Consultation at Scoping

The Malawi Power V project conducted a two-day scoping seminar involving government officials, NGO representatives and technical specialists to present the aims and activities of the proposed project. The participants were divided into three groups to discuss the main issues: terrestrial, aquatic and social. Each group listed and ranked the positive and negative impacts of the proposed project activities, and then returned to the plenary session to set priorities together for the most important activities and impacts. This discussion provided focus for preparing the EA TORs by helping to clarify priority areas of concern. It also helped build knowledge and consensus up front on what aspects the EA would address, thus reducing the risk of conflict and of raising issues later in the EA process.

and community people, were consulted in the Berke Hydropower Project in Turkey. Each group had different concerns. Local officials raised the issue of their inability to meet the increased demand for public services, and emphasized the importance of a local thermal spring for tourists; local people drew maps of their travel paths and roads, and voiced concerns about which ones would be flooded. The consultations clarified misconceptions regarding the project and its impacts; and also provided the EA consultants with important information for the mitigation plan.

In preparation of the Arun III Hydro-electric Project in Nepal, the largest development project undertaken in that country, over 35 different organizations (international, national and local), as well as local businessmen, traders, foresters, bankers and women were consulted. Workshops were held at the district and local

#### Box 2. Gabon: Local Consultation and Project Modification

Dense tropical forests cover 85% of Gabon's territory, and their high biodiversity includes more than 100 tree species of potential commercial value. Total dense forest cover is estimated at 22 million hectares. The Gabonese Government, with the assistance of the World Bank, has initiated a forestry project to (1) maintain the ecological balance and long-term productive potential of the Gabonese forests; and (2) increase the contribution of the forestry sector to national economic development and public welfare through rational management and conservation of the existing forest resources.

To attain the above objectives, the project design process was made highly participatory, involving most segments of society and including a three-year attitude survey. Responsibility for designing the project was placed on both key sectoral ministries and on the local institutions, local and foreign environmental NGOs, donors, private sector and village groups in the project area. The local media (press and national radio), seminars, and large public meetings were used to invite and make sure that all interested parties could comment on the project design, viability, and content. This approach led to (1) a comprehensive identification of environmental and social issues, and (2) internalization of responsibility for the project at all levels of society.

Project design also changed significantly. For example, while poaching control systems are necessary, new wildlife reserves and conservation areas are to be created as a counterweight measure. This will be done in close collaboration with local NGOs and the World Wildlife Fund. Another result of the consultations is extension courses on natural resource management for local people.

level. The consultation process was recorded using video film and written documents. Consultations resulted in (1) changes in the location of the access road; (2) proposals for community-based forestry user groups that would safeguard the valuable timber resources of the area; and (3) agricultural extension programs to assist villagers in capitalizing on livestock production opportunities provided by better access to markets.

**Consultation about draft EA report.** Consultation on the draft EA report for category A projects is mandated by OD 4.01 and is one of the most important elements of the EA process.

Those consulted should be allowed sufficient time to review and prepare comments on the draft EA conclusions before consultation takes place. A combination of seminars, simply written materials, visual representation, videos and scale-models are useful to decode the technical language of EAs and make them understandable to non-specialists.

So far, NGOs and specialists have been involved more often than local communities at this stage. In Latin America and the Middle East, consultation is typically conducted through public hearings; in Africa, it is more likely to be through mass media, particularly radio and the press. For example, radio has been used to engage traditional community leaders in consultations, thus ensuring at the same time that a large number of their communities were reached. The findings from these consultations can lay the groundwork for the participation plans that would involve affected groups and NGOs in further project preparation and implementation (e.g., monitoring).

#### **Participation**

Participation is a voluntary process in which people, including marginal groups (poor, women, indigenous, ethnic minorities), come together with project authorities to share, negotiate and control the decision-making process in project design and management. The process invites a greater degree of involvement in decision-making by affected people than consultation; but like consultation, it is based on two-way flow of information and ideas. To establish and sustain the process as long as needed usually calls for social science expertise, outreach personnel and resources.

The Bank requires the participation by affected people in project preparation when the project affects indigenous people (OD 4.20) or involves involuntary resettlement (OD 4.30) (*see* Box 3). While OD 4.01 does not mandate participation, experience worldwide demonstrates the importance of participation in establishing local ownership and achieving positive developmental impact. EAs are therefore gradually moving toward increased involvement of local people, with some

# Box 3. Project Types and Issues Triggering Public Participation

**Projects affecting indigenous peoples.** Indigenous peoples are tribal groups that commonly subsist on hunting, gathering and primitive rotation agriculture. They may also reside in areas where sedentary agriculture is dominant, and be engaged in wage labor or small-scale market-oriented activities. Indigenous peoples live in diverse climates, such as in tropical and temperate forests, mountains, deserts, or savannahs. Projects affecting these groups can therefore be of multiple types and locations. When EA is needed, indigenous peoples should be consulted as part of the EA process and special Indigenous Development Plans designed with their participation (see OD 4.20).

**Projects requiring involuntary resettlement.** Involuntary resettlement may be necessary in conjunction with virtually any type of major construction works or conversion of land, when people live on the sites to be converted under the project. Public participation in project preparation and resettlement planning is required under OD 4.30. When EA is required, participation by those to be resettled is needed in the EA process (e.g., in planning and implementation of mitigation, management and monitoring).

**Projects for specific beneficiary groups.** Such targeted groups may be the poor, indigenous people, women's associations, users' associations, or cooperatives. Under these circumstances, and when EA is required, participation by the beneficiary group concerned is essential in project design and implementation.

**Projects with community-based development.** When projects depend on local responsibility to be successful, participation in decision-making is important. Examples of such projects include rural infrastructure, urban low-income housing and infrastructure, community-oriented natural resource management, biodiversity conservation projects with buffer zone development, community-based forestry, and certain types of small-scale credit operations.

including representatives of affected people directly in the decision-making processes.

Participation in decision-making takes different forms during different stages of the project cycle. Consultation during EA scoping lays the groundwork for participation in project preparation or implementation. Participation during project preparation can occur through the development of TORs for the EA, and in conducting the EA. During project implementation, local NGOs or representatives of affected groups may participate in monitoring and in evaluating the measures recommended by the EA (*see* Box 4). In the case of the Dahanu Thermal Power Project in India, local NGOs will be monitoring atmospheric emissions.

### Box 4. Ecuador: Advantages of Consultation and Participation

The Lower Guayas Flood Control Project, which is currently under implementation, provides flood control and drainage for the Lower Guayas Basin. Due in large part to extensive consultations during EA preparation with local NGOs, a national NGO and local scientific expertise, the project design was significantly altered during project preparation, to better safeguard important and sensitive habitats. The consultations produced three distinct results:

(1) the project proponent was persuaded to change the alignment of flood evacuation canals, despite higher costs, in order to save an important wetland area from severe disruption;

(2) a proposed single large outlet from a new reservoir into a river was changed, in collaboration with the consulted parties, to a multi-outlet design, after the NGOs successfully argued that the outlet would damage mangrove forests in the estuary; and

(3) a plan for continued information dissemination, consultation and participation during project implementation was developed, giving local NGOs an important role in monitoring implementation and its impacts on the natural environment.

#### Who Should Be Involved

Knowing who are the affected groups and relevant NGOs is a vital step in meeting the Bank's consultation requirement. Groups that are directly affected should be involved early in the project cycle and should generally have the most extensive involvement. As the degree of impact diminishes, the frequency of consultation and participation and the duration of involvement may diminish as well.

#### **Directly Affected Groups**

One of the most difficult parts of the consultation process is ensuring that the affected groups are identified and adequately included. Directly affected groups include (1) intended beneficiaries of a project, (2) at-risk groups, and (3) stakeholders. They may be in physical proximity to the project or fall within its area of influence. Depending on the type and location of the project, an affected group could be a few hundred indigenous forest dwellers spread out over a vast territory or thousands of people living in one neighborhood of an industrial city. They may be dispersed in several villages and have different ethnic or religious backgrounds, or they may be only the women in a distinct community.

When considering whom to involve in consultations, project proponents must try to predict the project's po-

tential impact on the lives of particular groups. They should evaluate the impacts on each group, according to the (1) scope or extension (both the numbers and the percentage of the total potentially affected population); (2) magnitude or intensity; (3) duration; and (4) reversibility. Because this is sometimes difficult to evaluate during the early stages of project preparation, a flexible approach is desirable so as to allow adjustments to be made, as needed, in the range of groups taking part in the process.

In some situations, affected groups may have difficulty voicing their concerns. For example, ethnic, religious, gender and racial boundaries may make it difficult for some groups to come forward. Those living in remote areas, such as indigenous peoples, may lack the necessary language skills, information, or knowledge of how to "work the system." The poor and powerless, including urban informal sector workers, may not have any, or adequate, representation. Part of the EA consultation process is to work around these barriers to make contact with affected groups.

#### **Representatives for Affected Groups**

There are generally a variety of people and organizations that act as representatives for affected people. These representatives include a wide array of individuals and groups that can provide information and act as advocates and spokesmen for their constituencies, which may be affected groups or interested parties. Examples of such representatives are:

- **public representatives**, such as state and provincial government representatives, local officials, village councils and other elected leaders;
- **traditional authorities**, such as village headmen, tribal elders, religious leaders and other clergy;
- local organizations (including NGOs), such as local community development or users' groups, kinship societies, recreational groups, neighborhood associations, labor unions, gender groups, ethnic organizations, cooperatives, etc.; and
- private sector representatives, such as private business interest groups, trade associations, or professional societies.

Cultural and political variations from one project site to another will determine which of the possible representative groups would be the most effective in communicating the views of the affected groups to the borrower. Representative groups can perform numerous roles, such as organizing the means of communication; helping plan and set goals; making resource management more efficient; and reducing the risk of protracted conflict, breakdown of consultations or harm to those involved (if the political or social situation is volatile).

#### **Other Interested Groups**

There are a wide variety of other groups that may not be affected by a project, but still have an interest in the project and its impacts. These groups should not be surrogates for local and directly affected groups, but they may have important information and resources at their disposal. Involving them early on can often help identify key concerns and opportunities, but consultation with and participation by these groups should generally be less than with affected groups. These groups may include:

- national or international NGOs, usually concerned with a particular issue (e.g., biodiversity conservation, family planning, technology transfer, energy conservation, agricultural development, human rights, or indigenous peoples);
- universities, research, or training programs, which may have expertise or a general interest in the project, its impacts and development; and
- scientists and experts in a particular field, whose knowledge can contribute to project development.

#### **Elements of Effective Consultation**

The success of the consultation process is influenced by the appropriateness of the *consultation framework* and the *enabling environment* (see Box 5).

#### **Consultation Framework**

Clear agreement on "the rules of the game" at the start of the consultation process encourages respect and trust among the participants. It is therefore useful to establish during scoping, a recognized Consultation (and/ or Participation) Framework for the EA process. The Framework will define the what, when, who, where and how of the consultation process. For example, the Framework should clarify what issues should be taken up with the different groups and at which stages of project planning. If the decision to carry out a project has already been made, this should be clearly stated at the onset of the process. The Framework will determine:

- the issues to be addressed and those not under discussion;
- the **time framework** for the consultation process (duration and times of the year);
- the sampling of participants (whom to include), their legitimacy and representativeness;
- the **setting and location** for the consultative meetings (e.g., capital cities, rural communities, town halls, market places, or centers for women's organizations);

#### **Box 5. Effective Consultation**

Effective consultation is characterized by:

- wide dissemination of information before consultation begins;
- development of a Consultation Framework;
- use of two-way communication with, and wide sampling of, affected people;
- provision of feedback on results of consultation to participants;
- modification of project; and
- development of participation plans.
- the **consultation methods** (e.g., mapping, models, interviews, surveys, focus discussion groups, panel discussions); and
- the documentation and dissemination methods, including feedback to those consulted (e.g., through leaflets, meetings, letters, and electronic and print media).

The setting for the consultation process is important and should create respect, familiarity and trust, so that individuals and groups feel free to talk frankly. This includes using interviewers familiar with the local culture and language, holding meetings in community halls rather than bringing people out to central places they may be unfamiliar with, or perhaps holding separate meetings for men and women or for those that are poorer than the rest of the groups.

During identification of participants for the consultation process, the Bank should consider the representativeness of units or persons within the project organization responsible for information dissemination, consultations and, as appropriate, participation. The unit or person(s) should have, or be given, the authority to make firm commitments on issues that bear directly on project design and implementation.

There are many methods available for gathering opinions and engaging people in a dialogue. Since not all of the issues are known prior to data collection, and since people are being asked to anticipate the consequences of something unfamiliar to them, at least some of the methods should be designed to encourage people to respond freely and take the discussion in directions that may not have been anticipated by the researchers.

A flexible approach to project preparation and implementation may be important, particularly in projects that require a high degree of participation. Flexibility does not mean that the projects would be designed and implemented in an ad hoc manner; in-

## **Box 6. Revised Bank Policy for Disclosure of EA Documents**

Under the new policy (1993) for disclosure of information (OP 17.50 and BP 17.50), all EAs of category A projects will be made publicly available at Bank headquarters and in field offices after the borrower government releases them locally, prior to appraisal. For IDA projects, if the government objects to the release of an EA report, the project will not be appraised. For IBRD projects, the Board of Directors will decide whether or not the project will move forward in the event that the government objects.

Environmental analyses of IBRD category B projects will be summarized in the Project Information Documents (PIDs), which are factual descriptions of individual projects under preparation. PIDs will be produced for all projects that reach the IEPS stage prior to initiation of the project preparation phase. The PIDs will be made available at the Bank's Project Information Center (PIC) and updated as project preparation evolves. If separate environmental documentation is prepared for IBRD category B projects (i.e., not as part of the regular Bank project documents), borrower consent is needed on a case-by-case basis for release.

For IDA category B projects, if the environmental analysis is in a separate report, it will be made available at Bank headquarters (PIC) once it is released locally, prior to appraisal. If the borrower government objects to the release of the environmental analysis, the Country Director will decide whether to move forward with the project. If there is no separate report, the environmental analysis will be summarized in the PID, as for IBRD projects.

stead it means that special attention should be given to setting up mechanisms for communication and feedback, and allowing for adjustments to be made over the course of preparation and implementation.

The requirement for information disclosure is also an important part of the Consultation Framework. In August 1993 the Bank revised its policies and procedures on disclosure of information generally, expanding the range of publicly available documents both locally and from Bank headquarters. Box 6 describes the implications of these revisions for EA work.

#### The Enabling Environment

Experience to date points to the importance of the following factors in carrying out effective consultation processes:

- · appropriate legislative framework;
- capacity to carry out consultation;

- adequate resources; and
- social science expertise.

**EA legislation.** Without such a legislative framework, public participation in EA is often difficult. In Africa, countries that have prepared National Environmental Action Plans have all placed passage of EA legislation high on their policy agendas. Experience suggests however, that well-designed projects can promote effective consultation even in the absence of specific EA legislation.

In the Philippines, environmentally critical projects must prepare an Environmental Impact Statement in order to secure an Environmental Compliance Certificate. It is the responsibility of the agency proposing a project to secure the social acceptability of a project *before* a compliance certificate is issued. This legislation was found to be particularly useful in the Leyte Geothermal Project, which carried out an intensive information campaign for community officials, community development officers, local universities and private sector groups.

Local capacity. Experience demonstrates the importance of local capacity to carry out consultation and participation. Countries in which effective EAs were conducted had strong national institutions that could take on the management responsibility for the consultative process, which sometimes took 6-12 months. Task managers also found that while international consultants could play a useful advisory role in setting up the process, the key players needed to be in-country. Many task managers felt the need for training, so that they could knowledgeably monitor the consultative processes being proposed and carried out by local agencies. Task managers might consider arranging joint training for their local counterpart agencies and themselves. This would enable them to monitor better and also increase the level of mutual understanding.

Adequate resources. Conducting adequate consultation will incur costs for in-country activities and for the time and travel of task managers and other project staff. The costs will vary, of course, according to the project setting and the chosen methods and intensity of consultation; but in most cases, consultation accounts for a mere fraction of total project preparation costs and a small percentage of EA preparation costs. However, exact figures usually are not available, as most borrowers do not treat consultation as a separate item. In one known case, Malawi Power V (*see* Box 1), the cost of consultation was approximately US\$30,000.

**Social science expertise.** Experience also suggests the importance of drawing upon social science expertise. The EAs in Bank experience that have been conducted in more participatory ways have included so-

#### Box 7. Roles for Social Scientists

The skills of social scientists are needed to manage the EA consultation and participation process. There are four primary areas where these skills are most used: (1) identification of participant groups, stakeholders and other social groups in the project's area of influence; (2) design of consultation/participation strategies; (3) design of mechanisms for conflict management and resolution; and (4) institutional analysis.

**Identification of relevant groups.** The social scientist can serve a vital role in defining the key parameters about who should be consulted, including affected groups and their representatives, and how they should be consulted. Methods for this can include: social surveys, participant observation, mapping, discussion groups interviews with authorities, and socio-cultural profiling.

**Consultation/participation planning.** Based on detailed knowledge of the project and the affected groups, a social scientist can design a process for consultation and participation throughout the project cycle. Who will be involved? How will their ideas be elicited? What, when, and how will decision-making authority be delegated to them? Tasks may include: defining processes for information flow, including public relations campaigns; analyzing stakeholder concerns; leading a participatory rural appraisal; and planning for and with animaters or facilitators.

**Conflict management and resolution.** The objective is to define traditional mechanisms for making agreements, for negotiations, and for managing conflict in affected communities. Understanding and working within cultural expectations and practices may enhance consultation and participation processes, especially in projects where there are multiple and competing stakeholders or where disputes or conflict are evident.

**Institutional analysis.** It may be essential to analyze the capacities of and relationships among groups involved in project design and implementation, especially in complex projects with many actors. Such analysis includes: the strengths of organizations; their ability to act as effective representatives of affected communities; and the relationships among groups, such as information flows and decision-making authority. In such projects, recommendations can simplify complex institutional structures and improve coordination. cial scientists on the EA teams. These social scientists were involved in the process from the beginning and contributed in the ways described fully in Box 7.

#### **Issues and Risks**

Most of the issues and risks from having consultation and participation in projects can be avoided with sound planning. Perhaps more importantly, the *lack* of consultation and participation may pose a much greater risk to projects in the long run. Numerous studies of World Bank and other projects confirm that it is possible to include consultation and participation in large-scale projects without incurring substantial delays. Below is a list of the most common risks and how to avoid them.

- **Delays and excessive costs** ensue when projects have to "backtrack." Developing sound mechanisms to provide information on the project and elicit feedback early in the project cycle can avoid more costly design changes later on. Excessive costs are less likely to result when consultation (and participation) is planned and organized as part of a process.
- **Raising anxieties and expectations** prematurely may result from insufficient consultation. Unsubstantiated fears that projects may cause adverse impacts and false hopes that projects will bring benefits arise from lack of clear information. The best way to reduce this risk is to provide adequate information early on.
- **Politically volatile situations** may make consultation and participation more difficult, as people may be less inclined to speak out. Sensitivity and discretion are required where local representatives find themselves at risk when or if taking part in consultation. The safety of consulted parties should always be of utmost concern to the Bank, and the Bank should always ensure that borrowers are fully aware of this concern.
- **Capturing of development resources** by people they are not intended for can be reduced by checking whether representative and interest groups really do reflect the perspectives of affected groups. International NGOs may not accurately reflect the perceptions of their national counterparts. National NGOs may not accurately reflect local views. Developing a process that consults with each level helps to ensure that benefits are captured to a greater extent by those for whom they are targeted.

**EA SOURCEBOOK UPDATE** is designed to provide the most up-to-date information on the Bank's policy and procedures for conducting environmental assessments of proposed projects. This publication should be used as a supplement to the *Environmental Assessment Sourcebook*, which provides guidance on the subjects covered in Operational Directive 4.01. Please address comments and inquiries to Olav Kjørven, Managing Editor, EA Sourcebook Update, ENVLW, The World Bank, 1818 H St. NW, Washington, D.C., 20433, Room No. S-5123, (202) 473- 1297.