

**STAKEHOLDER PARTICIPATION TO IMPACT  
ASSESSMENT AND FOLLOW UP:  
A SOURCE OF EMPORWERMENT OR AN OTHER WAY TO  
NEGOCIATE PROJECT ACCEPTANCE?**

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**BACKGROUND INFORMATION**

I will very briefly present the highlights of a research project about the participation of stakeholders to the evaluation and the follow-up of an industrial project. The project is the construction of an aluminum smelter in the town of Alma, located in the region of Saguenay – Lac Saint-Jean region (Quebec).

The Alma industrial complex is a big project in every sense of the word. It covers an area of 95 acres and required an investment of \$2.9 billion (Canadian) which made it one of the largest private investments in North America at the time. The construction started in March 1998 and lasted 40 months. At the peak of the construction, 4,500 construction workers were on the building site. Production at the aluminum smelter began in started in 2001 and gradually increased to full capacity, 400 000 MT of aluminum ingots a year. It employs 865 people.

## **ENVIRONMENTAL ASSESSMENT PROCEDURE**

The Alma complex is one of the first industrial projects that went through the Quebec environmental impact assessment procedure. Included in this administrative procedure is the obligation for the promoter to do an environmental impact assessment following the directives of the Minister of Environment. The impact assessment report is made public only after the ministry has delivered a notice of conformity. At this time either individuals, groups or municipalities can ask the Minister to hold an inquiry and a public hearing on the project. The hearing is then conducted by the *Bureau d'audiences publiques sur l'environnement* (BAPE), a governmental agency specifically created for that purpose.

## **GOALS OF THE RESEARCH**

The study analysed the participation of stakeholders in the Environmental Impact Assessment (EIA) procedure, including the follow-up stage. We wanted to find out to what extent participation of stakeholders in the process:

1. contributes to the identification of environmental and social impacts in the planning and management of an industrial project;
2. helps in the dialogue between the various stakeholders,
3. contributes to a more equitable arbitration of conflicting interests,
4. contributes to a better distribution of power among stakeholders in the sense of providing social control over changes at the local level.

Our approach is in keeping with the concept of *sustainable development* and related notions of *empowerment* and *social capital*. The hypothesis of our study was that EIA and related participation measures promote sustainability by inducing *empowerment* as well as the building of *social capital* at the local level.

In order to verify our hypothesis, we conducted a five years study, in real time, throughout the different stages of the EIA, including the follow-up stage. We analyzed four participation measures: the consultation held by the promoter on scooping, the public hearing held by public authorities on the impact assessment report and the work of two follow-up committees.

## **RESULTS**

Our findings about the impact of the stakeholders' participation to the process as regards our hypothesis are not very conclusive. Two types of reasons explain the results. One is related to the conduct of stakeholders in

the context of that specific project, and the other one is related to the EIA process itself as well as the participation measures.

### **1 - Stakeholders conduct**

First, it is important to mention that the aluminium smelter project was perceived by the community as essential to its survival, and as such benefited from a high level of social acceptance. This social acceptance was expressed throughout the consultation process and at various times during the construction. In short people were saying that:

If the promoter is willing to build its plant in partnership with the community, that is, to be transparent and share information on the project and participate in the follow-up committees, as well as take actions to maximize economic repercussions by favouring local manufacturers and suppliers, as well as hiring workers at the regional and local level, the community was ready to make sacrifices to ensure the project was possible.

**Moreover, we found that this tacit agreement superseded any consideration that would have risen from the EIA process.**

### **Impact assessment**

Among participants at the public hearing, many tended to minimize the environmental impacts of the project. Some even repeated the argument of the promoter that new technologies reduce atmospheric emissions per ton of aluminums produced, and this, despite the fact that it had been proven that the production capacity of the new plant resulted in an increase in the level of total emissions for certain pollutants, compared to the old plant. Also, many expressed their trust of the promoter and of its ability to deal with environmental issues, insisting on the importance of maintaining a good partnership with the community.

It is interesting to mention that some of the groups or individuals that were the most critical about environmental issues in the community chose not to respond to the promoter's invitation to give their opinion and participate to the public hearings. They considered that the social acceptance level of the project was too high to raise such issues. The fact of the matter was that environmental groups represent a negligible proportion of the participants in the consultations.

### **Follow-up**

After the construction started, the idea that in order to make the project a success the community must be prepared to make sacrifices was particularly present in the public opinion when controversies arose concerning impacts of the project. On one occasion, in response to complains made by a group of residents affected by heavy traffic in a residential area, commentators in the media, political leaders and even members of the environmental follow-up committee said that the protesters were not the only ones affected and that they should be patient, especially since the inconveniences were to last a short period of time.

As far as the environmental follow-up committee was concerned, its members adopted a «wait and see attitude». When we met them privately, some members of the committee explained that this attitude was related to the high level of social acceptance of the project and the pressure felt among members to be tolerant. It is interesting to mention that the members of the committee did not perceived themselves as active participants in the follow-up, but rather as observers. They were observing the actions of the promoter as well as the public authorities which were the ones in charge.

### **Partial conclusion**

**All things considered, those attitudes raise questions about the efficiency of participation strategies based only on individual initiatives and the willingness of stakeholders to express their concerns or opinion openly in a consultation or in a committee.** In our case study, the participation was at best an occasion for economic and political leaders to voice the conditions of the deal which consisted basically in the traditional demands of the community toward the promoter concerning its partnership with the region and its responsibilities in the regional economic development. Also, it was an opportunity for the promoter to find solutions to irritants in the sense of insuring the social acceptance of the project. But, **participation in the EIA did not foster thinking in the community based on analysis of foreseen impacts of the project.**

## **2 - Process**

The high level of social acceptance towards the project is not the only consideration explaining the weak contribution of participation to EIA. The nature of the responses to the participant's concerns made during and after the consultation is also an important issue. **We found that the consultations held on the project had a very limited effect on structuring the impact assessment, and that many concerns raised by participants remained unanswered.**

## **Impact assessment**

First, it is important to remember that, in the Quebec EIA procedure, the considerations raised by participants cannot be taken into account in

structuring the impact assessment, since the hearing is held at the end of the process. The impact assessment and the public hearing result in two distinct reports which the Minister takes into account to make his recommendations to the cabinet.

However, in our case study, following the suggestion made by the Minister in its directive, the promoter did an extensive consultation at the scooping phase. Over 2000 people were met in 45 meetings held simultaneously with the impact assessment. A report has been therefore attached to the impact assessment report counting 839 questions and preoccupations expressed by participants. But we have no indication of how these considerations have been taken into account. From what we can see, based on available documentation, the purpose served by the consultation was not to structure the impact assessment, but rather to answer questions on the project and find solutions to irritants before public hearings.

As far as the public hearing is concerned, after an extensive analysis of the transcripts and other pertinent documents, we counted 84 new concerns raised by participants. But when we looked at the follow-up given these concerns by the invited experts and the commission in terms of analysis, **we found that in fact only 12 had been analysed**. In many cases it would have required new data or new studies which were impossible to make that late in the process. Rather, the commission proposed different types of measures: attenuation, compensation and other follow-up measures. **But many issues remained unanalysed**.

In short, **the public hearing did not add new comprehension on the impact of the project concerning new considerations raised by participants, and therefore did not fill the gap of the impact assessment**

**report, particularly concerning considerations related to public health and social impacts.**

### **Follow-up**

At the follow-up phase, the problem was noticeably the same. It is pertinent to mention that the scope of the follow-up committees' work was limited to surveillance of conformity to the application of the conditions established in the governmental decree authorizing the project, including regulations and attenuation measures. **The committee did not set any process for impact follow-up *per se***, that is, a process to identify and analyze impacts that result from changes that had not been anticipated, or changes that had been anticipated but misevaluated in the impact assessment report. Rather, the work of the committee was integrated to the communication strategy of the promoter, which consisted in processing complaints addressed directly to its community relation office or through the committee. In short, the committee played a limited role of liaison.

**The absence of a systematic identification and evaluation of impacts is not without consequences.** As an example, following the complaints received about heavy traffic in residential areas, the committee proposed some attenuation measures to increase security and to reduce inconveniences. Measures had been taken to reduce and enforce speed limits and new schedules were implemented to limit transport activities to certain hours. But no systematic evaluation of impacts had been made. Changes caused by the increase of traffic, like the high level of noise, the air contamination by dust, the security of resident, and the social consequences of these changes, like the loss of sleep, the increase of stress, the changes in living habits or the risks of increased accidents had not been documented or



evaluated. Even if nothing could have been done because it was hardly possible to stop circulation, which would have resulted in slowing or interrupting the construction work already on a tight schedule, the information about impacts of heavy traffic could have contributed to avoid the isolation of residents who decided to voice their dissatisfaction in the community, which then considered them as capricious or even traitorous people.

## Conclusion

In conclusion, our findings show, as *Kothari* defended in an article published in 2001, that participation :

- can encourage a reassertion of control and power by dominant individuals and groups, that,
- it can lead to the reification of social norms through self-surveillance and consensus-building, and that,
- it purifies knowledge and the spaces of participation through the codification, classification and control of information, and its analysis and representation.

The results of our research show the imperfections of participation strategies when based solely on individual initiatives and the willingness of stakeholders to express their concerns or opinions openly in a consultation or in a committee. It shows the necessity of finding other ways to make stakeholders participate to environmental evaluation and follow-up. It also reaffirms the importance of adopting methods that allow the integration of stakeholders' concerns within the process of environmental impact assessment and follow-up. Multicriteria decision aid methods can be used advantageously to integrate stakeholders' value systems in the process of impact assessment and follow-up. Also, social impact assessment, which uses a large range of inquiries methods, is an excellent way to voice considerations that would not be otherwise expressed in a consultation.

Besides, it is important to remember the distinction made by *Freudenberg and Olsen*, in an article written in 1983, between information on opinion which we find in consultation reports and information on social

consequences which can be obtained with the help of stakeholders through the application of proper social impact assessment methods.

**Without an approach to really integrate the concerns of stakeholders in the environmental impact assessment and the follow-up process, and to establish a real follow-up procedure that does not only verify conformity to the established plan, the contribution of stakeholders will remain very limited and will cause distrust in participative processes.**