

MEASUREMENT

The purpose of this agenda item is to have a general discussion about the approach to measurement used in the Protocol, prior to examining the measurement of the economic, technical and governance aspects of Sections A and B.

To support these discussions, the following information is compiled below:

1. Ratings by Forum members on the adequacy of measurement of the Section B aspects from the results of Survey 1.
2. Comments provided by Forum members in Survey 1 that relate to measurement.

Some conclusions and observations that can be drawn from these ratings and comments are:

- There is generally a low to very low level of consensus amongst Forum members on the adequacy of measurement of the Section B aspects. For some aspects, the ratings on adequacy range from 9 (extremely adequate) to 2 (somewhere between partly and not at all adequate).
- Some Forum members feel that there is too much emphasis on process and not enough on performance.
- Some Forum members feel that the system is too subjective, and there is a need for more quantitative approaches, technical guidance, and links to international standards.
- Some concerns are raised about ranking and weighting of aspects, and it is noted that a project could fail on some aspects but still get an overall satisfactory score.

Some proposals that were put forward in the survey comments are:

- Revisit the scoring system and develop guidance on total scoring.
- Incorporate a requirement that agreed important aspects must attain a score of at least satisfactory if the project is to be passed as a whole.
- Incorporate statements of simple goals.
- Ensure a clear connection between the Guidelines and Protocol by making one document.
- Produce a technical assessment protocol or manual to better inform assessors.
- Provide technical advice on what is meant in practice by phrases used in the Protocol (e.g. environmental flows, strategic environmental assessment).

QUALITY OF MEASUREMENT OF SECTION B ASPECTS
Results of Survey 1 of Forum Members

Note that the technical, economic and governance aspects are circled.

Adequacy of Measurement		Ave	Consensus	Min	Max
B11	Safety	7.0	M	5	9
B12	Cultural heritage	6.8	L	3	8
B4	Operational reliability & efficiency	6.5	VL	2	9
B20	Water quality	6.5	L	3	8
B19	Sedimentation & erosion	6.4	M	4	8
B6	Site selection & design optimisation	6.3	M	4	8
B15	Construction impacts	6.2	L	3	8
B16	Land mgmt / rehab	6.2	L	4	9
B10	Public health	6.2	L	3	8
B7	Community & stakeholder consultation / support	6.1	VL	3	9
B13	Environmental impact assessment / mgmt	6.1	L	3	8
B9	Impacts on directly affected stakeholders	6.1	L	3	8
B3	Additional benefits	6.1	L	3	8
B8	Social impact assessment / mgmt	6.1	VL	3	9
B2	Economic viability	5.9	VL	2	8
B5	Project management plan	5.8	VL	2	8
B14	Threshold & cumulative impacts	5.7	L	3	8
B17	Aquatic biodiversity	5.6	VL	2	8
B1	Political risk / regulatory approval	5.5	VL	2	9
B18	Environmental flows / reservoir mgmt	5.4	VL	2	8
Average		6.1			

(key for importance of aspect rating: 9 = extremely, 7 = very, 5 = reasonably, 3 = partly, 1 = not at all)
 (key for consensus rating: VH – 1 pt between min/max, H – 2 pts, M – 3-4 pts, L – 5 pts, VL – 6 or more)

1 aspect with average score 7 or above:

B11: Safety (medium level of consensus)

13 aspects with average score between 6 and 7 (majority have a low level of consensus)

6 aspects with average score below 6:

- B2**: Economic viability (very low consensus)
- B5**: Project management plan (very low consensus)
- B14: Threshold and cumulative environmental or social impacts (low consensus)
- B17: Aquatic biodiversity (very low consensus)
- B1**: Political risk and regulatory approval (very low consensus)
- B18: Environmental flows and reservoir management (very low consensus)

PROTOCOL ASPECT MEASUREMENT Comments from Survey 1 of Forum Members

References to the scoring system as a whole:

- The scoring system is an essential feature.
- Need to revisit the scoring system and develop guidance on the total scoring

References to subjectivity:

- Subjective nature of the criteria
- The scoring criteria may have to be enhanced by using quantitative or measurable parameters
- The scoring system may have to be enhanced by using quantitative or measurable parameters.
- The Protocol sees sections B and C as relying on objective evidence and yet the quality and process of development of this evidence base is key to meaningful scoring.
- At the moment the Protocol does not outline any benchmarks or clarity for the user (and reader) on what would constitute best practice. As such while the expectation is that assessments are made on objective evidence there is a real subjectivity embedded in interpretation of the criteria.
- The assessment of some aspects is lacking scientific foundation. For example, the assessment of environmental flows B18 emphasizes the community and regulator support instead of scientific methods or standards. The Protocol should employ national / international technical standards in the assessment of some aspects.
- Repeated reliance on “regulatory support” as a performance indicator places undue reliance on the quality of the regulator, which will vary greatly from jurisdiction to jurisdiction. Similarly the reliance on plans gives little indication of the quality of the planning process, including community engagement. Eg. Many EISs are not public – the content may or may not be comprehensive, but the degree of community quality control and ownership is often very low.

References to ranking, weighting, passing scores:

- Ranking, weighting of aspects?
- A major flaw in the current assessment protocol is for a project to be able to score well on economic and operational criteria, flunk social or environmental criteria and still pass. This is a major issue HSAF needs to address. Surely a pass should require at least an adequate level of performance in each sector.
- As it stands today, a project can achieve satisfactory status even if some of the major important aspects on the social or environmental side are not satisfactory. This is because all 20 aspects are given equal status or weighting. Although it may be difficult to agree on a weighting system for the individual aspects, perhaps a way

around this is to require that agreed important aspects must attain a score of at least satisfactory if the project is to be passed as a whole.

References to process versus performance:

- All elements are process focussed.
- Process vs outcomes: SAP as it stands overly emphasises process assessment

References to incorporation of goals:

- Many of the criteria could be scored better if there were more quantifiable outcome goals. Eg. if the guidelines included common goals like: i) representative and viable examples of each ecosystem type are conserved and ii) viable populations of all flora and fauna are conserved; then much more quantifiable performance measures are possible.
- What is not clear are what are the ideal outcomes that are sought (by contrast with certification systems like the MSC & FSC). Can these be summarised as simple goals, eg:
 - Legitimate energy needs are met;
 - Energy is produced in an economically efficient way;
 - Local peoples social and economic status is improved as a result;
 - Representative and viable examples of each ecosystem type are conserved;
 - Viable populations of all flora and fauna are conserved;
 - Greenhouse gas emissions are minimised.
- Clear connection between the Guidelines and the Protocol. This could be made one document – ensuring a ‘seamless’ link between the two.

References to need for better technical guidance, standards, best practice examples:

- The nature of the issues and brief format of the assessment protocol means that many of these aspects are measured in a general and qualitative manner. Could a more technical assessment protocol or manual be produced in future to better inform assessors? Eg. How do you distinguish between “very large gaps, large gaps, minor gaps, good planning, and comprehensive planning”? What are “moderate impacts”?
- Absence of key words and concepts: for example resettlement, free prior informed consent, livelihoods. Having a ‘core concepts’ or ‘areas of concern’ section which is supported by recognized standards, guidelines or best practice examples could be a useful addition to the auditing guidance notes.
- Practicality and cost-effectiveness versus high standards and international consistency and credibility.
- Many aspects use the right language but the technical advice on what this means in practice is missing or requires elaboration and case studies. Examples: strategic environmental assessment, environmental flows.
- Statement of standards and processes used, and a formalised ‘peer’ and/or independent assessment. Ongoing monitoring and reporting; consideration of grievance and/or complaints mechanism to ensure ongoing ‘sustainability’ measurement.