

## Introduction

This paper focusses on the overall Protocol structure. This is presently represented in Figures 2 and 3 in the HSAP Draft1 Final Introduction (Forum Mtg 9 Paper 4a). Comments on these figures raised during the redrafting of the Protocol introduction include that these figures could potentially be combined, that they are somewhat outdated, and that decommissioning is not very well addressed by a Section I assessment.

These figures in the Protocol Introduction would need amendment depending on how the Forum responds to some of the issues summarised below.

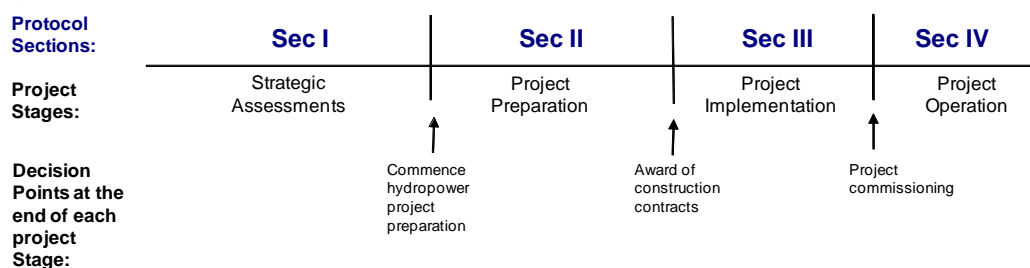


Figure 2 - Protocol Sections and Major Decision Points

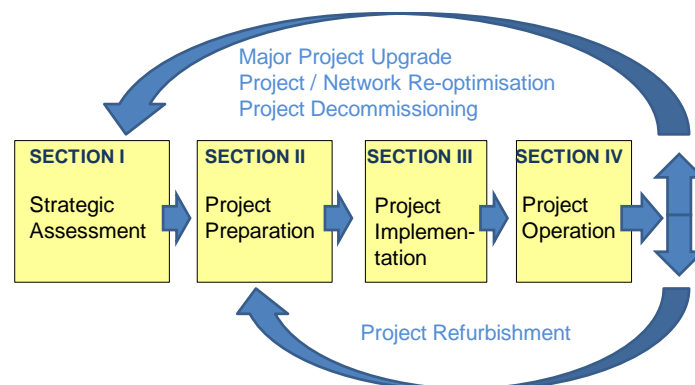


Figure 3 - Protocol Sections and the Project Life Cycle

## Section I

A number of concerns were raised in the HSAF Phase 2 Consultation with Section I, noting that it is quite different in nature than Sections II, III and IV, and that at this stage of the project life cycle it is difficult to score or obtain a sustainability profile for a hydropower project.

A number of issues relating to Section I are summarised in Forum Mtg 9 Paper 10. Pertinent issues at this strategic assessments stage include confidentiality of investigations and deliberations of a potential developer, absence of available evidence, roles of the developer versus government and lack of clarity about who or what is actually being scored, the widely

diverse national approaches to an emerging hydropower project at this very early stage, potential misuse of such an assessment, etc.

A major concern was the relative conceptual immaturity of development of this section relative to sections II, III and IV of the Protocol. Discussions on Section I consumed considerable Forum member attention at Forum meetings 2 to 5, and to avoid it obstructing progress on the less conceptually challenging sections relating to a specific hydropower project development (Sections II, III and IV) it was agreed that Section I would be placed after these other sections on the Forum meeting agendas. As a consequence it has not enjoyed the level of review and discussion that the other sections have had during Forum meetings 6 through 8, nor in the interim webinar meetings.

A strong message from Forum members has been that a Strategic Assessments tool is essential to be part of the Protocol package of documents, but there has appeared to be a willingness to explore alternative scoping approaches. At Forum Meeting 8 a Forum Working Group was formed to develop proposals on how to address the significant concerns that have been raised with Section I. During the redrafting the Forum members tested tightening the section to a confidential tool to be used by potential developers to evaluate a project they might be considering investing in. However this approach while potentially workable has not achieved strong support by Forum members and reference groups, and represents a major compromise in providing a tool that could be used by other users.

Many of the IHA Reference Group concerns are alleviated if Section I is treated differently than Sections II, III and IV, particularly with respect to assigning scores. A proposal from the IHA Reference Group is that Section I provides important guidance but does not include a scoring process, and consequently is referred to as Guidance Document rather than an Assessment Protocol. An alternative proposed is that Section I considerations are built into the Protocol Supplement (see below) if a consensus approach on it as a stand-alone Protocol document cannot be agreed.

## **Section IV**

The name and scope of application of Section IV is also something that will need to be taken into account in the Protocol Introduction and in Figures 2 and 3. At the Section IV stage, there is no longer a project, but an operating facility. A name change to Facility Operations or Operating Facility is proposed. It is noted that the focus is not just about how the facility operates, but how commitments made during project preparation have been handled and delivered.

Ongoing concerns with Section IV are summarised in Mtg9 Paper 8, with the applicability to older projects being the major one. If these concerns are not alleviated, it may be necessary to limit the scope of applicability of Section IV to those that have been commissioned since launch of the Final Protocol.

## **Protocol Supplement**

The other important overall structural issue that the Forum needs to consider is a proposed Protocol Supplement, provided in Forum Mtg 9 Paper 11.

In the redrafting process since Forum Meeting 8, Protocol Sections II, III and IV have been much more directly tailored towards the considerations of assessors and project representatives who would be the primary users during an assessment process. Consequently much of the rich information contained in the Draft Protocol assessment guidance notes has been moved into a Supplement so that it is not lost. It is felt that this

provides a rich educational reference or source book for the Protocol. Whilst it has considerable potential to be further developed, which is unlikely to be achieved in the present Forum process, it is important to show the relationship to the other Protocol documents.

## **Protocol Introduction**

Finally, the third significant overall structural issue is that many comments on the Draft Protocol documents were not in favour of the Introduction being at the front of each of the Protocol sections, and were more in favour of it being a stand-alone document. Only content important to the assessor and project representatives in assigning scores are proposed to be included in the Protocol section documents.

## **The Hydropower Sustainability Assessment Protocol**

At this stage in the Forum process, the Forum is now considering six separate documents instead of the four shown in Figures 2 and 3 in the Protocol Draft1 Final Introduction:

- HSAP Introduction
- HSAP Section I Strategic Assessments
- HSAP Section II Project Preparation
- HSAP Section III Project Implementation
- HSAP Section IV Project Operation
- HSAP Supplement

## **Proposal: The Hydropower Sustainability Assessment Framework**

A scenario that could address all issues raised could be to refer to the overall package of documents as the **Hydropower Sustainability Assessment Framework**, with six components.

Proposals are put forward for refinements in document names that appear to respond to concerns and suggestions.

- **HSAF Overview** Document
- Hydropower **Preliminary Screening** Guidance Document
- Hydropower **Project Preparation** Assessment Protocol
- Hydropower **Project Implementation** Assessment Protocol
- Hydropower **Facility Operation** Assessment Protocol
- **HSAF Sourcebook**

Section numbers are removed, but labels still clearly reflect the evolution of the project life cycle. Terms in bold can be used for “short-hand” references to these documents, and any coding (e.g. instead of Topic II-1 it could be Topic PP-1).

Future assessment protocols such as pertaining to decommissioning or river basin assessment could easily fit into this framework. Similarly, a future HSAF website and educational tools could also fit into this framework.

A graphic proposal reflecting this Hydropower Sustainability Assessment Framework vision will be presented at Forum Meeting 9.

**Decision Points:**

- Present the package as a “framework”?
- Remove Section numbers and references to sections?
- Treat Section I differently?