

Ref No.	Issue and specific comments	Analysis
	High level issues	
	<p>Wide support for HSAF aims and objectives</p>	<p>One of the main messages from the consultation is the wide ranging support for the Protocol's aims and objectives. Other than a relatively small number of less supportive voices, there appears to be support from a wide range of stakeholders for a mechanism that allows a user-friendly but comprehensive approach to the assessment of sustainable hydropower. A number of stakeholders felt that the Hydropower Sustainability Assessment Protocol (HSAP) was a timely document; others commenting that rather than creating barriers or hurdles, the HSAP would add value to a scheme.</p> <p>Opponents ranged from stakeholders from both civil society and the hydropower industry sectors. Civil society stakeholders opponents have tended to focus on specific aspects of the Protocol (e.g. re-settlement and conflict resolution) whereas those from hydropower sector were concerned that the Protocol may be used by Civil Society as a means to prevent the go-ahead of hydropower schemes.</p> <p>Whilst there is support for the Protocol, it is clear there is confusion over how the Protocol follows on from the World Commission on Dams (WCD). This comment was typical of stakeholders who were learning about the HSAF for the first time.</p> <p>Furthermore, there was criticism that the Protocol may be watering down the WCD and UNEP Dams for Development processes. It was suggested the HSAF make clear how the Protocol follows on from WCD.</p>
	<p>Conflicts with/duplicates other standards, regulation and evaluation processes</p> <p>Specific comments include:</p> <ul style="list-style-type: none"> • Mirrors the EIA and therefore seen as a waste of time and resources • May duplicate requirements of lending IFIs. • Duplication with national laws and 	<p>A number of stakeholders from more than one consultation method supported the view that the Protocol may mirror existing management and evaluation processes.</p> <p>One stakeholder expressed concern that local/regional project assessment processes should not be replaced by the Protocol. Several stakeholders felt that the Protocol should link to and not replace or replicate other processes such as EIA and development planning processes.</p> <p>Protocol may duplicate some or most of requirements of lending institutions such as the World Bank's 'Operational Policy 4.01', Inter-American Development Bank ('Fundamentals of Environmental Impact Assessment, 2002'), Asian Development Bank ('Environmental Impact</p>

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	regulation	<p>Assessment for Developing Countries in Asia, 1997') etc. It was suggested a cross-references of the Protocol's checklists and requirements be developed with respect, as a minimum, of the World Bank's Operations Policy 4.01. This would be intended to facilitate use of the Protocol in submittals to lending institutions and regulatory authorities.</p> <p>There is concern that there is overlap with national laws and regulation- standard should not challenge or conflict with regulation. In some countries, extensive legal requirements exist covering the full project lifecycle. Some stakeholders are concerned this creates extra work when they already have to do much to meet existing regulatory requirements.</p> <p>A suggestion was made that auditors conduct a project specific and host-nation specific assessment of the relevance of aspects or attributes. The host-nation specific assessment should consider the national context, including existing policies and regulation and energy planning.</p> <p>The Protocol should clearly demonstrate how it complements or is differentiated from existing standards, regulation and processes, and where it can add value as a development planning tool (particularly in countries with stronger regulatory environment).</p>
	Should be linked to set of core sustainability requirements	One stakeholder suggested that the HSAP has potential to inform public policy decisions. To do this, it would need to explicitly link the 39 criteria (aspects) to a set of core sustainability requirements to give various stakeholders confidence that the HSAP builds on a strong intellectual foundation. Stakeholders might learn more from working with fewer, but more absolute criteria and indicators. (1)
1	Practicability and Ease of Use	
	<p>Protocol not practical and not easy to use</p> <p>Specific comments include:</p> <ul style="list-style-type: none"> • Overwhelming • Too complex • Too many attributes asking too 	<p>A large number of stakeholders across almost all methods of consultation questioned the practicability and ease of use of the Protocol. This issue is one of the most important for the HSAF to address.</p> <p>One stakeholder described the Protocol as 'daunting' and the complexity of the assessment method may put certain stakeholders off from using it, especially for small and medium sized</p>

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	<p>many things</p> <ul style="list-style-type: none"> • Difficulty of conducting a robust audit in such a short timeframe • Complexity may limit public participation • It has lost much of the simplicity that were strong merits of the 2006 IHA Protocol. 	<p>hydro scheme where a less comprehensive assessment might be required.</p> <p>The Protocol appears focused on larger hydro schemes and needs to be adapted for small and medium sized hydro schemes (pp. 9, Phase I Outcomes Report).</p> <p>One stakeholder felt that the length and complexity of the Draft Protocol (39 Aspects and >200 indicators requiring a score) may limit informed public participation. Furthermore, there is a risk that when answering dozens of indicators, some key sustainability criteria get lost.</p> <p>A number of stakeholders felt that in certain sections of the Protocol data is required that is not already collected. One stakeholder felt it would be unrealistic for developers to suddenly create a lot of new information just to meet the Protocol needs.</p> <p>The message was that there was so much content and complicated structure that the key issues were just lost. They felt for each aspect it should be assessing: Do you understand the issues? What are you doing about them? Is it working? And only for the big ticket issues, not for everything. (Hydro Quebec – interviewer comments).</p> <p>Reducing the number of attributes to make the Protocol more stream-lined and less overwhelming was a point raised by a number of stakeholders.</p> <p>Several suggested redrafting the protocol into a checklist or a series of questions for auditors would facilitate assessment.</p>
	<p>Confusing language and terminology</p> <p>Specific comments include:</p> <ul style="list-style-type: none"> • Need to use plain language, terminology can be confusing • Ambiguity in wording 	<p>Related to the above criticism that the Protocol is impractical and not easy to use, some stakeholders criticised the language and terminology. This was of particular concern to those where English was not the mother tongue. This brought into question the issue of translation and the potential for incorrect translation of confusing and complicated terminology. Indeed, one stakeholder commented that an inaccurate translation could lead to barriers in understanding. To address this issue, it was suggested that translation should be undertaken by in-country representatives of the HSAF and other professionals focusing on the accurate translation of specialized vocabulary.</p> <p>One of the regional workshops emphasised the need for plain and simple English.</p>

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		<p>One stakeholder commented on the ambiguity in some of the wording. They suggested a clear, logical and accurate specification of criteria (Aspects) and indicators (Attributes). Some criteria in the Protocol, such as Options Assessment, have been clearly specified. Many others are described in a confusing manner.</p>
	<p>Context</p>	<p>Would be beneficial if the Protocol would mention the non-hydro benefits of schemes i.e. water supply, flood control, irrigation, recreation benefits of reservoirs. These benefits should be recognised in the Introduction and it made clear that the Protocol is only focusing on the hydro components of projects (MWH).</p>
	<p>Level of expertise required for auditors</p> <ul style="list-style-type: none"> Auditors need to be knowledgeable and trained 	<p>A number of stakeholders have expressed concern over the level of expertise required for Protocol auditors. Some have stated that auditors need to be independent, have a broad range of knowledge and skills, and be trained as assessors. One stakeholder noted the the assessment is only as good as the quality of the assessor.</p> <p>Considerable expertise required for auditors to cover the brevity of attributes and aspects (IR criticism) – Others have made similar point.</p> <p>Participants voiced an expectation that auditors would need to be knowledgeable on hydropower, and able to judge the specific project against broad experience for results to be useful in comparing different projects (Ghana).</p> <p>The attendees felt that the practicality and usefulness of the tool depends very strongly on the quality of the assessor. They felt it would be necessary for it to be applied by appropriate experts, and so capacity building for assessors was essential (Mekong).</p>
3	<p>Content</p>	
	<p>Mixed response on the Content</p>	<p>A number of stakeholders felt the range of aspects was thought to cover the important content quite well. It was noted that there were a number of over-lapping aspects.</p> <p>Other stakeholders felt the content was extremely broad and may be regarded as too comprehensive as it tries to be as general as possible.</p>

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		Too many attributes and the number needed to be reduced (IHA Ref group)
	Environmental flows query	<p>A number of stakeholders expressed reservations with the environmental flows aspect. See individual criticisms below:</p> <p>Some concern that references to environmental flows imply that ecosystem needs MUST be met, and that it is encouraging preservation of the pre-project ecosystems (which will inherently change by the very fact of the development so preservation is impossible) (H Quebec).</p> <p>The concern with the environmental flows aspect was that it was unclear what excellent, very good, good etc all meant. They thought the title could be better called “Environmental Flow Objective Setting” to be clear what is the major point of emphasis. Their major concern was that it could be implied that mimicking natural flow regimes was desired for all hydro projects, and that excellent would reflect those power stations that did this. It was clear that having information in the guidance notes up front (e.g. Quality of the Assessment Process, Quality of the Management Process) was too far removed from the aspect for them to understand what the ratings reflected (Man).</p>
	Consent	A number of governmental and industry stakeholders are concerned about the issue of full consent and free prior informed consent going too far; they feel it is unrealistic to ever achieve this.
	Resettlement	<p>A number of stakeholder groups raised issues with re-settlement. Some of the key issues are as follows:</p> <ul style="list-style-type: none"> • Need to align Draft Protocol with World Bank resettlement policy OP 4.12 and consider additional elements. This would mean scoring resettlement in the same way as OP 4.12. • No financial cost for resettlement included in the assessment • Resettlement needs to be culturally-appropriate • Resettlement is omitted from Section IV (Project Operation). The criticism is made that the Draft Protocol ignores the fact that re-settlement extends beyond project

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		<p>commissioning</p> <ul style="list-style-type: none"> • Omission of forced displacement and resettlement in Section I. • The Resettlement Action Plan (RAP) needs further development
	<p>Other specific issues raised by individual stakeholders</p>	<p>Demonstrated need – concept should be expanded</p> <p>Greenhouse gas emissions – needs to be assessed against broader context</p> <p>Gender issues - need to be addressed more specifically</p> <p>Traditional governance systems – no ability to consider how hydropower projects fit in with or create conflicts for traditional systems of land tenure and chieftainship</p>
4	<p>Guidance</p>	
	<p>Generally helpful but desire for clearer guidance</p>	<p>The question of guidance has raised a contrast of opinions. A considerable number of stakeholders are satisfied with the amount and level of detail; others are suggesting improved guidance. In particular, there was an interest in having better explanation in the documents about how the guidance might be used, by whom, and how it relates to existing tools (e.g. SEA, EIA, due diligence, etc.). Another stakeholders are suggesting improved guidance in the following areas:</p> <p>The Draft Protocol does not yet provide enough guidance. Since hydropower sustainability assessment covers a wide range of criteria, expertise in multiple disciplines is important. A multi-disciplinary team of experts, following the HSAP, could produce a credible assessment. In order to do so, they would need a methodology to incorporate the knowledge of marginalized and vulnerable people. Assessments should also make other key sources of knowledge (e.g., hydrologic simulations, economic and financial models) accessible for public review.</p> <p>Introduction and Auditing guidance are helpful but lengthy. Could do with being a bit shorter.</p> <p>Point to explore – guidance on how to deal with stakeholder engagement (MK point)</p>

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		<p>Need for clearer guidance on how to manage conflicting views and perspectives when the factual basis for assessments is being established (Norway NGOs)</p> <p>Need for guidance on how the auditor may secure representative input from local communities (Norway NGOs)</p>
	No clear absolute standards of progressive practice	For some criteria, the Draft HSAP provides more specific or substantive guidance about what is required to meet a standard. In other cases, it provides less:
	Issue with how best to engage with stakeholders	<p>A number of stakeholders raised concerns with how best to engage with stakeholders in the process of Protocol Assessment.</p> <p>One person commented that additional guidance might be useful for hydropower developers, especially for dealing with stakeholders involved in a project. For example, hydropower developers may have limited experience in engaging with stakeholders.</p> <p>Related to the above point, the same person wondered whether developing a Dispute Resolution Strategy before a project commences would be useful. This would be preferable to developing a resolution strategy once a project has started which may cause it to be rushed and ultimately less effective.</p>
	Stakeholder engagement requirements	Various stakeholders questioned whether stakeholder consultation has gone too far and is really required for all aspects. How to assess whether there is stakeholder support needs more clarity, along with how to define who are stakeholders.
5	Scoring	
	Current scoring mechanism unsatisfactory	<p>The current scoring mechanism was perceived as problematic by a considerable number of stakeholders across a variety of consultation methods. In particular, the highly subjective nature of the scoring component of the Protocol was raised as a concern.</p> <p>It was recommended that input be solicited from the World Bank and other IFIs to make sure the scoring is useful and interpretable (links to the point that Protocol should fit in line with World Bank etc EIA procedures, Bg7*).</p>

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		<p>While some argued for less scoring levels, others suggested going back to the 6 point scoring system.</p> <p>One stakeholder group proposed a different scoring scale for financing institutions: a single integrated score for three groups of aspects: economic, environmental and social. The overall result could then be shown in a three-letter format (“AAA” vs. “BCB” rating)</p>
	Scoring masking low performance	<p>There was a fundamental objection from some stakeholders to a scoring approach to assessing sustainability of hydropower projects and a concern about building averages of results.</p> <p>Scoring system could enable averaging to mask areas of low performance (Both Ends).</p>
	Standard setting seen as problematic	<p>The fact that the HSAF has not yet reached agreement on ‘acceptable’ standards for hydro projects made it somewhat difficult to address some of the IR concerns. In HSAF presentations at the beginning of such consultations, it is strongly recommended that it be explained to the interviewees that this point will be a major focus of the next phase of Protocol development.</p> <p>All participants found the meeting useful in improving their understanding of each others’ views.</p>
	Vagueness and subjective nature of the scoring system	<p>Concern that interpretation against criteria is highly subjective, and the scoring using excellent, very good, good etc were still vague. Going to the look up information in the Introduction was too far removed from the aspects themselves</p>
	Scoring change to Section I	<p>It was observed by more than one industry stakeholders that Section I could take a different format to current arrangement. Rather than score each aspect, this could be changed to a Yes/No checklist. It was suggested this would help to identify where there are information gaps and whether there is a strategic need for hydropower.</p>
6	Basic Good Practice	
		Question about whether meeting national laws and regulations be considered a 3

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		<p>Need to clarify what a score of 3 represents</p> <p>Concern that basic good practice in one country is not the same as in another country</p>
7	Proven Best Practice	
		Some stakeholders questioned whether a score of 5 was really achievable
8	Presentation	
		<p>Some stakeholders did not like the circle diagrams because the aggregation of scores meant some weaknesses could be masked.</p> <p>Other stakeholders liked that the diagram could show an overall picture that highlights trade-offs across different aspects. It was suggested that the scores be inversed so that the bullseye had the best practice scores.</p>