## Guidance Note F: Guidance for Preparation of a Public Consultation and Disclosure Plan

## **IFC Consultation and Disclosure Requirements**

- 1. Project sponsors are required to meaningfully consult with stakeholders on preparation and results of the Category A EA and disclose to the public the results of the EA process. Ongoing consultation is also required during the construction and operation phases of the project. Project sponsors should consult IFC's Doing Better Business Through Effective Public Consultation and Disclosure: A Good Practice Manual. The Manual provides guidance on effective public consultation and disclosure techniques for the private sector, in accordance with international good practice.
- 2. A Public Consultation and Disclosure Plan (PCDP) should: (i) describe local requirements for consultation and disclosure; (ii) identify key stakeholder groups; (iii) provide a strategy and timetable for sharing information and consulting with each of these groups during various phases of the project; (iv) describe resources and responsibilities for implementing the PCDP activities; and (v) detail reporting/documentation of consultation and disclosure activities.

## **Key Principles**

- 3. The Plan submitted by the sponsor to the IFC must define a technically sound and culturally appropriate approach to consultation and disclosure. The goal is to ensure that adequate and timely information is provided to project affected people and other stakeholders, and that these groups are given sufficient opportunity to voice their opinions and concerns. Important considerations include:
  - written and oral communications in local languages and readily understandable formats
  - easy accessibility to both written information and to the consultation process by relevant stakeholders
  - use of oral or visual methods to explain information to non-literate people
  - respect of local traditions of discussion, reflection, and decision making
  - care in assuring that groups being consulted are representative (with adequate representation of women, vulnerable groups, and ethnic or religious minorities, and separate meetings for various groups, where necessary)

• clear mechanisms to respond to people's concerns, suggestions and grievances.

## **Contents of a PCDP**

- 4. The sponsor must submit to IFC a Public Consultation and Disclosure Plan (PCDP). The contents of the plan should include the following:
  - a) *Introduction*. Briefly describe the project, including locational and design elements.
  - b) **Regulations and Requirements**. Summarize the in-country, local requirements (i.e., policies, laws, regulations and review processes) for public consultation and disclosure related to local EIA legislation or other aspects of the project.
  - c) Review of Any Previous Public Consultation and Disclosure. Summarize all public consultation and information disclosure undertaken to date, including:
    - the kinds of information disseminated, the forms this took (oral, brochure, report, posters, radio etc.), and the means of dissemination;
    - the location and dates of meetings;
    - a description of the individuals, groups and organizations consulted;
    - an overview of the issues discussed;
    - description of how the issues raised were responded to by the project sponsor, including an explanation if issues were not addressed; and
    - explanation of how these responses were communicated to those consulted and the wider public.
  - d) Stakeholders. Provide an inventory of key stakeholder groups who will be informed and consulted about the project. Stakeholders are persons who are affected by or can affect the outcome of a project. These can be affected communities, local organizations, NGOs and government authorities. Stakeholders can also include politicians, commercial and industrial enterprises, labor unions, academics, religious groups, national social and environmental public sector agencies and the media.
  - e) Public Consultation and Disclosure Program

**Disclosure of Information**: The draft Category A EA must be made available in the

project country as early as possible and not later than 60 days prior to the proposed Board date. The sponsor should proactively disseminate a non-technical summary of the EA findings, in a form and language meaningful to those being consulted, to local stakeholders prior to consultation activities. IFC will release the Category A EA through the World Bank InfoShop as early as possible and at least 60 days prior to Board consideration (regular procedure), Closing Date (streamlined procedure), or management approval date (delegated authority).

Consultation: The PCDP should set out a program for public consultation and information disclosure during the following stages: a) during the early scoping phase, before the terms of reference for the Category A EA are finalized; b) once a draft of the Category A EA has been prepared; and c) during the construction and operation phases. This section should:

- summarize the goals of the program; and
- briefly describe the kinds of methods that will be used to communicate information to each of the stakeholder groups identified in d) above. Methods used may vary according to target audience, for example:
  - mass media, (newspapers, posters, radio, television);
  - information centers and exhibitions, with brochures, leaflets, posters, and reports available;
  - meetings and workshops; and
  - •posters and other visual displays, etc.;
- briefly describe the methods that will be used to consult with each of the stakeholder groups identified in section d) above. Methods used may vary according to target audience, for example:
  - interviews with key people and groups;
  - surveys, polls and questionnaires;
  - public meetings;
  - public hearings;
  - continuous participation processes involving agents or committees in the project zone; and
  - other traditional mechanisms for consultation and decision-making.

- f) Timetable. Provide a schedule detailing when consultation and disclosure activities will take place for each stage of the process and each stakeholder group identified.
- g) Resources and Responsibilities. Indicate what staff and management resources will be devoted to undertaking the public consultation and disclosure program and who within the company will be responsible for carrying out these activities? IFC encourages the hiring of a Community Liaison Officer to arrange and facilitate these activities.

Effective consultation and information disclosure may require assistance from specialized consultants. The sponsor, however, should be involved in all consultations related to the project. Appointment of a Community Liaison Officer is a good way to ensure and sustain this involvement.

- h) *Grievance Mechanism.* Describe the process by which people affected by the project can bring their grievances to the sponsor, in a culturally appropriate manner, for consideration and redress.
- Reporting. Identify where and when the results of the public consultation and information disclosure will be reported. This should include:
  - the draft EA report;
  - details of the results of consultation on the draft EA, as necessary;
  - annual monitoring reports submitted to IFC.