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International Standards and Local Realities in ESIA

INTRODUCTION

Companies requiring finance for their projects must comply with the guidelines of international financial institutions (IFIs) with regards to the management of the environmental and social risks of their business activities. In particular, the International Finance Corporation (IFC) Performance Standards (PS) (2012) have become globally recognised good practice and are widely regarded as the 'gold standard' guiding project development (Vanclay *et al.* 2015).

For newcomers to the ESIA consulting world, such as myself, lender standards are an important reference point, providing assurance and legitimacy to their work. Notwithstanding the significance and value of such standards, my fieldwork experiences undertaking social baseline data collection and stakeholder engagement for an ESIA in Africa proved challenging in terms of applying international lender standards in practice. Juxtaposing my fieldwork experiences with industry guidelines exposed tensions between the two. This paper focuses on such tensions, using the examples of women as a vulnerable group and culturally appropriate stakeholder engagement. These examples feed into a discussion about the broadly Western values and assumptions underpinning international lender standards and create space for debate about how incongruencies between international standards and local realities can be reconciled in the future. Despite the multiplicity of IFI standards and guidelines, they do not differ largely from the principles of the IFC PS (Smith and Vanclay 2017). These are, therefore, the main reference point going forward.

WOMEN AS A VULNERABLE GROUP

Compliance with the IFC PS requires special attention to vulnerable groups – defined as those who may be disproportionately affected by a project for various reasons (e.g. gender, age, ethnicity, culture) – during ESIA (IFC 2012). Groups typically regarded as vulnerable include the elderly, indigenous peoples, people with disabilities, children and women. Women are portrayed as a potentially vulnerable group by the IFC PS with reference to the specific challenges they face in the workplace and employment (e.g. harassment, intimidation and exploitation). This portrayal is reinforced in the arena of land acquisition and resettlement; here, providing special measures to protect women is advocated, especially where national legislation does not recognise women's land and property rights equal to men's (IFC 2012).

The notion of women as a vulnerable group, as implied by the IFC PS, is well justified. A narrative linking women and vulnerability has been overarching in academic and policy circles (Balikoowa *et al.* 2018) and there is widespread consensus that being female can undermine fundamental

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human rights to health, asset ownership and self-determination (Chant 2016). The perception that women can be vulnerable was reinforced during early fieldwork experiences as an ESIA practitioner in Africa. Throughout key informant interviews and women's focus groups, women's vulnerability was a recurrent theme, illustrated by reports of gender-based violence, low school attendance and the absence of land and property rights. During one women's focus group, participants stated that *"violence is the order of the day… it cannot be avoided… when men drink they become violent"*. Elsewhere, during one key informant interview, a local government representative explained that *"sometimes women are chased off the land they are cultivating for their families"*.

Nevertheless, alternative narratives also surfaced to suggest that the situation regarding women's vulnerability is more complex. Stories of abusive husbands and lack of job opportunities coexisted alongside stories of women who had escaped violent marriages or successfully established local businesses. Reports of women being burdened with household responsibilities were interpreted by some women as evidence of their strengths and capabilities. In one focus group, women who had left their husbands and become single mothers commented that *"we are single mothers but we are proud of it; we are not vulnerable, we do everything!"*. Local government officials (many of whom were female) emphasised women's contributions to local development projects and referenced self-help groups set up by women to support one another. When asked about women's role in community development initiatives, one government representative responded that *"most development-related activities are driven by women here… unlike in other parts of the world, they are not seen as belonging at home just doing domestic work"*. In support of this statement, many of the small business owners interviewed during baseline data collection were female entrepreneurs engaged in the sale of basic goods and services to support their families.

These examples do not intend to undermine women's vulnerability in many contexts, nor to deny that women in many societies are systematically oppressed based on their gender (Sherwin 1999). Rather, they suggest that it is not appropriate to conceptualise women as being merely and exclusively vulnerable. As Florencia (2009) argues, just labelling women as vulnerable is too simplistic. Vulnerability is the result of many intertwining factors (UN-SPIDER 2017) and is closely related to the situation under analysis. This label also neglects women's agency, knowledge and resilience in particular contexts (Dankelman 2010).

From an ESIA perspective, preoccupation with women's vulnerability may lead ESIA practitioners to forego the potential benefits that women can derive from projects. Female business owners, for example, could experience increased incomes as a result of project procurement opportunities or livelihood restoration programmes featuring business training and skills development components. Elsewhere, the resettlement of households for a project can potentially improve access to social infrastructure and services; this may particularly benefit women as such services are integral to the well-being of themselves and their children.

Focusing on women's vulnerabilities during the project life cycle also risks obscuring the vulnerabilities of men. Whilst women may be vulnerable to workplace discrimination, men may be vulnerable to workplace accidents as they typically undertake more arduous work on construction sites. Additionally, men often constitute a large proportion of the construction workforce on projects, making them especially vulnerable to exploitation by third-party recruitment agencies and middlemen.

CULTURALLY APPROPRIATE STAKEHOLDER ENGAGEMENT

The IFC PS emphasise inclusivity and the equal participation of all affected parties in the stakeholder engagement process. To this end, the dissemination of information in a culturally appropriate manner, using languages and formats that are understandable to local communities, is encouraged. The prospect of giving all stakeholders a voice and a choice is widely advocated (Cornwall 2003), being viewed as a way to achieve more inclusive environmental decision-making, particularly regarding local communities' needs and concerns (dan Broeder *et al.* 2016).

Nevertheless, the barriers to achieving inclusive stakeholder engagement – as understood and defined by the IFC PS – are well known. Even when following international good practice, it is difficult to avoid that not everyone has the skills and knowledge to participate. In addition, differences in age, gender, ethnicity and socioeconomic status may exclude some people from participating in stakeholder events (UNDP 2017). Some community members may lack the time or be unwilling to participate, particularly if experiencing stakeholder fatigue (Durham *et al.* 2014). These issues all materialised when conducting stakeholder engagement for the ESIA in Africa.

Beyond these challenges, the (locally accepted) dominance of certain voices (particularly chairpersons' and elders') during some village meetings raised questions about whether wholly inclusive and participatory stakeholder engagement is culturally appropriate in all local contexts. This is not to dispute the principles of inclusivity and equality during stakeholder engagement for projects, but to suggest that the micro-political structures of local settings may be incongruous with these goals.

This proposition has been discussed in an Asian context, where it has been argued that focusing on the individual can conflict with local cultural and social values and undermine the importance of hierarchy in Asia (PwC 2019). In Taiwan, for example, opinions at the local level are typically conveyed through layers of elected representatives rather than individuals (Tseng and Penning-Rowsell 2012). It has also been discussed in an African context with reference to the important role of traditional leaders (e.g. chiefs, elders, headmen) in local village settings. In many countries, settlements often have paramount rulers who are seen to possess ultimate knowledge of the village and are responsible for making decisions and speaking on the community's behalf (FAO 2019).

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In local village settings, the African *Ubuntu* philosophy– which translates into "a person is a person because of, or through others" (Moloketi 2009) – may also be relevant. Described as an orientation to life that stands in contrast to individualism and places the community before the self, the teachings of Ubuntu are pervasive in communities throughout Africa (Khomba 2011). In villages framed by *Ubuntu*, where one person traditionally speaks on behalf of all others, it may be inappropriate to expect all village members to contribute to meetings. The local societal structures may not be conducive to such an all-encompassing stakeholder engagement approach.

As ESIA practitioners, it is important to consider the potential ethical implications of this approach. At the village level, engaging many stakeholders can conflict with existing power structures and political cultures (Kadurenge *et al.* 2017), particularly where presiding decision-makers perceive that their power is being diminished. This may stimulate strong adverse reactions amongst those who feel their interests are under threat, with negative repercussions for social cohesion and community well-being. Where cultural norms preclude groups such as women, youths and disabled persons from participating in local decision-making, these groups may be vulnerable to (increased) violence and discrimination by contributing to a project.

DISCUSSION

The examples discussed previously demonstrate the difficulties that can arise when trying to apply the principles of the IFC PS in practice. What they also share is that broadly Western values and assumptions underpin them. The notion that women are vulnerable echoes much of the Western feminist discourse of the late twentieth and early twenty-first centuries. This focused overwhelmingly on the exploitation, oppression and marginalisation of women and has been criticised for constituting women as a singular homogenous group born of the same experiences and realities (Mohanty 2007). As illustrated by field anecdotes, women's lives are complex and diverse; they can be many things, including vulnerable, all at once. Elsewhere, the promotion of inclusive, equal and participatory stakeholder engagement overlaps closely with liberal democratic values which arguably originated in the West and reflect western experiences of development and progress (Faust 2012).

When considering the history and genealogy of the IFC's parent body – the World Bank – the Western undertones of the IFC PS are understandable. Though an international organisation, the World Bank was founded in the USA and depends on the input of member states. High-income states, the majority of which are located in the West, exert strong influence over the Bank's activities; its policy agenda is hence said to reflect the interests of predominantly Western countries (Christiaens 2016).

Achieving the Sustainable Development Goals (SDGs) in regions where particularly large concentrations of people live in extreme poverty (e.g. Africa and Asia) will drive an expansion in

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the number of major infrastructure projects in coming years (Smith and Vanclay 2017). Consequently, ESIA practitioners will be increasingly required to work in non-Western contexts where international lender standards and local realities may come into conflict. This creates an important space for debate over how tensions between the two can be reconciled in the future. The identification of women as a vulnerable group in ESIA requires a highly contextualised and holistic approach which acknowledges the diversity of women's life experiences. Regarding culturally appropriate stakeholder engagement, attempting to consult communities in an inclusive and participatory manner must be balanced by cultural sensitivity and recognition of the diversity of micro-political structures, norms and values worldwide.

CONCLUSION

In conclusion, this paper has drawn on fieldwork experiences as an ESIA practitioner in Africa to discuss the difficulties that can arise when trying to implement international guidelines (as represented by the IFC PS) in practice. This has been achieved with reference to women as a vulnerable group and culturally appropriate stakeholder engagement. The international standards concerning these examples can be linked to broadly Western values and assumptions, reflecting the Western origins of the IFI that prescribes them. Given the large infrastructure and investment needs of countries across Asia, Africa and South America, debates amongst ESIA practitioners over how to effectively navigate tensions between lender standards and local contexts are essential in order to improve the quality of their work in the future.

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REFERENCES

Balikoowa, K., Nabanoga, G., and Tumusiime, DM. (2018), 'Gender Stereotyping: Evidence from Gender Differentiated Household Vulnerability to Climate Change in Eastern Uganda', *Cogent Environmental Science*, 4(1), 1-15.

Chant, S. (2016), 'Women, Girls and World Poverty: Empowerment, Equality or Essentialism?', *International Development Planning Review*, 38(1), 1-24.

Christiaens, E. (2016), *Conformity of World Bank Investments with International Environmental Law: The Credibility of the International Finance Corporation's Environmental and Social Performance Standards,* Gent: Universitet Gent.

Cornwall, A. (2003), 'Whose Voices? Whose Choices? Reflections on Gender and Participatory Development', *World Development*, 31(8), 1325-1342.

dan Broeder, L., Chung, KY., Geelen, L., Scholtes, M., Schuit, AJ., and Wagemakers, A. (2016), 'We are All Experts! Does Stakeholder Engagement in Health Impact Scoping Lead to Consensus? A Dutch Case Study', *Impact Assessment and Project Appraisal*, 34(4), 294-305.

Dankelman, I. (2010), *Gender and Climate Change: An Introduction*, London: Routledge.

Durham, E., Baker, H., Smith, M., Moore, E., and Morgan, V. (2014), *The BiodivERsA Stakeholder Engagement Handbook*, Paris: BiodivERsA.

FAO. (?), Comparing the Incomparable? Placing the Issues in a Rural Development Context. (online) available at: http://www.fao.org/docrep/006/ad721e/ad721e03.htm (accessed 18 January 2019)

Faust, J. (2012), Liberal Democracy as Universal Value. (online) available at: https://www.die-gdi.de/en/the-current-column/article/liberal-democracy-as-universal-value (accessed 23 January 2019)

Florencia, L. (2009), 'Elucidating the Concept of Vulnerability: Layers Not Labels', *International Journal of Feminist Approaches to Bioethics*, 2(1), 121-139.

IFC. (2012), Performance Standards on Environmental and Social Sustainability, Washington DC: World Bank Publications.

Kadurenge, BM., Nyonje, RO., and Ndunge, DK. (2017), 'In Search for an Alternative Stakeholder-Participation Model', *International Journal of Humanities and Social Science*, 7(1), 124-138.

Khomba, J. (2011), *Redesigning the Balanced Scorecard Model: An African Perspective*, Pretoria: University of Pretoria.

Mohanty, CT. (2007), 'Under Western Eyes: Feminist Scholarship and Colonial Discourses', *boundary 2*, 12(3), 333-358.

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RSK Environment, United Kingdom

Moloketi, GR. (2009), 'Towards a Common Understanding of Corruption in Africa', *Public Policy and Administration*, 24(3), 331-338.

PwC. (2019), Why "Walking the Diversity Talk" is Key. (online) available at: https://www.pwc.com/gx/en/about/diversity/internationalwomensday/blogs/winning-the-fight-for-female-talent-in-asia.html (accessed 10th January 2019)

Sherwin, S. (1999), Women in Clinical Studies: A Feminist View. In: Mastroianni, AC., Faden, R., Federman, D. *Women and Health Research: Ethical and Legal Issues of Including Women in Clinic Studies*, Washington DC: National Academies Press, 11-17.

Smith, E., and Vanclay, F. (2017), 'The Social Framework for Projects: A Conceptual but Practical Model to Assist in Assessing, Planning and Managing the Social Impacts of Projects', *Impact Assessment and Project Appraisal*, 35(1), 65-80.

Tseng, CP., and Penning-Rowsell, EC. (2012), 'Micro-Political and Related Barriers to Stakeholder Engagement in Flood Risk Management', *The Geographical Journal*, 178(3), 253-269.

UNDP. (2017), *Guidance Note – UNDP Social and Environmental Standards (SES) – Stakeholder Engagement*, Geneva: UN Publications.

UN-SPIDER. (2017), Factors Affecting Poverty, Livelihoods and Vulnerability. (online) available at: http://www.un-spider.org/projects/rivaf/factors-affecting-poverty-livelihoods-and-vulnerability (accessed 04 January 2019)

Vanclay, F., Esteves, AM., Aucamp, I., and Franks, D. (2015), *Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects*, Fargo (ND): International Association for Impact Assessment.