

## *ENVIRONMENTAL IMPACT ASSESSMENT OF THE CAMISEA GAS PROJECT: THE IMPORTANCE OF LOCAL PARTICIPATION*

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### *INTRODUCTION*

Large reserves of gas and natural gas liquids were discovered by the Shell company in the mid-1980s. These reserves are located in the Camisea Region in the Amazon rain forests of south-east Peru. This area was allocated to Shell Prospecting and Development Peru (SPDP) in 1996 for hydrocarbon appraisal and development. This is potentially the largest development project in Peru, capable of turning the country into a net energy exporter. The project encompasses 3 main components, namely a gas plant and associated infrastructure, flowlines and well clusters; a 600 km. pipeline across the Andes to the coast; and a fractionating plant plus a terminal at the coast.

In accordance with Peruvian legislation, project developers are obliged to subject all their proposed activities to an Environmental Impact Assessment (EIA). This ensures that adequate provision for environmental protection can be incorporated into the planning, design, execution, monitoring and decommissioning of the project. This EIA will be seen as the first step in an extended programme of consultation, research and analysis leading to sustainable development of the region.

The project is located in an area inhabited by indigenous riverine communities and include isolated communities. All these communities may be exposed to a number of potential impacts which may lead to changes in their livelihoods and socio-cultural characteristics. It is important that measures are taken to avoid the loss of tradition and customs, especially since these can lead to secondary impacts on the sustainable use of their natural environment.

The EIA, conducted by an independent contractor, Environmental Resources Management (ERM Peru) will cover all the issues related to the physical, biological and socio-cultural environment, identification and assessment of the potential impacts and mitigation measures. The EIA process is an innovative management tool that may be used to identify these changes. It is conducted early on in the project cycle and predicts impacts and allows for mitigation to be built into design. The challenge remains with gaining effective participation from the communities which may be affected by the project.

This paper focuses on the socio-cultural aspects of the EIA process to highlight that consultation and local participation are key to EIA and eventual project success. The key processes for directly involving local communities are provided. Examples such as: involving community members in field

survey; continuous consultation; local empowerment through Vigilance Brigades; capacity building and training are emphasised.

The paper concludes by highlighting the importance of local participation in delivering long term project success. EIA is an integral and key tool that can be used as the catalyst for initiating this process; a process which leads to social equity and local empowerment.

### ***The Communities and People Involved***

#### *General*

The Camisea Field Production Facilities will impact upon different groups of peoples in different ways and with varying magnitude, and can essentially be categorised into two distinct groups.

- Those potentially most affected which include native communities or colonist settlements located at and in the immediate vicinity of the 'zone of operations'.
- Those affected to a lesser degree which include native communities or settler groups that live along the Urubamba river downstream of Nuevo Mundo towards Atalaya and Pucallpa, the semi-isolated groups of Motentoni and Marankiato located south-east of SPDP's operations in the Cashiriari gas fields, and potentially some nomadic groups located within the Nahua and Kugapakori State Reserve.

The majority of the activities and consequently the impacts will take place during the construction phase of the gas processing plant, the in-field pipelines and the production clusters. Additional impacts will be caused as result of logistical activities needed to support these constructional activities. The 'zone of operations' or the area where most of the impacts will be concentrated will therefore be located at or in the vicinity of the site called Las Malvinas.

### ***STAKEHOLDER CONSULTATION: PROCESS AND OBJECTIVES***

#### ***The Process of Stakeholder Consultation***

'Stakeholder' is the name given to those individuals or groups that are likely to be either directly or indirectly affected by any part of a proposed project development. Those individuals or groups likely to be directly affected, such as native communities and their representative organisations are referred to as *primary* stakeholders, while those likely to be indirectly affected, such as line ministries, government departments and national and international non-government organisations (NGOs) are referred to as *secondary* stakeholders.

The participation of project stakeholders in project planning, design and implementation is now universally recognised as an integral part of environmental and social assessment. Local communities, their representatives, government and national and international NGOs may all be able to contribute to (and benefit from) dialogue directed at identifying and

resolving key project-related questions. Stakeholder consultation is a two-way flow of information and dialogue between the project proponent and stakeholders, specifically aimed at developing ideas that can help shape project design, resolve conflicts at an early stage, assist in implementing solutions and monitor ongoing activities.

### *The Objectives of Stakeholder Consultation*

The key objectives of stakeholder consultation include the following:

- to provide information related to proposed project activities;
- to facilitate and maintain dialogue;
- to seek participation of all interested parties;
- to identify stakeholder interests and issues;
- to create solutions for addressing these concerns and integrating them into project design, operations, and management;
- to enhance the project by learning from and incorporating the expertise of individuals, professionals, communities and organizations.

The main impediment to realisation of effective public participation has been the lack of an organised and developed institutional framework to implement the legal requirements. There is often a lack of resources within government and representative institutions which tends to limit the amount of consultation and facilitation that can be achieved.

More recently though, the EIA process has been used as a key mechanism to facilitate and initiate public participation. Enlightened EIA incorporates an element of stakeholder consultation. The EIA process in Peru is a formal requirement, and the participation of the public is encouraged, through the EIA process itself and recently, via the associated public hearing process. The Public Hearing process is being adopted increasingly by the various Peruvian line ministries.

The stakeholder consultation programme has been and will continue to be a forum for promoting dialogue, partnership and cooperation between all stakeholders. Its foci has been to identify, discuss, resolve and implement actions that maximise project profitability, minimise social, cultural, and ecological impacts, and contribute to the long term sustainable development of Peru and the Camisea Region. The consultation programme is also aimed at enhancing the delivery of Project social and environmental investments in the future of the Camisea Region and Peru, and demonstrating openness and transparency and commitment to the Camisea Project's social and environmental goals.

The consultation programme has been based upon the following main principles:

- to develop and maintain an open and transparent dialogue with all parties, who have an interest or influence on the proposed Camisea project;

- to be iterative and flexible (ie so that decisions can be continually fed into design, construction and operation) and to demonstrate how, when and why input from stakeholders was or was not utilised;
- to learn from stakeholder expertise so as to modify and adapt future consultation activities and project design;
- to maintain stakeholder consultation throughout the project planning and design phases and to continue such dialogue through actual construction and operation;
- to recognise that there exists different levels of understanding amongst the stakeholders and to develop the consultation programme accordingly;
- to provide complete information about the project, with regards to such issues as construction methodology, engineering and operating design, and mitigation.

Stakeholder consultation for the Camisea Field Production Facilities has included the following main activities:

- consulting with the native communities of the Lower Urubamba;
- consulting with the native community federations;
- consulting with Government;
- consulting with national and international NGOs;

The needs of primary stakeholders for example, are very different to those of an international NGO, and thus the consultation programme has been cognisant of the wide-ranging differences that exist between stakeholders, and the ways in which information needs to be disseminated and comments fed back. The stakeholder consultation programme has consequently, used different tools to address different stakeholder groups, ranging from for example, technical information contained in a formal report for a specialised international NGO, through to using three-dimensional (3-D) scale models and picture posters for native communities.

The main objectives of the community consultation programme include the following:

- provide information about the project;
- identify community expectations;
- explain SPDP's commitment to providing 'net benefit' to the region;
- provided information on SPDP's Regional Sustainable Development Strategy;
- sense concerns regarding environmental and social issues;
- seek opinions and information regarding key project decisions (eg location facilities and in-field pipeline routing, types of logistics to be used etc);
- support participation in the project decision making process and design;
- address expectations through a mutually agreed process of compensations;
- establish a mutual agreement for land to be used for project related activities;
- contribute to building capacity for regional leadership.

## *Incorporating Community Concerns into Project Design*

One of the key objectives of community consultation is to ensure that the concerns, fears and suggestions expressed by the communities, feed back into shaping project design.

### *The EIA Process*

Stakeholder consultation as part of the EIA process began in 1996 with the *Appraisal Drilling campaign EIA* and continued through to 1997 with the *Pagoreni/San Martin East Exploratory Drilling campaign EIA* undertaken by ERM Peru. Consultation during these EIAs focused on dialogue with primary stakeholders in the Camisea region, federation leaders, and secondary stakeholders in Peru, Europe and the USA. Since then efforts have focused on EIA consultation for the Camisea Field Production Facilities EIA.

### **LINKING EIA TO STAKEHOLDER CONSULTATION**

Stakeholder consultation is an integral component of the EIA process. ERM Peru has developed its EIA stakeholder consultation programme in accordance with the objectives and principles set out within SPDP's overall consultation programme. It has been conducted as a distinct yet integrated component of this programme. The stakeholder consultation programme has been developed to fully integrate the more focused consultation activities specifically undertaken within the EIA process. For example, SPDP Community Liaison Officers (CLO) have played an integral role in assisting EIA efforts by working together with the EIA field survey teams. The CLOs have not only been the interface for communication between SPDP, ERM Peru and the native communities, but have also been involved in such field activities as baseline data collection, community meetings, and community participatory mapping exercises. In addition, ERM was involved in the first round of SPDP's Consultation Programme with the native communities of the Lower Urubamba.

The main elements of the EIA stakeholder consultation process include the following:

- distribution and feeding back comments from the *Scoping Report*;
- finalising the EIA terms of reference following stakeholder consultation;
- stakeholder consultation during EIA field surveys;
- issues identification following field surveys and on-going consultation;
- distribution and feeding back comments from the *Key EIA Issues Report*;
- distribution and feeding back comments on the *Final EIA Report*;
- stakeholder consultation during the EIA approval process, namely the public hearing;
- post EIA consultation;
- EIA training.

## *The Scoping Report*

The Scoping Report was produced in June 1997 and was the first main consultative document in regard to the EIA and the overall Full-Field Development Programme (FFDP). This document was designed to serve as a study terms of reference (ToR) for the FFDP including the Camisea Field Production Facilities component, and included information on the relationships between the design and EIA processes. It outlined the execution programme for the various EIAs and how it was anticipated stakeholder input would feed into the EIA process, as well as other Camisea project management activities. Copies of this document were distributed to all stakeholders based in Peru and elsewhere.

## *Finalising Terms of Reference*

Stakeholders were invited to provide comment so that the ToR for the FFDP EIAs could be finalised. One-to-one meetings were held with some stakeholders and their comments sought and fed back into the design of the studies, thereby finalising the ToR for the EIAs. Even though a complete list of identified stakeholders had received a copy of the *Scoping Report*, few responded.

## *EIA Field Surveys*

In order to develop and produce an EIA, field work is necessary. This phase of the EIA process allows the EIA team to conduct the following main activities:

- collect baseline information (regional and site-specific) which will be used to assess the significance of a project's activity on its surrounding environment;
- understand more about the area or region from first-hand experience;
- consult those people which may be affected by the project's development, so as to inform them about the project, to seek their agreement to the project, and to feed back their comments, concerns and fears so as to mitigate against potential impacts.

Extensive consultation with the communities most likely to be directly affected by the Camisea Field Production Facilities was conducted during the EIA field surveys. To date, there have been two concentrated periods of consultation, one in October 1997 as part of SPDP's Community Consultation Programme with the native communities of Lower Urubamba, and a more recent, but more extensive period between January and April 1998.

## *Issues Identification*

Following on from the EIA field surveys, consultation with various stakeholder groups (ie Government, NGOs and native communities), a number of issues of primary concern to the stakeholders were identified. An approach was then developed which focused on taking these issues and processing them through a system so that a solution may be reached on each of the issues.

This Key Issues approach is based on the principle that by addressing these issues early-on, stakeholders are able to get involved in the process earlier. This ultimately allows for solutions to be reached earlier as well. The identification of key issues culminated in a Key Issues Report which addressed those issues that were identified as most relevant to the EIA and the stakeholders.

### ***Key Issues Report***

The key issues have been identified through consultation with stakeholders (eg through international and locally held workshops), EIA field surveys, and design activity. A separate *Key EIA Issues Report* has been produced and disseminated to stakeholders for comment and to seek active participation. A pro-forma has been produced which invites stakeholders to choose which key EIA issues they would like to be either involved in actively or just receive information on. Stakeholders will be able to participate in resolving the key issues through one-to-one meetings, focused groups or larger workshops.

### ***Final EIA and EIA Approval***

Upon submission of the Final Camisea Field Production Facilities EIA to the Ministry of Energy and Mines, copies of the report will be automatically distributed to a number of stakeholders for their comments. Copies will also be available to others on request. A non-technical summary will however, be distributed to all listed stakeholders (and any others requesting a copy), so that they may have the opportunity to review the EIA. All stakeholders have the opportunity to attend the Public Hearing which is scheduled to be called by the Ministry of Energy and Mines approximately 4 - 6 weeks following lodging of the EIA with the Authorities. SPDP will then be provided with the opportunity to respond to any concerns by stakeholders (following the Public Hearing and otherwise) prior to Government determination of SPDP's application within 60 days after first submission of the EIA.

In addition, the EIA, in a simplified format will be presented to the native communities for review, following production of the final EIA and before Government approval. The native community Federation Leaders will be invited to attend the Public Hearing on behalf of the communities they represent.

In order to aide the native communities' ability to both understand and evaluate the simplified EIA for themselves, a *Guide to Native Communities for Review of Shell Environmental Impact Statements* has been produced and distributed to the native communities.

### ***Post EIA***

Stakeholder consultation will continue following EIA submission and approval. An on-going local, national and international consultation process will be developed in consultation with the stakeholders and will continue to be refined through project construction and operation.

### *FURTHER EIA CONSULTATION EFFORTS*

In addition to those activities outlined above, two training workshops, aimed at building EIA capacity for local NGOs and SPDP Community Liaison Officer (CLOs) respectively have been conducted. Two separate workshops were held with the following main objectives:

- to highlight ERM's work to date in the region and how both NGOs and CLOs are involved in the EIA process;
- to raise the general level of understanding as to what an EIA is and why it is conducted;
- to run through the EIA process itself and its individual components using show case examples;
- to demonstrate the link between the EIA process and stakeholder consultation.

### *Non-Governmental Organisations EIA Training*

A one day EIA training workshop for NGOs . The specific objectives of this workshop were to provide the participants with the following information:

- an overview of the function of EIA including a description of key technical components;
- an outline of EIA methodology from scoping to mitigation;
- the key benefits of EIA to industry;
- how SPDP's commitment to social development fits into the EIA process;
- how ERM Peru fits into SPDP's overall stakeholder consultation programme.

The participants were provided with an information package relating to EIA methodology and process, benefits to industry and specific examples from EIA projects conducted by ERM elsewhere in the world.

Following completion of the workshop, the main findings from the discussions were collated, analysed and then disseminated to all the participants.

The focus for the field survey consultation was three fold: to present information on the project, to elicit community concerns regarding the project, and to build capacity of community members involved in the field surveys regarding EIA methodology.

### *OCTOBER 1997 FIELD SURVEY*

ERM Peru took part in a three week long field trip as part of a first round of consultation for the Camisea Field Production Facilities. The main objective of

the field trip was to visit each of the communities in the Lower Urubamba region between Sepahaua and Pongo de Mainique.

The main objectives of ERM Peru's consultation in the field trip included the following :

- to meet the communities of Lower Urubamba;
- to gather first-hand primary concerns relating to all aspects of the FFDP;
- to explain ERM Peru's role in conducting the EIAs;
- to present the concepts of EIA including the Environmental Management Plan (EMP);
- to identify key mechanisms for consultation to continue.

### *The Role of ERM Peru*

ERM Peru was asked to deliver a short presentation at each community explaining its role in the project. ERM Peru explained that it was an independent consultant company commissioned by SPDP to conduct the three EIAs for the three different components of the FFDP. ERM Peru was responsible for organising field surveys, conducting consultation activities relating to the EIA, producing EMPs, and supporting SPDP in all other areas of environmental management.

ERM Peru presented a diagram of the key potential impacts that the FFDP may cause. This was used to explain the function of an EIA and EMP and how the field surveys which might take place on their lands would be used to collect baseline data and during the impact assessment itself. In addition, ERM Peru presented the Pagoreni and San Martin East Exploratory Drilling campaign EIA and EMP. This was used to highlight the type of document that ERM Peru has produced and will produce for the FFDP EIAs. Simple examples such as soil and vegetation maps were shown and their importance described in understanding how they could be impacted upon.

Furthermore, the document with the acceptance of the Pagoreni and San Martin East EIA following the Ministry of Energy and Mines' public hearing was shown to the communities. This was used to explain how the communities had a part to play in the final decision, and how the community federations were very important in the consultation process. ERM Peru stressed that these federations (during the EIA process) should be used as the key vehicles through which concerns are highlighted and addressed. In general, the local people recognised the EIA as a positive endeavour and as a document that will help them in protecting their environment.

### *Key Concerns*

ERM Peru was able to identify the main concerns of the communities. These can be broadly split between concerns relating to the FFDP, socio-economic issues and environment and are collectively presented below.

### *Key findings*

#### *Full Field Development Programme*

In general there was a positive attitude from the communities towards the

FFDP. The communities were keen that it would be a source of many benefits (eg employment during the construction period). They saw many of these however, as short-term. The communities wanted to learn more about the project, as this was the first time for many communities that the FFDP had been mentioned. In principle, except for Cashiriari none of the communities objected to the gas plant being built on their lands, although they would not want it sited next to their village.

#### *Socio-Economic Issues*

The main concerns of the FFDP in terms of socio-economics were the potential affects upon health, education and agricultural development. Many of the communities felt that the project might bring about new diseases to the region which may affect health as well as food stocks and production. The communities were keen that SPDP showed a willingness to support development projects.

#### *Environment*

There are a number of environmental issues of concern to the communities, notably the following.

- Water pollution - they are concerned about the potential wastes from the project and how this will affect water quality, and also the impacts of the increased river traffic upon fish stocks, their main protein source.
- Use of hovercraft - they feel very strongly about the hovercraft and relate this to noise causing dwindling fish numbers, the wash from the hovercraft affecting daily river activities, and a mythical belief about a monster coming to take the fat from their children away to produce helicopter fuel, known as the "*pishtaco*" myth.
- Increases in general river traffic - they are concerned about the increases in river vessels and how these may disrupt their fishing or daily riverine activities (eg washing).
- Control of access along any roads - when asked about roads, the communities stated that they would accept these as they would provide improved market links and communication between communities. They were adamant however, that complete control and security must be provide to ward off and control the potential for settlers and loggers to enter their lands.
- Use of helicopters - the communities are worried about the increased noise levels from the helicopters and how this may affect the wildlife and potential game from running away. All of the communities saw the EIA as a constructive process and as a means of helping them to protect their environment.

#### *Consultation Process*

The communities feel that there has been a good level of co-ordination between SPDP, the communities, the local authorities and federation

representatives. They did note however, that the consultation of women and elders was not as effective as it could be and ways should be sought to improve this.

The communities in general welcomed the visits made by project personnel. Although their level of technical understanding is somewhat limited, the use of visual material provided great added value in disseminating a large amount of information. The idea of ERM Peru as an independent consultant has been well established. Its participation in the consultation process, both in explaining the EIA and Environmental Management Plan (EMP) as well as being a support element for the general process, has been positive.

#### *JANUARY - APRIL 1998 FIELD SURVEY*

ERM Peru undertook five separate field surveys during January and April 1998 as part of the Camisea Field Production Facilities EIA. The field surveys comprised the following surveying teams:

- *Team A*: survey of gas processing plant site options;
- *Team B*: socio-economic and socio-cultural survey of communities;
- *Team C*: survey of production clusters;
- *Team D*: assessing impacts related to FFDP construction and operation river logistics and survey of Atalaya marshalling facility options;
- *Team E*: in-field pipelines ground-truthing and field surveying.

Two of these field surveys included an extensive consultation component, namely the field surveys of Team B and Team D.

#### *Community Consultation regarding Baseline Data Collection*

ERM Peru undertook a four week survey focused on community consultation and socio-economic/cultural baseline data collection as part of its field survey for the Camisea Field Production Facilities EIA. The field survey was conducted between 08 January and 04 February 1998 and involved the following communities: Las Malvinas, Chokoriari, Camisea, Shivankoreni, Segakiato, Cashiriari, Nuevo Mundo, Kiriguete, Marankiato, Montetoni.

The field survey was conducted at a time when the children were on their school vacations. This presents a timely opportunity for the community to maximise the availability of their children as additional labour by working on their agricultural plots or *chacras*, rather than stay in their villages. In order to successfully complete the socio-economic and cultural survey, visits were made to the *chacras*.

The specific objectives of the survey were to:

- visit each of the communities potentially impacted by the gas processing plant, in-field pipelines and production clusters;
- conduct the socio-economic and cultural impact assessments at each community addressing such issues as natural resources consumption,

hunting (areas, species, frequencies, means), collection (distances, products, difficulties), logging (species, distances, uses), agriculture (location, labour force, products, land use), marketing, etc. (fisheries were not included in this study as a separate study is to be initiated);

- identify the community's main concerns in relation to the FFDP;
- discuss appropriate mitigation measures with the communities.

### ***Field Survey Methodologies***

The field survey was conducted using the following main methodologies:

- *Community meetings* were held to provide brief explanations to the communities concerning ERM Peru's research and EIA work. These meetings were also used as the main forum for data gathering, collecting community concerns relating to the proposed project
- *Participatory community mapping* was conducted to present information processed by a group of participants (eg men and/or women groups) in a visual format. The participatory maps provide valuable socio-cultural baseline information, much of which is presented in a geographically spatial form.
- *Questionnaires* were conducted based on a statistically defined sample, a specific number of surveys were applied to house heads in each community. This allowed the field team to obtain quantitative data and define local resources consumption trends.
- *Semi-structured Interviews* were held with the community presidents and members within the communities in order to supplement information collected through the questionnaires.
- *Population registers* were used in some villages which enabled the survey team to identify the total number of people, men, women and children, and to determine local historical tendencies on birth, death and migrations.

The concerns highlighted by these communities are representative of concerns raised throughout the region. In addition, a total of 164 questionnaires (statistically representative) were carried at the following 8 communities. The figure in parentheses highlights the number of questionnaires carried out at each community. The questionnaires were focused on collecting quantitative baseline data on such issues as hunting, collecting, agricultural, and logging. Chocoriari (21), Camisea (20), Shivankoreni (19), Segakiato (25), Cashiriari (13) Nuevo Mundo (29), Kirigueta (40), Las Malvinas (6).

### ***Community Consultation regarding Logistics Impacts***

ERM Peru undertook a survey of five riverine communities in early February 1998 in order to assess the impacts of increased river traffic once construction

for the Camisea Field Production Facilities begins. Daytime ambient sound measurements were taken and community participatory techniques were undertaken at the following river-bank locations:

Kirigueti (upstream from Nuevo Mundo); Miaria (between Nuevo Mundo and Sepahua); Puija (in close proximity to Sepahua); Bufe Pozo (between Sepahua and Atalaya); Maldonadillo (in close proximity to Atalaya).

The communities were consulted using semi-structured interviews and questionnaires to elicit their views and concerns about increases in river traffic. Forty-seven interviews were conducted between the five communities. In addition, ambient noise measurements were taken at each of the communities to provide valuable baseline information upon which impacts could be further assessed. The specific findings from this component of the field survey can be found in the main text of the EIA.

### *Native Community Participation during the EIA*

ERM Peru has since the beginning of the Camisea project sought to establish a close working relationship with the native communities of the Camisea region. ERM Peru has worked closely with SPDP to establish these links and has involved the native communities as much as possible with the following activities, during preparation of this EIA.

- *River traffic log survey:* In order to assess the level of impacts from increased river traffic once FFDP construction begins, ERM Peru initiated a river traffic log survey to collect baseline ambient data. This survey was conducted at Nuevo Mundo, Camisea and Las Malvinas and involved local community members. The river log provided an account of the types of river vessels and the time of day they passed any one of the communities. The information collected has been used during the assessment of impacts for this EIA.
- *EIA field surveys:* During EIA field surveys, native community members were employed to assist ERM Peru's technical experts with such activities as plant, tree and animal identifications (during transect exercises), collecting surface and ground water samples (from streams, rivers and community water wells), and assisting in collecting ambient noise and air quality measurements.
- *Socio-economic and socio-cultural baseline data acquisition:* During the field surveys, ERM Peru's socio-economic team visited all of the communities of the Camisea region. They conducted community-wide meetings and encouraged community members to participate. One key focal area for community participation was during the collection of socio-economic and socio-cultural baseline data. ERM Peru made use of well known "participatory rural appraisal" (PRA) techniques such as semi-structured interviewing, historical and daily profile assessments and participatory mapping. All of these techniques provided invaluable baseline information, which has been used throughout this EIA. Furthermore, they provided an opportunity for the communities to get involved in the EIA.

## ***ONGOING STAKEHOLDER CONSULTATION DURING PROJECT IMPLEMENTATION AND OPERATION***

Follow-up consultation on the implementation of the Camisea EIA will be managed within the context of SPDP's overall stakeholder consultation programme.

The goal of the on-going consultation is to inform and involve stakeholders in the implementation and monitoring of the policies and strategies outlined in the EIA and the EMP. SPDP is currently developing its stakeholder consultation programme for when project construction begins and runs through to the operational phase. This programme will need to be continually developed, modified and adapted in light of the changes and activities pressing at any one time. SPDP is committed to work with stakeholders by involving them at key phases of the programme. Stakeholders will be involved in the development of the consultation process and programme itself, capacity building exercises, implementation of measures outlined in the EMP, monitoring project activities and establishing review mechanisms. Some of the key elements of on-going consultation are discussed below.

### ***Native Community Participation***

Native community participation is seen as a key element of gauging the success and effectiveness of implementing those measures outlined in the EMP. A key focus will therefore lie in capacity building and awareness training. Furthermore, communities will be encouraged to participate in monitoring project activities through such measures as external auditing and the implementation of a community complaints procedure. Project CLOs will continue to provide the link between the project and the communities, and will work with them to find other ways of maximising their participation during project construction and operation.

### ***Monitoring and Evaluation***

As part of the overall stakeholder consultation programme, it is envisaged that a focus group of secondary stakeholders will be established to aide in the design of a monitoring and evaluation (M&E) programme. This programme will serve to provide an external check as to whether SPDP is meeting its commitments set out in both EMP and Health, Safety and Environment (HSE) objectives and goals. Some stakeholders have developed a record of developing and managing complex M&E programmes and their expertise would be extremely useful in helping to design such a programme for SPDP. This group of stakeholders will liaise with the native communities in developing such a monitoring programme.

### ***Internal Training and Education***

SPDP is currently working towards developing a training programme which will cover HSE components identified within the EMP. This programme will be developed to cover general environmental and social issues for all staff and more specific technical

issues for relevant project personnel. It is intended that key stakeholders will be involved in the training programme to build their technical capacity and also raise awareness for HSE issues.

### *Developing New Key Issues*

Updates on the key issues will be provided to all stakeholders. The updates will provide information on the procedures established to insure key issue management implementation and will also report on successes and problems. As the needs and circumstances of the project changes, and as gaps are identified in key issues procedures, stakeholders will be involved in identifying new key issues and possible solutions to identified gaps in mitigation strategies and procedures. Management systems could then be adapted to respond to the needs of the issues as they develop.

### *Dissemination of Information*

SPDP will continue to disseminate it's briefing paper on a regular basis. These serve as an effective means of providing stakeholders and any other interested parties with an update on project activities to date and those planned for the near future. In addition, SPDP is committed to (internally and by national legislation) to produce an annual HSE Performance Report which will be made available for public perusal upon completion. Finally, SPDP will continue to update it's Camisea website to include information on technical, environmental, social, health, safety and other project related issues. Stakeholders are encouraged to send in comments and questions on the project through the website.

### *Meetings and Workshops*

SPDP will continue to conduct one-to-one meetings and workshops to develop it's project with the participation of stakeholders. It is intended to hold annual workshops more regular meetings with national and international stakeholders to keep them informed on project activities, update them of key issues, and allow for their participation during the construction and implementation phases.