Stakeholder Engagement Report

About Business in the Community Ireland

Founded in 2000, we are a national non-profit organisation whose vision is to assist all businesses in Ireland become the most responsible and sustainable in the world.

Ireland's largest companies are members of our network (see members here[1]). Our team of experts help these businesses as well as others to integrate responsible and sustainable business practices throughout their operations. To that end, Business in the Community Ireland has also recently launched the Business Working Responsibly Mark certification for responsible and sustainable business.

Our range of practical supports help companies to develop, benchmark, scale-up and profile their activities to have the greatest impact on their business. In addition to our one-to-one advice to large Irish companies on corporate responsibility and certification, we also focus on how Irish business can have a positive impact on society focusing on the areas of Education and Employment.

Our patron is Michael D. Higgins, President of Ireland.

[1] http://www.bitc.ie/network-for-responsible-business/our-members/

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Executive Summary

This document is the output of a Working Group on Stakeholder Engagement convened by Business in the Community Ireland (BITCI) and including Bord Gáis Networks, Bord na Móna, Chambers Ireland, the County and City Managers Association, EirGrid, ESB Networks, the Irish Planning Institute and Shell E&P Ireland Ltd. It was chaired on behalf of BITCI, by former KPMG Managing Partner, Terence O'Rourke.

Its purpose is to complement the wide range of stakeholder engagement toolkits and standards that exist internationally with experiences of companies specifically in an Irish development context. Its contents will be of interest to anyone working in economic and social development in Ireland, whether in planning or implementation roles.

The companies acknowledge that they are always learning, improving and adapting their approach to stakeholder engagement and this project was itself a way to progress this agenda. There are many benefits to doing so and companies are seeking to take greater responsibility for the life of a business asset embedded within a community.

This report documents a mixture of considerations and practices for developing constructive engagements with stakeholders and a set of commitments for how engagement should be conducted. It also summarises three stakeholder engagement models and finally lists the stakeholders that were consulted in the development of this report.

The six commitments that the Group makes to stakeholder engagement are:
1.   Encouraging active involvement of stakeholders
2.   Ensuring stakeholders have the opportunity to have a say
3.   Explaining at the outset what elements of the project can be influenced, when and in what way
4.   Understanding and responding to stakeholder needs and concerns with considered and timely responses
5.   Engaging respectfully with stakeholders and expecting the same in return
6.   Evaluating and improving engagement with stakeholders on an ongoing basis

The Considerations that the Group encourages organisations to review include:
1.   Fundamental approach, including respect, early engagement, getting to know each community
2.   Company presence and brand
3.   The development of an issues register
4.   Community gain / community benefit

The Practices that the Group endorses include:
1.   Communications methods and approaches
2.   Community Liaison Officer
3.   Landowner engagement
4.   Engaging local authorities and public authorities
5.   Engaging local media
6.   Leadership

Message from Tina Roche

Business in the Community Ireland Chief Executive

Welcome to the report of the Business in the Community Ireland, Stakeholder Engagement Working Group. The remit of this Group was to contribute stakeholder engagement guidelines around development in Ireland, particularly in respect of local communities.

This output from the Group describes common and evolving practices in stakeholder engagement among a group of development companies and other stakeholders in Ireland. It is aimed at companies and other organisations involved in engagement as part of proposed development, to encourage them to observe certain approaches in communications with stakeholders generally, including communities. It documents key considerations and practices for developing constructive engagements with stakeholders and a set of commitments for how engagement should be conducted.

In this document, what we refer to as 'stakeholder engagement' is more proactive and extensive than what is required under planning legislation as 'stakeholder consultation.' This genuine dialogue between companies, communities and other stakeholders offers the opportunity to influence projects.

Business in the Community Ireland's interest in this topic arises because good stakeholder engagement is central to corporate responsibility and sustainability. According to the AA1000 Stakeholder Engagement Standard, stakeholder engagement "is the process used by an organisation to engage relevant stakeholders for a clear purpose to achieve accepted outcomes" (2008, 6). As such, stakeholder engagement is the key mechanism by which an organisation (frequently a business) engages with its stakeholders and adjusts its operations and outputs for mutual sustainability.

We hope that the compilation of this experience will prompt further discussion and lead other companies to similar and continually evolving approaches in achieving a win-win situation for all involved in the process.

Business in the Community Ireland convened the Group and was secretariat under Terence O'Rourke's chairmanship. The publication of the report will be followed by sharing and learning sessions with other companies.

We would like to thank the Group participants for their participation and for their genuine engagement with the work. We would especially like to thank Terence O'Rourke, former KPMG Managing Partner, for chairing the Group and the organisations that took the time to feedback to the Group.

Tina Roche,

Chief Executive,
Business in the Community Ireland

October 2013

Chairman's Report

As Chair of this Group, I welcome the publication of this document which concludes a year of collaboration and partnership, in the spirit of learning and knowledge exchange, between some of Ireland's key infrastructure developers and other stakeholders.

Overall, the project involved eight meetings over a nine month period. Over that time, the Group:

- Convened and agreed terms of reference
- Reviewed existing models to actively seek knowledge and understanding of best practices
- Openly shared case studies
- Pooled knowledge
- Submitted written materials
- Actively sought consultation on the drafts

The document captures key considerations and practices for developing constructive engagement with stakeholders and a set of commitments to underpin how engagement should be conducted—all of which we hope will prompt further discussion and lead other companies to similar approaches. While necessarily stakeholder engagement must always include a formal process with set parameters, there is enormous value in seeking collaboration and consensus building where facts can be tabled and discussed objectively in informal settings, often with less interference by political agendas and minority interests.

Of course there is always room for improvement and the companies involved would agree that mistakes can be made particularly where engagement is not sought early. Companies are always seeking to learn from past experiences. This project demonstrates their willingness to learn and analyse and this document captures the advice that companies would give to others based on their experiences to date. In that sense, stakeholder engagement is a continually evolving practice with continually evolving requirements and challenges. No one formula fits all but the report shows how companies are working to engage stakeholders effectively, often exceeding statutory requirements.

Terence O'Rourke
Former KPMG Managing Partner and Chair of this Group

1. Introduction

Who?

This Working Group was convened by Business in the Community Ireland (BITCI), Ireland's only network for responsible and sustainable business. Its vision is to assist businesses in Ireland become the most responsible and sustainable in the world. As well as providing one-to-one advice to companies, the organisation also provides them with networking opportunities to share or establish best practice.

The Working Group included Business in the Community members with an interest in and a demonstrable stake in the topic of stakeholder engagement particularly as it relates to development projects. The Group comprised representatives from Bord Gáis Networks, Bord na Móna, Chambers Ireland, the County and City Managers Association, EirGrid, ESB Networks, the Irish Planning Institute and Shell E&P Ireland Ltd. It was chaired on behalf of BITCI by former KPMG Managing Partner, Terence O'Rourke.

Intel and Ulster Bank also participated briefly but it was decided to concentrate their input in additional working groups with an appropriate focus – e.g. retail stakeholders or stakeholders near a long-term fixed site.

The Group's work has now concluded but it will be of interest to any organisation engaging with stakeholders in Ireland, from Chief Executive to engagement practitioners. It will also be of interest to planners and other advisors.

Community

Stakeholders might be considered as either communities of interest or spatial communities. The first refers to a community of people who share a common interest or passion that bonds them and the other refers to people who are bound together because of where they live or work for example. The experience of this Group would be that while development necessarily happens somewhere, others can have an interest in the development that is not necessarily linked to locale.

You will see references in this document to engaging with identifiable groups such as Chambers of Commerce. The amorphous nature of 'community' means that it is not always clear who to engage in order to reach 'community'. Formal routes include oral hearings but companies also need to take informal routes such as open houses, sites visits and Community Liaison Officers to reach community members. The wide range of stakeholders that companies do engage with—local employees, councillors, community groups, local media, local authorities, local partnership organisations and community centres—can all be considered additional ways that companies are trying to reach-out to all community members in order to engage with them.

Representatives of non-business stakeholders such as the Irish Planning Institute participated in this Working Group and others were invited but declined the opportunity to participate. No member represented the 'community sector' per se because it was not possible to identify an all-encompassing representative for the wide range of community views that are evident nationwide.

Community representatives listed in Appendix A (stakeholders who reviewed this document) recognised it as a good and worthwhile project. While they recognise the challenge of identifying an all-encompassing representative of community, their preference would be to involve any community professional from the outset to advise how companies can best engage community members.

Why?

The origin of this Group was in the recognition that while there are many day-to-day planning activities in Ireland, there is a dearth of fora to discuss approaches to and the development of stakeholder engagement practices.

A wide range of theoretical discussions on stakeholder engagement have been published globally as have international standards such as the AA1000SES. Rather than replicate the recommendations and principles of these standards, (we do summarise several key models in section 4 for the reader's reference) this report complements them by focussing on common and recommended stakeholder engagement approaches and practices in developing projects in Ireland.

This is highly relevant where infrastructure (particularly energy infrastructure) is concerned as it is intrinsic to our national ambitions for social and economic development. Jobs, homes and families depend on these developments no matter in what part of the country these developments are located.

The purpose of this document then is to supplement the many frameworks in existence with the experiences of members of this Group. Our document is specific to a set of development companies in the Irish context. The goal is to support businesses in engaging with local stakeholders ranging from businesses to ordinary citizens so that each can learn from the other and adopt the best approach to engagement and to the realisation of the proposed development.

Furthermore, there are many **benefits** for both business and communities to good consultation which include:
- Key to enabling development
- Establishing or strengthening relationships with local communities within which companies have long-term relationships
- Appropriate economic and social development that respects the environment and seeks to find commonality between business and community goals
- Continuous improvement of how a company operates and engages with stakeholders
- Better company understanding of the needs and expectations of people and their contexts
- Better risk management within companies
- Better local awareness of national development goals and their benefits
- A role and a say in development in their area for local people
- Reduced costs for all (including legal costs for small community groups) if solutions can be worked out together
- Development of community members engagement skills
- Collaborative solutions
- A licence to operate for companies

What?

This document documents some key considerations and practices for developing constructive engagement with stakeholders. It also outlines six commitments by the companies to principles that should underlie consultation.

The considerations and practices outlined below should be taken into account from the outset and continuously reviewed and adjusted as necessary as the engagement progresses. More detail on the phases of consultation will be found in the models referenced in section 4.

A key issue often is to establish engagement in the first place. Companies are putting increasing effort into fostering stakeholder engagement through varied outreach mechanisms as described in this document. Early engagement allows for stakeholder input before key decisions.

The companies are committed to respectful engagement and believe that it is important that the respect be mutual. This Group has a stated commitment to engaging with stakeholders in a spirit of respect, where despite differences, each party can work on solutions towards delivering development to the mutual satisfaction of stakeholders and companies alike. Hence, the correct approach to stakeholder engagement makes good business sense.

The Group has also met and incorporated a range of stakeholder views on this document, listed in Appendix A.

Companies recognise that reputation is a valuable asset to protect and that future company plans will be influenced by on-going positive relations with stakeholders. As stakeholder expectations grow, companies are responding with increasingly proactive communications and management practices that take greater responsibility for the final product—typically an infrastructure asset embedded long-term within a community. A range of others share in or are implicated by this responsibility. For example current employees may live and work there. Contractors must equally represent the company's ethos.
As such from adopting 'bare minimum' approaches in the past, here we have examples of companies that are taking risks in being more open in engagements, that are investing more in understanding stakeholders and local communities and as a result are developing how they regard stakeholders and evolving their engagement practices. Evidence of these fundamentals is captured in this short report.

2. Commitments

Approaches to stakeholder engagement typically include a set of principles or commitments on how engagement will be conducted.

Some models (see section 4) emphasise broad principles such as inclusivity and materiality that should underpin stakeholder engagement.

A key output from the Group is its choice of six commitments that practically address stakeholders: the inclusion of stakeholders in engagement; what the spirit of the engagement should be like for both businesses and stakeholders; how businesses respond to stakeholders while upholding commitments to responsiveness and continuous improvement.

> ### *The participants in this Working Group are committed to:*
>
> 1. Encouraging active involvement of stakeholders
> 2. Ensuring stakeholders have the opportunity to have a say
> 3. Explaining at the outset what elements of the project can be influenced, when and in what way
> 4. Understanding and responding to stakeholder needs and concerns with considered and timely responses
> 5. Engaging respectfully with stakeholders and expecting the same in return
> 6. Evaluating and improving engagement with stakeholders on an ongoing basis

The organisations below endorse these and endeavour to ensure that companies working on their behalf also endorse these commitments. These are principles that BITCI will convey across its membership network.

3. Key Learnings

Introduction

Over the last number of years, corporate stakeholder engagement has evolved considerably. More than ever, communities and individuals expect to be involved and consulted in developments in their area. Stakeholder engagement is constantly evolving and companies that are involved, particularly in major infrastructure projects, are learning both from their mistakes and successes. As one Group participant succinctly commented "it's time to be braver and bolder, to take a risk and push the boat out" in terms of companies' commitments to engaging with stakeholders.

All Group members acknowledge the benefits that early and meaningful engagement can bring for all parties involved. From a company perspective lack of engagement can lead to lengthy and costly processes that are ultimately unsatisfactory. From a stakeholder point of view lack of engagement at an early stage can inhibit the influence and outcome that stakeholders might otherwise have. Where there is engagement, companies need to plan realistically as thorough consultation takes time.

While this document looks at the approach of infrastructure and industrial development projects, the essence of the document is also applicable to other development projects, such as large residential or commercial developments. Common to any development or infrastructure project, is the need to engage meaningfully with stakeholders. In an ideal world companies and communities would make decisions together as far as possible. However because of technical, environmental, financial and other constraints there will typically be some elements of a development that cannot be changed if the project is to proceed to achieve its overall functional objective. Nonetheless, the goal is to achieve a successful outcome for all parties involved and to afford all parties the opportunity to have a say, through open communication.

The following are key learnings or lessons which members of this group have documented and are divided between 'Considerations' and 'Practices'. Section 4 makes reference to information which should be considered as part of the process in the development of projects.

Considerations

Fundamental Approach

There are a number of components that are fundamental in any approach to stakeholder engagement.

Respect for stakeholders and a willingness to listen are vital. Being forthright with stakeholders from the beginning contributes hugely to developing mutual respect even when that means laying out the elements of the project that are and aren't negotiable (for technical, cost or other reasons). This also ensures that expectations are not raised in a particular way. In addition, early engagement (i.e. while there is scope for stakeholders' inputs to contribute to the shape of the project) supports meaningful relationships with stakeholders.

Describing the scope of engagement for stakeholders at the outset of a relationship is a developing trend that has benefits for business and stakeholder alike. EirGrid for example has developed a five stage project development and consultation roadmap[2] which provides an overview of the process overall and the

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[2] http://www.eirgrid.com/media/EirGrid Roadmap Brochure July 2012.pdf

opportunities for stakeholders to input as the selection of routes for transmission lines or other project parameters is narrowed. This gives stakeholders a clear sense of what is involved, demystifying the somewhat oblique planning process—a perception that might hinder engagement.

The experience of all companies in this Group is that no one size fits all and that while it is imperative to transfer learnings from one project to another, it is equally important to get to know each community and find what's relevant in each area. Many companies have found that face-to-face engagement through 'door knocks' as well as information and consultation sessions such as open days have proved most effective. For example Grange Castle Business Park in South West Dublin embarked on early face-to-face engagement and this has now become a regular and successful feature of engagement even outside of specific planning processes.

At the same time it is important to look back at the types of issues that have previously been raised by groups during similar projects to get a better understanding of the potential concerns at the outset. This should also apply to statutory consultees or prescribed bodies so as to be aware of the issues that they tend to raise and address these in a proactive way.

Most peoples' concerns are genuine and understanding the impact the development is having or may have on people is constructive. Many companies have found that genuinely asking 'how can these concerns be accommodated?' or 'can we find a solution for them?' has led to working with the stakeholders to develop a solution that is acceptable to all even if it is a compromise.

Building an understanding of the community makes it possible to identify the things that are important to people and to implement simple touches that demonstrate respect. This might include a willingness to stop construction work during a funeral or during state exams or taking time from negotiations to eat with stakeholders. In Gaeltacht areas it is also important to respect the local language of Irish by offering to engage and do business with the community in Irish.

Representatives of the community sector reviewing this document raised the possibility of the Group endorsing capacity building, where they would support communities' skills for responding to consultation. While the Group recognises the importance of this approach, it did not feel that this was appropriate for companies specifically apart from ensuring that ample time was given to explaining the consultation process, the timelines and how people could participate. Companies could also give special consideration to groups at risk of exclusion on the basis of gender, civil status, family status, sexual orientation, religion, age, disability, race, or membership of the traveller community. The Equality Authority (www.equality.ie) provides a range of resources and advice.

In addition other members of the Group such as the Irish Planning Institute have started a process of raising awareness of the planning process which will address this to some extent. Many community organisations also have a role and have been tasked with building the capacity of local communities. There is also a role for the Irish Local Development Network and the Community Workers Co-op to understand what developments are coming and what capacity is required.

Engagement with stakeholders has raised fundamental questions for some companies about their projects and the way in which they are being carried out. The experience of some companies has shown that it is important that the culture within a company allows for such fundamental questions to be asked and allows for the genuine exploration of other options which may often also involve organisational learning and change.

South Dublin County Council's Experience in Grange Castle

South Dublin County Council realised at the outset when it began to develop Grange Castle Business Park that stakeholder engagement would be critical to the success of the Park. The Manager established a Project Management Team to work with prospective clients to also ensure that a communications strategy was developed which would facilitate tangible engagement with the various communities (local elected representatives, businesses and residential communities) that may have an interest in the development of the Park.

This collaborative approach between the Council, the respective clients and the community has ensured that each client locating in the Park has been able to develop their project in a timely and cost effective manner while garnering the goodwill of the community.

The Council has found that community goodwill is earned and it is earned out of generating respect within a community for the arrival of a new corporate neighbour. A project never gets a second chance to make a good first impression but by doing things right, taking care and attention, and listening to case history experience, a company can approach a prospective new business home with sensitivity and regard for neighbours. It's like any new arrival moving in next door, the local community and those living nearest will be quietly interested and curious; intuitively they will seek a sense of reassurance that their new neighbour will be courteous and considerate. Little things make a difference, so the tone, style and behaviour of communication can make a great difference in creating positive perception of, and good regard for a project.

In the case of Grange Castle all of the clients have used the same PR company which has meant that there has been consistency in the delivery of messages to the local community and the faces have become familiar over time as have the type of issues about which people had concerns. There have always been individual face-to-face meetings with those in closest proximity. Their concerns have been addressed in real and tangible ways and this happens in advance of the planning process.

A reactive strategy carries with it the risk of starting out in a community with negative experience, a poor knowledge of the company and its process, showing a lack of neighbourly expression or goodwill, presuming a welcome without making appropriate effort to demonstrate community interest or goodwill. Using the same PR company time and again has reduced this risk. But of particular benefit is early engagement so that a rumour mill or misinformation doesn't take hold.

In the Council's experience there needs to be as much thought and attention to the way in which community engagement happens as there is with the physical structure itself. Working through the issues with a community is hugely rewarding when there are clear parameters on both sides on what that consultation can deliver and the timelines are apparent.

There has not to date been an appeal to An Bord Pleanála with regard to Grange Castle clients and this is due in no small measure to the engagement process that takes place.

Company Presence & Brand

For companies that have had a long presence in Ireland, that already engage with a wide range of customers and have a positive track record and that are seen as a major employer in an area, the trust in their brand can play a positive role in opening engagement with the local community about new projects. The retention of employment or the creation of new jobs and other benefits are key interests.

Some companies have also built up good relationships with industry, environmental and farming representative bodies having liaised with them for many years. Large employers in the area were highlighted as another opportunity for engaging with members of the community e.g. through briefings, employee reps, trade unions and others. This on-going relationship and trust provides a good basis to involve additional stakeholders in new projects.

A number of companies also highlighted the benefit of communicating with employees who are from or live in a local community that may be impacted by a development. These employees can highlight local concerns, priorities and community contacts and they can also help with information dissemination.

Issues Register

Many companies saw the development of an issues register as an important step in developing stakeholder consultation.

An issues register serves two purposes at the outset: it identifies elements of the project that the project team feels may have the greatest potential impact on stakeholders, together with suggested mitigation measures to reduce the impact. It also identifies the effect that such issues could have on the project.

Entries in the issues register are drawn from concerns and past experiences from previous successful and unsuccessful projects, by soundings taken among the local community and by feedback from local authorities about past projects in the area. Those who had carried out this process found benefit in doing so in advance of community engagement and found it guided decisions on the project.

Other companies appoint liaison officers that function as an ongoing conduit between the company and the community, identifying issues arising among community members for the company to address and communicate relevant company news.

Community Gain / Community Benefit

Community Gain has many variables; where it applies, it is usually seen as a development contribution by the developer whereby a provision, typically comprising a financial element contributes or provides a service in an area.

It may also be viewed that the development itself is in the national interest, for example the extension of electricity or gas infrastructure facilitates Ireland's need for energy and more renewable energy sources are coming on line. It is more appropriate to think of community gain as 'community benefit' which does not necessarily entail a financial contribution. Developments have a positive local economic impact to some degree through for example, construction workers sourcing local goods and services. Many developments contribute to the expansion of our national heritage where discoveries, such as archaeological finds are made during excavation works; for example, during the construction of the natural gas pipeline from Dublin to Galway 190 previously unknown archaeological sites were identified.

Community gain can take many forms; companies have been exploring and developing appropriate structures through which contributions or other appropriate services might be managed transparently and involving local community representatives. In some cases these have been proposed by the developer in advance of its planning submission.

Bord na Móna's Experience

Bord na Móna has a number of infrastructure developments where community gain was deemed appropriate by the planning authorities. One such development included the setting up of a fund and the establishment of a Community Liaison Committee to identify environmental, recreational and community facilities to be funded. This committee includes equal representation from the local community, the planning authority, Bord na Móna and local political representatives.

The Community Liaison Committee meets several times a year to consider applications from local groups and clubs for financial assistance. Eligibility is limited to those within a certain geographic area proximate to the development. The Committee makes recommendations for fund disbursement to the local authority and these recommendations are then ratified at a meeting of the full County Council.

ESB's Experience

In another example, ESB has developed a community engagement policy that connects its engagement and capital support in the local community to its overall goal to deliver electricity while reducing carbon emissions. Wind farms are central to achieving this goal. The policy commits the company to effective communication and transparency as well as early engagement with the local community on the development of wind farms. It lays out the principles by which the company would like to see community gain disbursed – i.e. prioritising sustainable projects and those that focus on helping vulnerable groups. ESB sets up community funds in areas which are managed by the Community Foundation for Ireland who act as an independent administrator on all grant applications. This fund is set up for the life time of the wind farm and pays out to local groups and projects through an established grant-making procedure.

Practices
Communications Methods & Approaches

Complementing the role of Community Liaison Officers and Agricultural Liaison Officers as described below, companies use different communications and engagement methods and approaches depending on the stage they are at in the stakeholder engagement process.

These are well documented in frameworks such as the Monaghan Model or the AA 1000 SES (see section 4) where planning and understanding stakeholders at the outset are key. However, the most popular of these include:

- Understanding a community's priorities, history, demography, working patterns and other needs so that they can be accommodated in planning communications
- Preparing to address complex and technical issues in a way that people can easily understand e.g. using simple language supported by graphs, pictures and diagrams
- Engaging with landowners on a one-to-one basis and continuing to liaise with them throughout the course of the project
- Placing briefing notices in the local press and ads on local radio highlighting forthcoming meetings or other milestones in the consultation process where community members will have the opportunity to input
- Dropping information leaflets, sometimes delivered door-to-door or through central meetings
- Creating a dedicated website – in some cases a non-technical site separate from corporate website and specific to the project
- Creating dedicated project offices where all materials are available
- Public consultation sessions (at convenient times and venues for stakeholders) – including display boards, 3-D computer visualisations of the development in the landscape and the remediated landscape as well as a multi-disciplinary team on hand in person to answer questions and to explain the project. The point is to ensure an atmosphere conductive to dialogue is created.
  It is important to choose a venue that suits local community working hours and that is familiar such as a local school community hall or hotel. Companies should also pay attention to the teams that they put together for information sessions, considering the range of expertise that may be required (e.g. communications and technical) as well as training in managing conflict and group dynamics
- Questionnaires. These allow people to respond privately and with an opinion that they might not share in public. This method also allows consideration and analysis of proposals by the company. For example following a public consultation session run by Bord na Móna, all issues and concerns listed on the returned questionnaires or submitted via the email address were analysed and addressed. Some of these issues required direct one-on-one feedback to answer or update the individual concerned
- Willingness to meet opposition groups and respond to their questions and concerns
- Meeting with people in their own homes if they wish
- Increasingly, social media such as Twitter and smartphone applications are being utilised to good effect

EirGrid's Experience

Figure 1. below shows EirGrid's five stage project development and consultation roadmap[3] – this provides an overview of the overall process and the opportunities for stakeholders to input as the selection of routes for transmission lines or other project parameters is narrowed.

[3] http://www.eirgrid.com/media/EirGrid Roadmap Brochure July 2012.pdf

Figure 1. The EirGrid Roadmap

STAGE 1 — Information Gathering

Identify Project Study Area

Identify environmental & other constraints

Identify feasible options (corridor/sites)

Publication of **Stage 1 Report**

Pre-application consultation with An Bord Pleanála

Public

Public and stakeholder consultation on study area and constraints

Public and stakeholder consultation on findings of **Stage 1 Report**

STAGE 2 — Evaluate Options

Consideration of all feedback from **Stage 1**

Identification of EirGrid's emerging preferred option (route corridor/site)

Identification of indicative line within corridor or site boundary

Identify and meet landowners of indicative line/site; initial survey

Publication of **Stage 2 Report**

Pre-application consultation with An Bord Pleanála

Public

Public and stakeholder consultation on findings of **Stage 2 Report**

STAGE 3 — Confirm Design

Consideration of all feedback from **Stage 2**

Conduct environmental studies and surveys

Confirmation of design of line/site proposal including construction methodology

Ongoing engagement with landowners on preferred line route or site

Pre-application consultation with An Bord Pleanála

Public

Ongoing public information

STAGE 4 — Prepare Planning Application

Complete reports and prepare planning application

Preparation of Environmental Impact Statement (EIS) or Environmental Report as required

Conclusion of Pre-application consultation with An Bord Pleanála

Submit application to An Bord Pleanála

Public

Ongoing public information

Once application submitted, public can make submissions to An Bord Pleanála including at an oral hearing, if held

STAGE 5 — Wayleaving and Construction

Preparation of construction plans

Serve wayleave notice to landowners and agree access for construction

Commence construction

Public

Ongoing public information

Evaluation of Public Consultation process

Community Liaison Officer

For some companies, the role of community liaison officer (CLO or similar naming) can be important in building trust within a community and getting to the nub of issues.

In many cases, the person appointed lives within the community or has a connection with it while they openly work for the company. In other instances, the company can successfully recruit a suitable person who will be based within the community for the duration of the project. The companies recognise that the role needs certain skills and local knowledge. An investment in a facilitator on the ground is a way of showing respect and being as effective in engagement as they can.

Where the CLO is part of a project, they are seen as the central point of communication enabling consistent messaging, feeding back issues from the community, highlighting potential objections and importantly providing information to the community rapidly. Having the CLO in place to answer questions may alleviate some of the frustration people feel at being given too little information infrequently or too large amounts. Some approaches see the CLO as being best placed to elaborate more on the need for the project and benefits and the reason a particular approach is being taken on certain company positions, as it is not always easily communicated through other media methods i.e. letters or posters etc. Other approaches use the CLO primarily as a facilitator or conduit to ensure information flows.

Given these roles, it is important that the CLO is seen as someone of value to the community—perhaps because they have some power to deliver responses to queries or because they are the only (or one of only a few) liaison officer(s).

CLOs are appointed in a variety of ways. Many companies use an informal process that seeks out the suitable candidate through referrals or word of mouth in the immediate area. Other companies use formal recruitment processes and agencies.

As one company member put it, the CLO is the kind of person you will recognise when they walk through the door – people who will be facilitators and conduits, able to work in a contentious environment, occupying an independent role – e.g. prompting the company to change its approach in certain respects.

They will have a certain approach, good intuition with listening skills, able to give the time necessary to stakeholders and engage in a way best suited to stakeholders typically being informal (e.g. 'over a cup of tea') to ensure genuine dialogue is happening.

Bord Gáis Networks' Experience

Bord Gáis Networks has an in-house CLO who works with the communications team to establish a suitable communications plan for the project. In addition, the CLO serves as the central point to coordinate agreed and necessary communications on projects and to activate the relevant communications channels. This has been a contributing factor to the success of Bord Gáis Networks' engagement with community and project stakeholders. To support stakeholder engagement activity, contractors employed by Bord Gáis Networks may also appoint a CLO on projects as required.

For large capital projects or projects with particular sensitivities, a Local Liaison Officer may also be appointed as the project contact on the ground. The Local Liaison Officer ensures that consistent messaging in relation to project developments is delivered, as appropriate, to the project stakeholders.

CLOs may already have some profile among the community and are prepared to be flexible and on 'the end of a phone'. In some cases the role has been fulfilled by a retired person. Their understanding of technical issues is in general not seen as very important for this role as that expertise can be drawn in as required by the company. Some companies have informal CLOs in place in the form of local employees as described under 'company presence' above.

Reviewers from the community sector reading this document also highlighted the option of liaison with the community through mediators such as area partnerships or other community organisations. Their role would not necessarily be to support one side or the other but to accurately inform relevant stakeholders.

Landowner Engagement

For almost all projects, landowner engagement is critical to successful development. Most companies recognise the significant role that the farming organisations play as a trusted broker in this engagement and the need to build this relationship and to engage at an early stage pre-planning.

Although landowner engagement is most relevant to linear infrastructure projects, it is also applicable to other development projects, such as industrial business parks or facilitating the extension of county development or local area plans to cater for the future. Regardless of the type of project, where there is a need to engage with landowners, Group members would encourage engagement with landowners at an early stage in the process and before it is required by planning.

The volume of landowner consent approvals in respect of way leave agreements and the granting of relevant planning permissions can be indicative of successful engagement.

Farming organisations such as the Irish Farmers' Association have extensive networks throughout the country and are an important conduit to rural and farming communities. These organisations have been instrumental in negotiating with many companies on behalf of farmers.

Bord Gáis Networks' Experience

At the initial stages of a project, a dedicated team is appointed to engage with the landowners. An Agricultural Liaison officer (ALO) is appointed to brief the landowner on the project and how it will impact on their land. The ALO indicates the route of the pipeline on the ground for the landowner and advises of the typical compensation based on that.

An in-house team manages all communications, payments and legal agreements with the landowner through his/her appointed legal representative.

Once a date is agreed for construction, the ALO visits each landowner on the project to agree individual requirements throughout the construction process e.g. fencing requirements, water supply provision and access gates. Reinstatement is overseen by the relevant ALO. Throughout the project and thereafter, the ALO acts as the point of contact between the Landowner and the contractor.

Bord Gáis Networks' absolute priority is safety and it communicates regularly with landowners on safety matters. In addition, Bord Gáis Networks continues to maintain excellent relationships with farming organisations and representative bodies. The Bord Gáis Networks publication 'Working with You – The Landowner's Handbook[4]' provides landowners with further information related to pipeline projects from planning through to construction and to working on the land post-construction.

Engaging Local Authorities and Public Authorities

Forming and maintaining a good relationship with local authorities (both elected members and executives) and other public and regulatory bodies to draw on their guidance, local knowledge and experience is seen as essential for most companies. The key is early engagement. Many bodies also provide guidance documentation. See for example the EPA guidelines on undertaking environmental impact statements[5].

For many, consultation with the local authority mainly involves meetings with planners regarding technical planning and EIS matters. Increasingly, the advice of local authority Directors of Services is also sought. This local authority resource is vitally important in terms of understanding the community, identifying what is relevant for a particular area, providing advice on who to talk to in the community, understanding the political agenda and sharing learnings from past experiences in the area. One company indicated the valuable and extensive network of County Community Forums while other important roles and organisations cited were local engineers, the local water curator, city and county development boards and the local Garda superintendent.

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[4] http://www.bordgaisnetworks.ie/Global/About Us/About Us documents/Our Network Projects Docs/7637 Landowners Handbook.pdf.pdf
[5] http://www.epa.ie/pubs/advice/ea/guidelines/

Many companies stressed the importance of briefing local representatives such as councillors before holding any public consultation events or activities. This activity should be open and visible and the information given to such authority figures should be the same as that shared with the public. The rationale behind this approach is to ensure that local authority figures understand the process and are informed in the likely event that constituents will approach them once public consultation activities begin. Some suggestions included early engagement with this group, as soon as 2-3 years before intending to seek planning permission. It was felt by some that these representatives can provide a good sounding board on how the company and the proposed project are perceived. The importance of continued engagement with this group was also stressed by some, seeking their ongoing advice as engagement with the wider community about the development continues.

In some cases being aware of electoral cycles and inputting to local development plans were seen as critically important. However where projects are driven by third parties and international directives with little leeway in terms of timing, they seem less so.

At the very least, companies should be aware of and input where possible to all relevant plans, strategies and frameworks whether at EU, national or local level. Such inputs ensure that development plans take account of potential projects and make that possibility a point of public information as well as supporting general understanding of the linkage between companies' day to day activities (and potential disruptions) and their contribution to national social and economic development.

Engaging Local Media

Engagement with local media varies from company to company. Some companies are proactive in this engagement utilising local media outlets to advertise as widely as possible to promote public consultation events, holding media briefings on the project and inviting reporters to information sessions. A number of other local outlets such as parish newsletters and posters in shops are also used to inform people of events.

The familiarity of the press officer with the area in question was recognised as important as well as the company's ability to provide an Irish speaking spokesperson to engage with those media outlets that operate through Irish.

Other companies do not always have a specific media plan but would respond with a press release following a media enquiry. In some projects local advertising was used to respond to misinformation that was circulating locally.

In terms of responding to critical media articles, there are a number of approaches. Companies can choose not to react to stories but instead prepare pieces based on critiques that defend the development and that are released through the website, newsletters and other media outlets. In other cases it is appropriate to opt for a more immediate rebuttal to media stories, particularly those which featured inaccuracies around the project.

In recent years Group members have also seen the value and importance on engaging through social media and this will become increasingly important in the future. The provision of information through the likes of Twitter, Facebook etc. allows for engagement in many cases with a different type of audience than through traditional media outlets. Companies should carefully consider the resources for managing social media as they are likely to generate a welcome but substantial volume of stakeholder views.

Engaging National Media

In addition to local media some companies highlighted the importance of briefing both the regional correspondents of national media and national correspondents who specialise in a particularly relevant field e.g. RTÉ's Science and Technology Correspondent. The latter would allow for balanced debate and examination at a national level around some of the technological options particularly for projects of a strategic importance.

Leadership

Another important aspect of stakeholder engagement is around building support for the project among strategic organisations representing a specific cohort e.g. Chambers Ireland, IBEC, Údarás na Gaeltachta, community leadership etc. These are organisations with local bases that also have national linkages through their own networks. These are good for soundings and for informing or relaying information to stakeholders and as such can be a source of knowledge and communication on certain issues. For many companies this is a relatively new approach; many of these organisations had not been approached in this way until recently.

ESB Networks' Experience

Many companies have found it valuable to engage with business leaders at a local level. For example ESB Networks engaged with Westport Works, a multi-agency enterprise group interested in ensuring good infrastructure for the town; the group helped to facilitate engagement with local stakeholders. In other cases companies have consulted with business groups around the construction phase of the project to ensure the least impact possible to businesses and the appropriate communication around works.

On-going Engagement

For most companies, engagement does not end once planning permission has been granted or even when construction is complete. The relationship built up during engagement pre-planning and during construction is an important one and needs to be fostered and maintained throughout operation. In addition to maintaining this relationship companies should also ensure that they reflect and audit themselves on their engagement with stakeholders, noting the learnings and building these in to any future stakeholder engagement.

4. Stakeholder Engagement Models

Around the world, a range of different toolkits exist for stakeholder engagement. Our document does not wish to replicate these but as they are valuable references for planning stakeholder engagement stages and for understanding what is considered best practice, we reference three below that should be considered in any stakeholder engagement.

They include (links included below):
1.   Guidelines developed in Monaghan;
2.   A CSR Europe-generated guide on best practice with respect to different sets of stakeholders and
3.   A frequently referenced, globally-applicable standard for Stakeholder Engagement, the AA1000 SES designed through consultation by AccountAbility.

We also briefly refer here to a guidelines document on engagement principles specifically for electric utilities companies, created by the World Business Council on Sustainable Development (WBCSD).

The AccountAbility standard takes a theoretical approach to documenting the phases and steps to be followed. The WBCSD report dwells on five essential principles that electric utilities providers should follow in stakeholder engagement. The Monaghan Model provides a very useful checklist of steps, procedures and templates for stakeholder engagement. The CSR Europe guide is very practical and includes tips specific to different sets of stakeholders. Our guide also tends to the practical end of the scale.

1. The models outlined have much in common.

The Monaghan Model	*WBCSD*	*AA 1000 SES*
7 principles:	*5 principles*	*3 principles*
1. Integrity of consultation	1. Inclusivity	1. Inclusivity
2. Visibility of consultation	2. Materiality	2. Materiality
3. Accessibility of consultation	3. Responsiveness	3. Responsiveness
4. Confidentiality of consultation	4. Measurement	
5. Disclosure obligations in consultation	5. Transparency	
6. Fair interpretation of consultation		
7. Publication of consultation		

There is a large degree of overlap in the principles between the schemes. For example, several of our Group's commitments are to do with inclusivity and transparency (or visibility and accessibility in the Monaghan Model) such as encouraging active involvement of stakeholders, ensuring stakeholders have the opportunity to have a say, providing explanations of what elements can be influenced, when.

The Group's commitment to understanding and responding to stakeholders relates to responsiveness (or disclosure obligations and publication of consultation in the Monaghan Model).

Overall, our Group has chosen six commitments that practically address: the inclusion of stakeholders in engagement; what the spirit of the engagement should be like for both businesses and stakeholders; how the companies respond to them while upholding commitments to responsiveness and continuous improvement.

2. All of the models recommend thinking in terms of phases to the consultation, namely preparation or planning phase(s); an implementation phase and reviewing and improving phase. Each model takes a slightly different approach within each of these, the AA1000 requiring three sub-phases to preparation including the formulation of a corporate commitment to engagement, the definition of the purpose, scope and stakeholders to be engaged with before getting into the detail of actually planning engagement.

Our Group broadly accepts the principles and phased approaches outlined in the various documents but in keeping with the practical approach to outlining commitments, our report has focused on capturing practical considerations drawn from experience that complement recommended procedures. Our document is specific to a set of development companies in the Irish context.

There are some points that this Group would approach differently. For instance, the Monaghan Model suggests it may be appropriate not to respond to a consultation in certain circumstances—for example if the subject is not relevant or if a group thinks a decision has already been taken, or they have no faith in the consultation process (see page 23).

In contrast this Group would encourage stakeholders to always respond where possible. Businesses learn from all feedback and ideally it will improve their practices. This would resemble what the Monaghan Model refers to elsewhere as making a nominal response (see page 24).

The Monaghan Model

Full text available at:
http://www.monaghancommunityforum.ie/uploads/Resources/monaghanmodel.pdf

The Monaghan Model, a Guide to Good Practice in Community Consultation was developed jointly by The Monaghan Community Forum and Monaghan County Council with the guidance of the Consultation Institute and Stratagem. Its purpose is to ensure that community is represented as effectively as possible in consultation processes and to give guidance to other organisations and agencies on how best to consult with community.

The document includes sections on how a business should plan a consultation and how a stakeholder can get the most from being consulted. It also includes notes on the benefits of consultation, principles that should underpin consultation, the theory behind stakeholder engagement and consultation tools. The document also offers guidance on planning, communication and evaluation, including tips on identifying who to talk to when, where and how. Overall, it is a very useful checklist of steps, procedures and templates for stakeholder engagement.

According to the model, consultation has three phases: 1) pre-consultation planning that defines objectives, target audiences and materials to be used; 2) The consultation process which includes publicity campaigns, events and ongoing monitoring to ensure all is working and 3) feedback to those who participated as well as an evaluation of the overall process.

CSR Europe Guide to Proactive Stakeholder Engagement

Full text available from: http://www.csreurope.org

This resource is a toolbox helping companies to engage with their stakeholders and practically help actors in:
- Better identifying the issues raised through engagement with stakeholders and a range of good practices
- Selecting their partners by prioritising the mapping of issues, actors and tools
- Asking the right questions to enable internal implementation of commitments

It covers two tools and engagement with six types of stakeholder. Each section includes further resources and case studies of individual company approaches.

AA1000 Stakeholder Engagement Standard

Full text available at: http://www.accountability.org/standards/aa1000ses/index.html

The purpose of this standard is to establish the benchmark for good quality engagement. It was developed over several years with a wide range of stakeholders and is used by companies globally such as Vodafone.

The AA1000 SES model involves three stages where a company 1) commits to and integrates the principles behind the standard, 2) identifies the stakeholders involved and then 3) plans, prepares, implements and reviews the engagement.

The AA1000SES (2011) is part of a suite of stakeholder engagement tools developed by AccountAbility that also includes the AA1000SE Manual. This is two volumes published as an extensive set and developed by experts with support from broad public consultation.
http://www.accountability.org/images/content/2/0/207.pdf
http://www.accountability.org/images/content/2/0/208.pdf

They address:
•   How to develop the case for stakeholder engagement
•   Step-by-step guidance, templates and worked examples for organisational engagement
•   Project-based engagement
•   Public sector engagement

The standard is based on criteria allowing an evaluation of the stakeholder relations established by the company. The three criteria are: inclusivity, materiality and responsiveness. It is up to the company to specify what it means by these three criteria: i.e. how it applies these generic principles in the context of its own activity and engagements ultimately bringing companies and their stakeholders to co-produce indicators of success.

Appendix A: Stakeholders

The following is a sample of authorities and organisations which were engaged and provided comment on the document. Some organisations did not comment:

- Community Workers Co-operative member
- Irish Local Development Network member
- Údarás na Gaeltachta
- Commission for Energy Regulation
- IDA Ireland (Industrial Development Agency)
- Forfás
- Environmental Protection Agency

Appendix B: Planning in Ireland

Overview

The Planning and Development Act, 2000 (as amended) legislates for a hierarchy of plans and planning guidance in Ireland. At National level there is national strategic planning framework, in the form of the National Spatial Strategy (currently under review). At a regional level, Regional Planning Guidelines were developed in order to realise the spatial vision laid down in national policy. This level bridges the gap between high level policy and County Development Plans which are prepared by local planning authorities. There are currently 88 planning authorities in Ireland – this is proposed to change. The 2010 Planning Act introduced the Core Strategy requirement which means that planning authorities must demonstrate that the development plan and its objectives are consistent with the National Spatial Strategy and Regional Planning Guidelines. In addition to planning legislation there are relevant EU and statutory regulations. All of the legislation governing the administration of the Irish planning system is available on www.irishstatutebook.ie and the Department of the Environment, Community and Local Government's website, www.environ.ie.

Forward Planning

The development plan is the main public statement of planning policies for the local community. It sets out the land use, amenity and development objectives and policies of the planning authority for a 6 year period. The plan consists of a written statement of objectives and a map or series of maps.

The plan includes objectives for;
• Development and renewal of obsolete areas
• Preserving, improving and extending amenities
• Provision of water supplies and sewerage services, waste recovery and disposal facilities
• Zoning of areas for residential, commercial, industrial, agricultural etc. purposes
• Provision of accommodation for travellers
• Provision of services for the community

The development plan also contains land use zonings which outline the envisioned use of lands in urban areas and their immediate rural hinterlands. When land is zoned for a particular type of development in the development plan, this is a clear indication that a planning permission for this form of development may be obtained. Zoning may also indicate restrictions on development (e.g. a low number of houses per hectare, certain types of industry only) and permitted development will be limited accordingly.

The making, reviewing and varying of the plan is a function reserved for the elected members (i.e. councillors) of the planning authority. It is their duty to adopt the plan with the technical help of their officials (the Manager, planners, engineers etc.), and following extensive public consultation.

Development Management

There are three main types of planning permission. An application may be made for:
• Permission
• Outline permission
• Retention permission

The most common type of application made is for permission, often referred to as full permission. There are circumstances when the applicant may want to make an application for outline permission. This type of consent is useful in terms of clarifying as to whether or not the planning authority agrees with the proposed development in principle prior to commencing development. If outline permission is obtained, full permission must be acquired prior to commencing work on the development.

There may be specific requirements depending on the type of development for which permission is sought. Information on the specific requirements of planning applications is available in a number of forms. A preplanning application meeting can be requested with the planning authority in order to determine what may be required of an applicant prior to the commencement of the development consent process. The purpose of consultations is to try to ensure that the subsequent application for permission/approval is of a high standard, e.g. that correct procedures are followed and that issues relating to proper planning and sustainable development and the effects on the environment are adequately addressed from the outset in the application.

Further details on the requirements associated with planning applications pertaining to certain types of development are available on the Department of the Environment, Community & Local Government's website, www.environ.ie. The Planning and Development section of this website has a number of publications which outline the statutory consultation process which exist for the planning consent procedures. An Bord Pleanála's website, www.pleanala.ie also has a large body of information on public consultation processes attached to the planning appeals process. If specific queries arise in relation to an aspect of the planning process then one should consult the website of the Irish Planning Institute (www.ipi.ie) in order to find the contact details of a planning consultant who may be able to provide the detailed advice desired.

Prescribed Planning Bodies

The function of a Prescribed Body, facilitated under legislation, is to consider and make comment on draft development plans and applications that have the potential to impact on a particular interest area of the Prescribed Body. The mechanism facilitates the inclusion of expert commentary and expertise within the development process which may contribute to, and facilitate the realisation of "proper planning and sustainable development".

The prescribed authorities for the purposes of the making of a Development Plan and the record of protected structures include the Minister of the Environment, An Bord Pleanála, various Ministers, the Heritage Council, the National Roads Authority, An Taisce — the National Trust for Ireland, any planning authority whose area is contiguous to the area of the planning authority that prepared the draft and the relevant regional authority. There are also a number of types of planning applications (including applications that contain EIS) for which Local Authorities are obliged to refer applications to Prescribed Bodies for review and comment. There are a large number of prescribed bodies listed within the Planning and Development Regulations 2001 (as amended). Depending on the circumstances of the planning issue or application, the prescribed bodies to be consulted may change. These instances are fully outlined in the Planning and Development Regulations 2001 (as amended).

Planning Appeals

Ireland is one of the few countries which possess an independent appeals mechanism facilitated by An Bord Pleanála. The Board also has functions to determine appeals under Water and Air Pollution Acts and the Building Control Act.

Appeals under section 37 of the 2000 Planning Act, usually referred to as normal planning appeals, constitute a significant proportion of the work of the Board and account for most of the decisions made by it. These appeals arise from decisions by planning authorities on applications for permission for the development of land (including applications for the retention of structures or the continuance of uses).

The three types of appeals typically heard by An Bord Pleanála are;
- First party appeals against decision of planning authorities to refuse permission
- First party appeals against conditions proposed to be attached to permissions by planning authorities

- Third party appeals, which are normally against decisions of planning authorities to grant permission

In some cases, there may be both first party and third party appeals against a decision of a planning authority. Only persons or bodies who have made submissions or observations on a planning application, and paid the prescribed fee to a planning authority can appeal a planning decision to An Bord Pleanála.

Strategic Infrastructure Development

The Planning and Development (Strategic Infrastructure) Act 2006 made significant changes to the way strategic infrastructure developments are determined within the planning system. An Bord Pleanála now deals directly with determinations relating to Strategic Infrastructure Development (SID) as defined by Act. Strategic infrastructure development can generally be described as development which is of strategic economic or social importance to the State or a region. The opinion is formed by the Board at the conclusion of the pre-application stage. Strategic infrastructure development can include electricity transmission infrastructure development and strategic gas infrastructure development.

A research paper on strategic infrastructure planning entitled "Strategic Infrastructure Planning: Making It Better" is available from Chambers Ireland.

Changing European Union Regulations

The European Union, under regulation no. 347/2013 sets out a comprehensive legal and policy framework to optimise energy network development at a European level by the year 2020 and beyond. It identifies twelve (12) strategic trans-European energy infrastructure corridors and geographic areas for energy infrastructure with a trans-European/cross border dimension. The new regulation sets out a process to establish on a two-yearly basis a list of Projects of Common Interest (PCIs) which will contribute towards the development of energy infrastructure networks in each of the 12 corridors. Ireland is within the North West Europe corridor.

Public Consultation

The planning system is open and transparent. Everyone (individuals, residents' associations, etc.) has the right to see an application and, subject to payment of a prescribed fee, comment in writing, either positively or negatively, on it, if it is likely to affect either the individual or the neighbourhood. The language in the legislation focuses on consultation "with the public", prescribed bodies, planning authorities, etc. In deciding on an application, the planning authority must take all written comments into consideration. In the case of standard planning permissions, a 5 week window exists from the date that the planning authority receives an application for the public to comment upon it.

Under the Strategic Infrastructure Act there is provision for wide ranging public participation in relation to the strategic infrastructure development consent process. Any person or body may make submissions to the Board within the period allowed for the application to be inspected (minimum of six weeks) in relation to the implications of the proposed development on the proper planning and sustainable development and the likely effects on the environment of the proposed development. Where meetings have been held between the Board and prospective applicants under the consultations or scoping procedures referred to earlier, the record of any such meetings will be made available for inspection.

The paper used for this document comes from a mixture of
recycled and sustainably managed sources.