

Public Consultation Report – Template

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Notes:

This template is prepared to support EBRD Clients to produce a Public Consultation Report (PCR) in form and scope satisfactory to the EBRD as required by the EBRD 2024 Environmental and Social Policy (ESP) and Environmental and Social Requirement (ESR) 10 Stakeholder Engagement, paragraph 33 for Category A projects:

- **“The consultation and disclosure process [for the disclosure of the final ESIA] will meet any applicable requirements under national environmental impact assessment laws and other relevant laws. The client will publicly disclose a summary of the disclosure and consultation process, including stakeholder feedback received, and the client’s response to such feedback (consultation summary).”**

The PCR is a specific document that presents the summary and the outcomes of the public consultation and stakeholder engagement efforts by the Company and its consultants conducted during ESIA disclosure period.

This document is presented as general guidance on the form of the PCR and should be adapted by the client to the specificities of the project context.

The EBRD encourages Clients to provide clear and sufficient information in all sections of the PCR. The more comprehensive the answers given, the less need there may be for the Bank to request further information. To keep main text concise, additional information can be contained in annexes.

This is a one-time report that follows ESIA disclosure, which happens prior to Category A project financing approval by EBRD. The PCR will be publicly disclosed by the Client (which will include any amendments if required to respond to comments made during the disclosure period) either as an annex to the ESIA or as a standalone report.

Where comments received during the ESIA disclosure do not trigger any material changes requiring significant revision of the ESIA¹ and where clarifications have been provided to sufficiently address such comments, those clarifications will be reflected in the PCR without updating the entire ESIA package. The preference in this case is that the ESMP is updated with any additional mitigation measures and the PCR is included as an annex to the ESIA in order for the final ESIA disclosure to present a complete picture of final commitments and clarifications. Clients should refer to ESR1 and associated guidance on material change when making this determination and be prepared to discuss and agree the proposed approach with the EBRD.

The difference between PCR content and other project E&S documentation is explained below:

- **Stakeholder engagement (SE) section inside the ESIA: This dedicated SE section explains how the ESIA was prepared and what type of stakeholder engagement was conducted during its development.** This section includes stakeholder identification and details (including figures on participation) of engagement from the start of ESIA activities such as ESIA screening, scoping and baseline data collection and details and analysis of the specific concerns, questions and opportunities for improvement of the Project raised by stakeholders during ESIA preparation

¹ If the ESIA has also been submitted for or approvals received under national regulatory purposes, the implications of such changes will need to be assessed by the Client and, if required the relevant authorities in accordance with national legislation.

before the impact assessment and mitigation measures have been fully defined. ESIA preparation-related engagement is aimed at collecting inputs and feedback to inform the impact assessment and proposed avoidance, minimisation, mitigation and compensation measures. This final draft of the ESIA, which has considered stakeholder feedback to date, is then disclosed to the public and followed by targeted consultation with institutional stakeholders and affected communities during the disclosure period confirming whether collected feedback indeed helped to shape the avoidance and mitigation measures

- **The project Stakeholder Engagement Plan (SEP) outlines Client's overall approach to stakeholder engagement for the entire lifecycle of the project and therefore is different from PCR, which is a one-off summary document linked to the ESIA phase. The SEP should include a very high-level summary of engagement during the ESIA, with the PCR providing the opportunity for explaining how methods of engagement and consultation included in the SEP were used during ESIA disclosure and the detailed analysis of the results of this engagement.**

TEMPLATE OF PCR
(to be adapted by client for specific project)

Public Consultation Report
“Project Name, Country Name”

Advisory notes provided in text boxes

A length guide is provided by section. The PCR level of detail will always depend on the project context. A key question for determining the right level of detail is to ask: does this information allow a given stakeholder to identify how their feedback was addressed?

Date: month and year

Public Consultation Report

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1. Introduction

[Length guide: maximum one page text]

Elements that make a better PCR

- a brief description, including a figure of the location, of the project and the main parties involved; this should match but be a very high-level summary of the description in the ESIA so stakeholders are clear which project the PCR relates to
- the stage of project development, i.e., the ESIA has now been prepared and disclosed
- the purpose and scope of the PCR, including its relationship to / how it complements other documents, in particular the ESIA and SEP, providing links to the location of these documents.

Add text.

2. Requirements for stakeholder engagement for ESIA disclosure

[Length guide: one to two pages]

Elements that make a better PCR

- a summary of stakeholder engagement requirements within the national regulatory framework that applies to EIA/ESIA disclosure for the project; include any transboundary requirements that might apply
- a summary of EBRD (and any other lender) stakeholder engagement requirements for ESIA disclosure for the project; include any transboundary requirements that might apply
- reference to the project SEP and how these requirements have been incorporated into that document and now executed (with reference to Section 3 of the PCR)
- requirements should be concise, providing the context for the engagement that has been undertaken for ESIA disclosure

Common issues to avoid

- Content is overly detailed; detailed regulatory requirements would sit in the ESIA itself and / or the project SEP. The goal is to highlight the requirements related to stakeholder engagement that might be most relevant for the reader, for example, the EIA Code requires a 30-day public consultation period, advertised in the national newspaper 28 days in advance.
- Exclude personal data from PCR including information such as names of local residents, their addresses, telephone numbers and signatures collected via attendance registration sheets. Details of public officials referenced in PCR is normally an acceptable practice unlike those of general public. Faces on pictures if included into the PCR will need to be blurred to avoid risk of retaliation or for personal data protection purposes.

Add text.

3. Summary of stakeholder engagement for ESIA disclosure

[Length guide: five to ten pages]

Elements that make a better PCR

- Present a summary of the disclosure and consultation process; How stakeholders were identified and analysis of stakeholders potentially affected by the Project is contained in the project SEP and does not need to be replicated in the PCR. A cross-reference can be made to the SEP for this information. Only where new stakeholders have been added to the engagement program for ESIA disclosure that are not covered in the SEP, will the methods of identification and rationale for engagement method need to be described in the PCR
- Provide detail on the specific stakeholder engagement events / activities (including timing, information disclosed, language(s) used, forum and methods) by stakeholder group; This does not need to have been undertaken by the proponent; for example, if a regulator disclosed the EIA this can be included.
- Summarise additional measures undertaken in order to engage and address risks and impacts to vulnerable groups or individuals
- Summarise engagement attendance statistics, including noting any media attendance and how any low attendance or notable absence of certain groups (where not planned for) were supplemented for in the overall disclosure program
- Summarise any grievances received related to the ESIA disclosure engagement process itself and how these were resolved (to the degree confidentiality allows); it should usually be possible to indicate the stakeholder group and summarise the main issues raised and explain how they were resolved
- It will generally be inappropriate to name specific individuals (unless those who have an official position) and in some cases specific groups with which the project team has engaged, as this may pose risks to those involved. Information about the types of stakeholders engaged and for what general purposes may be more appropriate (see further guidance on privacy in the Section 4 advisory notes).

Add text.

Depending on the volume of information to be presented, a table such as the one below could be used to summarise engagement activities undertaken. This should be able to draw, at least as a starting point, on the plan for ESIA disclosure in the project SEP. The stakeholder groups should match those used in the project SEP. If the table is becoming too complex or long, information could be appended with a summary presented in the main text.

Performance against any general principles used for engagement² (usually as described in the project SEP) could be described as a narrative in addition to the table.

² For example, as a general principle for all formal consultation, Client will explain objectives of the discussion, how the event will be structured, and expected follow up and proactively communicating the projects zero-tolerance to reprisals, including communicating any specific measures taken for a consultation event in this regard.

Table X ESIA disclosure stakeholder engagement by stakeholder group

Stakeholder group	Event Timing and Method/detailed content	Changes compared to the plan for ESIA disclosure contained in the SEP, with justification and how this still meets planned engagement requirements
Group X	<p>By date x:</p> <p>The following documents were available³:</p> <p>In these formats and language(s):</p> <p>At these locations:</p> <p>This many days in advance of engagement event x:</p> <p>Public meeting in location x was advertised as follows:</p> <p>Public meeting took place at location x on date x</p> <p><i>Include all activities, such as any focus groups, one-to one meetings</i></p> <p><i>For each event (or in summary if applies to all), summarise any specific measures used such as local translators to facilitate meaningful engagement</i></p>	
Group Y		

³ Provide link to information where still publicly available or if not manageable as a footnote add a reference list to the PCR.

4. Summary of stakeholder feedback and Client response

[Length guide: five to ten pages]

Elements that make a better PCR

- Provide introductory text describing the Client comment review process, for example, all feedback (comments, concerns, issues) on the ESIA content were collated and considered by the Client to ascertain which feedback should result in a revision to the ESIA and rationale documented regarding those that were not accepted or where no change to the ESIA was needed
- Summarise how engagement was documented (this could include describing general principles such as the use of minutes and an internal stakeholder engagement register)
- Summarise the stakeholder feedback received, including any coverage in the media
- Summarise the Client's response to the feedback, including how the ESIA was influenced by the feedback, for example any changes made to proposed avoidance, minimisation, mitigation and compensation measures or the rationale regarding feedback where no change to the ESIA was needed or a change could not be accommodated
- The appropriate format for the summary of feedback and Client response to feedback will depend on the volume of feedback received; it is possible the feedback and response to feedback could be tabulated by meeting or stakeholder group if only a small volume of feedback is received; feedback could also be grouped into topic areas perhaps reflecting the structure of the ESIA. An indication should also be given of any trends in the feedback, for example, where a large number of stakeholders or those from certain stakeholder groups have expressed similar concerns. Where the volume of information cannot easily be contained in the main text, a higher-level summary table could be used, with further detail included as an annex. *Whatever format is chosen, it should allow a given stakeholder to identify how their feedback was addressed*
- Include a description of how any diverging views amongst stakeholders was resolved where applicable
- In all cases, there is a need to balance the requirement of documented and transparent engagement (which remains the guiding principle) with protection of personal data, [maintaining confidentiality](#) and prevention of risk of retaliation. In the case of the Public Consultation Report, this will need to be publicly disclosed, however, personal data can be redacted, faces blurred or photos not used if necessary (see ESR 10 Guidance Note for further guidance on privacy and avoiding retaliation)
- Include any feedback received in the form of grievances received related to the project E&S risks and impacts during the ESIA disclosure period and how these were resolved (to the degree confidentiality allows); in most cases it will be possible to indicate the stakeholder group and summarise the main issues raised and explain how they were resolved.

Annexes

As needed, see content guidance above.