



# Reviewing and improving our public consultation process



Working with you  
for our energy future

[www.eirgrid.com](http://www.eirgrid.com)

# Table of Contents

<b>Executive Summary</b>	1
1. Introduction	4
2. EirGrid's Current Approach to Consultation	6
3. Review of Feedback from the Public, Elected Representatives & Media	7
4. International Review of Best Practice	13
5. External Review – SLR Consulting Limited	18
6. External Review – The Chartered Institute of Arbitrators	20
7. Conclusions & Commitments	22
<b>Appendices</b>	28

# Executive Summary

EirGrid's role, as a state-owned company, is to manage and operate Ireland's national grid to ensure a safe, secure supply of electricity to homes, businesses and industry across the island.

In order to implement Government energy policy, we need to develop the Irish electricity transmission system to guarantee a secure supply of electricity for now and future generations.

Our long-term strategy - Grid25 - is our plan to meet these responsibilities in the Republic of Ireland. It involves the maintenance, improvement and technological upgrade of the network. Developing and implementing that strategy is a consultative process, designed to involve anyone that may be affected by the decision to locate a project in their area.

This engagement is absolutely necessary: It provides stakeholders with the information they need to participate in a meaningful way and helps EirGrid understand their concerns. It also provides an opportunity for EirGrid to explain to those affected how and when they can have input to the project.

In response to the feedback we received on our recent consultations, we made the commitment in January 2014 to carry out a review of our consultation process to enhance future public engagement regarding our Grid25 projects.

There were four inputs to this process:

- A review of public feedback;
- A review of international best practice in public consultation;
- An independent external expert review carried out by SLR Consulting Limited;
- An independent external expert review carried out by the Chartered Institute of Arbitrators.

In the wide-ranging recommendations arising from the two external reviews undertaken by SLR Consulting and the Chartered Institute of Arbitrators there is significant commonality in the changes that are needed for the future.

We accept the conclusions of these two independent studies and have compiled a set of commitments based on their reports. We propose to carry out a similar examination of our approach to consultation in Northern Ireland in the coming months.

Three common themes have emerged from this examination of our public consultation process: -

## Theme 1: Develop a Participative Approach

We will move to a more community-focused approach when developing electricity projects - to enable greater stakeholder participation from the outset.

## Theme 2: Change our Culture and Processes

We will change the culture in our organisation - to develop stronger relationships with stakeholders and communities.

## Theme 3: Encourage Leadership & Advocacy

We will seek support from the political system and state bodies - to better explain energy issues and make the benefits of a stronger system clearer to all.

Under each of these themes we have proposed a number of commitments. These are intended to improve the way we engage with the public and stakeholders in the development of grid projects: -

### Theme 1: Develop a Participative Approach

#### 1. Clear Communications

We will ensure that information is presented in a straightforward way.

#### 2. Process for Consultation in Project Development

We will improve the effectiveness of our consultation process to clearly define consultation opportunities, to explain how feedback can be provided and to efficiently assess feedback received.

#### 3. Consultation Toolkit

We will clearly explain the available methods of consultation and involve our stakeholders in developing these methods.

#### **4. Improved Community Relationships**

We will locate staff in the regions to facilitate enhanced dialogue with local communities and interest groups and to develop sustained long-term relationships in local areas.

#### **5. Demonstrate Consideration of Social Impact**

We will increase the transparency of the consultation and decision making process.

### **Theme 2: Change our Culture and Processes**

#### **6. Consultation Handbook**

We will create a consultation handbook that sets out the purpose and principles of our consultation process, to ensure that high standards are met.

#### **7. Consistency of Information**

We will consistently review a project to ensure the original network need remains, the proposed solution is appropriate and that any changes are communicated in a transparent and consistent manner.

#### **8. Complaints Process**

We will immediately put in place a system to manage and investigate complaints or feedback. This will include providing the opportunity to investigate and resolve a complaint.

### **Theme 3: Encourage Leadership & Advocacy**

#### **9. Support of Policy Makers**

We will encourage state agencies and other bodies to participate in a broader debate on why new or enhanced electricity infrastructure is required.

#### **10. Input from Representative Groups into EirGrid's approach to grid development**

We will establish a structured approach to work more cooperatively with national representative groups, and with the associations who are acknowledged as key influencers.

#### **11. Regional Discussion Forums**

We will create forums to allow for meaningful dialogue on different technical and environmental matters when developing the grid.

#### **12. Independent EMF monitoring & compliance**

We will comply with any recommendations from the separate Department of the Environment, Community and Local Government review of the latest research and developments concerning electric and magnetic fields. We will also investigate the role an independent body could play in the area of monitoring EMF levels for both compliance and reassurance.

These commitments, which are given in more detail at the end of this review, will require a major cultural change within EirGrid. The primary goal is to build trust and enable greater participation in the decision-making process as part of future consultations. This is critical if we are to deliver the grid on behalf of all electricity users and to meet the energy needs of Ireland – both now and in the future.

# 1. Introduction

EirGrid is the state owned company with the statutory responsibility to develop, manage and maintain the electricity transmission network in the interests of all electricity users. We are also tasked with implementing aspects of Government energy policy. Our long-term strategy - Grid25 - is our plan to meet these responsibilities in the Republic of Ireland. It involves the maintenance, improvement and technological upgrade of the network.

In implementing Government energy policy we need to upgrade parts of the national grid network to help secure Ireland's energy needs now and for future generations. Grid development is also essential to meet Ireland's commitment to reduce carbon emissions. Without this upgrade of the network, Ireland will struggle to achieve its objective to supply 40% of electricity from renewable sources by 2020.

Developing and implementing our Grid25 programme is an on-going process that involves a broad community of stakeholders – in particular those that may be impacted by new electricity infrastructure. Active engagement in the consultation process provides stakeholders with the opportunity to raise any concerns or issues they would like to see addressed. Their participation also assists EirGrid in meeting the needs of a project. By increasing our levels of transparency and stakeholder engagement we believe there is potential to achieve more support, more participation and more acceptability in developing the electricity network.

We made the commitment in January 2014 to carry out a *Review of our consultation process to enhance future public engagement* on our Grid25 projects. The purpose of this is to learn from our experiences to date, to hear the views of those who took part in the consultation process, and to understand the wider European and International experiences of consultation and engagement in infrastructure development. While this review relates to EirGrid's approach to consultation in the Republic of Ireland, we will undertake a similar examination of our consultation process with stakeholders in Northern Ireland in the coming months.

There were four inputs to this process:

- A review of public feedback;
- A review of international best practice in public consultation;
- An independent external expert review carried out by SLR Consulting Limited;
- An independent external expert review carried out by the Chartered Institute of Arbitrators.



We accept the conclusions of these two independent studies. They have much in common. In Chapter 7 we set out our response to the findings and how we propose to change.

We have learnt many lessons from all aspects of this process. Three common themes have emerged, which are outlined below.

### **Theme 1: Develop A Participative Approach**

We will move to a more community-focused approach when developing electricity projects - to enable greater stakeholder participation from the outset.

### **Theme 2: Change our Culture and Processes**

We will change the culture in our organisation - to develop stronger relationships with stakeholders and communities.

### **Theme 3: Encourage Leadership & Advocacy**

We will seek support from the political system and state bodies - to better explain energy issues and make the benefits of a stronger system clearer to all.

Based on these themes, we have set out 12 commitments to improve how we consult and engage.

Finally, whilst the challenges we face are common around the world, there are circumstances unique to Ireland that affect our interaction with the public. Irish culture, history, settlement patterns and society – particularly people’s relationship with the land – greatly affect our public consultation process. This should not be underestimated or overlooked.

## 2. EirGrid's Current Approach to Consultation

EirGrid's Project Development and Consultation Roadmap provides a strategic framework for the development and progression of its major electricity transmission infrastructure projects up to (and beyond) the application and consents stage. A more detailed outline of the current approach is contained in Appendix 1.

The Roadmap is divided into stages. At each stage, there are objectives, milestones and opportunities for members of the public to engage in shaping the project's development.

However, the Roadmap is not an inflexible or rigid process. There will never be a "one size fits all" consultation process that suits the wide variety of transmission infrastructure projects across the country.

The Roadmap's five stages are listed below. The first four stages lead up to submission of the application for planning permission. If a project receives planning approval, only then do we move to the fifth stage, which involves the physical construction of the project.

**Stage One:** Information Gathering

**Stage Two:** Evaluate Options

**Stage Three:** Confirm Design

**Stage Four:** Prepare Application

Decision made by statutory authority on planning permission

**Stage Five:** Wayleaving and Construction

The first four stages explain the sequence of our decision-making that takes place before we apply for planning and proceed to the construction stage. They also clearly outline the important opportunities for public participation in development of these projects.

In examining our consultation process for this report, we reviewed each stage of this consultation process. This included looking at how the process could be improved, but also whether it could be expanded to provide more information and further opportunities for public participation.



# 3. Review of Feedback from the Public, Elected Representatives & Media

## Overview of Consultation Processes for Major Projects

A key aspect of this review was to consider the specific feedback that stakeholders, elected representatives and the media provided in their comments on our consultation process for our major projects over the last number of years. This includes examining the changes, if any, in how participants have perceived or experienced our existing consultation process.

There are patterns that are common across all projects. Initially, the news of an investment in a grid project is generally well received and viewed positively. However this shifts to considerable concern and opposition when route corridors are identified.

This pattern was consistent across the major grid projects – such as the Grid West Project in the west of Ireland. However, when route corridors were published on the Grid Link Project (from Cork to south Kildare) the volume of public submissions was unprecedented.

Our approach to consultation is constantly revised and adapted according to the scale, location and stage of a project.

A number of focused periods of consultation take place during the five key stages of project development - four of which are undertaken prior to making a planning application. Through all stages of the process, we work to keep the public, and other stakeholders, informed about the project, providing opportunities for input and feedback.

We seek to engage with people who may be affected by the planned transmission infrastructure from the earliest stage of project development, through to project completion. When we first launch a project and identify the study area where a project may be located, a comprehensive consultation plan is developed. This is designed to ensure as many people as possible are made aware of a project.

Some of the methods used in the initial phase of the consultation could include: Opening up dedicated communications channels such as information lines, taking out print and broadcast advertising, organising meetings and briefings, and possibly opening information centres.

Over the past three years there have been many consultations carried out.

- In excess of 50 open days were held;
- Ten information centres were opened;
- More than 1,000 separate advertisements were placed;
- More than 4,000 stakeholders met with staff from our project teams;
- We received in excess of 45,000 submissions.

In addition, thousands of households received mail-outs, whilst briefings were arranged with elected representatives, business and community leaders, and local authorities.

While there has been extensive consultation and participation in the development of our grid projects, there has also been significant feedback on our approach to consultation. Some of this has been positive, but a significant amount of feedback was critical. This feedback was considered as part of the review of our consultation, in order to improve how we consult with communities affected by our projects.

The following sections summarise the feedback received in the last two years on major grid projects. The detailed report on this feedback is included in Appendix 2.

## **Summary of Feedback from the Grid Link Project Consultation Process**

There have been three phases of public consultation on the Grid Link Project since April 2012.

Over the course of the consultation, as the project was analysed in more detail and route corridors were identified, the level of participation in the consultation increased.

Since April 2012, three focussed rounds of public consultation have taken place:

- Between April and June 2012, following the launch of the project, members of the public and other stakeholders were asked to comment on the study area map. 527 responses were received;
- Over eight weeks between August and October 2012 we sought feedback to identify constraints that should be considered in routing the project and 278 people and groups made responses.
- Finally, from September 2013 to January 2014 we invited feedback on a number of route corridor options we had identified and in excess of 38,000 responses were received during this third consultation.

The purpose of this process was to determine one preferred corridor within which an overhead line could be routed.

Feedback and submissions came from a variety of sources - including individual members of the public, statutory bodies, farming organisations, industry groups, elected representatives and local community groups.

While at the early stages it was felt by some stakeholders that EirGrid had carried out extensive advertising to generate awareness of the project, by the third round of consultation many stakeholders criticised the lack of awareness of the project.

With regard to Open Days, it was recognised that while they are useful, one-to-one engagement is also necessary to hear opinions that get lost in a crowd. Other stakeholders were of the view that EirGrid should attend more public meetings. There was also much criticism that the decision to rule out the underground option was taken too early in the process, and without sufficient consultation. This was in spite of the fact that a variety of transmission technologies – such as HVAC overhead and HVDC underground amongst others – had been considered by EirGrid.

We undertook an outreach programme in supermarkets and marts to generate awareness of the Grid Link Project - yet many stakeholders suggested that an information mail-out to every home and business would have been preferable.

A number of route options were presented to the public to seek their views before EirGrid started to make a decision on a preferred corridor. However, this was criticised by members of the public. These criticisms were based on a belief that publishing a number of route corridor options was a deliberate intent to 'divide and conquer' affected communities.

EirGrid was also criticised for the length of time it took to respond to queries and submissions – which was due to the unprecedented level of submissions on the third round of consultation. Because of this, some members of the public requested quicker response times.

## **Summary of Feedback from the Grid West Project Consultation Process**

As with the Grid Link Project, the Grid West Project followed the same staged development approach- with opportunities for consultation at key stages.

The Grid West Project has progressed further than the Grid Link Project and to date five rounds of public consultation have already taken place, the most recent in July 2014:

- Starting in May 2012 and continuing to June of that year, the project team initially sought comments from members of the public and other stakeholders on the study area map; in total, 135 responses were recorded for this phase.
- This was followed by a second round of consultation between August and September 2012. This round sought suggestions on constraints and mapping, and gave people an opportunity to input on how the corridors should be developed. A total of 195 responses were recorded for this phase.
- Over March and April 2013, we then asked for feedback on the shortlisted corridors - with a view to determining one preferred corridor within which an overhead line could be routed. 1,802 responses were recorded for this phase.
- In October 2013 we announced an emerging preferred corridor and held a series of open days on these corridors. 1,385 responses were recorded for this phase.
- In July 2014, following feedback from the public we announced an emerging preferred underground corridor. We then sought input on proposed changes to the selected overhead corridor. 850 responses were recorded for this phase.

In addition to the dedicated consultation periods, the project team has engaged with relevant stakeholders throughout the project.

As with the Grid link Project, while the project was analysed in more detail and route corridors were identified, the level of participation in the consultation increased. Following a decision on the preferred corridor, the Grid West project team commenced landowner engagement in order to identify a line within this corridor.

The early consultation on the Grid West Project was well received: Stakeholders were positive in their views of our approach, and they welcomed our commitment to engage at key stages of the process. A number of stakeholders cited other infrastructure

projects in the west as examples of both effective and ineffective consultation processes. Some stakeholders commented that while early consultation is desirable, EirGrid might find that in-depth engagement only occurs after potential corridors or routes are published. This comment proved to be quite accurate as many more stakeholders participated in the consultation process at a later stage.

A mail-out to 200,000 homes in counties Mayo, Galway, Roscommon, Sligo and Leitrim generated increased awareness of the project and was well received. Unfortunately some areas were originally missed by the mail supplier, which resulted in some negative criticism. Certain stakeholders expressed concern that they had not heard about the project before, and that this was the first time that they had the opportunity to provide feedback. Many of those who attended open days were complimentary about how they were promoted and managed, but some asked that EirGrid attend more public meetings in addition to information offices and open days. Whilst EirGrid considered various transmission technologies, there was much criticism that the decision to rule out the underground option was taken too early in the process, and without sufficient consultation.

### **Feedback from the North South Interconnection Development Consultation Process**

Following the withdrawal of an original planning application for the North South 400kV Interconnection Development in July 2010, consultation on a new application began in May 2011 with the launch of a *Preliminary Re-Evaluation Report*. In April 2013, EirGrid published a *Final Re-evaluation Report*, which provided a comprehensive overview of the project - this was subject to a six-week period of public consultation. This feedback was considered by the project team and formed part of a *Preferred Project Solution Report* published two months later. This report documented the line design process and provided detailed information on the line route. This was followed by an eight-week period of public consultation.

The greatest criticism of the consultation carried out on the North South 400kV Interconnection Development was that participants believed the consultation was not meaningful. This was because they believed that EirGrid was exclusively focused on an overhead solution, and so was ignoring potential underground alternatives. While there was recognition of the consultation opportunities, stakeholders expressed the opinion that EirGrid did not listen to the views of the public when consulting with the community.

A number of stakeholders provided feedback relating to community gain during the consultation on the preferred project solution. This feedback predominantly related to enquiries on the principle of community gain, as well as suggestions and feedback on who should receive community gain, and who should manage any such fund.

### **Feedback from the National Advisory Committee**

As part of this review of our consultation process, we also considered the advice and recommendations we had received from key representative organisations that formed the EirGrid National Advisory Committee. This Committee, a national forum,

was made up of stakeholders representing a broad spectrum of sectors such as rural communities, farming, tourism, business and the environment. It was facilitated by a senior professional mediator.

The National Advisory Committee made a number of points over the course of their three meetings, many of which focused on critical issues such as EirGrid's consultation process.

In particular, crucial points were raised by the Committee in terms of improvements that EirGrid could make to its consultation process. These included: enhancing trust, increasing transparency, using innovative engagement techniques, and other considerations such as community gain, greater support from leaders, and greater awareness of EirGrid's role. We will consider the future use of this forum in the context of our commitments to improving our consultation and engagement.

### **Summary of criticism raised by Elected Representatives**

Over the past number of years, there have been regular briefings with elected representatives and also a number of meetings of the Oireachtas Joint Committee on Transport and Communications relating to EirGrid's projects.

In summary, there was broad support for the Grid25 projects and our approach to consultation in the early stages of a project. However, this support declined as projects progressed. In later stages of our large grid projects, EirGrid's public consultation activities were significantly criticised. Some Oireachtas members accused EirGrid of being disingenuous in its dealings with the public. Criticisms included claims that consultation activities were "tick box" exercises; that they failed to address the issues of concern to the public; and that they failed to adequately consider the option of burying power lines instead of using pylons.

Some additional points were made with regard to the issue of undergrounding. It was felt that the use of underground technology should be the preferred option for any new transmission infrastructure and reference was made to examples in other countries. Without this, it was asserted that EirGrid's consultation process would remain flawed. Another point expressed by some was that communities affected by the revised North South Interconnector project did not get the early consultation process that the Grid West and Grid Link projects have been afforded.

### **Note on media criticisms of EirGrid Consultation Process**

The concerns of members of the public about the public consultation were reflected in media coverage of the projects, primarily in local media but also featuring in national media. The key criticisms reported by the media tended to reflect feedback made directly to EirGrid or conveyed during the course of public and Oireachtas meetings.

Overall, the vast majority of the media reported in a balanced way about the project and did not express subjective opinions on the consultation process.

## Summary of main themes of feedback

The main feedback on the consultation from community groups, elected representatives or other stakeholders can be summarised as follows:

1. EirGrid ruled out an underground option too early in the project development process. Therefore, meaningful consultation with communities could not take place.
2. The staged approach to consultation was perceived to be clear, but there was a lack of information about what exactly the public could influence.
3. EirGrid failed to provide a cost analysis for projects. This meant there was a lack of detailed information in relation to the project cost and its benefits for society.
4. There was criticism of EirGrid for not attending many public meetings - although the open days were complimented on their set-up and on the information presented.
5. While many people appreciated the early consultation, others felt EirGrid had not adequately communicated the need for the projects, nor involved stakeholders sufficiently in key early decisions.
6. EirGrid failed during its consultation to reassure communities in relation to health concerns. It was stated that more needs to be done to convince communities that the infrastructure is safe.
7. There was some positive feedback from stakeholders about the local offices, but there was also some criticism concerning their locations and opening hours.

## 4. International Review of Best Practice

### Introduction and Context

A key pillar of the ‘Aarhus Convention’, ratified by the Irish Government in June 2012, concerns Public Participation in Environmental Decision-Making. This requires public authorities to enable the public to comment on proposals for projects, plans and programmes relating to, or affecting, the environment. It also provides that *“Each Party shall provide for early public participation, when all options are open and effective public participation can take place”*.

The Aarhus Convention forms a key context within which EirGrid’s Project Development and Consultation Roadmap was prepared.

This review has considered a number of different approaches to consultation and engagement such as the Gunning Principles and the Monaghan Model. This chapter focuses on the approaches that are considered most appropriate to transmission infrastructure development. A more detailed analysis of international practice in consultation is contained in Appendix 3.

This process has also examined the findings of the document *Stakeholder Engagement Strategies in Sustainable Development – Electricity Industry Overview* (August 2013). This document was published by Cigré, the international council on large electricity systems - and the recognised worldwide authoritative body for transmission infrastructure development. This document *“summarises a survey of electricity organisations worldwide on their attitudes to, and experiences of stakeholder engagement, particularly in relation to the development of electricity construction projects, within the context of sustainable development”* (extract from executive summary).

This review of our approach to consultation has given significant consideration to the Renewables Grid Initiative (RGI) document *European Grid Report – Beyond Public Opposition: lessons learned across Europe*, and its subsequent *Update 2013*. These documents explore the challenges and lessons from public and stakeholder consultation for transmission infrastructure development. They highlight a commonality of issues across Europe.

The Cigré Report sets out eight *Key Principles for Stakeholder Engagement* (p.67-68):

Cigré Key Principles for Stakeholder Engagement

1. **Approach to stakeholder engagement:** The approach should be consistent for all of a company's construction projects, while still being flexible, according to the scale and type of the project. The aim must be to establish trust among stakeholders.
2. **Project Scoping (proportional approach):** Be clear about what aspects of a project public engagement can influence, and what is out of scope.
3. **Stakeholder Identification (identify and understand your stakeholders):**  
There should be a clear commitment to community engagement at a local level. It is also important to define and specifically target the 'voiceless' or 'hard to reach' stakeholders.
4. **Start engagement early:** Early engagement in a scoped manner, particularly with key stakeholders, will help to build project awareness and understanding. This helps to reduce the risk of 'surprise' later. Be clear about the stage of the project when engaging.
5. **Targeted mix of consultation/engagement methods:** A combination of methods for stakeholder engagement should be considered. These should be chosen depending on the stage of the project, the stakeholder groups involved and their individual concerns, needs and priorities.
6. **Create an open and transparent process:** It is important to manage the expectations of stakeholders by clearly stating the objectives and scope of the engagement from the outset. Project information should be tailored for different audiences in format and style.
7. **Provide feedback to stakeholders (monitor and evaluate):** Ensure stakeholders can see how their comments have been taken into consideration. This demonstrates not only that engagement has taken place, but also that it has been an effective part of the process.
8. **Engagement should be proactive and meaningful:** Stakeholders should generally be involved at project stages where they are able to influence an outcome or decision. The approach to engagement should be proactive, accessible and inclusive.



## How EirGrid compares with the Cigré Principles

The table below sets out how EirGrid’s current approach to the development of its major transmission infrastructure projects (based on the EirGrid Roadmap) aligns against with the Cigré principles: -

<b>Cigré Principles for Stakeholder Engagement</b>	<b>EirGrid approach to the development of its major transmission infrastructure projects</b>
<b>1. Approach to stakeholder engagement</b>	Our Roadmap approach ensures consistency across projects. It forms the basis for project-specific Communications Strategies. It acknowledges that there is no “one-size-fits-all” process. Its purpose is to develop trust and relationships among all stakeholders.
<b>2. Project Scoping</b>	The Roadmap identifies where engagement occurs at various stages of project development. Project-specific information – such as brochures – identify the purpose of each consultation event. Public and stakeholder consultation occurs at the earliest part of Stage One (Identification of Study Area) and includes the aim of identifying key stakeholders.
<b>3. Stakeholder Identification</b>	Consistency is achieved through a dedicated in-house Communications Unit that contributes to, and signs-off on, project-specific communications strategies. There is a clear focus on local consultation and engagement, including affected landowners (Stage 2 of Roadmap). There is significant advertising undertaken in local print and broadcast media to ensure awareness of project and consultation events. However, there is potential for a greater focus on engaging with “voiceless” and “hard to reach” stakeholders.
<b>4. Start Engagement Early</b>	The Roadmap includes early engagement: Projects are launched locally and promoted extensively with a focus on project constraints, and on events around identification of study area. This builds project awareness and likely issues arising. It also includes engagement with key stakeholders, and is often the time for establishment of project-specific community groups. In addition, the Roadmap is a key graphic used to explain to the public at what stage of development the project is at.

<b>5. Targeted Mix of Consultation / Engagement Methods</b>	Project-specific communications strategies identify the various methods for consultation/engagement. These methods are refined as groups/needs are identified and reflect the scale of a project. They include: community liaison and local project offices; briefings with various interest groups and elected representatives; and contact databases created to ensure on-going engagement with stakeholders.
<b>6. Create an Open and Transparent Process</b>	The Roadmap sets out the intended purpose of our engagement, and this is expanded in project-specific material. Timescales for consultation are clearly set out - generally confirming that submissions received outside set periods will also be considered. Consultation events are also well publicised in media, websites, social media, mail out, notices and through other channels. Information is provided both as an actual deliverable (the subject of the consultation), and as a non-technical summary brochure, in presentations, online videos, and in other communications.
<b>7. Provide Feedback to Stakeholders</b>	Consultation reports are prepared to identify the issues raised, and how they have been addressed at each stage of the consultation development. The Roadmap specifically includes for “Consideration of all feedback...” and modification where appropriate. There is potential to be more explicit about where comments are considered, yet proposals are not changed. There is also potential to respond directly to every submission, in a manner that is appropriate and proportionate to the project. Correspondence received is responded to throughout the development of a project.
<b>8. Engagement Should be Proactive and Meaningful</b>	The Roadmap is a structured and purposeful process to integrate consultation and engagement with project development. It presents opportunities for early non-statutory engagement before key project decisions are made. It identifies target audiences, breaks down consultation by deliverables or milestones and facilitates consultation opportunities. These can take place in the community - using open days, project offices and other initiatives - and online or by public notice.

Overall, it is considered that the Roadmap process – which forms the framework for the preparation of project-specific communications strategies – ensures a structured, transparent and defensible process. We believe it is generally in accordance with the principles set out in the Cigré Working Group document. Notwithstanding this, there are undoubtedly areas where it can be improved.

## Conclusions of International Review of Best Practice

EirGrid's current Roadmap process encompasses much of the established international best practice (see Appendices 3 and 4 for more detail). However, there are emerging practices that are now appropriate for consideration by EirGrid. EirGrid is striving to broaden and deepen its approach to public consultation - so that it better achieves the purposes and principles of international best practice.

This examination of European and International practice, experience, and lessons learned identifies a number of common themes. These relate to public and stakeholder consultation and engagement in transmission infrastructure development, and can be summarised as follows: -

- Proactive lead taken by policy-makers and Regulator in the development of plans: Encouraging policy-makers to take a greater role in the debate surrounding need for grid infrastructure.
- Early Public and Stakeholder participation in the identification of projects: Ensuring their involvement, particularly in the pre-project phase when key parameters have not been decided.
- Stakeholder “mapping”: Identifying different stakeholders and communities, and ensuring appropriate means of communications for different groups with different needs.
- Transparency in decision-making: Demonstrating how consultations and engagement with public and stakeholders have been considered.
- Outreach, information and learning experiences: Establishing co-ordinated programmes of education and information sharing. The goal is to ensure that information is accessible to all. This is achieved using a variety of media and formats to match the distinct preferences from different sections of your audience.

## 5. External Review – SLR Consulting Limited

SLR Consulting Limited was commissioned to undertake an independent review of the consultation and community engagement process undertaken by EirGrid on its major Grid25 projects. SLR is a leading international environmental consultancy with a strong reputation for providing expert, tailored services.

In Ireland, SLR recently completed the “Wind Energy in Ireland: Building Community Engagement and Social Support” on behalf of the National Economic and Social Council (NESC). The report examined the wind energy industry and its challenge of community engagement and social acceptance in Ireland and in three other jurisdictions: Germany, Scotland and Denmark.

For EirGrid, SLR sought to highlight the effectiveness and limitations of the consultation and community engagement programme. Successes and weaknesses would be examined, and potentially lost opportunities for engagement would be identified.

Specifically, SLR conducted a review of EirGrid’s Project Development and Consultation Roadmap, including structured interviews with a wide range of individuals and groups who had experience of EirGrid’s consultation process. They considered its implementation across recent public consultations, and identified any gaps or potential for improvement.

SLR also sought to identify a best practice approach for public consultation for transmission infrastructure projects. They did this by looking at international transmission infrastructure developments and linear infrastructure projects in Ireland.

SLR Consulting Limited has made nine recommendations, which are summarised below:

1. Consider development of a separate Grid25 website that is linked to the parent EirGrid site, but as a stand-alone, citizen friendly interface
2. Have clear and unambiguous, non-technical summaries of all proposals. These should be available within '6 clicks' of entering the website, and as easily downloadable PDFs.
3. Establish a Representative Steering Group to include national organisations. This group would provide policy inputs and direction on all aspects of grid roll-out.
4. Make better use of community forums, rural organisations, NGOs, business groups and regional assemblies.
5. Consider an approach to public meetings that uses independent chairing.
6. Initiate a national communication programme to connect national policy with the implementation of Grid25 Projects. EirGrid should not be left out on its own.
7. Consider Multi-criteria Integrated Resource Assessment (MIRA) or environmental economics to improve transparency of selection methodology.
8. Seek buy-in to EirGrid's selection methodology for options at the outset of a project from selected stakeholders and intermediaries – such as Regional Assemblies, Engineers Ireland, Fáilte Ireland, IFA and others.
9. Modify the legal-technocratic approach, changing our communications from 'speaking at' people to 'speaking to' people.

For more detail on the recommendations in the SLR Consulting Limited report, see Appendix 5.

## 6. External Review – The Chartered Institute of Arbitrators

The Chartered Institute of Arbitrators was commissioned by EirGrid to undertake an external review of EirGrid's existing consultation process. As part of this external review, a number of stakeholders (as selected by the institute) were asked for their opinions on the consultation that EirGrid had carried out and how it could be improved.

Specifically, the CIARB were tasked to identify potential areas for improvement along with suggested changes to enhance future consultation and engagement. As part of this review, the CIARB identified strengths and weaknesses of EirGrid's current approach to public consultation and engagement for project development.

The CIARB have made a number of recommendations which are summarised below under 3 headings:

### A. Strategic: Helping EirGrid To Implement Public Policy

1. EirGrid should publicly acknowledge that it has learned lessons from the past and that it is working to enhance and improve the consultation process for the future.
2. The Chairman of EirGrid should publicly commit to improving the organisation's capacity for, and approach to public consultation in the future.
3. In conjunction with Nos. 1 and 2 above, a statement of good intent should be made, setting out plainly how EirGrid intends to improve its consultation and participation process in the future.
4. EirGrid should engage in a substantial initiative to create a new national independent discussion forum so as to hear and give voice to the key concerns expressed by landowners, community groups, business interests, public representatives, individual citizens generally and EirGrid.
5. EirGrid should seek to strengthen formal channels of communications and cooperation with all relevant State Bodies, Agencies, Local Authorities and public representatives to clarify its role and gain the support it needs in fulfilling its mandate.
6. EirGrid should review the EirGrid Project Management approach to the Grid25 programme to include a more comprehensive stakeholder engagement strategy on all projects.
7. EirGrid should create new opportunities at, or in, high level networks to achieve the necessary support for EirGrid in realising its mandate.
8. EirGrid should encourage greater responsibility and support among national politicians for the implementation of EirGrid's mandate.

## B. Operational: Consultation Improvement Techniques

9. EirGrid should invest in simplified, meaningful communication. All communication should be in ‘Simple English’; it is imperative that EirGrid move away from technical and legal terminology in their general communication. EirGrid should also commit to respond to submissions and queries from the public in a timely manner.
10. EirGrid should develop a new Corporate Policy for stakeholder engagement in line with international best practice. EirGrid should ensure it addresses all aspects of corporate and social responsibility and engagement.
11. EirGrid should develop a Community Consultation Handbook in consultation with community representatives and selected others
12. EirGrid should focus on building local relationships and not confuse this with local presence. Encourage public participation in projects from the earliest stages.
13. EirGrid should introduce conflict resolution tools and techniques to deal with impasses, and build these into the new consultation Road Map.

## C. Consultation Tools: Road Map

In this section, the CIARB have specific recommendations (14 to 21) to improve the EirGrid Consultation Roadmap, under the following headings:

**Stage 0:** “Public first”: What you should expect from EirGrid: Information Giving vs. Information Gathering

**Stage 0:** Commitment to Improve Staff Consultation Competence

**Stage 1:** Public introduction & Involvement: “A Good Start is Half the Work”

**Stage 2:** Inform the public of all the options: Maintaining the Momentum

**Stage 3:** Public ownership of consultation process: Coming to terms with preferred options & preparing for the planning process

**Stage 4:** Confirm design with public care & attention: Moving to the Statutory Consultation Process

**Stage 5:** Prepare planning application & provide public with on-going information: Complete consultation reports & finalise planning application

**Stage 6:** Construction stage – on going public assurance and quality of approach: way-leaving & construction phase

For more detail on the full report carried out by CIARB report, see Appendix 6.

## 7. Conclusions & Commitments

This review of our consultation process has highlighted the absolute importance of engagement with the public and with communities directly impacted by new grid projects. It has highlighted that while significant measures have been taken, there are changes required to improve the consultation process for future engagement.

It is important to remember the purpose of our consultation process: It is not only to ensure a successful planning and consenting process, but also to work collaboratively with those impacted by the need to expand the national grid. The full statement of purpose of consultation is set out in appendix 2.

Focusing on this wider remit will allow EirGrid to both inform and learn from the public in improving our consultations. We must do so in a manner that is open and accessible, with empathy for public concerns and clear information to enable an informed debate as we develop the grid.

This new approach has the potential to make our project development process truly collaborative rather than confrontational – which will also make it more efficient.

### Commitments

As set out above, there were four inputs to this review process:

- A review of public feedback;
- A review of international best practice in public consultation;
- An independent external expert review carried out by SLR Consulting Limited;
- An independent external expert review carried out by the Chartered Institute of Arbitrators.

These inputs have collectively informed our understanding of how the EirGrid consultation process is viewed. They have also allowed us to compare the EirGrid approach to other consultation models and have highlighted areas where improvements are needed.

Amongst the wide-ranging recommendations in the two external reviews, (undertaken by SLR Consulting Limited and the Chartered Institute of Arbitrators) there are significant commonalities in their proposals.

We accept the conclusions of these two independent studies and have compiled a set of commitments based on their reports.

This comprehensive set of commitments is outlined below, grouped into three themes:



# Theme 1: Develop a Participative Approach

We will move to a more community-focused approach when developing electricity projects - to enable greater stakeholder participation from the outset.

# Theme 2: Change our Culture and Processes

We will change the culture in our organisation - to develop stronger relationships with stakeholders and communities.

# Theme 3: Encourage Leadership & Advocacy

We will seek support from the political system and state bodies - to better explain energy issues and make the benefits of a stronger system clearer to all.

## Theme 1: Develop a Participative Approach

### 1. Clear Communications

A key aspect to facilitating public participation in the development of grid connections across Ireland is to ensure that information is presented in a straightforward way. In the interests of transparency and participation, we will ensure all topics of a technical nature are presented in an understandable manner. This public-facing communication can be supported by technical documentation to meet regulatory or legal requirements where necessary.

### 2. Process for Consultation in Project Development

EirGrid understands the public and stakeholders wish to play an active role in deciding why, how and where we build a new grid project. We want to work together in a transparent, collaborative and inclusive way. It is important that participants in a consultation process are clear on what exactly they are being asked to comment on, and how their information will be considered. We will improve the effectiveness of our consultation process to clearly define the consultation opportunities, including offering clear guidance on how feedback and input can be provided.

We will publish this new approach to consultation. This publication will clearly set out the steps in delivering major projects, including when key decisions are to be made. It will also define and explain the opportunities for the public – such as farmers, landowners, community groups and representative bodies – to participate. This approach, which will be developed over the coming months, will improve and update

EirGrid's current Project Development and Consultation Roadmap. The revised approach will be built on community, landowner and stakeholder participation. This approach will focus on three key areas:

**a. Agreeing the Need**

We recognise that consulting at an earlier stage – as the rationale and need for a project is being set out – will enable greater participation and understanding. At the outset we will now ensure that the public, landowners and stakeholders have the opportunity to discuss and understand the need for a project. In particular, we must explain the role of each project in providing a reliable and secure supply of electricity for all existing users and to promote future development.

**b. Identifying Options**

Where previously the technical options were determined primarily within the company, we will now consult openly with stakeholders. This could include local authorities, farming and community associations, as well as business and environmental groups. Our consultation will explain the transmission technology options that we are considering, and then seek to learn from their local knowledge and specific expertise. This will assist us in determining the best transmission technology for the project.

**c. Consultation**

A significant change in how we consult is that we will ask stakeholders to help form a consultation plan to determine how we should engage with them. This will allow for public representatives, local communities and other stakeholders to influence how local engagement should be carried out. This should facilitate participation at an earlier stage, and in ways that are more accessible and inclusive.

We have also learned the importance of clarity. We need to explain to consultees what they are being asked to comment on, and how this information will be considered when decisions are being made. We will improve the effectiveness of our consultation process to clearly define consultation opportunities, how feedback can be provided and to efficiently assess the feedback received.

**3. Consultation Toolkit**

In order to facilitate the involvement of public representatives, local communities and other stakeholders in defining the consultation plan, we will develop a consultation toolkit. This toolkit will set out the various procedures that are available to facilitate participation - which stakeholders can then consider and choose from. For example, this toolkit could describe forms of consultation such as open days, public meetings, help lines, letter drops, civic forums and online discussions. All stakeholders can then make use of the information and assistance the toolkit provides to establish sustainable and effective dialogue. We will immediately develop this toolkit – using both existing and new methods of consultation. Our goal is to ensure the consultation tools are fair, broad, accessible and inclusive.

**4. Improved Community Relationships**

EirGrid recognises the importance of positive, close relationships with local communities, farmers and landowners that are impacted by grid projects. We acknowledge the need to do much more in this area. In future there will be a greater emphasis on locating staff in the regions. This will facilitate enhanced dialogue

with local communities and interest groups as we work together to develop the grid. In addition to greater local presence, EirGrid will also investigate ways to develop sustained long-term relations in local areas.

### **5. Demonstrate Consideration of Social Impact**

We recognise that the development of new lines, cables or substations can have an impact on communities. In order to achieve public acceptance, this impact must be assessed and considered more transparently in our decision-making. This will include giving due regard to the perceptions and knowledge of local communities. EirGrid will explore methods to increase transparency of the consultation and decision-making process, including multi-criteria decision-making tools – and this will be shared with the general public and stakeholders.

## **Theme 2: Change our Culture and Processes**

### **6. Consultation Handbook**

It is important that our commitment to new principles of consultation is communicated to those who carry out this process for EirGrid. We will develop a handbook for all staff and consultants working on behalf of EirGrid. This will clearly set out the purpose and principles of our consultation process, and provide training to ensure that high standards are met. The handbook will explain the approach to consultation that EirGrid is taking and ensure that all personnel are working in accordance with this approach. It will also become the yardstick against which our consultations can be measured.

### **7. Consistency of Information**

It is important that information is based on fact and current knowledge, and is communicated to the public and stakeholders in a timely manner. EirGrid will consistently review projects to ensure the original need remains and that any changes are communicated. This will include any changes such as developments in technology that could affect a planned project.

### **8. Complaints Process**

We are committed to interacting with all our stakeholders in a fair and respectful way - but sometimes issues may arise that lead to a sense of grievance. If this happens, we want to know - and we will then seek to resolve the issues as quickly as possible. It is therefore important that stakeholders are encouraged to report a complaint and to provide critical feedback. This is especially important if anyone feels that a member of our team is not treating them appropriately. To immediately deal with these issues, EirGrid will establish a service to manage and investigate complaints or feedback, which we will promote widely. Our complaints process will set out how complaints will be received, acknowledged, investigated and resolved. We will ensure that all complaints are dealt with fairly and ensure that our business continues to improve and learn from complaints raised. The details of this service will be widely promoted through all our communication channels.

## **Theme 3: Leadership & Advocacy**

### **9. Support of Policy Makers**

The work EirGrid undertakes in developing the grid is in response to Government and regulatory policy that in turn is designed to meet European directives, which relate to a range of issues including security of supply, interconnection and renewables. EirGrid acknowledges the benefit that would flow from other bodies and state agencies participating in a broader debate examining the reasons why more electricity infrastructure is required. EirGrid will explore appropriate ways to encourage such participation around these issues.

### **10. Input from Representative Groups into EirGrid's approach to grid development**

Early engagement with national representative groups and associations – as well as local branches of these national organisations – is extremely useful. It provides input at a stage when feedback can meaningfully influence the subsequent decision-making process. EirGrid will establish a structured approach to working in greater cooperation with these key groups.

### **11. Regional Discussion Forums**

Currently, discussions on key issues – particularly technical ones – occur locally and only in relation to specific projects. It would be informative and useful to establish regional forums to consider broader themes, such as transmission technology options. This would allow for meaningful dialogue on different topics that are of interest to stakeholders. These forums should allow for greater local understanding of technical and environmental matters. Regional forums facilitated by a neutral chairperson will be organised where participants can have the opportunity to voice their opinion and discuss the issues at hand. In addition, some topics related to grid development may also involve relevant agencies or regulatory bodies

### **12. Independent EMF monitoring & compliance**

The Department of the Environment, Community and Local Government has commissioned a review of the latest research and developments concerning electric and magnetic fields. EirGrid will comply with any recommendations from that review, and will continue to ensure that the electricity system is operated in line with guidelines to protect public health. Furthermore EirGrid will investigate the role an independent body could play – such as monitoring electricity lines and providing EMF measurements to those who have concerns.

These commitments will facilitate enhanced opportunities for effective public participation in decision-making as we continue to develop the electricity grid. However, they will also require a major cultural change within EirGrid.

While the commitments will improve how we engage with the public and stakeholders in the development and construction of grid projects, the primary goal is to build trust and enable greater participation in the decision-making process as part of future consultations. This is critical if we are to deliver the grid on behalf of all electricity users, and to meet the energy needs of Ireland – both now and in the future.

## Timelines

EirGrid is committed to the implementation of these recommendations. However, it is acknowledged that each recommendation will need specific consideration and development. The following Table gives an indicative outline of a timeline for development of each recommendation.

It is currently envisaged that the majority of these Recommendations would be implemented within six months of publication of this Review. It is our intention to continuously review our approach to consultation to meet the evolving needs of those participating in and engaging with our projects.

<b>Commitment</b>	<b>Scoping &amp; Implementation</b>
<b>Clear Communications</b>	To be implemented immediately
<b>Process for Consultation in Project Development</b>	To be developed and rolled out over the next 3-6 months
<b>Consultation Toolkit</b>	To be developed and rolled out over the next 3-6 months
<b>Improved Community Relationships</b>	To be built up over next 6 months
<b>Demonstrate Consideration of Social Impact</b>	To be implemented immediately
<b>Consultation Handbook</b>	To be developed and rolled out over the next 3-6 months
<b>Consistency of Information</b>	To be implemented immediately
<b>Complaints Process</b>	To be developed and rolled out over the next 2-3 months
<b>Support of Policy Makers</b>	On-going
<b>Input from Representative Groups into EirGrid's approach to grid development</b>	To be built up over next 6 months
<b>Regional Discussion Forums</b>	To be developed within the next 12 months
<b>Independent EMF monitoring &amp; compliance</b>	To be developed and rolled out over the next 3-6 months

## References

- Audit Commission, 1999, *Listen Up! Effective Community Consultation*, referenced in CIGRE TB 548 (WG C3.04), 2013.
- CIGRE TB 274 (WG B2.15), 2005, *Consultation Models for Overhead Line Projects*, referenced in CIGRE TB 548 (WG C3.04), 2013.
- CIGRE TB 548 (WG C3.04), 2013, Stakeholder Engagement Strategies in Sustainable Development – Electricity Industry Overview
- ENTEC, 2007, Local Development Frameworks Effective Community Involvement, referenced in CIGRE TB 548 (WG C3.04), 2013.
- National Grid, 2012, Our Approach to the Design and Routeing of New Electricity Transmission Line.
- National Grid, 2012, Our Approach to Options Appraisal.
- Renewables Grid Initiative, 2013 (2nd edition), *European Grid Report: beyond public opposition; lessons learned across Europe*, (also including summary brochure).
- Renewables Grid Initiative, 2013, European Grid Report: beyond public opposition; lessons learned across Europe, Update 2013.
- United Nations Economic Commission for Europe (UNECE) *Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters*.
- Transcript of EirGrid Grid25 Project: Discussion, 20th November 2013.  
<http://bit.ly/1FTaEg4>
- Transcript - EirGrid: Discussion with Chairman Designate - Joint Committee on Transport and Communications, 3rd December 2013  
<http://bit.ly/1pY6Dmo>
- Transcript - Electricity Infrastructure: Motion [Private Members], 3rd December 2013
- Transcript of Joint Business of Joint Committee - Electricity Transmission Network: Discussion with EirGrid, 4th December 2013  
<http://bit.ly/11ZSLgF>
- Grid link Consultation report,  
<http://www.eirgridprojects.com/projects/gridlink/overview/>
- Grid West Consultation report  
<http://www.eirgridprojects.com/projects/gridwest/stage1report/#d.en.11541>
- North South Interconnector project  
<http://www.eirgridprojects.com/projects/northsouth400kvinterconnectiondevelopment/projectactivity/>

**Notes**

