

Brincat Anna at Parlament-MT

From: Brincat Anna at Parlament-MT
Sent: Monday, 17 June 2019 16:21
To: Brincat Anna at Parlament-MT
Subject: FW: [EXTERNAL] - Re: Environment and Development Planning Committee Meeting - 17.06.19

From: Dr Michael Briguglio [mbrig@hotmail.com]
Sent: 10 June 2019 10:32
To: Brincat Anna at Parlament-MT
Cc: michael.briguglio@um.edu.mt
Subject: [EXTERNAL] - Re: Environment and Development Planning Committee Meeting - 17.06.19

Dear Ms Brincat,

Thanks for your email. I will probably have to miss the meeting as I will probably be away. Can you kindly give a hard+electronic copy of my feedback below to all committee members and excuse me for my absence, as this issue is of great interest to me. I can also assist if required.

Best,
Michael Briguglio

Feedback re Social Impact Assessment Public Consutation

To Planning Authority, SIA Procedures Consultation - sia@pa.org.mt

I am pleased that my proposal to mainstream social impact assessments in PA procedures is being taken up.

A social impact assessment reviews the social effects of development and social change, both intended and not.

The International Association for Impact Assessment defines an SIA as the process of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions and any social change processes invoked by those interventions.

Such changes may range from natural disasters to population growth and from policy interventions to singular development projects. Consequently, SIAs investigate the effects on people's everyday lives in terms of culture, politics, community, health, well-being, aspirations, needs, rights and responsibilities, to name a few. They provide data for policymaking, which is based on evidence.

Social impacts under assessment should include all those things relevant to people's everyday life. This may include one's culture, community, political context, environment, health, well-being, personal and property rights as well as fears and aspirations.

Social impact assessments can help verify the consequences and impacts of development proposals in relation to the communities involved. Hence, a basic starting point for such assessments should be the compilation of a community profile. A social impact assessment that does not understand the society in question is practically worthless.

This can help bring about genuine processes of engagement between communities, developers and authorities as well as identify and implement mitigation measures and compensation mechanisms. As things stand in Malta, various developers do quite the opposite, often causing huge inconvenience to residents and leaving a mess behind in surrounding infrastructure.

Various methods, both quantitative and qualitative could be used within social impact assessments. The former refers to generalisable data especially through numbers, while the latter produce in-depth data on matters.

Research methods in SIAs may therefore include surveys of concerned populations who are asked questions on their perceptions of the change in question. Ethnographic methods may involve a deeper look into everyday practices of people, while elite interviews may verify the advice, concerns and interpretations of persons who are experts or who have experience in the respective field under analysis.

Methods may also involve the analysis of discourse on the subject in question, for example by looking at what is being pronounced in the public sphere, whether by the public, civil society, political actors, the media and the like.

SIAs should involve the participation of different stakeholders, ideally through mixed research methods.

Some other factors which should be included in social impact assessments include the consideration of reasonable alternatives to development proposals as well as comparative analysis of similar development proposals and related good or bad practices.

Analytic indicators should be provided and the entire process should be subject to peer review by independent experts in the field.

Social impact assessments should not be one-off exercises which are rubber-stamped by authorities without any sense of critical engagement. To the contrary, they should be ongoing processes which engage with various stakeholders and which report back so as to ensure effective policy processes. They should also use complementary research methods so as to ensure reliable and valid data.

Recommendations and mitigation measures could therefore be in place, and these would be based on social-scientific evidence.

It is also important that SIAs are peer-reviewed. This means that if a study is being carried out by a team of social scientists, this should be scrutinised by other independent social scientists. This could help identify shortcomings, conflicts and possible improvements to the same SIA.

As things stand, there are no national guidelines on the need for SIAs in Malta. The conducting of such studies on development projects is at the discretion of the Planning Authority.

When exceptionally carried out, they are one-off studies on major development projects. This effectively means that smaller-scale development projects with bigger cumulative impacts are not subjected to SIAs.

Such ongoing processes should also take account of changes in the social context in question, such as cumulative impacts of other developments. For example, a social impact assessment that focuses on one development but ignores another development in the region is not realistic.

If one looks at other policy interventions, SIAs are practically absent. Just to name a few: the dynamics of agriculture, the cost of living, social cohesion and integration, urbanisation, the commercialisation of public land.

Indeed, there are so many areas where SIAs could be introduced in Malta: government consultation on new

legislation, proposals in the national budget, the adoption of EU directives, parliamentary committees and local councils are just some areas. For example, the latter could carry out SIAs to establish community profiles, cultural commonalities and differences, social needs, demographics, impacts of development and so forth.

The University of Malta and other educational institutions are currently producing graduates in different social sciences who are equipped to carry out SIAs and who are sensible to the need for evidence-based policymaking.

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