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ASSESSING the ASSESSMENTS

An Analysis of Social Impacts Reported in Environmental Impact Assessments (EIAs) in Sri Lanka

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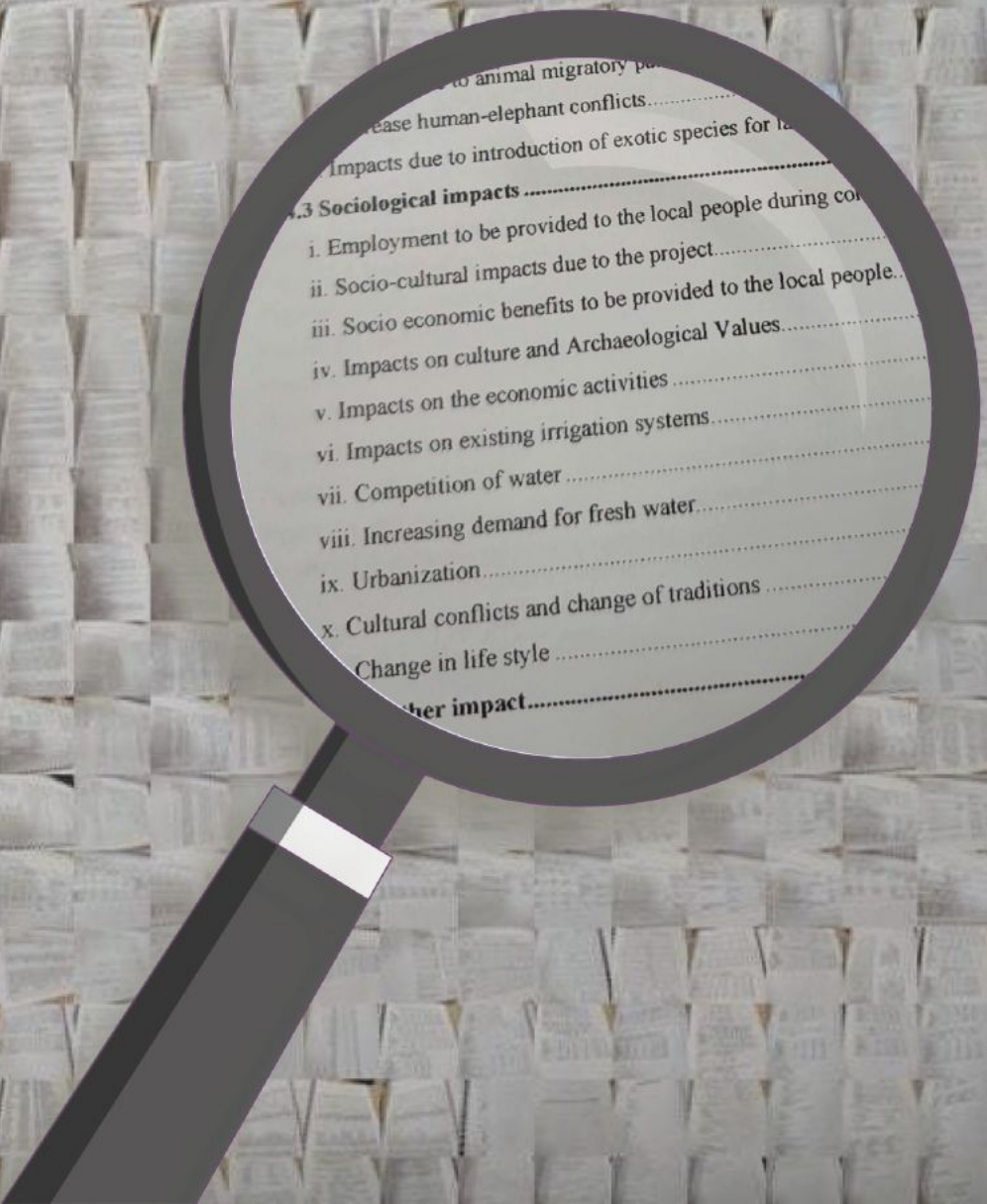

CENTRE FOR A SMART FUTURE

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LIST OF ABBREVIATIONS AND ACRONYMS

ADB	Asian Development Bank
AIIB	Asian Infrastructure Investment Bank
CBD	Convention on Biological Diversity
CC&CRMD	Coast Conservation and Coastal Resource Management Department
CCA	Coast Conservation Act, No. 57 of 1981
CEA	Central Environmental Authority
DWC	Department of Wildlife Conservation
EIA	Environmental Impact Assessment
FFPA	Fauna and Flora Protection Act No. 1993
IAIA	International Association for Impact Assessment
IFC	International Finance Corporation
JICA	Japan International Cooperation Agency
LLMs	Large Language Models
NEA	National Environmental Act No. 47 of 1980
NEIC	National Environmental Information Centre
NWPES	North Western Province Environmental Statute No. 12 of 1990
PAA	Project Approving Agency
PP	Project Proponent
SEIA	Supplementary EIA report
TECs	Technical Evaluation Committees
ToR	Terms of References
UNCLOS	UN Convention on the Law of the Sea
UNEP	United Nations Environment Programme

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EXECUTIVE SUMMARY

Large development projects have been a cornerstone of Sri Lanka's growth model since economic liberalisation in 1977. Introduced in 1981, Environmental Impact Assessments (EIAs) are a critical safeguard to ensure balance between developmental priorities and environmental protection. An EIA is compulsory for all projects with the potential to cause significant environmental impacts. A typical EIA assesses not only the physical and the biotic environments, but also the social environment. Before authorities make a decision on a proposed project, the draft EIA report is made public so any individual or organisation can request clarifications and raise concerns.

So, beyond the approving authorities, EIA reports have a variety of users and uses with varying degrees of technical expertise and proximity to the project site and its impacts. Communities near the project site are concerned about impacts arising from projects. Investors and financiers both domestic and international are interested to understand EIA findings on project viability and sustainability. Indirectly, EIAs determine the direction of capital in the economy. So, it is imperative that EIA reports are robust and accessible to ensure that stakeholders can make decisions that are just by both people and nature.

However, the quality of reporting in EIAs has often been criticised. Sri Lankan laws and regulations on EIAs do not mandate requirements on reporting quality. The primary coverage of quality standards is provided in EIA guidelines published by the Central Environment Authority (CEA). In addition, project-specific Terms of References (ToRs) dictate expected quality requirements. Beyond isolated academic studies, there is no systematic analysis of the quality of EIA reporting across time. Furthermore, the little literature that does exist predominantly focuses on the physical and biotic aspects of EIAs. Therefore, the quality of reporting social impacts in EIAs is severely under-analysed. Anecdotal evidence and public discourse have highlighted many instances where poorly conducted social impact analyses in EIAs have adversely affected local communities.

To address the above gap, this study analyses how social impacts have been reported in EIA reports over time. Using a bespoke assessment criteria based on existing EIA guidelines and ToRs, this study systematically analyses 250 EIA reports across a span of 3 decades covering all 25 districts. This provides a much-needed quantitative overview into EIA reporting quality across time and preliminary insight into institutional and project specific factors that affect reporting quality. The analysis also includes qualitative insights that highlight policy priorities and avenues for further enquiry.

The findings indicate that the overall reporting quality of social impacts in EIAs are low. Methods used to assess social impacts are often not reported and most impacts are discussed without specifying crucial information such as magnitude, reversibility, and temporality. This is particularly concerning as social impacts are often indirect, unquantifiable, and speculative which leaves readers with little ability to evaluate and verify claims made by EIA reports. Although ToR requirements do influence reporting quality, ToR requirements are drafted inconsistently, both within and across the respective authorities that draft ToRs. Reporting quality on most

dimensions have increased over time but varies based on institutional and project-specific idiosyncrasies such as the type of project, type of project proponent and consultant, and whether a development partner is involved or not. Qualitative examples highlight instances where social impact analyses do not conform to the conceptual scope of EIAs and violate basic ethics in conducting and reporting socio-economic research.

The findings below highlight three reform priorities to improve social impact reporting in EIAs.

1. The quality control apparatus of EIAs must be strengthened

Approving Authorities must establish a process to conduct an annual assessment on EIA reporting quality. The EIA cells of PAAs must have greater access to consistent socio-economic expertise. The applicability of EIA guidelines should be clarified and guidelines must be modernised, informed by prevailing best practices. Benchmarks such as the page limits need updating. A policy must be established to regulate the use and management of personal and sensitive information in EIA reports. The drafting of TORs must be standardised and the merits of using sector or project-scale specific ToR templates should be explored.

2. Training and awareness in socio-economic analysis among consultants must be improved

Training should include modules on boundaries of socio-economic considerations applicable to EIAs, techniques for conducting and reporting empirical research using primary and secondary data, including appropriate citation styles, and ethics on the collection and interpretation of primary data. Furthermore, the use and reporting of relevant existing socio-economic literature must be emphasised through the promotion of relevant journal databases and repositories.

3. Accessibility of EIAs must be increased for public and other critical stakeholders

Toolkits for the public should be updated to help scrutinise crucial aspects of the socio-economic analysis such as survey sampling methodologies and the coverage of relevant stakeholders in consultations. Executive summaries must be standardised, so that critical information is provided in a predictable and accessible manner. Key stakeholders such as domestic and international lenders, journalists, and media organisations should develop guidelines and toolkits to use and assess EIA reports.

While Sri Lanka continues an ambitious push for growth in the medium term, its people are still reeling from a polycrisis. As the country moves forward, EIA reports with robust social impact analyses are a vital need to avoid and minimise harms to vulnerable populations and maintain investor confidence through a reliable rules-based mechanism. The findings, recommendations, and the methodological learnings from this study can contribute to realising a better and more inclusive EIA reporting practice.

Figure 1: Matrix of key findings

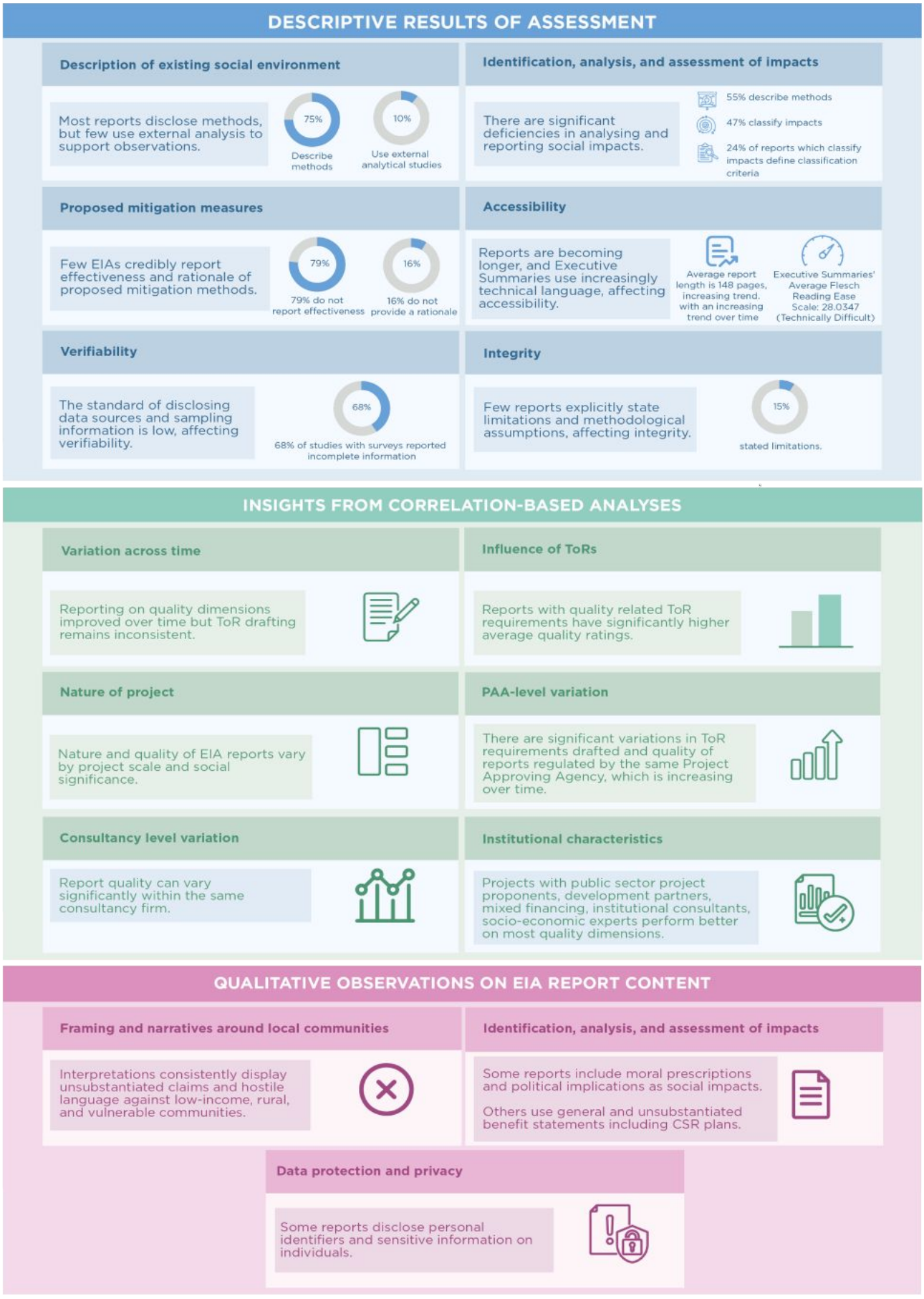


Table 1: Matrix of key recommendations

Recommendation		Relevant key stakeholders
1.	**Governance, management, and evaluation of the EIA process**	
1.1.	A systematic monitoring and evaluation mechanism should be established to assess quality of EIA reporting across time	CEA and PAAs
1.2.	PAA level access to consistent socio-economic expertise must be increased by establishing collaborative cross-institutional platforms, reinstating intensive EIA trainings for regulators, and revising hiring processes.	CEA, PAAs, and relevant subject ministeries
1.3.	The applicability of CEA Guidelines must be assessed and they must be revised to reflect current needs and best practices.	CEA
1.4.	ToR formats and report drafting procedures should be standardised and sector-based requirements and templates must be formulated.	CEA and PAAs
1.5.	A policy on the use and management of personal information in EIA reports should be introduced	CEA
1.6.	Guidelines on digital document standards should be formulated and implemented to ensure standardisation and access to EIA reports	CEA and PAAs
2.	**Industry practice, training, and knowledge sharing on conducting EIAs**	
2.1.	Modules on socio-economic analyses should be introduced in EIA training and qualification material, with special focus on ethics and best practices in conducting and reporting social impacts	CEA, universities, industry associations, private sector, and development partners
2.2.	Access to Sri Lankan socio-economic literature should be increased through institutional collaborations between the National Environmental Information Centre, other public libraries, universities, and research institutions	CEA (NIEC), universities, and relevant subject ministries
3.	**Public Participation and Monitoring**	
3.1.	Trilingual toolkits for rapid assessments of social impacts in EIA reports should be introduced to standardise quality related public comments at the review stage	Think tanks, CSOs, NGOs, and development partners
3.2.	Trainings should be conducted for media and journalists on using EIA reports and evaluating report quality.	Think tanks, CSOs, NGOs, and development partners
4.	**Domestic and foreign lender considerations**	
4.1.	Insights and assessments on the quality of EIA reports and the local practice should inform requirements and screening procedures of development partners.	Development Partners
4.2.	Toolkits must be formulated to assist public and private financial institutions in assessing reporting quality and substantive impacts in EIA reports	Ministry of Finance, and domestic financial institutions

1 ENVIRONMENTAL IMPACT ASSESSMENTS: A VITAL SAFEGUARD IN THE SRI LANKAN DEVELOPMENT PROCESS

Large-scale infrastructure development has been a core component of Sri Lanka's economic growth experience, especially since economic liberalisation in 1977.[1] With the influx of foreign and domestic investment,[2] charismatic projects such as the Accelerated Mahaweli Development Programme have periodically been in the spotlight,[3] often featuring as political trump cards in elections.[4] With the end of the 30-year civil war in 2009, Sri Lanka injected significant capital to mega-development projects[5] until the multiple and overlapping crises struck beginning 2019.[6]

Given their scale, such projects are likely to significantly alter the surrounding environment. So, it is critical that projects are designed to avoid or minimise negative impacts. However, Sri Lanka's infrastructure-led growth experience in the past decades caution that poorly designed projects can not only be an economic burden but also displace local communities and cause severe harm to Sri Lanka's deteriorating natural environment (See Box 1).

As Sri Lanka emerges from a polycrisis, once again large-scale projects are a cornerstone in the country's quest for a rapid recovery and growth. From the resumption of 87 Chinese and Japanese funded projects,[7] to the provision of 50,000 acres of lands for industries,[8] announcements by the government in 2025 have highlighted optimism in unlocking domestic and foreign funding for investment to such projects. So, it is critical that such projects are better designed not only to safeguard the natural environment and local communities but also ensure that the expected economic gains are realised. In this quest, Environmental Impact Assessments (EIAs) are a vital mechanism to proactively identify detrimental impacts so that projects can be designed to avoid or mitigate harm.

1 E H Liyanage, "Does Infrastructure Development Matter For Economic Growth? The Sri Lankan Experience," Sri Lanka Journal of Economics, Statistics, and Information Management 2, no. 1 (2023): 33–48.

2 Saman Kelegama, "Development in Independent Sri Lanka: What Went Wrong?," Economic and Political Weekly 35, no. 17 (2000): 1477–90.

3 Thiruni Kelegama, "Development Gone Wrong: Sri Lanka at 75," South Asia @ LSE, April 10, 2023, https://blogs.lse.ac.uk/southasia/2023/04/10/development-gone-wrong-sri-lanka-at-75/.

4 Rathindra Kuruwita, "Will the Uma Oya Multipurpose Project Impress Sri Lankan Voters?," The Diplomat, April 29, 2024, https://thediplomat.com/2024/04/will-the-uma-oya-multipurpose-project-impress-sri-lankan-voters/.

5 International Monetary Fund Asia and Pacific Department, Sri Lanka: Selected Issues (2018), https://www.elibrary.imf.org/view/journals/002/2018/176/article-A001-en.xml.

6 Easter Sunday Bombings in 2019, the Covid-19 Pandemic in 2020, and the Economic crisis which followed.

7 EconomyNext, "Sri Lanka President Says 87 Projects Resumed by China, Japan under New Govt," Business, EconomyNext, March 5, 2025, https://economynext.com/sri-lanka-president-says-87-projects-resumed-by-china-japan-under-new-govt-209599.

8 EconomyNext, "Sri Lanka to Provide 50,000 Acres of Land for Industry, Expand Tiny Allocation," Business, EconomyNext, February 10, 2025, https://economynext.com/sri-lanka-to-provide-50000-acres-of-land-for-industry-expand-tiny-allocation-203112.

Box 1: Uma Oya and Mattala - How poorly designed projects can impact people and nature

The Uma Oya Multipurpose Development Project (UOMDP) has been in the public limelight for decades due to issues in project design and politicisation. Conceptualised during successive governments and rejected by Asian Development Bank (ADB) feasibility studies due to technical issues and adverse impacts, the project was pushed forward amidst severe backlash from local communities and environmentalists for political expedience (Kuruwita, 2024 (a)). Though the project is now operational, flaws in both preliminary studies and project design caused a 9 year delay and additional direct costs of USD 39 million (Jayanath et al, 2025). More crucially, many community-level accounts highlight a range of severe socio-economic impacts such as structural damages to houses (Rathnayake and Suratissa, 2016) and drying of wells and water shortages (Sriyananda, 2015) which affected over 7000 families (David and Warakapitiya, 2017). Even though the Supreme Court ordered compensation for farmers affected by the project (Centre for Environmetal Justice, 2020) in 2015, accounts indicate that not all payments have been made upto date (Diakonia, 2025).

Since its opening in 2013, Mattala International Airport (MIA) has become a posterchild for white elephant projects, earning the dubious moniker "the World's Emptiest International Airport" (Shepard, 2016). Beyond the economic losses of the project (Aiddata, 2025; Attanayake, 2018; Samarawickrama, 2025), the Auditor General's Department (2015) notes that the human elephant conflict has risen due to the project which has caused harm and deaths to people, elephants, and damages to property. Such impacts also affect the operation of the airport as well, requiring a dedicated wildlife office setup in the airport premises (Newswire, 2025). Problems with process and final choice of site selection is regarded as one of the key causes of this issue (Auditor General's Department, 2015; Echelon, 2016; Hettiarachchi, 2010).

1.1 WHAT IS AN ENVIRONMENTAL IMPACT ASSESSMENT?

The International Association for Impact Assessment (IAIA) defines an Environmental Impact Assessment (EIA) as "the process of identifying, predicting, evaluating and mitigating the bio physical, social, and other relevant effects of development proposals prior to major decisions being taken and commitments made."[9] So, an EIA is a proactive measure to ensure that projects with the potential to cause significant environmental impacts are identified early and environmental concerns are integrated into the project approval process and thereafter during the entire project lifecycle from design and construction, to implementation. Typically, an EIA process would produce a document or report that will contain all relevant information from the assessment including methodologies used, impacts identified and recommendations proposed to mitigate harms.

Introduced in the United States in the 1960s, EIAs have become a staple of national and international governance of developmental projects.[10] A 2011 estimate records that 191 out of 193

9 International Association for Impact Assessment, "What Is Impact Assessment?," October 2009, https://iaia.org/wp-content/uploads/2025/03/What-is-Impact-Assessment.pdf.

10 Peter Chapman et al., Good Practices in National Systems for Environmental and Social Impact Assessments: A Literature Review (World Bank, 2022), https://doi.org/10.1596/37830.

UN member states at the time had integrated EIAs to their environmental governance framework through national legislation or by signing an international legal instrument.[11] EIAs have been featured in several international agreements including the 1992 Rio Declaration,[12] the Convention on Biological Diversity (CBD),[13] and the UN Convention on the Law of the Sea (UNCLOS).[14] International financial institutions and development banks have increasingly incorporated EIAs and similar mechanisms to their grant and lending procedures which influence how EIAs are conducted especially in developing countries such as Sri Lanka.[15]

In addition to providing vital information to stakeholders approving and funding proposed projects, almost all national EIA systems include mechanisms for the public to participate in the EIA process.[16] So frameworks and studies emphasise various qualities that an EIA must possess to fulfil its role as a safeguard mechanism that engages with a variety of stakeholders. An early study on global EIA practice, which influenced subsequent global frameworks on EIAs, identified three core values of an EIA: integrity, utility, and sustainability.[17] A World Bank literature review of national EIA systems in 2022 highlights 11 core principles of an EIA system including predictability, practicality and relevance, participation, credibility, and transparency. [18]

The focus of EIAs have been dynamic, evolving from analysing purely biophysical impacts to encompass other aspects including social impacts.[19] Approaches differ on how social impacts are incorporated in EIA processes. While most international and national EIA frameworks (like the aforementioned IAIA definition) include the social environment within the definition of "environment" in their EIA process some require social impact assessments separate to an EIA based on project specific characteristics.[20]

1.2 AN OVERVIEW OF THE SRI LANKAN EIA REPORTING PROCESS

The Sri Lankan legal framework governing EIAs is fragmented, with four laws operating in tandem. EIAs were introduced to Sri Lanka by the Coast Conservation Act, No. 57 of 1981 (CCA) which mandates EIAs for selected projects within the coastal zone.[21] Thereafter, the National Environmental Act No. 47 of 1980 (NEA) through an amendment in 1988 established the EIA process nationally, excluding the coastal zone.[22]

11 Richard K. Morgan, "Environmental Impact Assessment: The State of the Art," Impact Assessment and Project Appraisal 30, no. 1 (2012): 5–14, https://doi.org/10.1080/14615517.2012.661557.

12 Rio Declaration 1992, Principle 17

13 Convention on Biological Diversity 1992, Article 14

14 Law of the Sea Convention 1982, Articles 204-206

15 World Bank, Good Practices in National Systems for Environmental and Social Impact Assessment (Washington, DC, 2022), https://doi.org/10.1596/37830.

16 United Nations Environment Programme, Assessing Environmental Impacts: A Global Review of Legislation (UNEP, 2018), https://wedocs.unep.org/handle/20.500.11822/22691.

17 Barry Sadler, Environmental Assessment in a Changing World: Evaluating Practice to Improve Performance (Canadian Environmental Assessment Agency, 1996), https://unece.org/DAM/env/eia/documents/StudyEffectivenessEA.pdf.

18 Chapman et al., Good Practices in National Systems for Environmental and Social Impact Assessments: A Literature Review.

19 Ibid.

20 For example, States of Queensland and New South Wales in Australia and India. See Vera Ogorodnikova et al., "National Legal Frameworks for Social Impact Assessment and Management," in Handbook of Social Impact Assessment and Management (Edward Elgar Publishing Limited, n.d.), accessed January 3, 2026, https://www.researchgate.net/publication/378963537_National_legal_frameworks_for_social_impact_assessment_and_management.

21 Coast Conservation and Coastal Resource Management Act, No. 57 of 1981, § 41 (1981), https://lankalaw.net/wp-content/uploads/2025/03/Coast-Conservation-Consolidated-2024.pdf.

22 National Environmental (Amendment) Act No. 56 of 1988 (1988), https://efl.lk/national-environmental-act/#1641398248461-32502309-0d0d.

The 13th Amendment to the Sri Lankan Constitution classifies protection of environment as a subject governed concurrently by the central government and the provincial councils.[23] The North Western Province is the only provincial council which has passed their own environmental statute: the North Western Provincial Environmental Statute of 1991 (NWPES). So, within the North Westen Provincial Limits, the NWPES has established its own EIA procedure.[24]

Finally, in 2009, the Fauna and Flora Protection Act No. 1993 (FFPA) was amended to introduce a separate EIA process for projects falling within a one-mile distance of a National Reserve.[25] So each of the above four laws (thereinafter referred to as the "domestic laws") establish a lead institution which oversees implementation (See Table 2).

Table 2: Domestic laws governing the Sri Lankan EIA process and the relevant lead institutions

Law	Jurisdiction	Lead Institution
NEA	The entire country with the following three exceptions	Central Environmental Authority (CEA)
CCA	Coastal Zone as defined by the CCA	Coast Conservation and Coastal Resource Management Department (CC&CRMD)
NWPES	The North-Western Province	North Western Province Environmental Authority (NWPEA)
FFPA	National Reserves and the immediate 1km radius	Department of Wildlife Conservation (DWC)

Source: Authors' compilation

Though the interplay among the domestic laws is not always clear,[26] the NEA and its accompanying regulations, along with guidelines issued by the CEA provide the structure for all the EIA processes established by domestic laws.[27] Furthermore, lead institutions typically follow procedures and frameworks set by the CEA when implementing EIA related activities in their respective jurisdiction, both due to the national mandate and institutional expertise possessed by the CEA.[28] So in the sections to follow, the procedures set out by the CEA shall form the basis of discussion and analysis. Figure 2 provides an overview into the key stages of the EIA process as outlined by the NEA and Annex 1 contains a detailed discussion on the relevant differences in the EIA processes across the four domestic laws.

23 The Constitution of the Democratic Socialist Republic of Sri Lanka, https://www.parliament.lk/files/pdf/constitution.pdf.

24 Environmental Foundation Limited, Handbook on the Environmental Impact Assessment Process in Sri Lanka (Environmental Foundation (Guarantee) Limited, 2022).

25 Fauna and Flora Protection (Amendment) Act, No. 22 of 2009 (2009), https://stepbysteptrade.lk/media/ordinanceeng_1.pdf.

26 For example, there is legal ambiguity on how the NWPES should be applied. See C. A Chandraprema, Sordid Saga of Wayamba Environmental Authority Ended by Sirisena?, 2016, https://www.lankaweb.com/news/items/2016/09/08/sordid-saga-of-wayamba-environmental-authority-ended-by-sirisena/. and Mario Gomez et al., Judges Environmental Law A Handbook For The Sri Lankan Judiciary (Environmental Foundation Limited, 2009), https://www.scribd.com/document/382343673/Judges-Environmental-Law-a-Handbook-for-the-Sri-Lankan-Judiciary-2009.

27 The NWPES was modelled after the NEA. See Institute for Constitutional Studies, Mapping and Assessment of Provincial Council Statutes and Drafting of Model Statutes (n.d.), https://mpclg.gov.lk/web/images/divisions/Legal/report_Deliverable_3_PDF_2.pdf.

28 KII05 in the public sector observed that the CEA guidelines, templates, and training material on the EIA process is referred to by other lead institutions. See Section 3 for more details.

As highlighted in Figure 2, Sri Lanka follows a two-tier EIA process. If the magnitude of impact of the proposed project is deemed significant in the scoping stage, an EIA report will be required. If the impacts are lesser, an Initial Environmental Examination (IEE) report will be required. It should also be noted that even after an EIA is approved, if there are significant alterations to the project design, the local environment, or other relevant considerations, fresh approval is needed, often through a Supplementary EIA report (SEIA).[29] A SEIA will follow the same process as a typical EIA.

Even though definitions of "environment" provided in the NEA and the NWPES do not include the social environment,[30] guidelines issued by the CEA along with historical practice emphasise that the Sri Lankan EIA process include the social environment.[31] So, in the Sri Lankan system, social impact assessments take place within the EIA.

In addition to the national legal framework governing EIAs, the Sri Lankan EIA process is also influenced by international conventions that have been ratified by Sri Lanka such as the Rio Declaration, CBD, UNCLOS and the Paris Convention. They emphasise core principles and concepts of an EIA system and have been cited in the Supreme Court to establish objectives and qualities the Sri Lankan EIA system must possess.[32] Finally, environmental assessment procedures of development partners such as The World Bank,[33] the International Finance Corporation (IFC),[34] the Asian Development Bank (ADB),[35] the Asian Infrastructure Bank (AIIB)[36] and the Japan International Cooperation Agency (JICA)[37] have also applied to relevant Sri Lankan projects.

29 Section 13, Regulation Published under the Gazette Notification No. 772/22 Dated 24.06.1993 (1993), https://www.cea.lk/web/images/pdf/eiaregulations/reg772-22.pdf.

30 The CCA and the FFPA do not provide definitions for "environment".

31 For example, See "Environmental Impact Assessment (EIA) Procedure in Sri Lanka," accessed January 3, 2026, https://www.cea.lk/web/en/environmental-impact-assessment-eia-procedure-in-sri-lanka.

32 P.B.S. Dissanayake and others v. Geological Survey & Mines Bureau (SC Appeal No. 137/2017) observes that "The importance of the EIA procedure is illustrated in various environment-related international instruments" and the Eppawela case (2000/V3-SRI-LR-243) specifically mentions Principles 10 and 17 of the Rio Convention.

33 World Bank, "Environmental and Social Framework (ESF)," World Bank, accessed December 17, 2025, https://www.worldbank.org/en/projects-operations/environmental-and-social-framework.

34 IFC, "IFC's Performance Standards on Environmental and Social Sustainability," Text/HTML, IFC, accessed December 17, 2025, https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards.

35 ADB, "Environmental and Social Requirements," text, ADB, Asian Development Bank, September 5, 2025, https://www.adb.org/who-we-are/environmental-social-requirements.

36 Environmental and Social Framework (2016), https://www.aiib.org/en/policies-strategies/_download/environment-framework/AIIB-Environmental-and-Social-Framework_ESF-June-2024.pdf.

37 JICA, "JICA Guidelines for Environmental and Social Considerations (January 2022)," JICA, accessed December 17, 2025, https://www.jica.go.jp/english/about/policy/environment/guideline/index.html.

Box 2: Key actors in an EIA process

Any EIA process in Sri Lanka will have the following key actors who will be referred to throughout this study.

Project Approving Agency (PAA): The lead institution or another government entity appointed by lead institutions to oversee the EIA process and make decisions on approval.

Project Proponent (PP): The party who formulates and proposes the project. They are tasked with submitting the EIA report to the PAA. A PP can be a public or private sector actor.

Developer: In cases such as Public Private Partnerships, the PP is a government institution who has allowed a developer to formulate and implement the project.

EIA preparer: The party who conducts the EIA and prepares the report. Preparers can be the PP themselves, consultants appointed by the PP, or a combination of both.

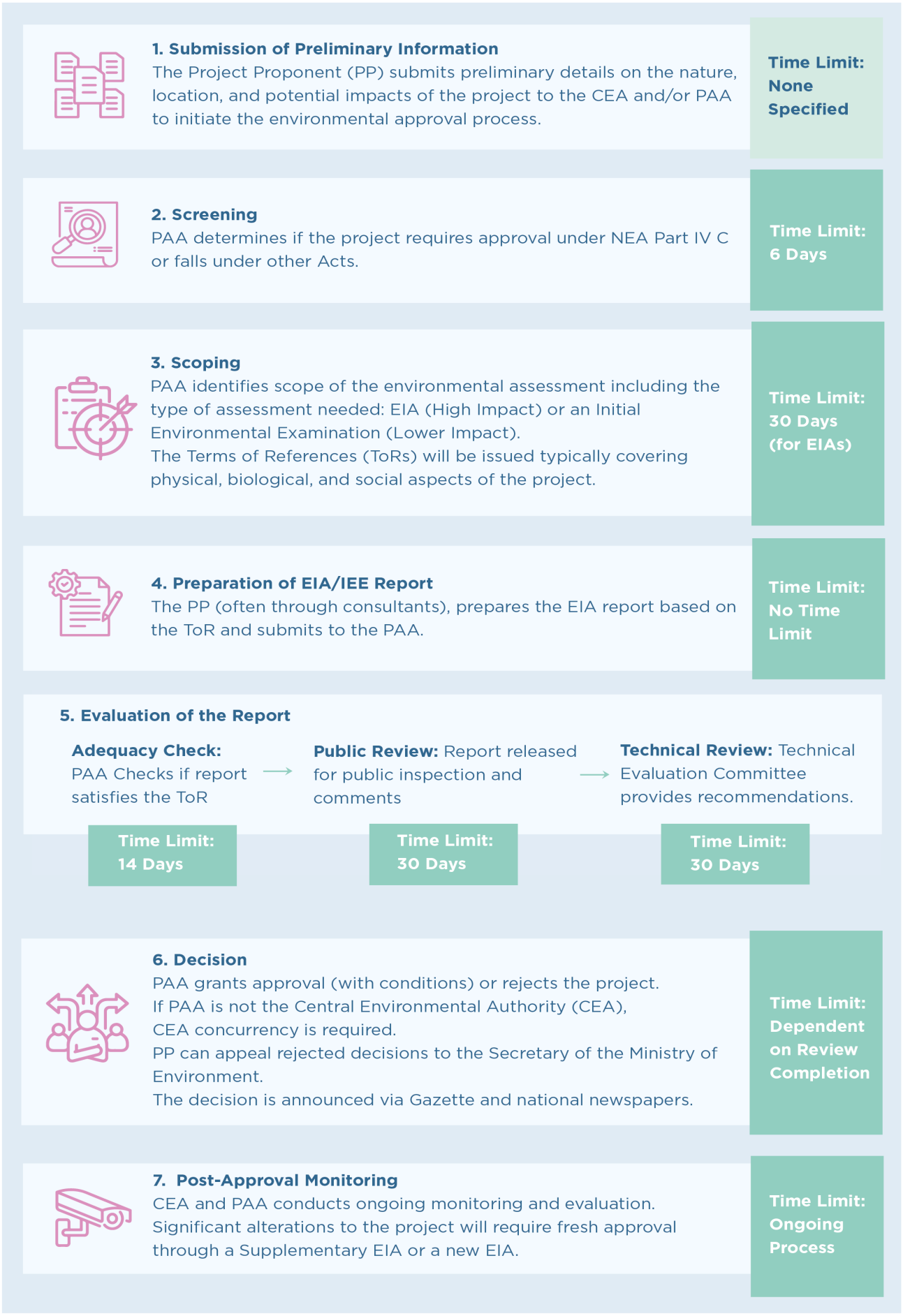
Consultant: An individual expert, group of experts, or a firm, that is external to the PP who can prepare an EIA and provide technical guidance. The CEA maintains a registered list of consulting organisations.

Funder: Any entity who contributes to financing the project. Such actors include the PP themselves, the Treasury, local state and private banks, and development partners.

Development Partner: Bilateral or Multilateral actors such as development and EXIM banks, aid agencies, the World Bank and the Asian Development Bank who will contribute to project financing. Development partners will also play a role in preparing the EIA if they have their own guidelines and requirements.

Source: EFL Handbook, CEA Website and Guidelines

Figure 2: Key stages of the national EIA reporting process

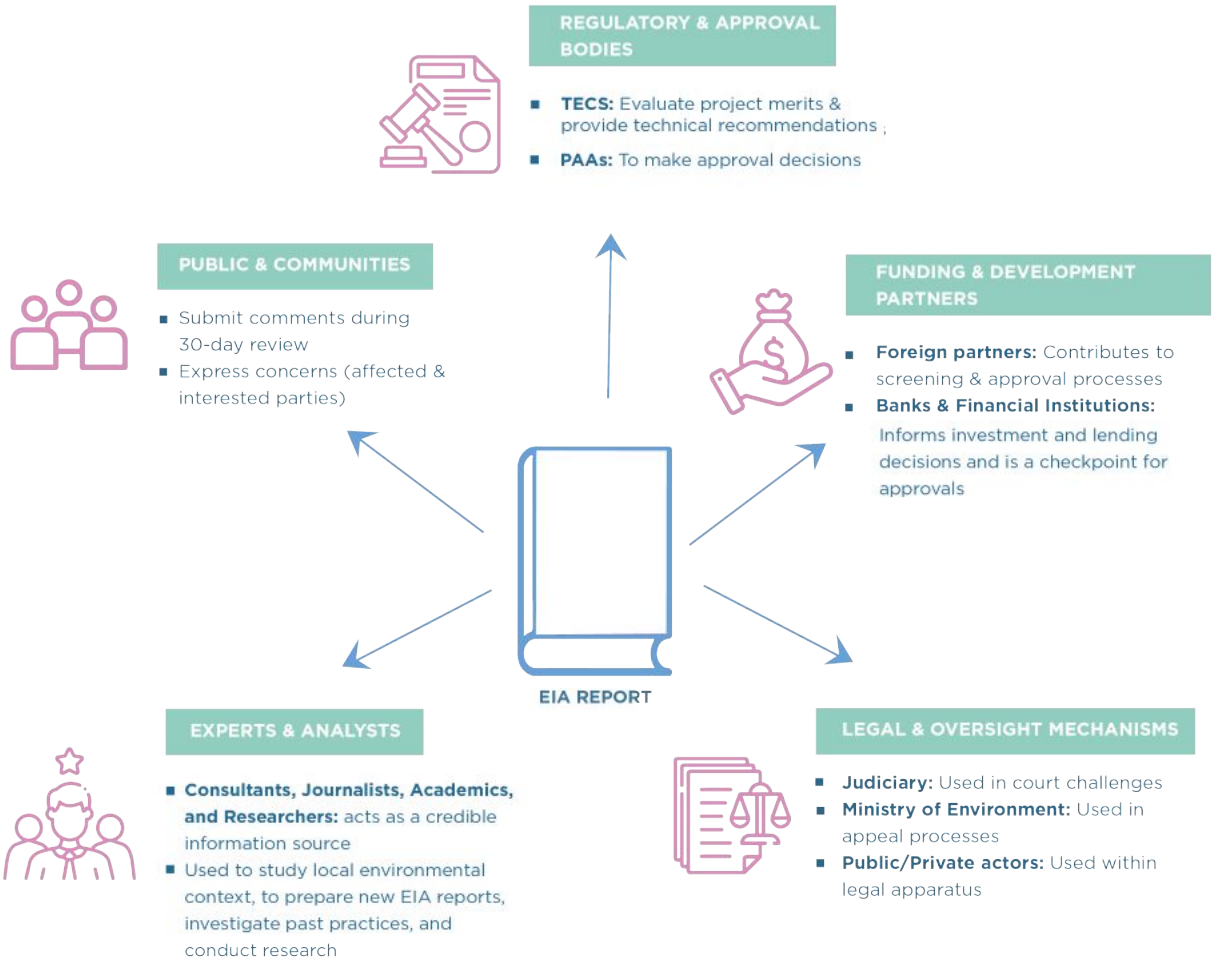


1.3 USERS AND USES OF AN EIA REPORT

EIAs are used by a range of stakeholders both before and after the approval stage of a project. Constitutional provisions and legal precedent emphasise that any member of the public, ranging from individuals and communities to incorporated and non-incorporated organisations, are welcome to submit comments during the 30-day review period. This includes affected parties who are more exposed to project impacts and interested parties who are concerned about broader issues.

Technical Evaluation Committees (TECs) appointed by the PAA use EIA reports to evaluate the merits of the projects and provide technical recommendations to assist PAAs when making the final decision. TECs are appointed per project and consist of subject matter experts. Concurrently, if the project is a foreign-funded project, the EIA reports will contribute to the respective screening and approval processes of the development partner.

Figure 3: The users and uses of an EIA report



Source: Authors' compilation

The EIA process features in a variety of legal proceedings relating to projects including fundamental rights cases and writ cases on approval procedures. A spectrum of public and private sector actors in the legal apparatus including the judiciary rely on EIA reports as a critical source of information. The Court of Appeal in Public Interest Law Foundation v. CEA and Another[38] made a much cited argument that "the Court is ill equipped, in any event, to form an opinion on environmental matters-they being best left to people who have specialised knowledge and skills in such spheres" which highlights the importance of EIA reports.[39] In the landmark Waters Edge Case, the Supreme Court relied on the findings in the EIA report on endangered species and commented on content related gaps in the report chapter on monitoring measures.[40]

Furthermore, banks and other financial institutions also refer to EIA reports when making investment and lending decisions. Often, a project loan appraisal at a commercial bank will necessarily include a section on whether EIA approvals were obtained or not, and credit officers will indicate this as a specific checkpoint. However, it is rare that the details of the EIA findings will be considered in credit appraisals.

Finally, consultants, journalists, academics, and researchers use EIA reports as a credible source of information when studying the environment around a specific project area, compiling future EIA reports, investigating practices of past projects, and analysing the overall environmental governance process.

EIA reports have a variety of users and uses with varying degrees of technical expertise and proximity to the project site and its impacts. Therefore, it is imperative that EIA reports are robust and accessible to ensure that stakeholders can make the best possible use of the report.

38 C. A. 981/99, 2000.

39 Cited in subsequent cases including Public Interest Law Foundation v. CEA and Others (CA/WRIT/527/2015) and Asia Hydro Power Generation (Pvt.) Ltd. V. Hon. Maithripala Sirisena and others (CA/WRIT/359/2017).

40 Sugathapala Mendis and Another Vs. Chandrika Kumaratunga and Others (SC FR 352/07, 2008).

2 ASSESSING REPORTING QUALITY IN EIAS

High-quality EIA reports signal a healthy environmental governance structure and contribute to sound decision-making. Globally, expectations of EIAs have expanded from purely focusing on the minimisation of project-related harms to a broader focus on assessing if public interest is met through project benefits.[41] So, this increasing importance of the role EIAs play both as a safeguard mechanism and tool informing resource allocation has spurred an international and local interest in assessing and ensuring the quality of EIA reports.

2.1 INTERNATIONAL FRAMEWORKS AND LITERATURE ON ASSESSING EIA REPORTING QUALITY

Focus on the quality of EIA reports appear on international, regional, and national EIA-related frameworks and guidelines. One of the earliest comparative studies on EIAs, the International Study of the Effectiveness of Environmental Assessment 1996 emphasises objectivity, credibility, and adherence to best practices in impact science as core principles of an EIA.[42] Similarly the IAIA Principles of Environmental Impact Assessment 1999 include rigour (employing appropriate methodologies) and credibility (objectivity, impartiality, and verifiability).[43] The Conference of Parties to the CBD have issued voluntary guidelines which include directions on the content and quality of EIA reports.[44]

A United Nations Environment Programme (UNEP) global review of EIA legislation observes that national EIA systems take varied approaches to ensure EIA reporting quality.[45] Regulating who prepares EIA reports through registrations, certifications, and licenses is a method used by countries such as China, Indonesia, and Peru to ensure reporting quality.[46] Some countries like Mongolia have imposed administrative or criminal liability on consultants (i.e. revoking licenses and imposing fines) if a completed EIA report is deemed inadequate at the review stage.[47] The Netherlands has incorporated an independent review of EIAs for complex projects by establishing a dedicated agency: the Netherlands Commission for Environmental Assessment.[48] National EIA laws also differ in how requirements on contents in EIA reports are stipulated. Some EIA laws provide detailed provisions (i.e Tanzania), while others provide brief content requirements.[49] In the case of latter, countries such as Oman have provided detailed guidance on EIA requirements in non-binding guidelines while others like China require detailed guidance to be defined for each individual EIA.[50]

41 World Bank, Good Practices in National Systems for Environmental and Social Impact Assessment.

42 Ibid.

43 IAIA and IEA, Principles of Environmental Impact Assessment Best Practice, 1999, https://iaia.org/wp-content/uploads/2025/02/BEST-PRACTICE-Principles-of-EIA.pdf.

44 Biosafety Unit, "Voluntary Guidelines on Biodiversity-Inclusive Impact Assessment," Convention on Biological Diversity, Secretariat of the Convention on Biological Diversity, accessed January 4, 2026, https://www.cbd.int/decision/cop?id=11042.

45 "Assessing Environmental Impacts: A Global Review of Legislation," accessed January 3, 2026, https://wedocs.unep.org/items/32fa52b5-52e7-4268-ab44-31bcfb911969.

46 "Assessing Environmental Impacts: A Global Review of Legislation."

47 Ibid.

48 NCEA, "About the NCEA," NCEA - EN, n.d., accessed January 4, 2026, https://www.eia.nl/en/about-the-ncea/.

49 Ibid.

50 Ibid.

Several efforts have been made to define and standardise quality requirements for EIA reports. The European Commission published detailed guidance on preparation of EIA reports in 2017.[51] Section 2 is dedicated to quality requirements of an EIA report. It emphasises that qualities of a good EIA report include the use of impartial language, referencing sources, describing methodologies used to study each environmental factor, provision of evidence of effective consultation, and a non-technical summary devoid of technical jargon. The guidance also includes a checklist that can be used for EIA review which includes a section on reviewing EIA report quality.

The seminal work on checklist-based review methods was conducted by Norman Lee and Raymond Colley along with their collaborators. Since Colley's unpublished MSc dissertation (1989) developed a criterion to review environmental statements appearing in UK environmental assessments,[52] the review criteria for EIAs developed by Lee, Colley et al. (known as the Lee-Colley Review Package) has become the most popular criteria used to assess EIA quality.[53] Review packages such as the Lee-Colley Review Package evaluate an EIA report using a hierarchical set of review criteria and assign qualitative grades, which are then summarised into an overall quality rating. The four key review areas are (1) Description of the development and environment; (2) Identification and evaluation of key impacts; (3) Alternatives and mitigation; and (4) Communication of results. Crucially, the objective of a review package is to assess the quality of information presented in an EIA report and not to directly assess scientific accuracy of the conclusions made in a report.[54] Checklist based methods such as the Lee-Colley Review Package and the EC Guidance have influenced national capacity building tools such as the UNEP EIA Training Resource Manual[55] and EU capacity building programmes.[56]

Studies use various methods to assess EIA reporting quality. A popular approach is to directly use or adapt one or a combination of standard review packages or checklists.[57] In contrast, studies such as Mhango (2005)[58] and Machaka et al. (2015)[59] assess EIA report quality by analysing compliance with national regulations and TOR. Others use techniques such as content analysis[60] and analysing texts for readability.[61]

51 Adrien Lantieri et al., Environmental Impact Assessment of Projects: Guidance on the Preparation of the Environmental Impact Assessment Report (European Commission, 2017), https://circabc.europa.eu/ui/group/3b48eff1-b955-423f-9086-0d85ad1c5879/library/b7451988-d869-4fee-80de-0935695f67f2/details?download=true.

52 Fernanda Aparecida Veronez and Marcelo Montaño, "Towards a Systematic Use of Quality Review Packages," 38th Annual Conference of the International Association for Impact Assessment, 2018.

53 Other prominent standardized criteria include the IAIA EIA effectiveness checklist.

54 N Lee et al., Reviewing The Quality Of Environmental Statements And Environmental Appraisals, Occassional Paper, vol. 55 (1999).

55 "Environmental Impact Assessment Training Resource Manual," with UNEP et al., Australian Environment Protection Agency for UNEP, 1996, https://digitallibrary.un.org/record/248749.

56 Michal Musil and Natalia Guranda, Guidelines on Quality Control of EIA Documentation for the Republic of Moldova – Including Guidance for the Transboundary EIA Process, 2024.

57 See Appendix 2 of Kamijo and Huang (2017) for a list of examples. Tetsuya Kamijo and Guangwei Huang, "Focusing on the Quality of EIS to Solve the Constraints on EIA Systems in Developing Countries: A Literature Review," JICA-RI Working Paper, JICA Research Institute, 2017, https://www.jica.go.jp/Resource/jica-ri/publication/workingpaper/l75nbg00000660y6-att/JICA-RI_WP_No.144.pdf.

58 Solani Dennis Mhango, "The Quality of Environmental Impact Assessment in Malawi: A Retrospective Analysis," Development Southern Africa 22, no. 3 (2005): 383–408, https://doi.org/10.1080/14797580500252837.

59 Rowan Machaka et al., "Compliance with the Requirements of the Environmental Impact Assessment Guidelines in Zimbabwe: A Case Study," Journal of Sustainable Development 9, no. 5 (2016): p121, https://doi.org/10.5539/jsd.v9n5p121.

60 Jiaying Xu et al., "Content Analysis of National EIA Reports in China," Journal of Environmental Information Science, 2016.

61 Emily Louise Stace McKie and Esther Sophia Rust, "Promoting Readability in EIA – Impacts of Regulation, Guidance & Certification," IAIA21 Smartening Impact Assessment in Challenging Times, 2021, https://conferences.iaia.org/2021/edited-papers/914_MCKIE_Promoting%20Readability%20in%20EIA.pdf?utm_source=chatgpt.com.

Literature also varies in terms of the scope of analysis. The scope ranges from specific geographical regions,[62] specific sectors,[63] and specific development partners,[64] to the overall EIA mechanism in a jurisdiction.[65] A related issue is the sample size of reports used for analysis. Kamijo and Huang (2019) highlights that sample sizes in existing literature vary from as little as 18 to above 100 with their own sample size of 160 reports being the highest among literature reviewed.[66]

Some studies go beyond providing data on the state of EIA reporting quality and identify factors that influence quality. Such factors range from project-specific characteristics (the size of projects and project type), consultant-specific characteristics (experience of consultant and length of reports), process-related factors (laws and regulations and TORs) and institutional idiosyncrasies (type of approving authority and ownership of project proponent).[67] Kamijo and Huang (2019) observes that while most studies that identify factors influencing EIA report quality do so using qualitative sources such as professional perspectives or interview results, a nascent body of literature including their own paper use statistical techniques to determine influencing factors.[68]

Literature on analysing EIA reporting quality looks at the overall report or predominantly at the biophysical elements so social impacts are typically overshadowed.[69] A few studies provide dedicated attention to social impacts or specific sections of EIA reports. Hildebrandt and Sandham (2014) adapts the Lee-Colley Review Package to assess social impacts in 23 South African EIA reports and finds that the quality of reporting is low.[70] Suwanteep et al (2017) analyses the public participation sections of 82 EIA reports in Thailand.

2.2 LOCAL GUIDELINES AND REQUIREMENTS ON EIA REPORTING QUALITY

Sri Lankan laws and regulations on EIAs do not mandate requirements on reporting quality. The only mention of content or format related aspects of an EIA report in Sri Lankan laws is in the definition for an EIA report provided by the NEA, CCA, and the NWPES, which outline the key sections of a report including a description of the project, description of the impacts and the description of alternatives. Instead, quality requirements are provided through two sources: (1)

62 Keletso V. Malepe et al., "Evaluating the Quality of Environmental Impact Assessment Reports (EIARs) for Tourism Developments in Protected Areas: The Kruger to Canyons Biosphere Case Study," Impact Assessment and Project Appraisal 40, no. 5 (2022): 384–98, https://doi.org/10.1080/14615517.2022.2091055.

63 Vincent D. Choji et al., "An Evaluation of the Quality of Environmental Impact Assessment Reports in the Mobile Telecommunications Infrastructure Sector: The Case of Plateau State in Nigeria," International Journal of Environmental Research and Public Health 19, no. 19 (2022): 12659, https://doi.org/10.3390/ijerph191912659.

64 Tetsuya Kamijo and Guangwei Huang, "Determinants of the EIA Report Quality for Development Cooperation Projects: Effects of Alternatives and Public Involvement," JICA-RI Working Paper, JICA Research Institute, 2019, https://jicari.repo.nii.ac.jp/records/989.

65 Mahamadou Zakari, "Evaluation of the Quality of Environmental Impact Assessment Reports Using Lee and Colley Package in Niger Republic," Modern Applied Science 9 (January 2015): 89–95, https://doi.org/10.5539/mas.v9n1p89.

66 Kamijo and Huang, "Determinants of the EIA Report Quality for Development Cooperation Projects: Effects of Alternatives and Public Involvement."

67 See Section 1 of Kamijo and Huang (2019) for a detailed overview of existing literature on determinants of EIA reporting quality. Kamijo and Huang, "Determinants of the EIA Report Quality for Development Cooperation Projects: Effects of Alternatives and Public Involvement."

68 Ibid.

69 Jacobus A. du Pisani and Luke A. Sandham, "Assessing the Performance of SIA in the EIA Context: A Case Study of South Africa," Environmental Impact Assessment Review 26, no. 8 (2006): 707–24, https://doi.org/10.1016/j.eiar.2006.07.002.

70 L. Hildebrandt and L. A. Sandham, "Social Impact Assessment: The Lesser Sibling in the South African EIA Process?," Environmental Impact Assessment Review 48 (September 2014): 20–26, https://doi.org/10.1016/j.eiar.2014.04.003.

EIA guidance documents published by the CEA and (2) Terms of References issued for each EIA.

The CEA has published several documents. Table 3 provides an overview of the key guidance documents on the general EIA process along with a snapshot of aspects relevant to reporting quality contained in each document.

Table 3: Guidance documents published by the CEA

Document Name	Aspects relevant to reporting quality	Latest edition (Year)
Guidance for Implementing the EIA process No 1: A General Guide for Project Approving Agencies	• Recommended structure, format, and content to be included in an EIA • Qualities of a good EIA report including writing style, disclosure of incomplete information, presentation of methodologies and professional integrity • Objectives of a ToR and draft ToR template • Definitions of key concepts such as "effects" and "mitigation" • Page limits for the entire report (100 pages) and the executive summary (5 pages)	4th edition (2006)
Guidance for Implementing the EIA process No 2: A General Guide for Conducting Environmental Scoping	• Discusses considerations on the scope and boundaries of an EIA study • Mentions socio-cultural and economic conditions as a primary technical topic commonly addressed in an EIA	3rd edition (2006)
Guidance for Implementing the EIA process No 3: Public Participation Handbook	• Emphasis on accessibility as an ideal EIA report quality • Highlighting types of reporting quality issues that were raised during the public review period including issues in data, calculations, assumptions, and logical inconsistencies on solutions	2nd edition (1998)
Simple Questions and Answers on EIA	• Provides the definition of "environment" in an EIA which includes three components: physical, biotic, and the social • Describes an EIA report as a short and concise document (100 pages) written in easy-to-understand language	2nd edition (2005)

Source: Authors' compilation

In addition to the above guidance documents, three sector specific guidelines have been developed by the CEA which contain methodological best practices to be followed when conducing environmental analyses. The guidelines are: (1) Environmental Guidelines for Road and Rail Development in Sri Lanka (1997), (2) Environmental Guidelines for Road and Rail Development in Sri Lanka (1997), and (3) Guideline for Determination of Environmental Flows for Development Projects that Result in Impounding of Water in Streams/Rivers. (1) and (2) refers to the some of the guidance documents in Table 3 when discussing EIA report format and quality requirements. (2) also observes that most EIA reports (at the time of publication in 1997) suffers from biased and incomplete assessments, with reports often prepared to justify proposed projects rather than provide an objective evaluation.

Evidence suggest that the above guidelines have normative influence on the EIA report drafting process. Firstly, some sections of TORs issued by PAAs across all four domain-specific laws over the years have closely followed the language used in guidelines.[71] Secondly, key informants confirmed that guidelines are a reference point for quality-related expectations on EIAs. Thirdly, the Supreme Court in the recent Uva Magnetite Case[72] and the landmark Eppawela Case[73] directly quote sections of the Guidance for Implementing the EIA process No 1: A General Guide for Project Approving Agencies (CEA Guide for PAAs) when discussing objectives and qualities of the EIA process. Finally, some EIA reports have included the guidelines when outlining the existing legal and regulatory procedures governing EIAs.[74]

However, key informants and existing literature observe that Guidance for Implementing the EIA process No 3: Public Participation Handbook (CEA Public Participation Handbook) is no longer in circulation. Though new editions of the CEA Guide for PAAs and the Guidance for Implementing the EIA process No 2: A General Guide for Conducting Environmental Scoping (CEA Guide for Scoping) were published in 2006, the Public Participation Handbook was not. It is not featured in the CEA website as a guideline either.[75]

The most direct source of quality requirements for an EIA report is contained in the EIA ToRs issued by the PAAs for each proposed project. In theory, the ToR is to be drafted to meet the assessment requirements specific to each project. As highlighted in Section 4, ToRs across PAAs have consistently included language specifying requirements related to reporting quality such as the reporting the methodologies employed, the data sources used, and the technicality of language used in the Executive Summary.

71 Definitions provided and the instructions contained in Appendix 2 on EIA content and format in Guidance for Implementing the EIA process No 1: A General Guide for Project Approving Agencies are closely followed in ToR requirements on EIA content and format.

72 P.B.S. Dissanayake and Others v. Geological Survey & Mines Bureau and Others (SC Appeal No. 137/2017).

73 Bulankulama And Others v. Secretary, Ministry of Industrial Development and Others (SC (FR) Application No. 884 /99).

74 See EIA report for the Proposed Mixed Development Project Havelock City, 2007.

75 Law & Society Trust, Access to Information, Peoples' Participation and Social Justice in Sri Lanka, LST Review (Law & Society Trust, 2009), https://lst.lk/wp-content/uploads/2024/02/Vol.20-Issue-N.-264-OCTOBER-2009.pdf.

2.3 LOCAL LITERATURE ON THE PRACTICE OF EIA REPORTING AND SOCIO-ECONOMIC IMPACTS

There is a nascent body of local literature that assesses the quality of EIA reporting.[76] Miriya Gunewardena's PhD Thesis[77] and their expanded thesis chapter subsequently published separately as Samarakoon and Rowan (2007) are the seminal studies on systemic analyses of Sri Lankan environmental assessments.[78] The study used an adapted checklist of review criteria to examine how ecological impacts were assessed in a representative sample of 130 IEE and EIA reports[79] and highlighted severe methodological and quality-related deficiencies. It found that none of the assessed reports used statistically rigorous analysis, which is necessary to establish testable predications of impact. Ravi et al (2023) is the only Sri Lankan study in the literature review that explicitly analyses the reporting quality of EIAs using the Lee-Colley review package.[80] Analysing the differences between the EIA reports of 6 purely domestic-funded and 6 foreign-funded projects, the study finds that EIA reports of projects with development partner involvement tend to be of better quality than purely domestic-funded projects.

Instead of using standardised checklists or review packages, most other studies have formulated criteria relevant to their respective research questions to assess aspects of EIA reporting quality. Gamlath et al (2014) analyse six EIA reports of transport infrastructure projects and find that impacts are rarely quantified in reports, and even when they are, quantification is only on magnitude.[81] Such one-dimensional impact assessments may misrepresent impacts that are temporal in nature. The study also highlights quality-related issues, such as the use of unreliable secondary data and the lack of robust guidelines to evaluate the content of an EIA report. Using two projects as case studies and comparing them with New Zealand's EIA system, Hapuarachchi et al. (2016) find that although EIA reports are generally subject to independent review and verification, both EIA regulations and Terms of Reference still have gaps in their content requirements for addressing development-induced disasters.[82] Peiris (2019)[83] and Hamza (2024)[84] analyse one EIA report as a case study to highlight procedural and methodological issues when conducting and reporting EIAs. Using insights from interviews on infrastructure development projects, Wijerathna and Abeynayake (2021) identify poor quality

76 See Annex 2 for the full list of Sri Lankan literetire with findings related to EIA report quality.

77 Miriya Prasanni Gunawardena, "A Critical Review of Ecological Impact Assessment in Sri Lanka: With Particular Reference to the Shrimp Aquaculture Industry" (Ph.D., Lancaster University (United Kingdom), 2001), https://www.proquest.com/docview/301581783/abstract/D96983D4F04D4F37PQ/1.

78 Miriya Samarakoon and John S. Rowan, "A Critical Review of Environmental Impact Statements in Sri Lanka with Particular Reference to Ecological Impact Assessment," Environmental Management 41, no. 3 (2008): 441–60, https://doi.org/10.1007/s00267-007-9039-5.

79 Though the exact number of EIA reports assessed was not specified by Samarakoon and Rowan, in the survey of reports conducted, 34 percent (156 reports) were EIAs. Given that the sample is representative, it is likely that they assessed approximately 45 EIA reports in their study.

80 V. Ravi et al., "A Quality Review of EIA: A Comparative Study of State-Funded and International Aid Agency Funded Development Projects in Sri Lanka," Ceylon Journal of Science 52, no. 3 (2023), https://doi.org/10.4038/cjs.v52i3.8021.

81 I M Gamalath et al., "Environmental Impact Assessment of Transport Infrastructure Projects in Sri Lanka: Way Forward," Journal of Tropical Forestry and Environment 4, no. 01 (2014).

82 Arosh Buddika Hapuarachchi et al., "Effectiveness of Environmental Impact Assessment (EIA) in Addressing Development-Induced Disasters: A Comparison of the EIA Processes of Sri Lanka and New Zealand," Natural Hazards 81, no. 1 (2016): 423–45, https://doi.org/10.1007/s11069-015-2089-8.

83 Vishvajith Peiris, "Evaluation of Post Impacts of Second International Airport in Sri Lanka with Reference to the Environmental Impact Assessment Process," International Journal of Multidisciplinary Research Review 4 (June 2019): 76–83.

84 Shazna Ameerul Hamza, "A Review on the Effectiveness of the Environmental Impact Assessment Report of the Proposed Mullikulam Wind Farm-Sri Lanka: Evaluating the Site Selection, Mitigatory Measures and Stakeholder Participation." (Masters, Uppsala University, 2024).

of EIA reports and the unavailability of quality related guidelines as significant challenges in the current system.[85]

Many studies also make observations on aspects related to EIA reporting quality. Zubair (2001) highlights that difficulties in accessing environmental data to conduct EIAs have at times led to the fabrication of such data in reports.[86] Furthermore, even though the EIA process relies heavily on the judgements made by EIA consultants, the consultants are not adequately held accountable for unethical work. They also highlight that the public finds the 30-day review period insufficient particularly for complex projects, and EIA report contents are often inaccessible. Focusing exclusively on small hydro projects, Silva and Silva (2016) claim that more than 90 per cent of IEE and EIA reports approved by PAAs were not made by an EIA preparing team with the appropriate mix of expertise.[87] MacKee et al (2001) highlight examples where the lack of expertise in PAAs affect the quality of ToR requirements.[88] De Silva et al (2020) discuss instances where public have emphasised how EIA reports are inaccessible due to the use of complicated and technical language.[89]

An apparent gap in local literature is the systematic focus on social impacts reporting quality in EIAs. Caron (2003) observes that "EIA reports tend to privilege a project's environmental impact over its social and cultural ones."[90] Silva and Silva (2016) note that in small hydro projects, EIA content deprioritises immediate local and social issues for verbose and irrelevant explanations on carbon trade and engineering mathematics. Analysing one project as a case study, Zaman and Gonnetilleke (2016) observed fundamental inadequacies in the social impact assessment that was conducted.[91] Anecdotal evidence reported in public media highlight instances of methodological malpractice when conducting social assessments and surveys.[92] Wijesekera and Weerakkody (2006) find that socio-economic topics were the most frequent issue raised by public responses to EIA reports (32 per cent), followed by cultural and aesthetic issues, and environmental reports (20 per cent each) while analysing 15 EIA and 13 IEE reports on reported public participation.[93] Crucially, 17 per cent of public responses focused on the inadequacy of reporting, emphasising the need for better quality socio-economic reporting.

85 B.V.M.K. Wijerathna and M.D.T.E Abeynayake, "Challenges and Issues of Environmental Protection Instruments Related to Infrastructure Development Projects in Sri Lanka," Proceedings of the 9th World Construction Symposium B.V.M.K. Wijerathna and M.D.T.E Abeynayake, "Challenges and Issues of Environmental Protection Instruments Related to Infrastructure Development Projects in Sri Lanka," Proceedings of the 9th World Construction Symposium 2021 on Reshaping Construction: Strategic, Structural and Cultural Transformations towards the "

86 Lareef Zubair, "Challenges for Environmental Impact Assessment in Sri Lanka," Environmental Impact Assessment Review 21, no. 5 (2001): 469–78, https://doi.org/10.1016/S0195-9255(01)00081-6.

87 E I L Silva and E N S Silva, Small Hydropower Development and Environment: A Case Study on Sri Lanka (Water Resources Science and Technology, 2016), https://www.apn-gcr.org/wp-content/uploads/2020/09/ee74f51d9cac104230f85b4acfdd4618.pdf.

88 Jamie Mackee et al., "Environmental Assessment in Sri Lanka: Its Status and the Potential for the Introduction of Strategic Environmental Assessment," Journal of Environmental Assessment Policy and Management 3, no. 2 (2001): 209–40.

89 Keshara de Silva et al., "The Impact of Accountability Mechanisms on Public Sector Environmental Sustainability Performance: A Case Study of Sri Lanka," Australasian Accounting, Business and Finance Journal 14, no. 3 (2020), https://doi.org/10.14453/aabfj.v14i3.4.

90 Cynthia Caron, Defining the Public Interest, Negotiating Rights: The Influence of Environmental Impact Assessment Legislation in Sri Lanka (2003).

91 Mohammad Zaman and Sunil Gonnetilleke, "Incorporating Social Impact Dimensions in Project Planning: Examples from Bangladesh, Nepal, Pakistan and Sri Lanka," in Assessing the Social Impact of Development Projects: Experience in India and Other Asian Countries, ed. Hari Mohan Mathur (Springer International Publishing, 2016), https://doi.org/10.1007/978-3-319-19117-1_11.

92 Mia Abeyawardene, "Mannar's Fight Against Destructive Development and Ecological Injustice -," Groundviews, 2025, https://groundviews.org/2025/11/05/mannars-fight-against-destructive-development-and-ecological-injustice/.

93 N. T. S. Wijesekera and N. C. Weerakkody, "Public Participation in Environmental Assessment of Development Projects - The Sri Lankan Situation," Engineer: Journal of the Institution of Engineers, Sri Lanka 39, no. 2 (2006), https://doi.org/10.4038/engineer.v39i2.7181.

3 RESEARCH OBJECTIVES AND METHODOLOGY

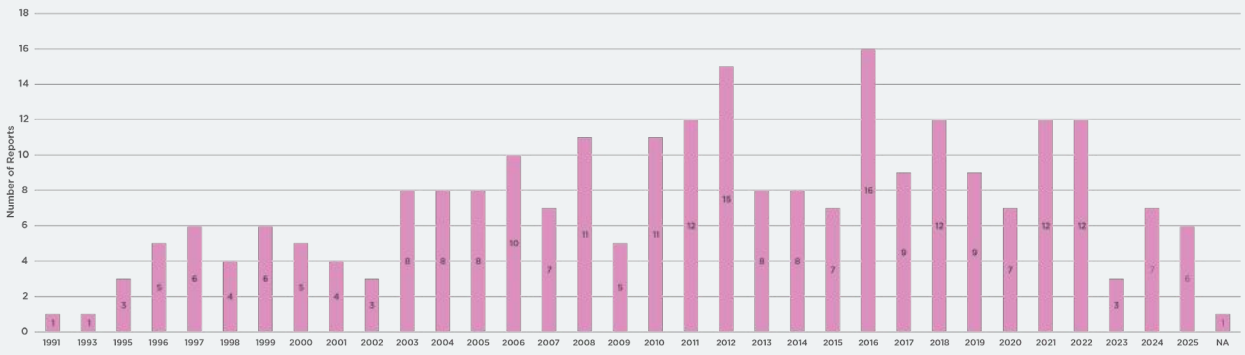
This study assesses how 250 EIAs conducted between 1991 and 2025 report social impacts (See Figure 4).[94] The research aims to achieve the following objectives:

1. Provide a data-driven state of play on the practice of social impact assessments in EIA reports
2. Assess preliminary trends in the reporting quality of EIAs and propose priority recommendations for key stakeholders
3. Expand the scope of systemic analysis of EIA reports in Sri Lanka by highlighting avenues of further enquiry

Interviews and discussions with seven key public and private sector actors were conducted at different stages of the research to help validate the methodology and interpret findings.[95]

Detailed explanations on aspects of the research methodology along with the descriptive statistics of the dataset are provided in Annexures 3 to 5. This section will focus on the guiding principles of the research, along with an overview of the dimensions of the assessment and the types of analyses conducted.

Figure 4: Number of analysed EIA reports by year



Source: Author's construction

94 Annex 3 provides a detailed overview into how the dataset of EIA reports were compiled, Annex 4 provides the full list of EIA reports assessed for this study, and Annex 5 provides an overview of the constructed dataset of EIA reports along with the descriptive statistics.

95 Annex 6 provides an overview of interviewee profiles.

3.1 GUIDING PRINCIPLES OF THE RESEARCH

When formulating the criteria to assess the reporting of social impacts in EIAs, this study adopted two guiding principles.

Firstly, since the study is retrospective, the assessment was anchored to standards of reporting quality that were expected from reports through guidelines and ToRs at the time the reports were published.

Secondly, a minimum-threshold approach was adopted when conducting the assessment. Unless otherwise stated, a report was marked as meeting a requirement if it demonstrated compliance at least once (or in a small number of instances), even where that compliance was uneven or inconsistent across the document. This effectively sets a low bar akin to a best-case reading of minimal compliance so when a criterion still falls short under this approach, it signals a more serious and robust quality gap.

These guiding principles drove the study not to adopt a standard review package such as Lee-Colley and instead formulate a bespoke criterion when assessing the quality of social impact reporting. This is to ensure that instead of imposing aspirational standards of quality, the study assessed EIA reports based on the minimum quality requirements expected by the national system.

Furthermore, given the stated objective of informing critical aspects of policy reform, the study did not attempt to formulate and attribute an overall metric of quality to each report, and instead focused on individually assessing different policy-relevant aspects of reporting quality. The study assessed reporting quality across six dimensions, which fall into two groups.

3.2 DIMENSIONS OF ASSESSMENT

The many uses and users of EIA reports, along with requirements highlighted by EIA guidelines and TORs, inspired the assessment to consider reporting quality across two types of dimensions: 1) Requirements and 2) Attributes. Requirements are three fundamental components of social assessments that are expected of a typical EIA, while attributes are three dimensions of reporting quality that are critical to ensure different stakeholders with varied technical expertise and proximity to the project can meaningfully use EIA reports. Guidelines and ToRs explicitly stipulate the fulfilment of all three requirement-based dimensions, while only some component attribute-based dimensions are explicitly requested. Other attributes are alluded to in guidelines and ToRs. For all components of dimensions where ToRs explicitly request compliance, ToRs are assessed alongside the EIAs to explore the practice of ToR making and the interplay between ToRs and the quality of EIA reporting. Table 4 provides an overview of the 6 dimensions and the respective criteria within each dimension that were assessed. The table also highlights which source of quality requirements inspired the inclusion of each dimension criteria.

Table 4: Types of dimensions assessed in the study and their respective criteria

Dimension	Criteria	Source
Requirements		
 Description of existing environment	Are methodologies used to assess the existing social environment reported?	ToRs; CEA Guide for PAAs
	Are external analytical studies used when assessing the social environment baseline?	CEA Guide for PAAs
 Identification, analysis, and assessment of impacts	Are methodologies used to assess social impacts reported?	ToRs; CEA Guide for PAAs
	Are the identified significant impacts classified?	ToRs; CEA Guide for PAAs
 Proposed Mitigation measures	Is the effectiveness of proposed mitigation methods reported?	ToRs
	Is the rationale for proposing mitigation methods provided?	ToRs
Attributes		
 Accessibility	How long are EIA reports and Executive Summaries?	CEA Guide for PAAs
	Is the language used in Executive Summaries technical?	ToRs; CEA Guide for PAAs
 Verifiability	Are data sources relied on to assess the social environmental baseline disclosed?	CEA Guide for PAAs
	If a social survey is conducted, are critical sampling information provided?	ToRs; CEA Guide for PAAs
 Integrity	Are limitations and assumptions disclosed?	CEA Guide for PAAs
	Is the language used in Executive Summaries objective?	CEA Guide for PAAs

Source: Author's construction

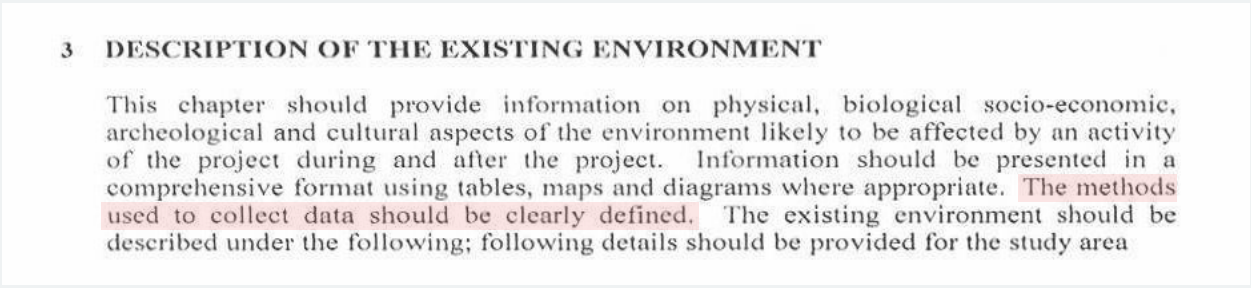
The basis for each of the six dimensions, the respective assessment criteria, and some examples of reports that meet and do not meet the respective criteria are provided individually below to illustrate how the marking was conducted.

Dimension R1: Description of existing environment

The CEA Guide for PAAs state that "the EIA should succinctly describe the environment of area(s) to be affected by the proposed project" and that "data and analyses in the assessment should be commensurate with the importance of the impact" and "PPs should identify any methodologies used". The Public Participation Handbook mirrors the emphasis on data and methodologies by including comments on data as one of the eight types of comments that the public can raise. The handbook states that "The EIA's description of the local population (such as their level of income, types of employment…) may be incorrect. If you spot such errors in the data (that you know are factually incorrect), point them out in your written comments." The CEA Guide for Scoping reiterates the complexity in defining the affected social environment, given the many direct and indirect social impacts a project may have. This requirement can be seen among ToRs as well (See Figure 5).

Figure 5: ToRs requirements on reporting methods used to assess the existing social environment

An example of a ToR explicitly requiring the reporting of methods used

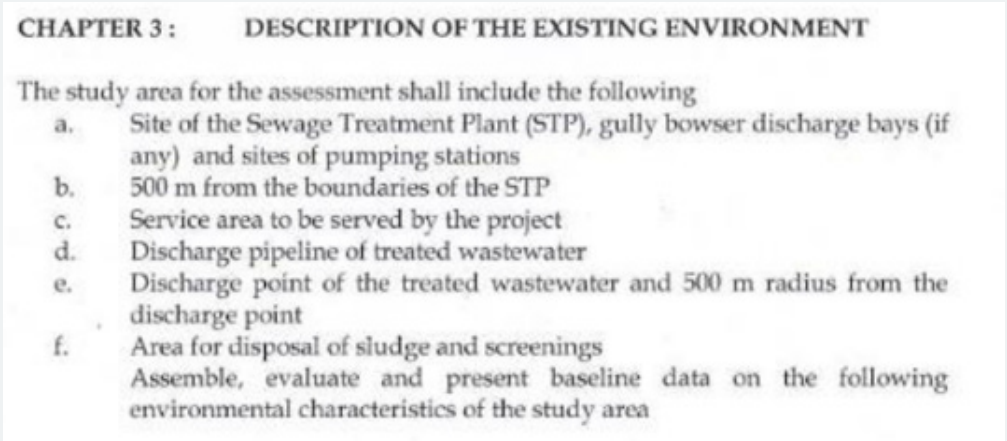


3 DESCRIPTION OF THE EXISTING ENVIRONMENT

This chapter should provide information on physical, biological socio-economic, archeological and cultural aspects of the environment likely to be affected by an activity of the project during and after the project. Information should be presented in a comprehensive format using tables, maps and diagrams where appropriate. The methods used to collect data should be clearly defined. The existing environment should be described under the following; following details should be provided for the study area

Source: Envision Dutch Bay 150 MW + 23.8 Bess Renewable Energy Wind Power Project Kalpitiya, 2025

An example of a ToR not requiring the reporting of methods used



CHAPTER 3 : DESCRIPTION OF THE EXISTING ENVIRONMENT

The study area for the assessment shall include the following

a. Site of the Sewage Treatment Plant (STP), gully bowser discharge bays (if any) and sites of pumping stations
b. 500 m from the boundaries of the STP
c. Service area to be served by the project
d. Discharge pipeline of treated wastewater
e. Discharge point of the treated wastewater and 500 m radius from the discharge point
f. Area for disposal of sludge and screenings

Assemble, evaluate and present baseline data on the following environmental characteristics of the study area

Source: Proposed Wastewater Disposal Infrastructure for Negombo, 2022

Figure 6 provides an example of two descriptions with very different degrees of specificity when reporting the methodology. Even if the report provided a short boilerplate description of the methodology, the requirement was marked fulfilled.

Figure 6: Examples of EIA reports that were marked for providing some description of methods used to collect data on existing environments

3.6 Social and Economic Environment

3.6.1 Socio-Cultural and Socio-Economic Environment:

For the EIA study on the proposed project, data and information on the demographic and socio-economic characteristics of the area and immediate surroundings were collected through sample based quantitative and qualitative field surveys conducted and also from the Department of Census & Statistics and information published by Colombo D.S. Division.

Source: Integrated Campus And Enhancing Academic Standards Of Ocean University Of Sri Lanka, 2022

1.4.5.9 Socio-economic investigations

- Baseline identification

Secondary data on socioeconomic situation of the country was collected and studied to review situation of project area, keeping them as main reference material prior to the commencement of field studies. They include publications of Dept. of Census and Statistics, Central Bank, NGOs and UN and other International Development Agencies. In addition to these closely studied publications, administrative records and documents prepared by Provincial Councils, District Secretariat/Divisional Secretariats and line departments were also studied. This report carries necessary information adopted from those sources appropriately. A profile of the existing community was prepared, identifying the nature of settlements along the project corridor, people, businesses, land uses and existing infrastructure in the area.

For the primary survey, both qualitative and quantitative methods have been used. Qualitative methods involved; Focus Group Discussions (FGD), In-Depth Interviews (IDIs) and Participatory Rapid Appraisals (PRAs)[3]. Gender disaggregated FGDs with communities, key informant interviews and in-depth interviews with women and men in project area were conduct as part of this study. Similarly, key persons attached to Divisional Secretariats, GN Divisions, NGOs and opinion leaders in the communities were consulted. Quantitative methods involved in administration of questionnaire at household levels based on 100% census survey for the ROW. This questionnaire and discussion

[3] FGD– A focus group is a form of qualitative research in which a group of people are asked about their attitude towards issues related to a product, service, concept, advertisement idea, or packaging. Questions asked in an interactive group setting where participants are encouraged to talk freely and spontaneously. Its purpose is to obtain in-depth information on perceptions and ideas of a group. The group typically comprises of 6 to 8 people who under the minimum guidance of a facilitator discuss a particular topic in detail. The facilitator uses an FGD guide in which topics and issues outlined in advance and elicits information from the group during the course of the discussion.

IDI – Research technique conducted in person in the field (rather than in the researcher's office) by a trained interviewer who interacts with respondents and encourages them (usually in a one-on-one situation) to freely express their opinions, ideas, feelings, thoughts and attitudes. This is an exploratory process conducted on different people revealing a range of opinions and attitudes from their varied experiences on that topic.

PRA – The Participatory Rapid Appraisal is one of the techniques used for gathering information at community level.

Source: Proposed Ruwanpura Expressway Project, 2018

Furthermore, the CEA Guide for PAAs states that PPs "should make explicit reference by footnote to the scientific and other sources relied upon for the conclusions in the assessment." Therefore, EIA reports were assessed on whether they referenced external sources when describing the existing environment and if so, whether such sources were descriptive statistics or if they cited at least one study which provides analytical insights that supplement or contrast the findings of the EIA assessment (See Figure 6). The latter is significant since the Guideline for PAAs strictly says that "preparers should avoid useless bulk in assessments… and verbose descriptions of the affected environment are themselves no measure of the adequacy of an EIA."

Dimension R2: Identification, analysis, and assessment of impacts

In addition to requiring methodologies used to identify and assess impacts, both the CEA Guide for PAAs and the CEA Guide for Scoping emphasise that whenever possible impacts must be classified beyond directionality (positive and negative) according to different dimensions such as direct and indirect, reversibility and temporality. As shown in Figure 8, these two requirements appears in ToRs as well.

Figure 7: Assessing if and what external sources are cited by EIA reports when describing the existing environment

An example of an EIA citing external sources with only descriptive statistics

Table 3.7: Age Distribution of the Community in the Randombe GN Division
(Source: Balapitiya DS Office: 2016)

Below 05 years	06-14 years	15-64 years	Over 64 years
10 %	20 %	62 %	8 %

iii. Educational Level

The educational level of the adult population of age over 18 years is given in **Table 3.8**. The records at the Randombe North GN Office indicate that all the children in the age group of 5-14 years attend schools and no school leavers or dropouts are reported in the area.

Table 3.8: Educational Level of the Community in the Randombe GN Division
(Source: Balapitiya DS Office: 2016)

Educational level	No school Education	Grade 1-5	Grade 6-10	GCE O/L Qualified	GCE A/L Qualified	Graduate or Higher Level
%	0.8	11.5	48.7	18.0	16.7	4.3

iv. Economic Status

The economic status of population of the Randombe North GN Division is given in Table 3.9.

Table 3.9: Economic Status of the Community in the Randombe GN Division
(Source: Balapitiya DS Office: 2016)

Monthly Income (Rs)	Less than 3,000	3,001 to 5,000	5,001 to 10,000	10,001 to 25,000	25,001 to 50,000	50,001 to1 00,000	Over 100,000
No of Families	02	06	79	217	91	19	03

As indicated in **Table 3.9**, the income of the majority of the population exceeds Rs 10,000 per month. However, it is recorded that 116 families receive social aid that include 63 'Samurdhi' recipients and 39 others who receive social aid due to health issues, disabilities and age (elderly community members). In addition, 03 families

Source: SEIA 136 Units Of Residential Apartment Complex At Randombe North, Balapitiya, 2018

An example of an EIA citing external sources which provide analytical insights

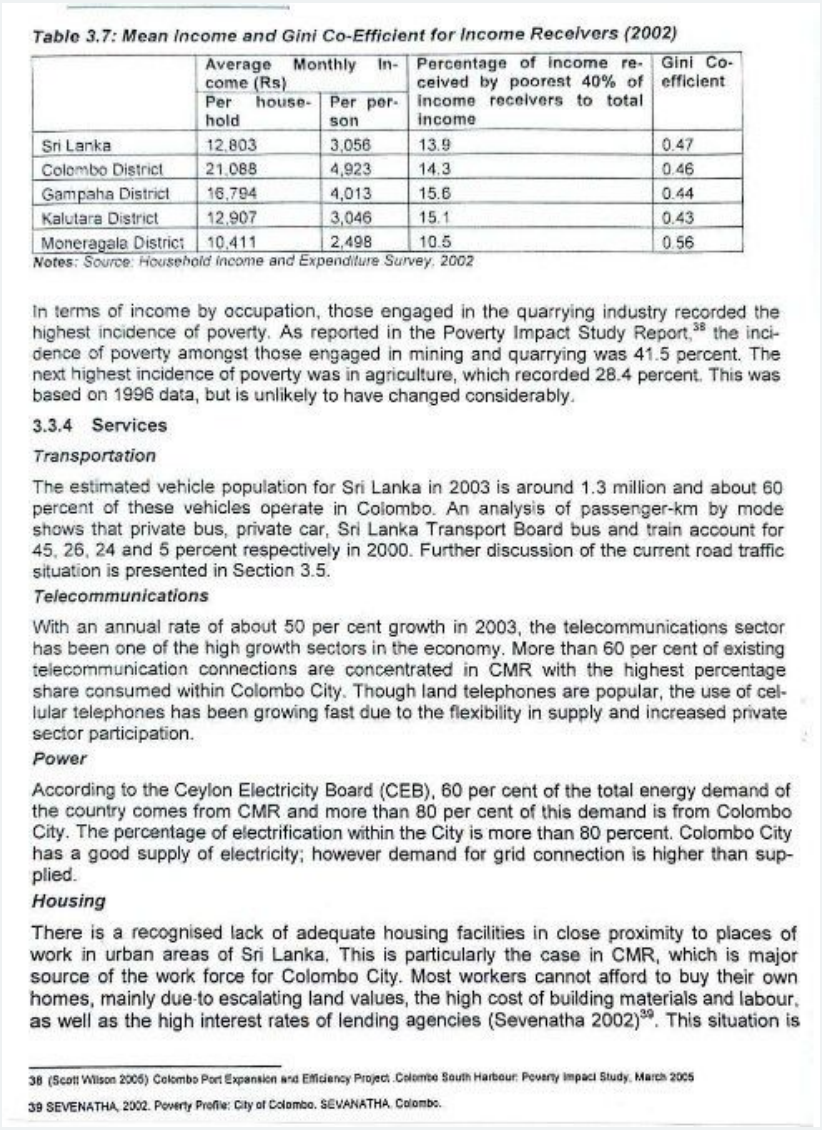


Table 3.7: Mean Income and Gini Co-Efficient for Income Receivers (2002)

	Average Monthly Income (Rs)		Percentage of income received by poorest 40% of income receivers to total income	Gini Co-efficient
	Per household	Per person		
Sri Lanka	12,803	3,056	13.9	0.47
Colombo District	21,088	4,923	14.3	0.46
Gampaha District	16,794	4,013	15.6	0.44
Kalutara District	12,907	3,046	15.1	0.43
Moneragala District	10,411	2,498	10.5	0.56

Notes: Source: Household Income and Expenditure Survey, 2002

In terms of income by occupation, those engaged in the quarrying industry recorded the highest incidence of poverty. As reported in the Poverty Impact Study Report,[38] the incidence of poverty amongst those engaged in mining and quarrying was 41.5 percent. The next highest incidence of poverty was in agriculture, which recorded 28.4 percent. This was based on 1996 data, but is unlikely to have changed considerably.

3.3.4 Services

Transportation

The estimated vehicle population for Sri Lanka in 2003 is around 1.3 million and about 60 percent of these vehicles operate in Colombo. An analysis of passenger-km by mode shows that private bus, private car, Sri Lanka Transport Board bus and train account for 45, 26, 24 and 5 percent respectively in 2000. Further discussion of the current road traffic situation is presented in Section 3.5.

Telecommunications

With an annual rate of about 50 per cent growth in 2003, the telecommunications sector has been one of the high growth sectors in the economy. More than 60 per cent of existing telecommunication connections are concentrated in CMR with the highest percentage share consumed within Colombo City. Though land telephones are popular, the use of cellular telephones has been growing fast due to the flexibility in supply and increased private sector participation.

Power

According to the Ceylon Electricity Board (CEB), 60 per cent of the total energy demand of the country comes from CMR and more than 80 per cent of this demand is from Colombo City. The percentage of electrification within the City is more than 80 percent. Colombo City has a good supply of electricity; however demand for grid connection is higher than supplied.

Housing

There is a recognised lack of adequate housing facilities in close proximity to places of work in urban areas of Sri Lanka. This is particularly the case in CMR, which is major source of the work force for Colombo City. Most workers cannot afford to buy their own homes, mainly due to escalating land values, the high cost of building materials and labour, as well as the high interest rates of lending agencies (Sevenatha 2002)[39]. This situation is

38 (Scott Wilson 2005) Colombo Port Expansion and Efficiency Project ,Colombo South Harbour: Poverty Impact Study, March 2005

39 SEVENATHA, 2002. Poverty Profile: City of Colombo. SEVANATHA. Colombo.

Source: Colombo Port Efficiency and Expansion Project, 2005

Figure 8: ToR requirements on reporting the Identification, analysis, and assessment of impacts

An example of a ToR requiring classification of impacts

4. ASSESSMENT OF ANTICIPATED ENVIRONMENTAL IMPACTS

This chapter should show the overall effects of the project on the individual environmental components. Impacts should include the direct and indirect, long and short-term positive and negative effects. Significance of impacts should be assessed using appropriate techniques. When describing the impacts, indicate which are irreversible or unavoidable and which can be mitigated to the extent possible.

Source: Reclamation Under The Galle Port Development Project, 2024

An example of a ToR requiring classification of impacts and reporting methods used

ASSESSMENT OF ANTICIPATED ENVIRONMENTAL IMPACTS

This chapter should show the overall effects of the project on the individual environmental components. Impacts should include the direct and indirect, long and short-term positive and negative effects. Significance of impacts should be assessed using appropriate techniques. In all cases where an assessment is made it should be quite clear what criteria have been employed to assess impacts. Where possible, effects should be quantified, uncertainties highlighted and the basis of predictions should be stated and justified through case studies/models, literature etc. Nature of impacts should be considered in terms of magnitude, severity, duration, frequency, risk and indirect effects. Cumulative impacts on the environment which results from the incremental impact of the action when added to the past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such actions should also be stated.

Source: Reclamation Under The Galle Port Development Project, 2024

An example of a ToR requiring neither

4 ANTICIPATED ENVIRONMENTAL IMPACTS

Hydrological impacts

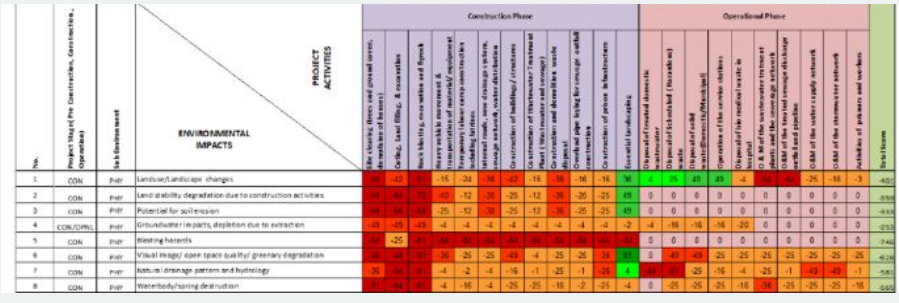
The study should cover the affected catchment area and it should be done by applying latest proper model.

Source: Textile Zone at Punnaikudah, Eravur, Batticaloa, 2021

So, the sections of EIA reports on social impacts were assessed on reporting of methodologies used and the classification of impacts. Since significant subjectivity is involved in assessing social impacts, an additional note was made on whether assumptions and limitations were explicitly highlighted when discussing methodologies used, and definitions of classifications were explicitly mentioned (See Figure 9).

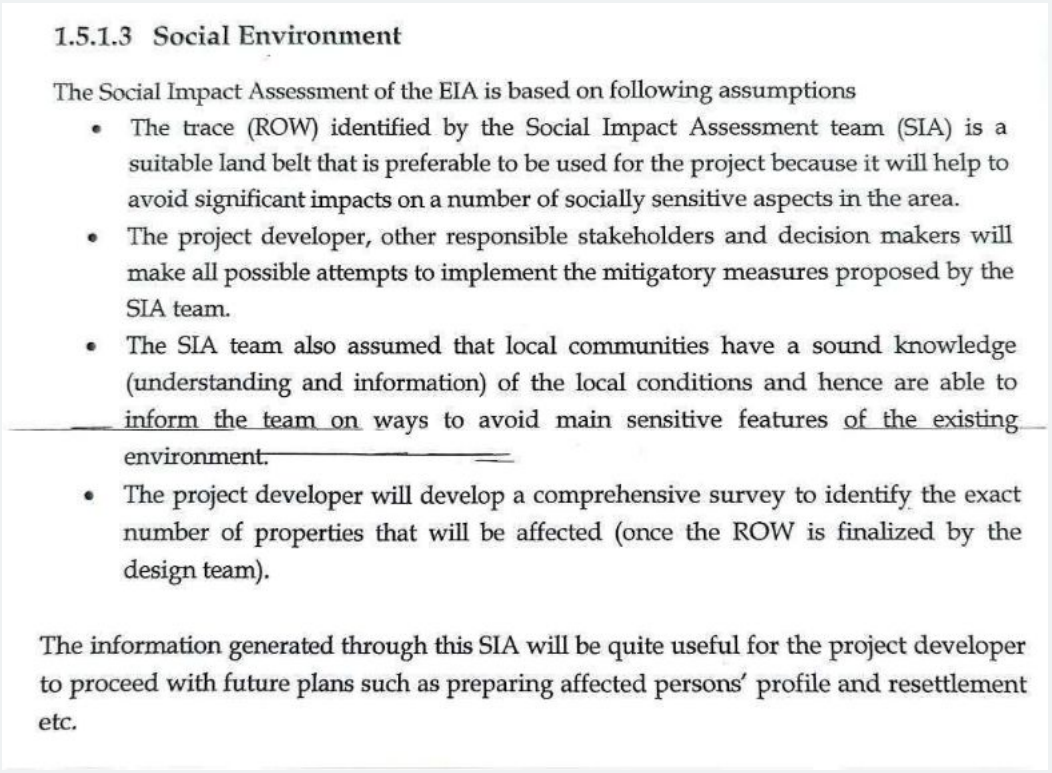
Figure 9: Assessing if ToRs require reporting of methods used to assess impacts and classification of impacts into different dimensions

An example of an EIA report which uses multiple dimensions of impact classifications



Source: Prison Relocation Project at Millewa, Horana, 2021

An example of an EIA report which highlights assumptions when discussing methodology



1.5.1.3 Social Environment

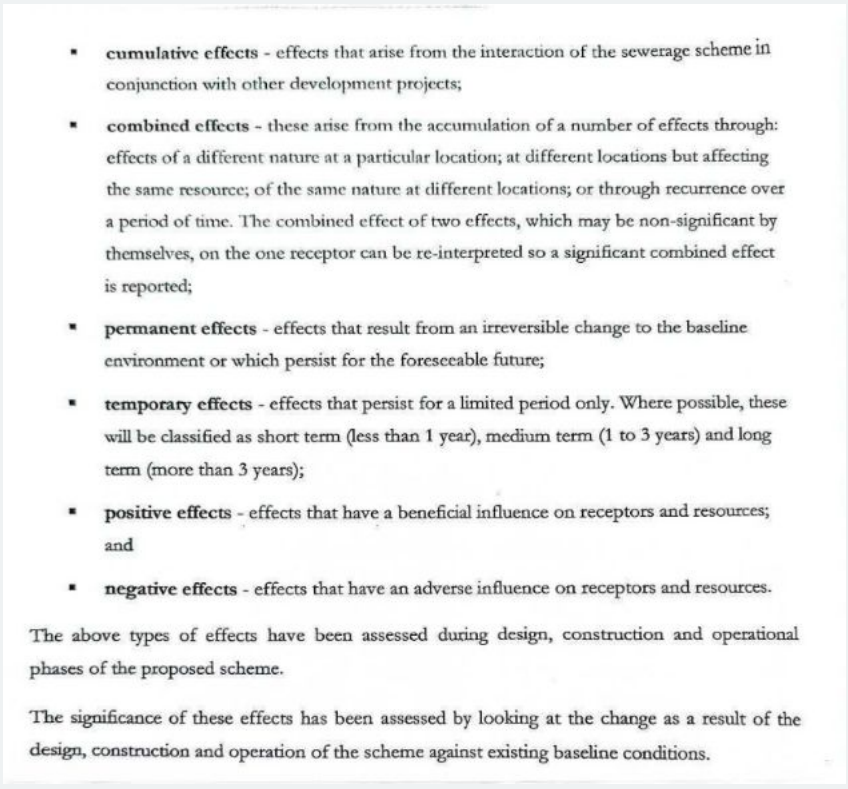
The Social Impact Assessment of the EIA is based on following assumptions

- The trace (ROW) identified by the Social Impact Assessment team (SIA) is a suitable land belt that is preferable to be used for the project because it will help to avoid significant impacts on a number of socially sensitive aspects in the area.
- The project developer, other responsible stakeholders and decision makers will make all possible attempts to implement the mitigatory measures proposed by the SIA team.
- The SIA team also assumed that local communities have a sound knowledge (understanding and information) of the local conditions and hence are able to inform the team on ways to avoid main sensitive features of the existing environment.
- The project developer will develop a comprehensive survey to identify the exact number of properties that will be affected (once the ROW is finalized by the design team).

The information generated through this SIA will be quite useful for the project developer to proceed with future plans such as preparing affected persons' profile and resettlement etc.

Source: Matara - Kataragama Railway Extension, 2008

An example of an EIA report which defines the dimensions of impact classifications used



- **cumulative effects** - effects that arise from the interaction of the sewerage scheme in conjunction with other development projects;
- **combined effects** - these arise from the accumulation of a number of effects through: effects of a different nature at a particular location; at different locations but affecting the same resource; of the same nature at different locations; or through recurrence over a period of time. The combined effect of two effects, which may be non-significant by themselves, on the one receptor can be re-interpreted so a significant combined effect is reported;
- **permanent effects** - effects that result from an irreversible change to the baseline environment or which persist for the foreseeable future;
- **temporary effects** - effects that persist for a limited period only. Where possible, these will be classified as short term (less than 1 year), medium term (1 to 3 years) and long term (more than 3 years);
- **positive effects** - effects that have a beneficial influence on receptors and resources; and
- **negative effects** - effects that have an adverse influence on receptors and resources.

The above types of effects have been assessed during design, construction and operational phases of the proposed scheme.

The significance of these effects has been assessed by looking at the change as a result of the design, construction and operation of the scheme against existing baseline conditions.

Source: Jaffna-Kilinochchi Water Supply and Sanitation Project, 2016

Dimension R3: Mitigation methods

CEA Guidelines provide a detailed definition for the concept of mitigation, stating that mitigation encompasses a spectrum of effects, including avoiding, minimising, rectifying, reducing, or compensating for impacts. So, the ToRs were assessed on whether they requested the EIA report to explicitly mention the effectiveness and the rationale for proposing specific mitigation measures to identify social impacts (See Figure 10).

Figure 10: ToRs requiring EIAs to report the effectiveness and rationale for proposed mitigation methods

An example of a ToR which requests for both effectiveness and rationale

5. PROPOSED MITIGATORY MEASURES

This chapter should set out the proposed measures to avoid, reduce, mitigate or compensate the impacts identified in Chapter 4 to acceptable levels (in that order of priority) including conformity to the gazetted Sri Lankan standards. Mitigatory measures should be defined in specific practical terms. Alternative methods of mitigation should be discussed and the effectiveness of the proposed measures that are to be provided should be stated. A rationale should also be presented for selection of chosen mitigatory measures

Source: Wastewater Disposal System for Ja- Ela/ Ekala- Stage II, 2022

An example of a ToR which requests neither

CHAPTER5 MITIGATORY ACTIONS

This chapter should set out the proposed measures to avoid, reduce, mitigate or compensate the impacts identified in Chapter 4 to acceptable levels(in that order of priority) including conformity to gazette SriLankan standards. Mitigation measures should be defined with technical details together with designs, equipment descriptions and operating procedures as appropriate. Estimate the cost of implementation of mitigation measures and sources of funding.

Source: Extension of Pipe Borne Sewerage project for Dehiwala Mt. Lavinia Municipal Council Area, 2019

Sections on mitigatory measures in EIA reports were assessed on whether they specify the rationale and effectiveness of proposed mitigation measures. Regarding the latter, a note was also made if effectiveness was discussed descriptively or quantified (See Figure 11).

Figure 11: Assessing if EIAs report the effectiveness and rationale for proposed mitigation methods

An example of an EIA which quantifies the effectiveness of mitigation methods

Table 5.19: Risk assessment register for impacts on disturbance to the free movement of traffic and overcrowding, resulting in nuisance and interruption of commercial and social activities

Impact	Initial risk assessment			Mitigatory measures	Residual risk assessment		
	S	L	R		S	L	R
Impacts on disturbance to the free movement of traffic and overcrowding, resulting in nuisance and interruption of commercial and social activities (Details are explained under sub-section 4.1.13)	3	3	9	Details are explained under sub-section 5.1.13	2	2	4
Notes: S - Severity/Consequence, L - Likelihood, R - Rating (Risk ranking system 0: No incidence; 1–5: Incidence is low to very severe)							

Source: Mullikulam Wind Farm with Grid Connecting 220kv Transmission Line & Wind Farm Collector Substation, 2022

Dimension A1: Accessibility

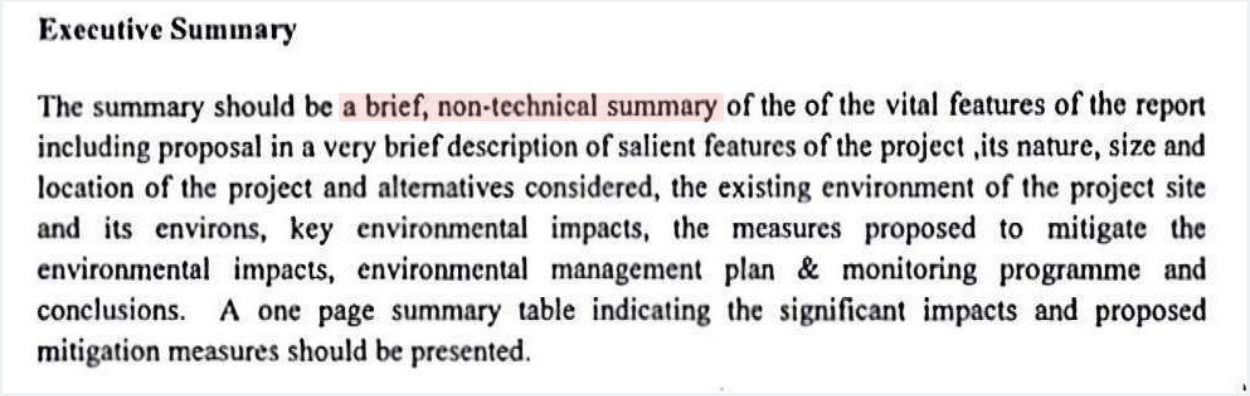
The guidelines place a significant emphasis on EIA reports being accessible to readers who might not possess technical expertise. The CEA Guide for PAAs specify that the text of an EIA, excluding appendices, should typically be less than 50 pages and proposals with unusual scope and complexity should be no more than 100 pages. Furthermore, the guide recommends that executive summaries be fewer than 5 pages. Therefore, the length of the main reports (excluding annexures) and the executive summaries has been assessed separately.

The CEA Guide for PAAs also specify that EIA reports should be written in plain language, and many ToRs explicitly mention that executive summaries should be non-technical (See Figure 12). The technicality of executive summaries has been analysed using the Flesch Reading Ease Score, which is a standard metric assessing readability of text. The findings from McKie and Rust (2021) were used as a benchmark to assess the readability of Sri Lankan EIA reports are relative to its peers.[96] See Annex 7 for a detailed discussion of the methodology used to assess technicality.

96 McKie and Rust, "Promoting Readability in EIA – Impacts of Regulation, Guidance & Certification."

Figure 12: Assessing if ToRs require executive summaries to be non-technical

An example of a ToR which requests executive summaries to be non-technical

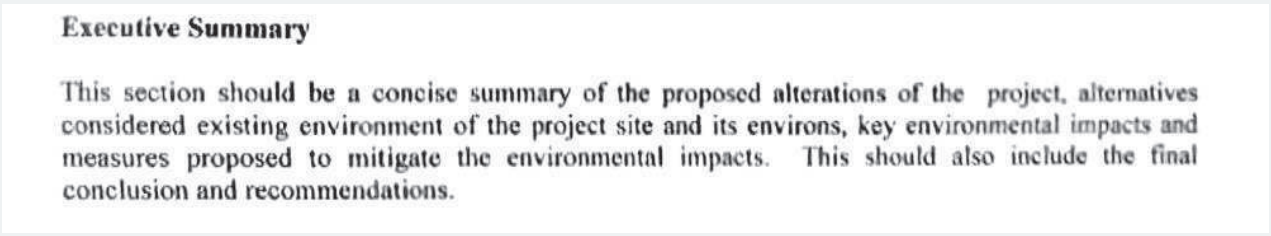


Executive Summary

The summary should be a brief, non-technical summary of the of the vital features of the report including proposal in a very brief description of salient features of the project ,its nature, size and location of the project and alternatives considered, the existing environment of the project site and its environs, key environmental impacts, the measures proposed to mitigate the environmental impacts, environmental management plan & monitoring programme and conclusions. A one page summary table indicating the significant impacts and proposed mitigation measures should be presented.

Source: 220 Units of Apartment Project - No. 106/106A, Galle Road, Colombo 03, 2025

An example of a ToR which does not request non-technicality in the executive summary



Executive Summary

This section should be a concise summary of the proposed alterations of the project, alternatives considered existing environment of the project site and its environs, key environmental impacts and measures proposed to mitigate the environmental impacts. This should also include the final conclusion and recommendations.

Source: SEIA of Diggala Mini Hydro, 2016

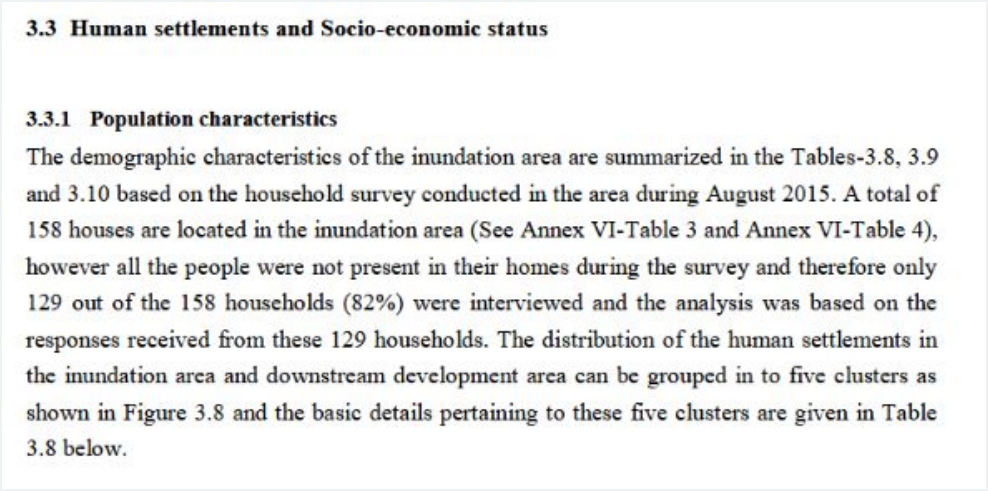
Dimension A2: Verifiability

As discussed above, guidelines emphasise reporting of methodologies, data sources, and referencing. This is crucial to verify both the data and the conclusions presented in EIA reports, especially since many users of EIA reports may not be familiar with the socio-economic context around the project site.[97] So, EIAs have been assessed on how well they disclose data sources and cite such data in the report sections describing the existing social environment. Additionally, in socio-economic analyses where quantitative and mixed methods techniques of primary data collection have been used, it is crucial that information on sampling methodology, such as the sample size and the timeframe in which surveys have been conducted, is clearly presented. So how such information is disclosed was also assessed (See Figure 13).

97 Internationally, lack of verifiability has been a basis to challenge the quality of EIA reports. For instance in India, challenges against the EIA report for the Great Nicobar Island Development Project included "serious issues of scientific accuracy and integrity where the data presented is concerned. Large parts of Section 3.9, which is on ecology and biodiversity, have in-text citations but no references. Tables with lists of plants and animals found in the island are incomplete and with no sources provided. The information in other places is internally inconsistent and/or incorrect. The area of the island is mentioned in one place as 1,045 sq. km, while it is 910 sq. km (the current official figure) in another." See Pankaj Sekhsaria, "'Inaccuracies, Procedural Violations' in Great Nicobar Draft Environment Impact Assessment Report," Environment, The Hindu, January 25, 2022, https://www.thehindu.com/sci-tech/energy-and-environment/inaccuracies-procedural-violations-in-great-nicobar-draft-environment-impact-assessment/article38324776.ece.

Figure 12: Assessing if EIAs disclose information on survey methodologies

An example of an EIA which adequately discloses survey information



3.3 Human settlements and Socio-economic status

3.3.1 Population characteristics

The demographic characteristics of the inundation area are summarized in the Tables-3.8, 3.9 and 3.10 based on the household survey conducted in the area during August 2015. A total of 158 houses are located in the inundation area (See Annex VI-Table 3 and Annex VI-Table 4), however all the people were not present in their homes during the survey and therefore only 129 out of the 158 households (82%) were interviewed and the analysis was based on the responses received from these 129 households. The distribution of the human settlements in the inundation area and downstream development area can be grouped in to five clusters as shown in Figure 3.8 and the basic details pertaining to these five clusters are given in Table 3.8 below.

Source: Lower Malwathu Oya Reservoir Project, 2018

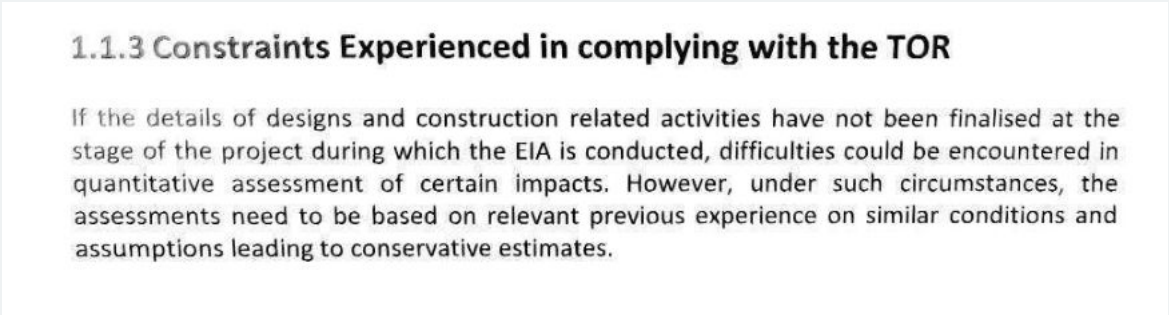
Dimension A3: Integrity

CEA Guide for PAAs encourage disclosing limitations in obtaining information necessary to assess environmental impacts. Information can be incomplete or totally unavailable. In cases where such limitations impede the robustness of analyses and prediction of impacts, the guide states that PPs must make a statement within the EIA. So EIAs were assessed on whether they specify limitations on the whole or socio-economic sections of the report (See Figure 14).

EIAs are a crucial decision-making tool informing key stakeholders. So, the report must present findings in an objective manner to facilitate sound decision-making and revise project designs proactively to address anticipated impacts. The Simple Questions and Answers on EIA emphasises that “the PP must insist that the EIA consultants or firm prepare a sound EIA report. The EIA report must be objective and accurate and not appear to be a biased document that simply promotes the project.” Paradoxically, assessing objectivity of a text is a subjective matter. Using sentiment analyses-based techniques through Large Language Models (LLMs), a preliminary assessment was made on how objective the language used in executive summaries are. See Annex 7 for a detailed overview of the methodology used to assess objectivity.

Figure 14: Assessing the disclosure of limitations in EIA reports

An example of a boilerplate limitation statement in a ToR

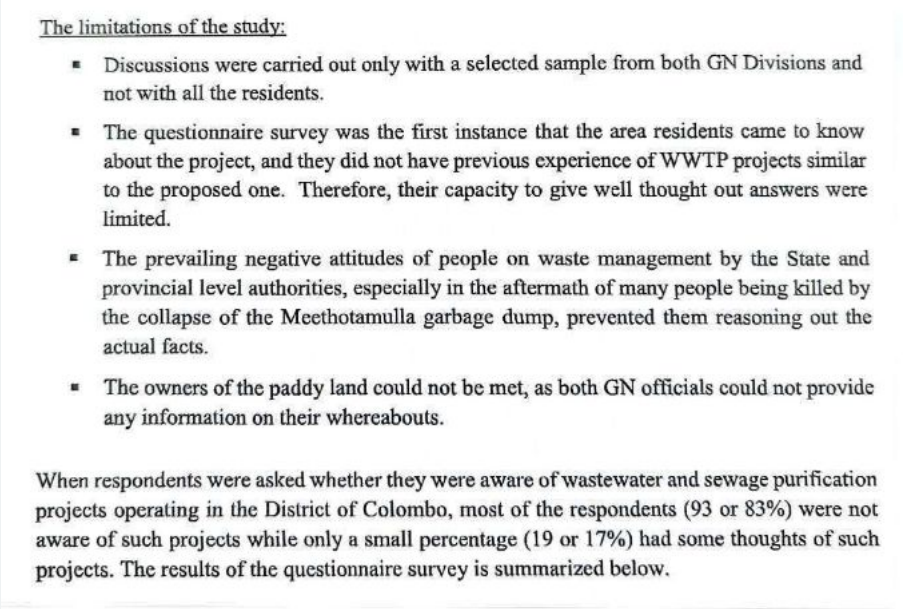


1.1.3 Constraints Experienced in complying with the TOR

If the details of designs and construction related activities have not been finalised at the stage of the project during which the EIA is conducted, difficulties could be encountered in quantitative assessment of certain impacts. However, under such circumstances, the assessments need to be based on relevant previous experience on similar conditions and assumptions leading to conservative estimates.

Source: 501 Roomed RIU Resort Hotel Project in Ahungalla, 2014

An example of a limitation statement with study-specific details



The limitations of the study:

- Discussions were carried out only with a selected sample from both GN Divisions and not with all the residents.
- The questionnaire survey was the first instance that the area residents came to know about the project, and they did not have previous experience of WWTP projects similar to the proposed one. Therefore, their capacity to give well thought out answers were limited.
- The prevailing negative attitudes of people on waste management by the State and provincial level authorities, especially in the aftermath of many people being killed by the collapse of the Meethotamulla garbage dump, prevented them reasoning out the actual facts.
- The owners of the paddy land could not be met, as both GN officials could not provide any information on their whereabouts.

When respondents were asked whether they were aware of wastewater and sewage purification projects operating in the District of Colombo, most of the respondents (93 or 83%) were not aware of such projects while only a small percentage (19 or 17%) had some thoughts of such projects. The results of the questionnaire survey is summarized below.

Source: Sri Jayawardenapura Kotte Wastewater Collection, treatment, and Disposal Project, 2019

3.3 DATASETS, VARIABLES, AND ANALYTICAL METHODS

While Annexures 3 to 8 specify aspects of methodology in detail, several key methodological considerations are listed below.

Sample size and population of EIA reports: While official sources cannot confirm the total number of EIA reports that have been issued thus far, statistics from CEA Annual Reports from 1991-2025 and key informant insights suggest that the total population of EIA reports from 1991 onwards should be approximately 300 reports. So, the sample of 250 reports used in this study should be more than 80 per cent of the total population of reports. However, given data constraints, the study is unable to confirm if the reports not included in the study are randomly distributed or not, which has implications for the statistical analyses conducted. See Annex 1 for a further discussion on the sourcing of EIA reports and estimates of the EIA report population.

Types of reports assessed: This study only assessed EIA reports. So, IEE reports are beyond the scope of the study. SEIA reports were considered as standalone EIA reports for the purposes of this study as SEIAs undergo the entire review and approval process as the standard report. Therefore, the reporting quality requirements of SEIAs should not be conceptually different from a standard EIA.

Language of Reports and ToRs: Although the ToRs and EIAs are published trilingually as mandated by law, this study only analyses the English versions of the reports and ToRs. Key informants confirmed that the English version of the ToR is what is practically used when compiling the EIA report.[98] Though most stakeholders use the English versions of the report, especially local communities may depend on the Sinhala and Tamil versions of the report. So even though beyond the scope of this study, the reporting quality of the Sinhala and Tamil translations are a critical factor to ensure public translations.[99]

Temporal applicability of EIA report standards: EIA reports in this analysis have been published from 1991 to 2025, with only one report published before September 1993. It was in 1993 that key regulations and guidelines forming the framework of the currently functioning EIA system were established with the regulation published under Gazette Notification No. 722/22 dated 24th June 1993 and the first edition of the CEA Guide to PAAs. Even though the CEA Guide to PAAs was subsequently revised thrice, none of the reporting quality requirements were changed. Furthermore, the requirements on reporting quality among the available ToRs of early reports from 1991-1995 included all the requirements assessed.[100] So, it was assumed that reporting quality requirements stayed constant throughout the period of study.

Development partner requirements: As highlighted in Section 3, projects wholly or partly financed by developments partners may be subject to requirements and guidelines of the respective development partner and therefore will influence the quality of EIA reports. This

98 Key informant interview 2

99 Evidence suggests significant deficiencies in both quality and access to Sinhala and Tamil translations of EIA reports. See Caron, Defining the Public Interest, Negotiating Rights.

100 See Annex 5 for further details on the historical evolution of report quality requirements in ToRs.

study did not incorporate such development partner requirements to the analyses on the premise that the PPs and consultants will adhere to all applicable standards. So, in cases where the development partner requirements are higher than the national requirements, the latter is fulfilled by default. If vice versa, development partner requirements are not consequential to the reporting quality.

Scope of social environment in reports: What is considered the social environment varies across EIA reports. Since this study did not assess the content of social impact reports, whenever an EIA report had dedicated sections titled social, socio-economic, or socio-cultural environment, such sections were considered the applicable sections. If not, the author made an informed judgement on which aspects of the reports were relevant to the study.[101]

Impact of report quality on EIA approval: A critical question that arises when assessing EIA report quality is if and to what extent the quality of reporting affects the approval of proposed projects. As Annex 5 highlights, more than 90 per cent of all EIA reports have been approved since 1991. So given the lack of variation and broader data limitations, it is difficult to statistically assess the relationship between EIA report quality and the likelihood of approval.

101 See Annex 5 for an overview of reports which had dedicated sections for the analysis of social environment.

4 RESEARCH FINDINGS

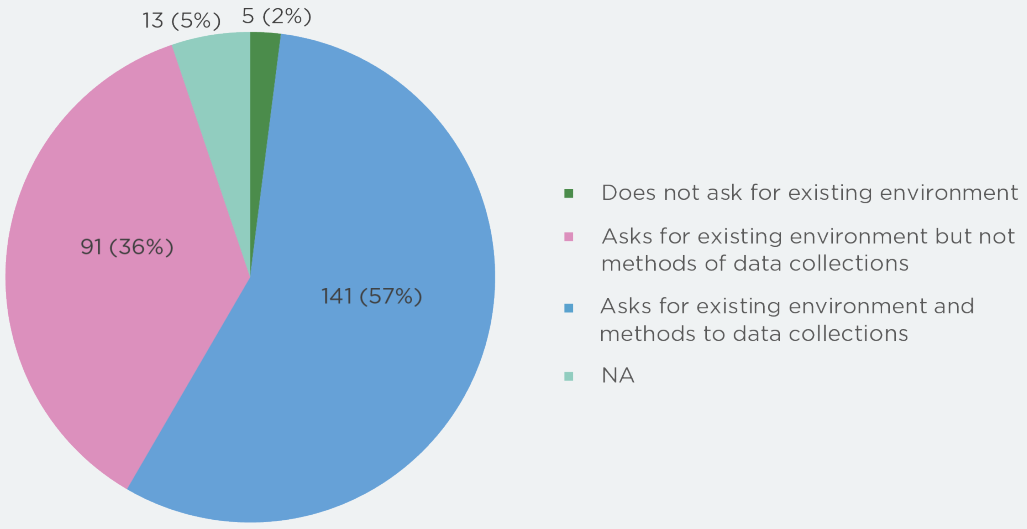
The study conducted three types of analyses. First is a descriptive analysis of the EIA report and ToR assessment results. Second is a correlation and regression analysis to provide preliminary insight into factors that influence the quality of reports over time. Third is a qualitative discussion on observations the author made while going through and marking 250 EIA reports. The findings are categorised based on the respective type of analysis.

4.1 FINDINGS FROM THE DESCRIPTIVE ANALYSIS OF ASSESSMENT RESULTS

Finding 1: Although most EIAs reports disclose methods used to assess the existing social environment, very few use external analysis to support observations

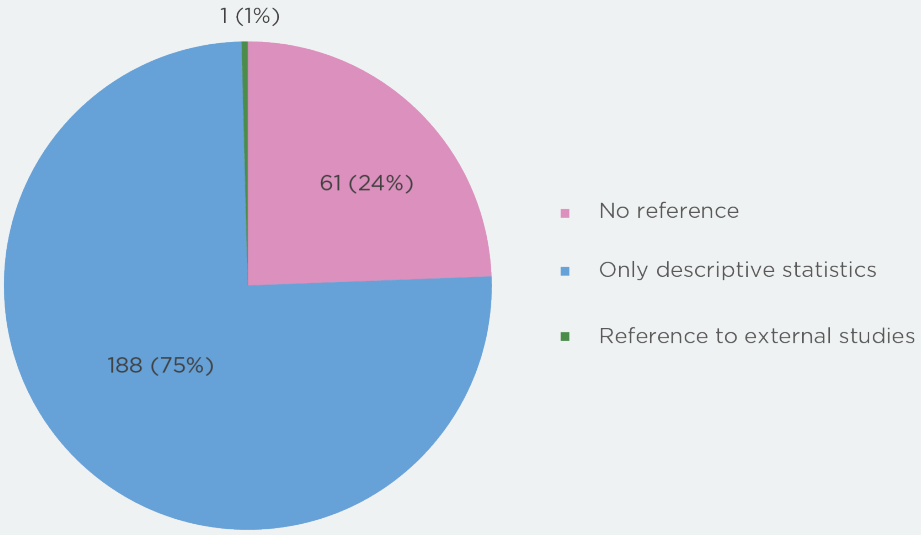
Only 36 per cent of ToRs require EIAs to report data collection methods used to assess the existing social environment (See Figure 15). However, 75 per cent of EIA reports do contain some description of such methods (See Figure 16). Though boilerplate sections on methodology included in the introductory chapter of EIAs contribute to this statistic, EIA reports generally fare well in reporting how they have approached baseline data collection on the existing socio-economic environment.

Figure 15: TOR requirements on reporting data collection methods used to assess the existing social environment



Source: Author's construction

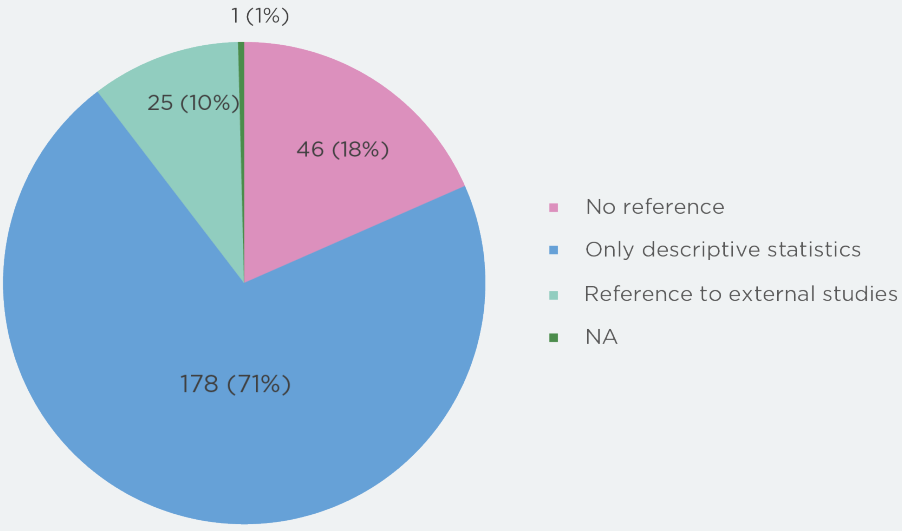
Figure 16: EIA reports on describing methods used to collect data on the existing social environment



Source: Author's construction

What is less encouraging is that 71 per cent of reports only use external sources of information to report descriptive statistics (See Figure 17). There are often many tables of data on demographical and socio-economic factors in the existing environment around the proposed project site, extracted from local administrative databases such as GNs or resource profiles compiled by the Department of Census and Statistics. Only 10 per cent cite analysis from the existing body of socio-economic literature. This suggests that not only are sections on existing social environments verbose, but in most reports, such sections entirely depend on data and interpretations of the EIA preparers with no external perspectives.

Figure 17: EIA reports on how they use external studies on the socio-economic environment

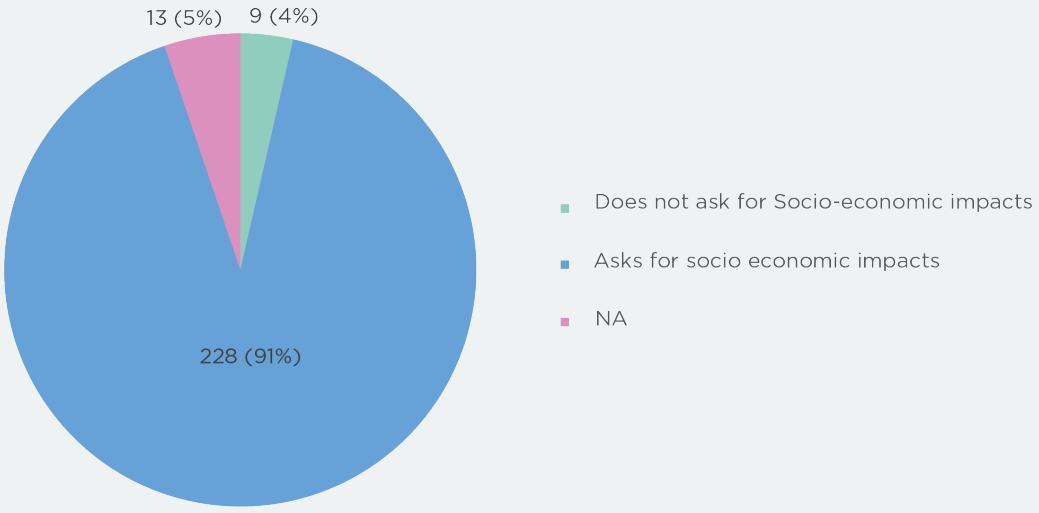


Source: Author's construction

Finding 2: There are significant deficiencies in analysing and reporting social impacts

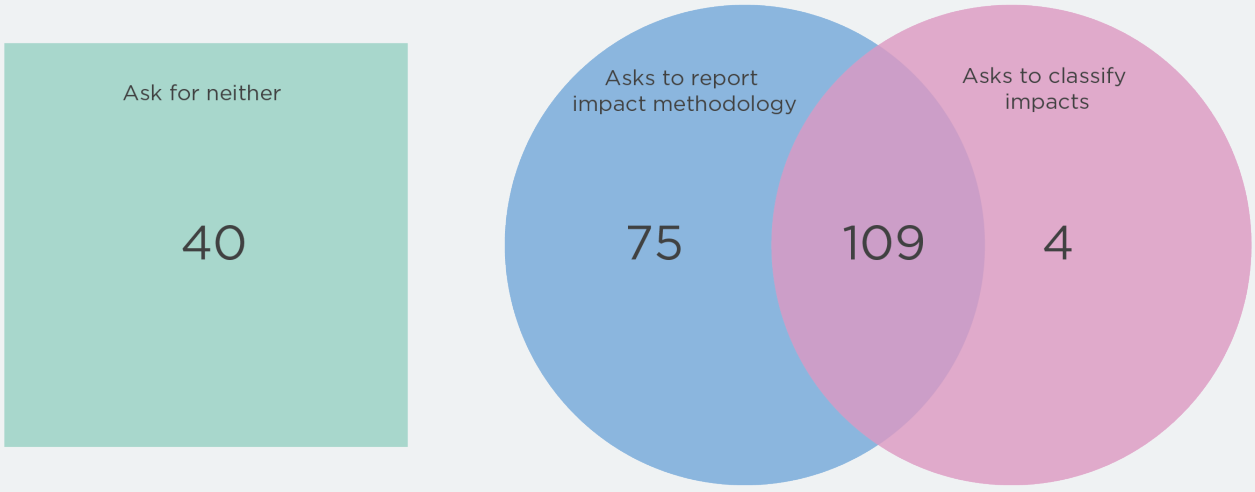
Even though 91 per cent of ToRs require the assessment and reporting of social impacts (See Figure 18), ToRs are highly inconsistent in specific aspects of reporting requirements, with 17 per cent (40 ToRs) not requiring either the reporting of methodology or classification of impacts (See Figure 19).

Figure 18: TOR requirements for conducting social impacts



Source: Author's construction

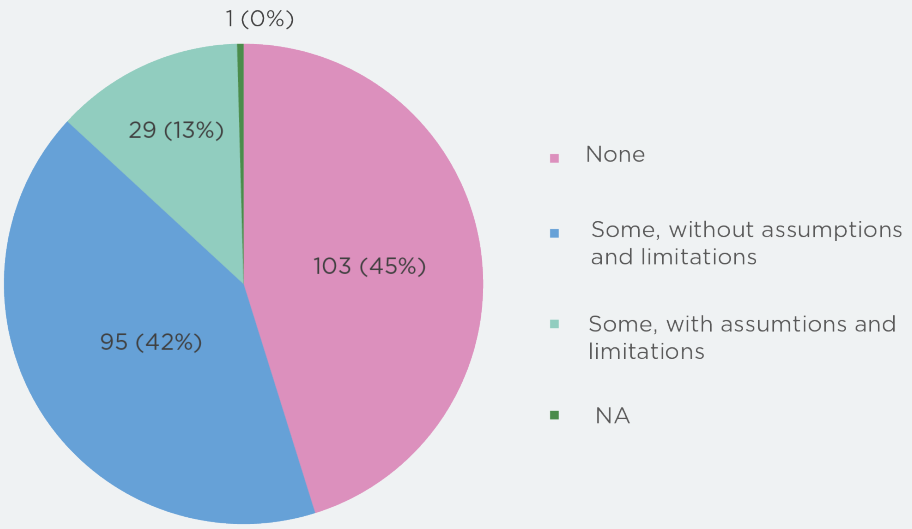
Figure 19: TOR requirements on reporting methodologies and classifying impacts



Source: Author's construction

A similar inconsistency is observed in the contents of the EIA reports as well, with 45 per cent of EIA reports containing no explanation on the methodology used to identify and evaluate impacts (See Figure 20). This is particularly concerning as social impacts are often indirect, unquantifiable, and speculative. Therefore, a lack of clarity on methodology leaves the reader with little space to meaningfully scrutinise assessments made on the report.

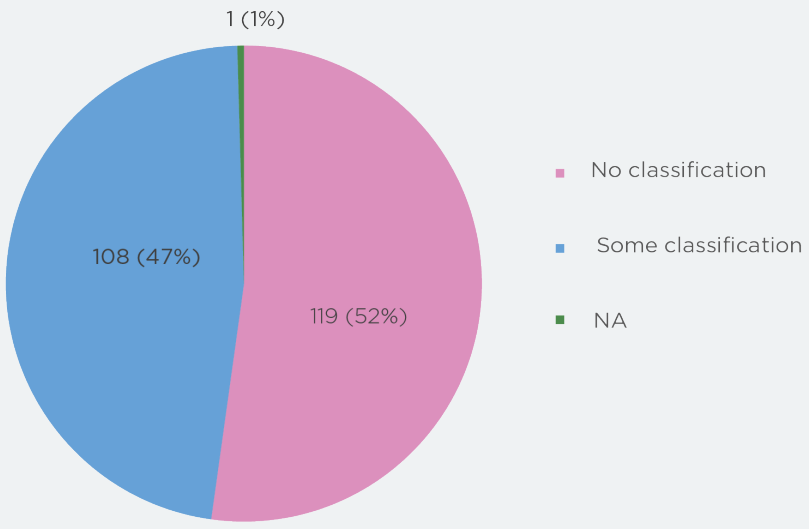
Figure 20: EIAs on reporting social impact assessment methodologies



Source: Author's construction

Most EIA reports (52 per cent) that have reported social impacts have not made any classification (See Figure 21). So, such impacts are explained descriptively with no indication of crucial dimensions of impacts, such as whether they are short-term or long-term, direct or indirect, and reversible or irreversible.

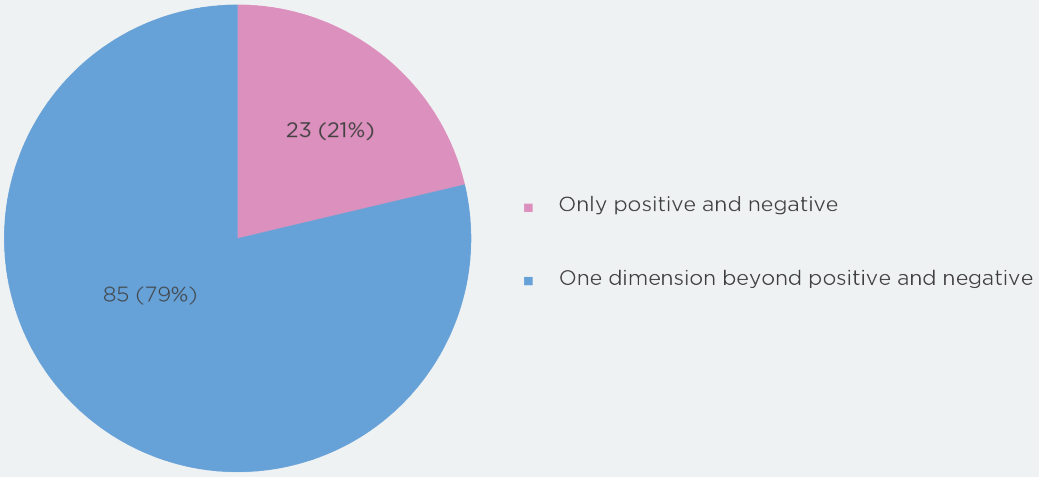
Figure 21: EIAs on classifying social impacts into dimensions



Source: Author's construction

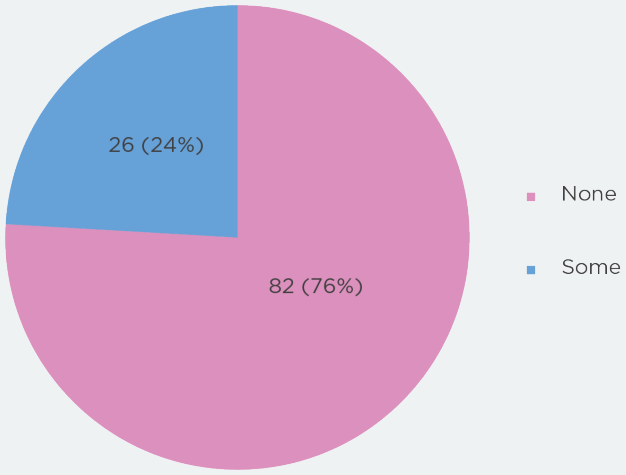
While most of the reports (79 per cent) which have classified impacts have done so across at least one dimension beyond directionality of impacts (positive or negative) (See Figure 22), it is concerning that only 24 per cent define the scale that has been used to assess the impact (See Figure 23). For example, if the magnitude and temporality of impacts are marked on a scale of 1 to 5, 76 per cent of the reports do not define what 1, 2, 3, 4, and 5 mean for magnitude or temporality. This leaves the reader unable to understand the logic that the EIA preparers have used in assessing impacts.

Figure 22: EIAs on the number of dimensions used to classify social impacts



Source: Author's construction

Figure 23: EIAs on providing definitions for the usage of impact dimensions

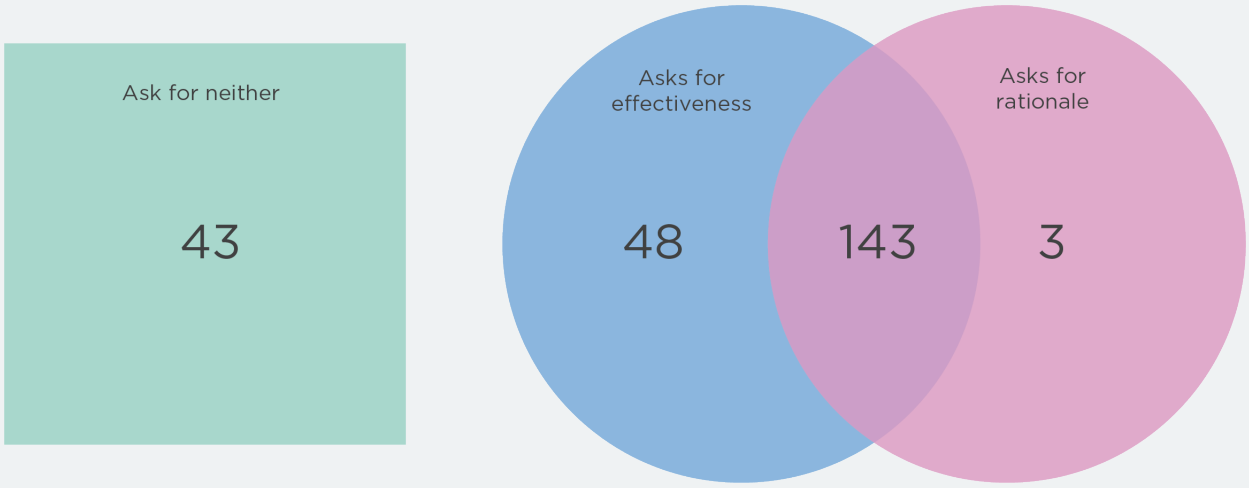


Source: Author's construction

Finding 3: Very few EIA reports credibly report the effectiveness and rationale of proposed mitigation methods

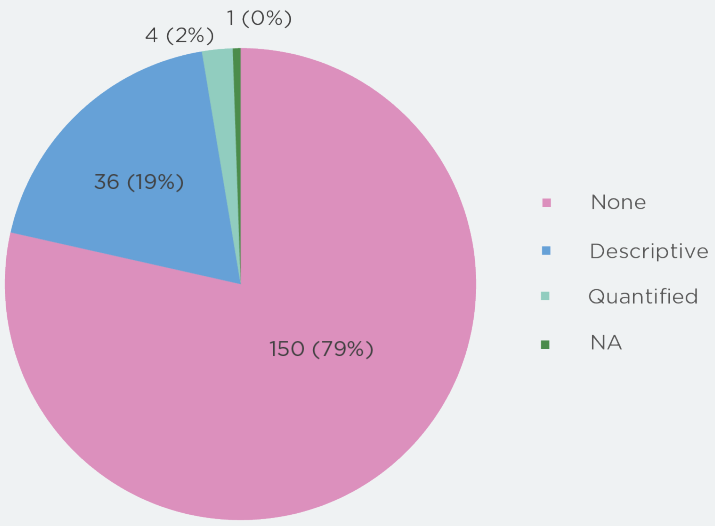
Most ToRs (60 per cent) require EIA reports to provide both the effectiveness and rationale of mitigation methods (See Figure 24). However, 79 per cent of reports do not provide even a descriptive explanation on the effectiveness of proposed mitigation methods (See Figure 25), and only 40 per cent of EIA reports present the rationale with data and evidence (See Figure 26).

Figure 24: TOR requirements on the effectiveness and rationale of mitigation methods



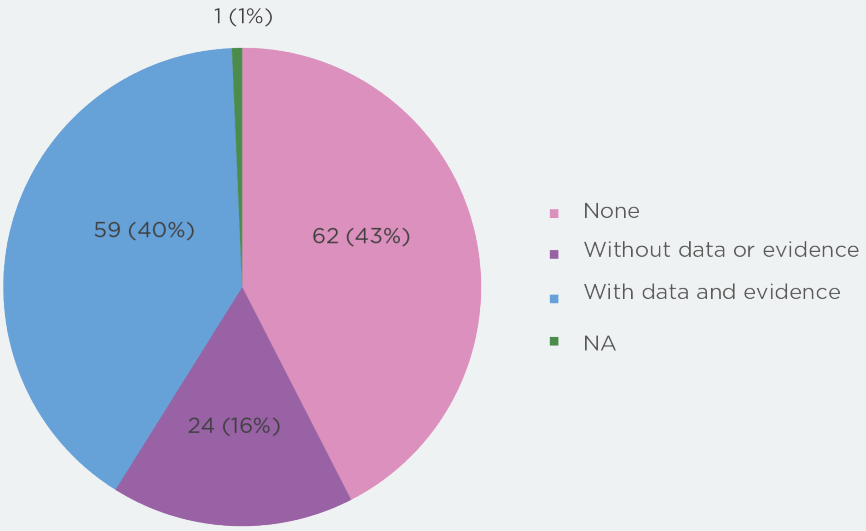
Source: Author's construction

Figure 25: EIAs on reporting the effectiveness of mitigation methods



Source: Author's construction

Figure 26: EIAS on presenting the rationale for mitigation methods

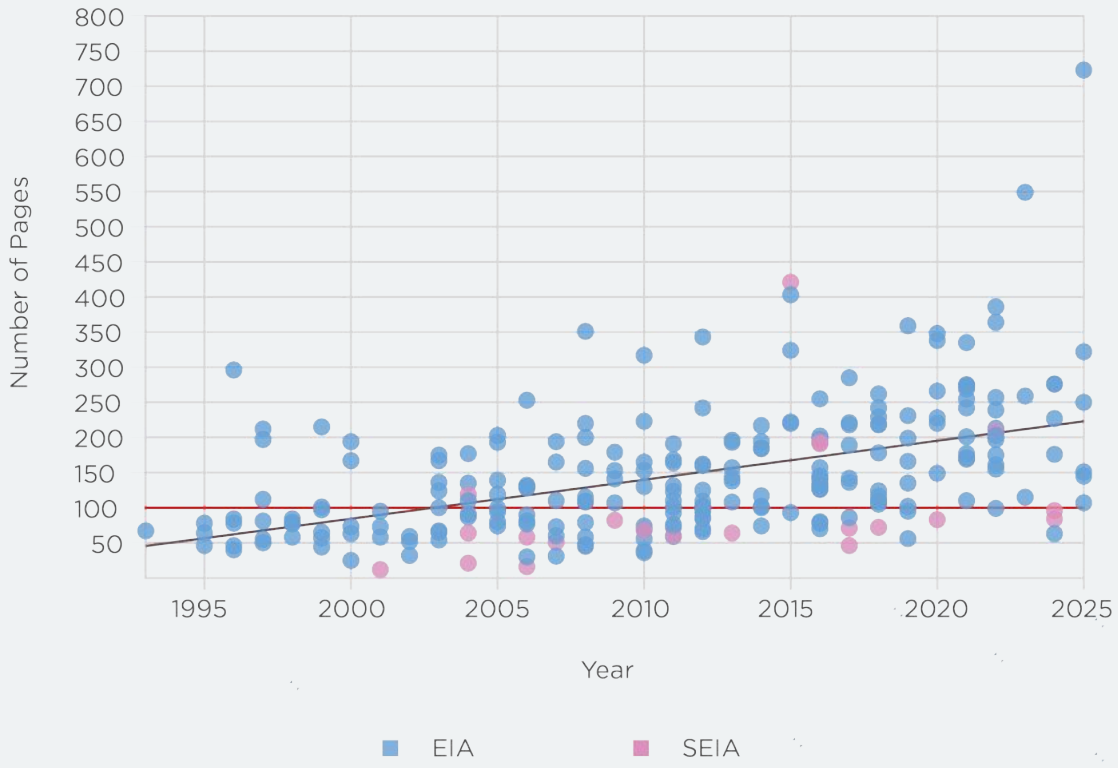


Source: Author's construction

Finding 4: EIA reports are increasingly becoming longer than the guidelines recommend, affecting their accessibility

The length of EIA reports is increasingly getting longer, with some reports reaching over 500 pages without annexures, well over the recommended 100-page limit in the CEA guidelines indicated in red (See Figure 27).

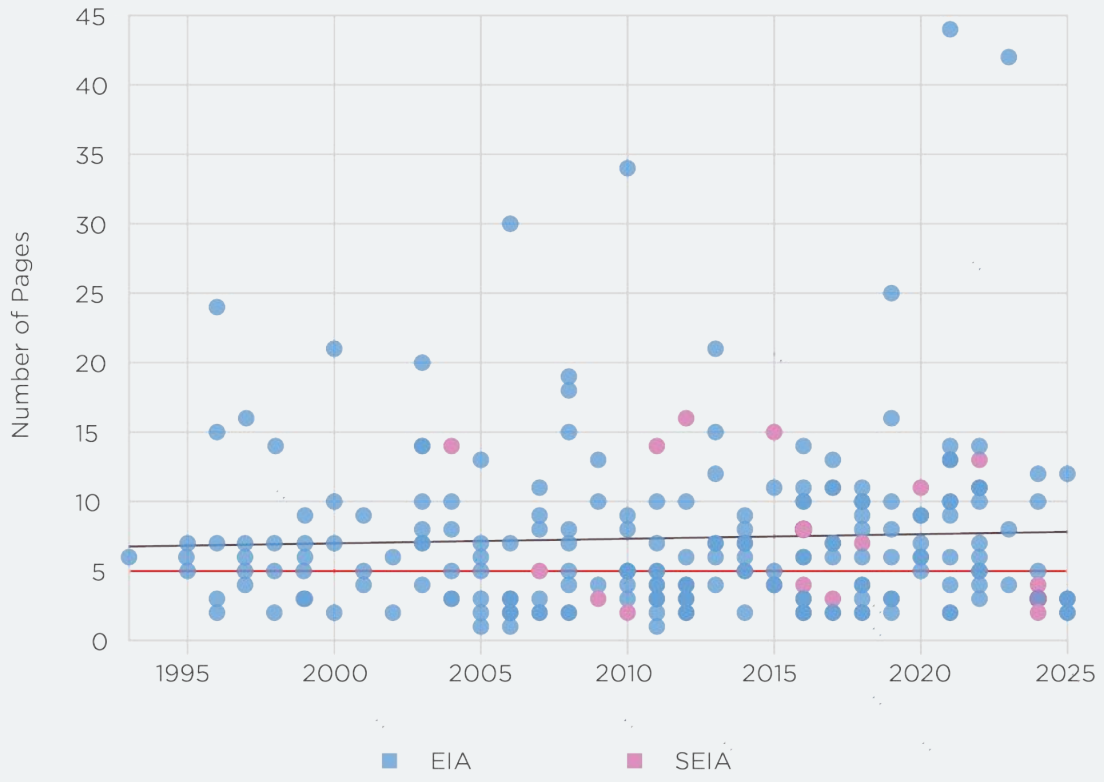
Figure 27: Length of EIA Reports (excluding annexures), over time



Source: Author's construction

Executive summaries also display a similar trend, with some summaries reaching over 20 pages, four times the guideline-recommended limit of 5 pages (See Figure 28). Given that annexures are often as long or longer than the main report, this trend suggests not only that EIA reports are increasingly becoming inaccessible to the public, but also that CEA guidelines are outdated.

Figure 28: Length of Executive Summaries, over time

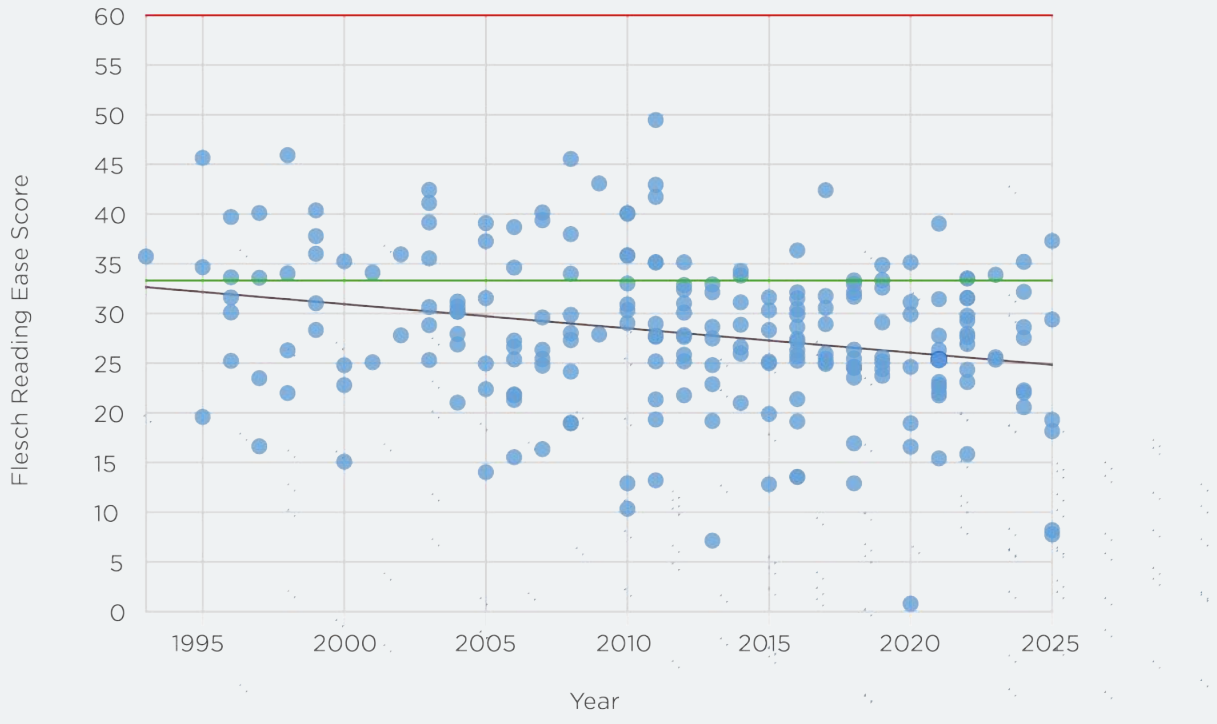


Source: Author's construction

Flesch Reading Ease Scores range from 0 (hard) to 100 (easy) and a score of 60 is considered the minimum score for public readability. Scores calculated on all available executive summaries highlight that the language used is highly technical, with no executive summary reaching the desirable score of 60 (See Figure 29). But as McKie and Rust (2021) highlight, a sample of EIA report summaries of 11 countries including India, Bangladesh, and Vietnam also score far below the score of public readability.[102] However, the average score in their study is 33 while the average among the Sri Lankan reports is 27.82 and is on a decreasing trend. This highlights that not only are Sri Lankan executive summaries harder to read on average, but they are also become harder over time.

102 McKie and Rust, "Promoting Readability in EIA – Impacts of Regulation, Guidance & Certification."

Figure 29: Ease of reading executive summaries, over time

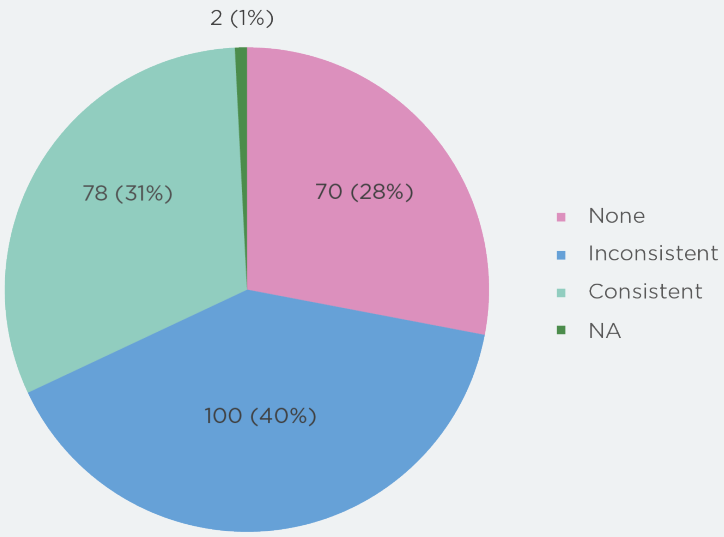


Source: Author's construction

Finding 5: Low standards followed in disclosing data and sampling information affect the verifiability of the report information

40 per cent of EIA reports are not consistent when disclosing data sources of secondary and primary data (Figure 30). This affects the ability for stakeholders such as the public to verify data and information presented in the report – a crucial aspect if the public is to send comments on data, as highlighted by CEA Public Participation Handbook.

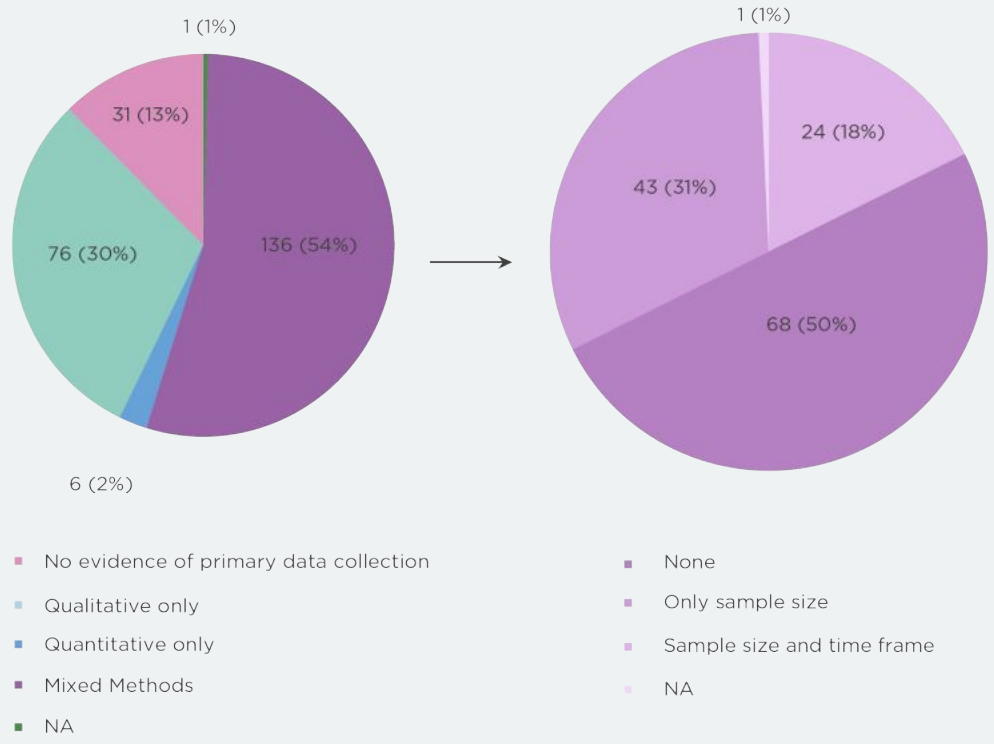
Figure 30: EIAs on disclosing data sources of secondary and primary data



Source: Author's construction

Even though 54 per cent of studies have conducted mixed-methods primary data collection, which includes structured surveys, only 31 per cent of such reports have clearly disclosed both the sample size and the survey timeframe (See Figure 31). Both pieces of information are crucial, especially for concerned stakeholders and local communities, to verify the efficacy of conducted surveys.

Figure 31: Methods of primary data collection on social environment (left) and the disclosure of survey information (right)

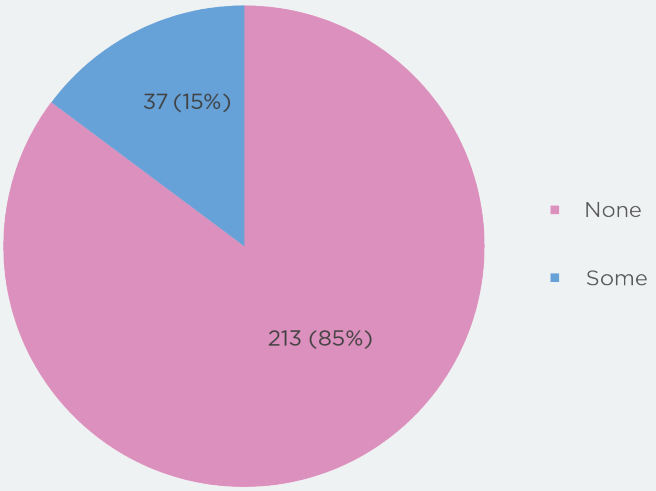


Source: Author's construction

Finding 6: Objectivity of reports are low, with very few EIA reports disclosing limitations and assumptions made in the social analyses, and executive summaries being written in relatively biased language.

As highlighted by the CEA Guidelines, clearly disclosing limitations in information collection is a salient feature of a credible EIA report. 85 per cent of reports have not even included a boilerplate section outlining limitations and constraints faced when complying with the ToR and conducting the analyses (See Figure 32). Within the 15 per cent who have, some have outlined both general and section-specific limitations encountered and methodological assumptions made.

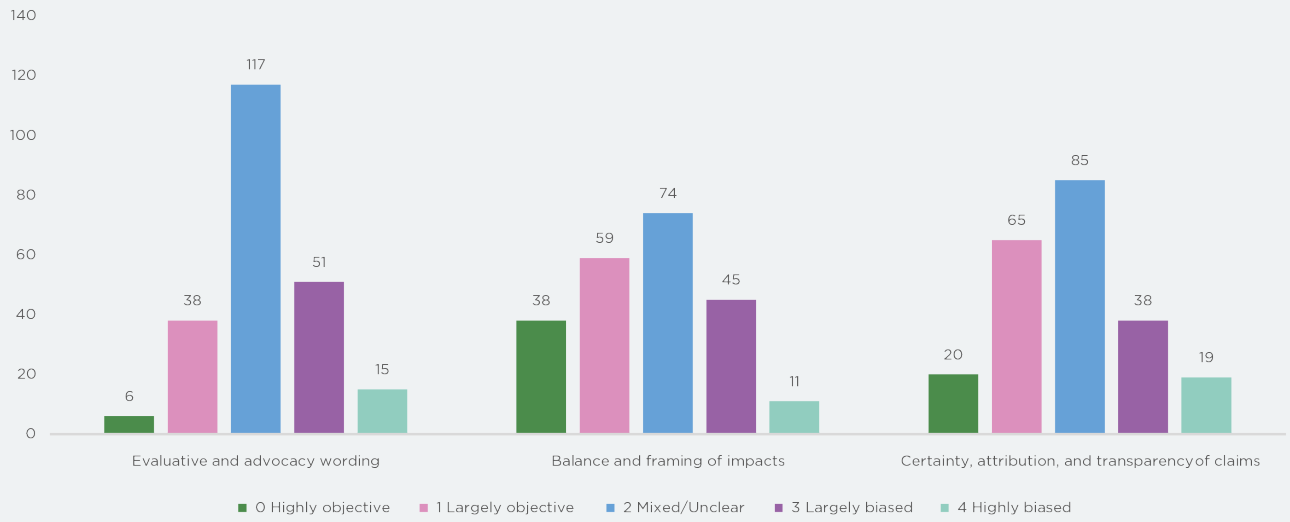
Figure 32: EIAs on reporting limitations and assumptions on social impact analyses



Source: Author's construction

The LLM based objectivity analysis of the language used in executive summaries provides mixed results (See Figure 33). Most summaries present positive and negative impacts in a relatively balanced way. However, the language becomes less objective when making or defending key claims, often relying on over-certain phrasing or vague attribution that reduces transparency.

Figure 33: Objectivity of language used in executive summaries



Source: Author's construction

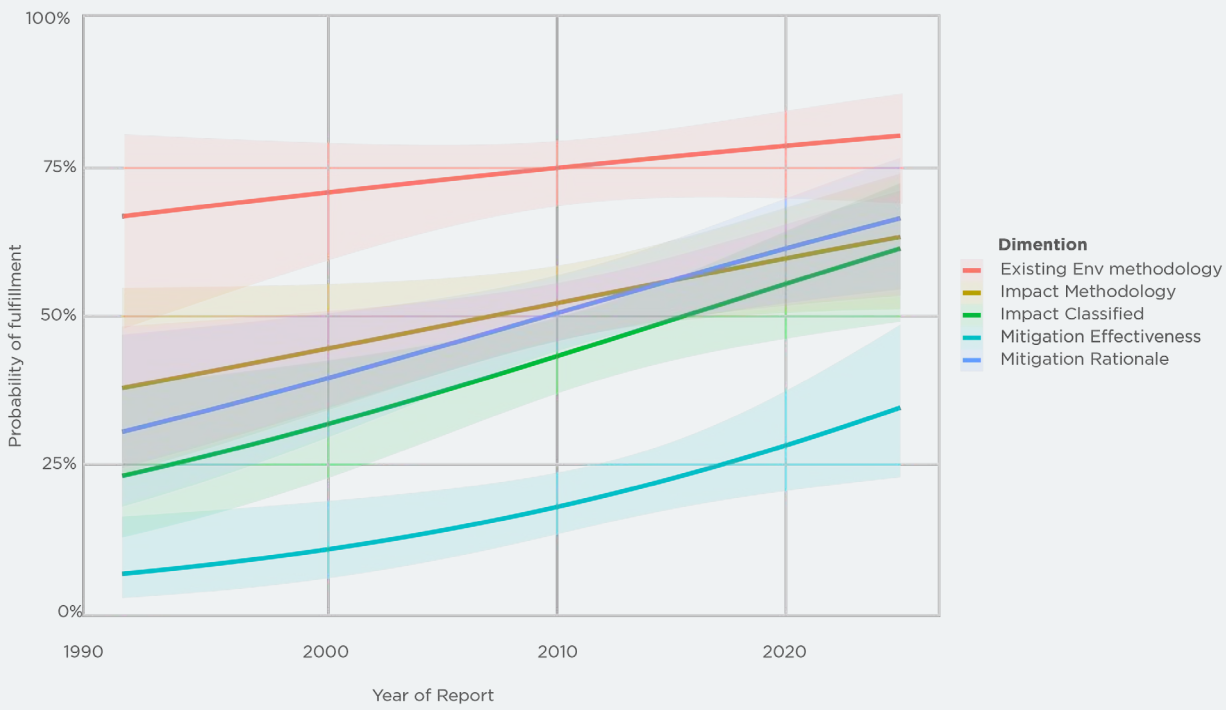
4.2 FINDINGS FROM THE CORRELATION AND REGRESSION ANALYSES

While findings in Section 4.1. highlight that the overall standard of report quality across the six assessed dimensions is low and the corresponding ToRs are inconsistently drafted, this section attempts to unpack selected trends between the quality of reports and related factors.[103] A detailed overview of the regression methodologies used, and the respective statistical tables can be found in the Annex 8.

Finding 1: Reporting on most quality dimensions has improved over time but the drafting of ToR requirements remains inconsistent

Simple time trends suggest that EIA performance on most quality dimensions has improved over time (See Figure 34). This may be due to a variety of factors, ranging from increasing the capacity of consultants, better awareness campaigns, and the adoption of newer best practices. However, given that reports in the early 1990s were typewriter-based, this improvement may also be influenced by technological advancements which provide greater flexibility in reporting a variety of complex information. However, the inclusion of different EIA quality related requirements in ToRs is inconsistent (See Figure 35), with the requirement to report methodologies used when assessing impacts displaying a sharp decline.

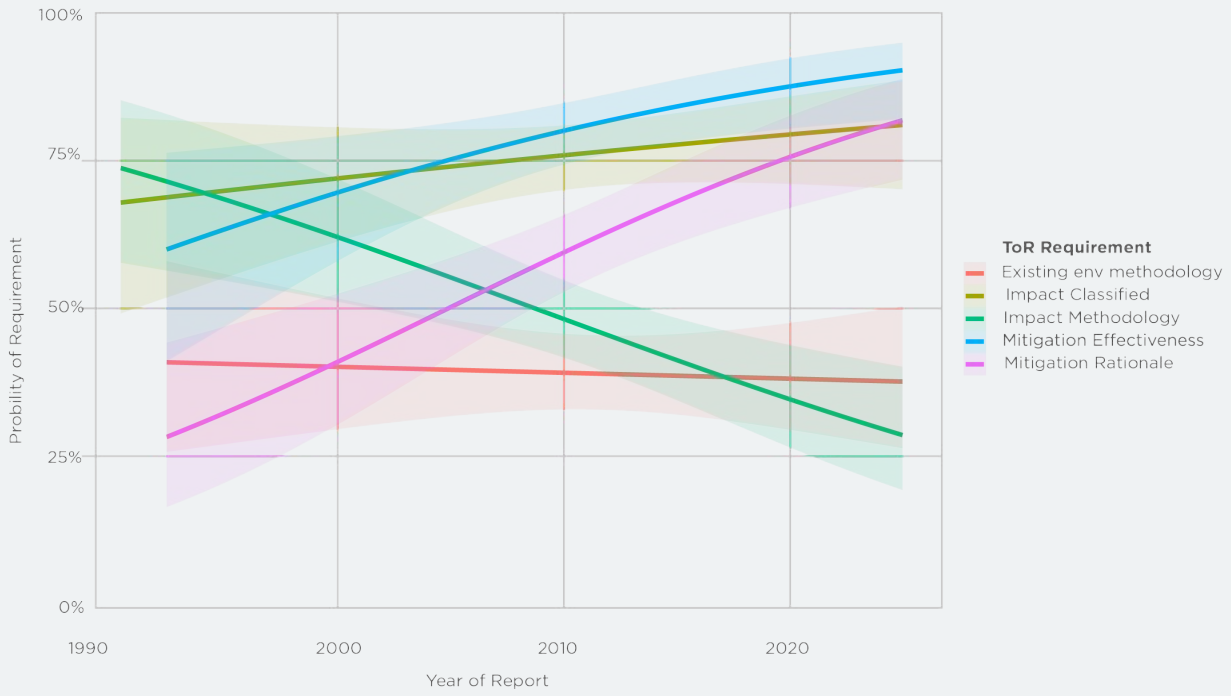
Figure 34: Trend in dimensions of report quality, over time



Source: Author's construction

103 Given the nature of the study, constraints in data, and the possible non-random sampling, the findings from this section should not be interpreted as causal and at best should inform preliminary insights and avenues for further inquiry.

Figure 35: Trend in inclusion of reporting quality requirements in ToRs, over time

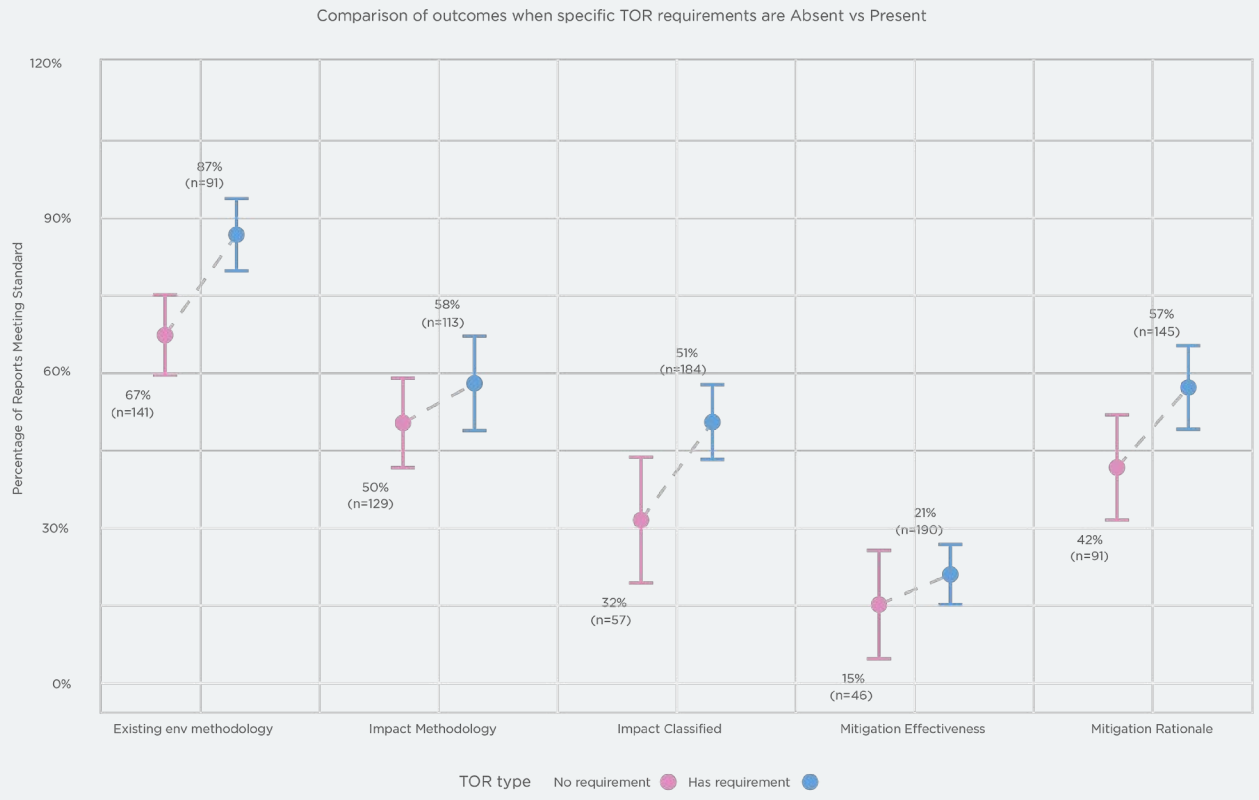


Source: Author's construction

Finding 2: ToRs with quality requirements produce better reports

In the previous section, it was clear that even though TORs stipulated reporting requirements, many reports have not complied with such requirements. However, that does not mean that TORs, as they exist now, do not have any influence at all. As seen in Figure 36, though not close to perfect, ToRs which require specific reporting dimensions (green) have produced relatively better-quality reports compared to those which do not. This strongly suggests the need to not only standardise the ToR drafting procedure but also improve the implementation and monitoring capacity of EIA cells in PAAs.

Figure 36: Influence of TOR requirements on dimensions of reporting quality

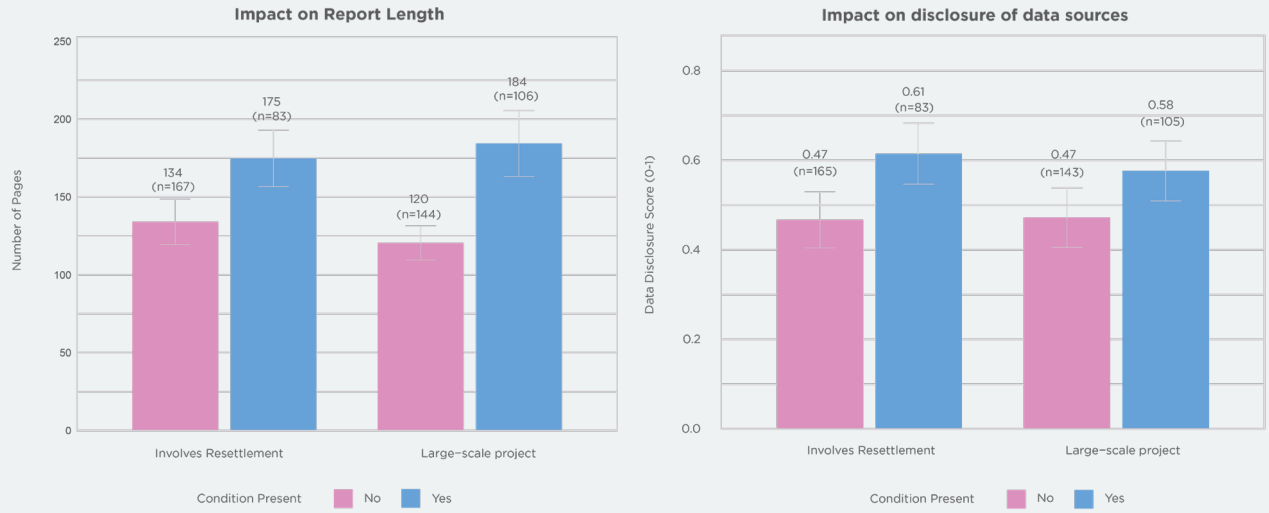


Source: Author's construction

Finding 3: The project scale affects both the complexity and the reporting quality of EIA reports

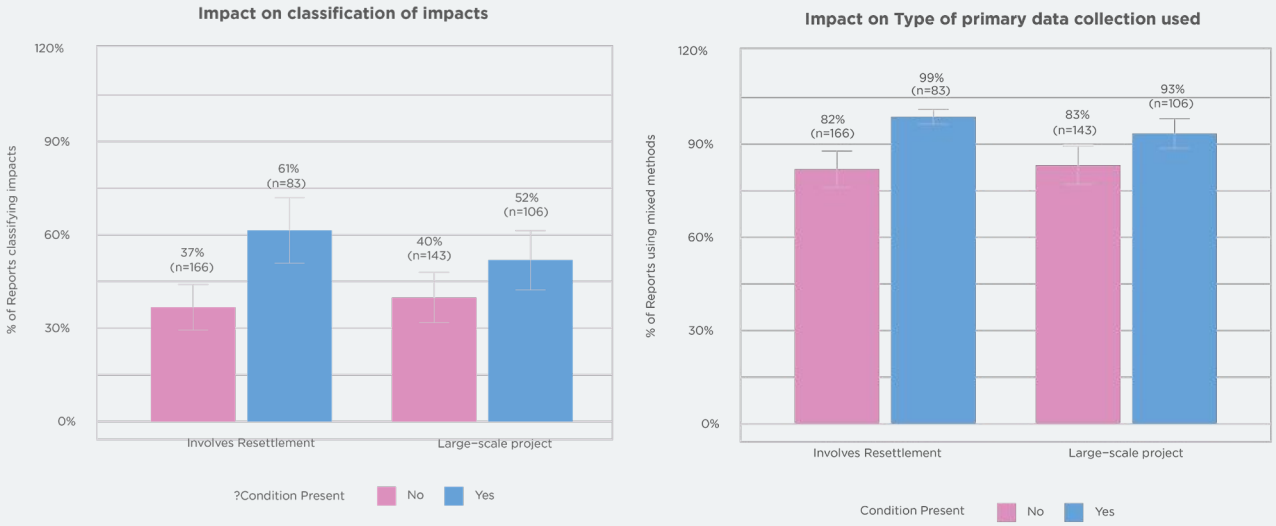
In international literature, the type of project (e.g. transportation, tourism, energy etc) is a factor that significantly impacts the quality of reporting. Initial trends suggest a similar pattern in the quality of social impact reporting as well. Projects that involve resettlement and projects that are significantly larger in land area, investment size, workforce requirement, and project length tend to have much longer reports with a higher likelihood of conducting primary data collection (See Figure 37). Furthermore, such projects also perform better on certain criteria such as classification of significant impacts and the disclosure of data sources (See Figure 38).
As literature and key informants emphasise, this effect could be due to a host of factors such as differences in project complexity, availability of funds for the EIA, and available domain expertise. However, this suggests that there is merit in exploring differentiated guidelines and EIA review processes based on sectoral or scale-based characteristics.

Figure 37: Difference in report length and type of primary data collection used based on project significance



Source: Author's construction

Figure 38: Difference in classification of impacts and verification of data sources based on project significance

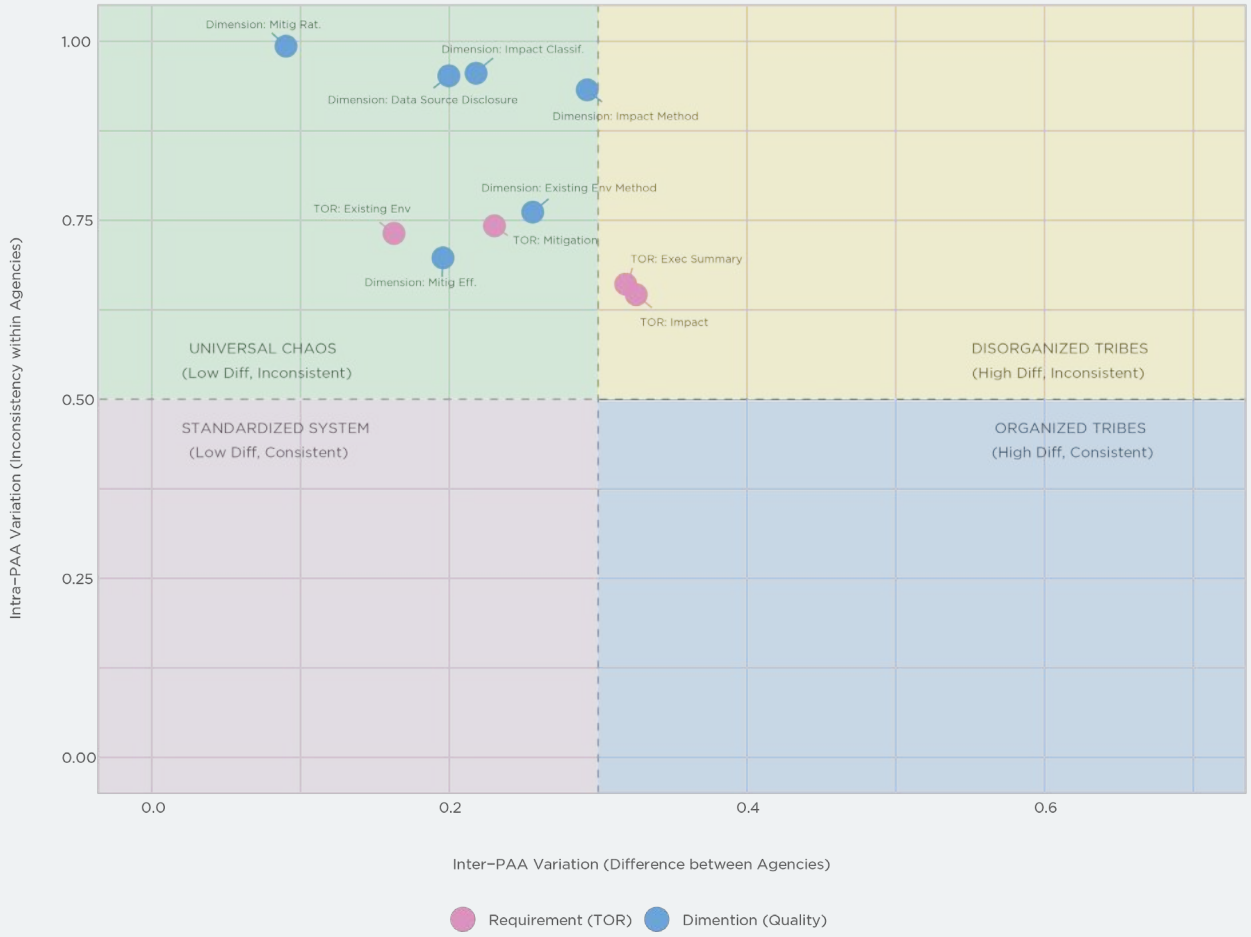


Source: Author's construction

Finding 4: There is significant variation in ToRs drafted by the same PAAs. Report quality regulated by the same PAA is highly variable as well.

The ToRs drafted by the same PAAs tend to be highly inconsistent in the assessed quality dimensions. The existence of project-specific requirements should not explain this variation, given that the aspects of ToRs studied by this study are related to reporting quality, which should not change based on project characteristics. As seen in Figure 39, all dimensions of reporting quality and ToR requirements on the environment and mitigation sections display high variation within PAAs and low variation across PAAs, suggesting that most PAAs are highly inconsistent.

Figure 39: Variation of TOR requirements and EIA report quality within and across PAAs



Source: Author's construction

Given that most EIA reports fall within the jurisdiction of CEA and CC&CRM, their respective sample sizes allow for assessing this variation temporally. As seen in Figure 40, temporality unpacks this phenomenon further by showing that variation of ToR requirements and report quality within these two institutions continues to increase, and differences across the two PAA, especially on ToRs ,are converging. This suggests that the static phenomenon of "universal chaos" visualised in Figure 39 is increasing over time.

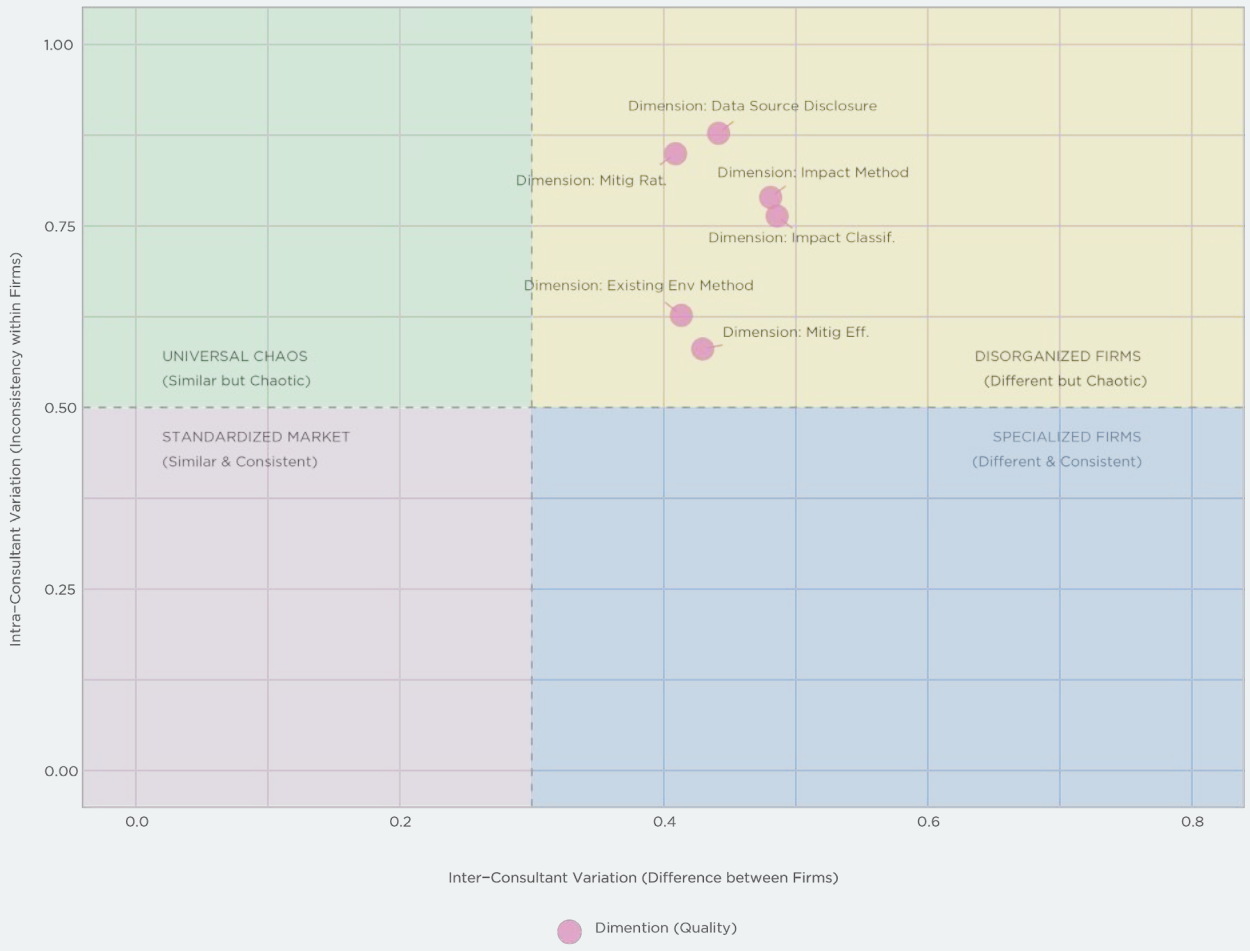
Figure 40: Variations within and across two selected PAAs over time

Source: Author's construction

Finding 5: Reporting quality within the same consultancy firms varies widely, while reporting quality varies across firms as well

Analysing a sample of consultancy firms with more than 4 reports per firm highlights that reporting quality varies both within and across firms (See Figure 41). This is concerning, especially since one would expect quality-based aspects of EIA reporting to be part of standard operating procedures and templates used by consultancy firms. This may suggest that consultancy firms behave differently based on project-specific characteristics, or there are significant differences in how individual consultants within a firm conduct and report EIA assessments.

Figure 41: Variation of TOR requirements and EIA report quality within and across consultancy firms



Source: Author's construction

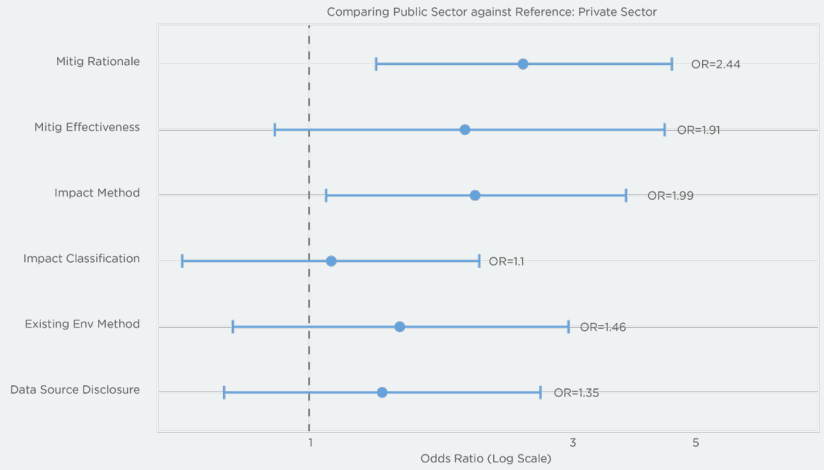
Finding 6: Dimensions of EIA report quality vary based on institutional characteristics.

To determine whether institutional characteristics affect dimensions of EIA reporting quality, a series of simple regressions was conducted using selected institutional factors. Based on the results presented earlier, the existence of the relevant ToR requirement and the project's significance were added as control variables to account for ToR and project-level characteristics. To account for the ToR requirements, only Requirement-based dimensions were included. The results are not causal, and at best can inform further enquiry.

EIA report quality tends to be better in projects where the PP is from the public sector

Projects where the public sector is the project proponent has a higher likelihood to perform better on requirement-related dimensions such as reporting methodologies, classifying significant impacts, and presenting the rationale and effectiveness of proposed mitigation methods (See Figure 42).

Figure 42: Effect of Proponent type on selected aspects of EIA report quality



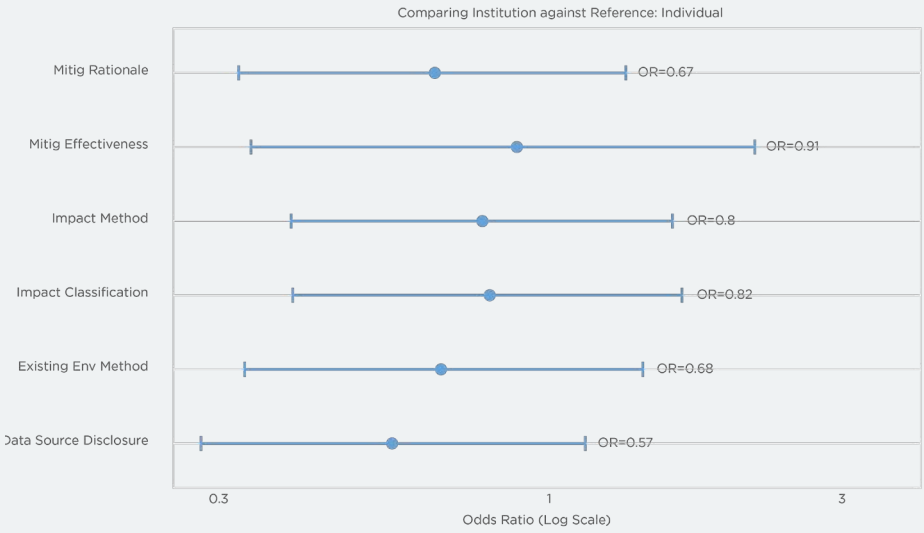
Note: Odds Ratio (OR) indicates the likelihood of the selected factor (public sector) being better than the reference factor (private sector). OR = 1: no difference between the two factors. OR = 2: Public sector is twice as likely to perform better.

Source: Author's construction

Development partner involvement is associated with better performance on some criteria

The involvement of a development partner is also associated with better quality, especially in reporting the effectiveness of mitigation measures – an aspect that most EIA reports struggle with (See Figure 43). This finding reflects the conclusions of Ravi et al (2022), who compared the quality of EIAs with development partner involvement against those without.

Figure 43: Effect of Development partner involvement on selected aspects of EIA report quality



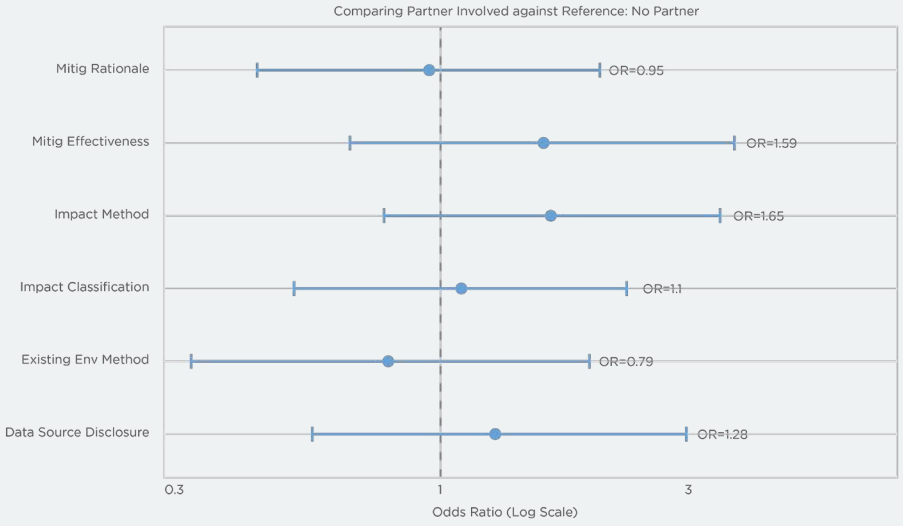
Note: Odds Ratio (OR) indicates the likelihood of the selected factor (Involvement of development partner) being better than the reference factor (No involvement of development partner). OR = 1: no difference between the two factors. OR = 2: Development partner involvement is twice as likely to perform better.

Source: Author's construction

The effect of the type of financing mechanism is mixed

While purely private-financed tend to produce lower levels of quality across most dimensions, projects financed purely through public sources and mixed financing tend to perform better (See Figure 44).[104]

Figure 44: Effect of type of financing mechanism on selected aspects of EIA report quality



Note: Odds Ratio (OR) indicates the likelihood of the selected factors (private and mixed financing) being better than the reference factor (public financing). OR = 1: no difference between the three factors.

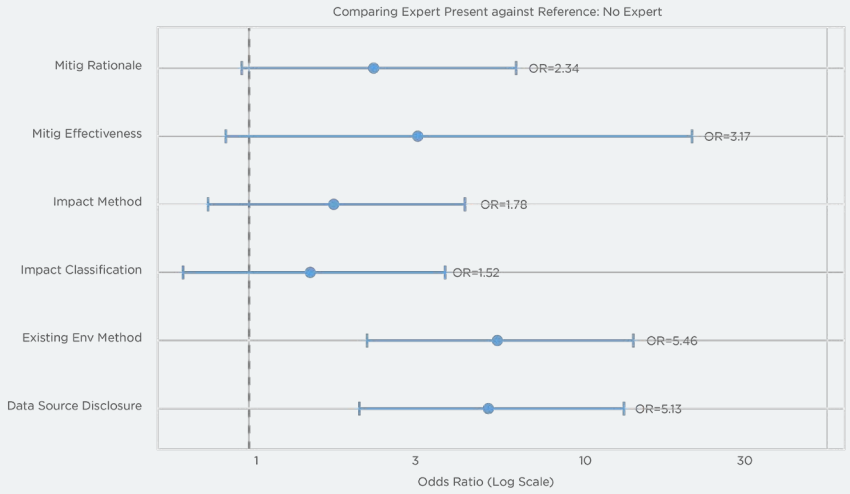
Source: Author's construction

Nature and composition of consultancy teams influence EIA report quality

When focusing on consultant-specific aspects, institutional consultants (R&D units of public departments, Consultancy firms, Universities etc.) consistently perform better than EIA preparation teams that have not indicated an institutional affiliation (See Figure 45). This is understandable as institutional consultancy has advantages such as scale (e.g. dedicated formatting and research units) and institutional memory (standard operating procedures). Finally, as expected, the inclusion of a socio-economic expert tends to increase the quality across all selected dimensions (See Figure 46).

104 Mixed financing is if the report indicates that financing has contributions from both the private and the public sector. A development partner being involved with a private sector actor was also considered as mixed financing.

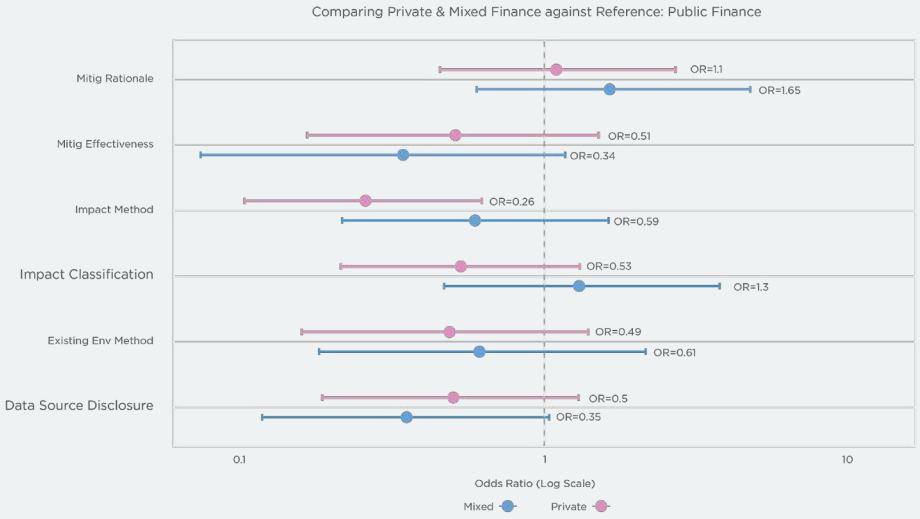
Figure 45: Effect of type of consultant on selected aspects of EIA report quality



Note: Odds Ratio (OR) indicates the likelihood of the selected factors (Non-institutional consultants) being better than the reference factor (Institutional consultants). OR = 1: no difference between the two factors.

Source: Author's construction

Figure 46: Effect of the inclusion of socio-economic expertise in the EIA team on selected aspects of EIA report quality



Note: Odds Ratio (OR) indicates the likelihood of the selected factor (Inclusion of a socio-economic expert) being better than the reference factor (No socio-economic expert). OR = 1: no difference between the two factors.

Source: Author's construction

5 QUALITATIVE OBSERVATIONS ON SUBSTANTIVE ISSUES IN SOCIAL IMPACT ASSESSMENTS

While assessing the reporting quality of individual EIA reports, the author noted down the following observations and excerpts of social assessments that highlight problems in both the governance and practice of assessing social impacts in EIAs. Such problems highlight the issues that can exacerbate if EIA reporting quality is not monitored and scrutinized.

As argued by Gismondi (1997), EIAs have a significant influence on framing social issues and perpetuating narratives which can exacerbate power imbalances and social prejudices. The first two findings highlight issues in how sociological analysis is conducted and communicated in EIA reports.

Finding 1: Interpretations and conclusions made in EIAs consistently display unsubstantiated claims and use hostile language against poor and rural communities

EIA reports often make sweeping generalisations about the behaviour of underprivileged groups in society without evidence or justification. Figure 47 illustrates a claim made about the fiscal habits of construction workers and an unsubstantiated link to adultery, rape, and child abuse.

Figure 47: An example of an unsubstantiated claim

> With workers from outside living among the villagers, it can some times lead to misunderstandings, especially if the new found wealth is used for the consumption of alcohol and drugs. The danger of adultery, rape and child abuse can raise its ugly head if these problems are not identified and dealt with at the very start.

Source: Solar Salt Manufacturing Project in Puttlam/Wanathavilluwa, na

Similarly when discussing potential impacts from an influx of construction workers to the local community, the EIA report of the Diversion of Mau Ara to Malala Oya Basin (1998) comments that "the possessive tendencies, aggression, and the disdain for the law found in every frontier communities can be seen here to a certain degree. Even the few traditional villages in the area have been submerged by this influx of outsiders. In such a situation, the impact from the incoming project workers will be insignificant." In this instance, a sweeping generalisation on a community is used to justify the insignificance of a potential project impact.

Perceptions can also appear when opinions and perspectives of local communities are represented. Figure 48 highlights an instance where the report casts doubt on opinions held by local communities purely based on the personal preferences of one individual. Such narratives

can increase an already skewed power dynamic between local communities at risk of impacts and decision-making authorities.

Figure 48: An example of invalidating local opinions

> In assessing socio-economic factors various questions were directed at the farmers and other residents in the district. Though the answers provided some indications, they were somewhat clouded with perceptions and bias. A driver who was hiring vehicles for instance did not think of tapping the water from the tank as a serious factor compared to the increased opportunities he would get in the event of the hotel coming up.

Source: Wirawila Walk Inn Ltd, na

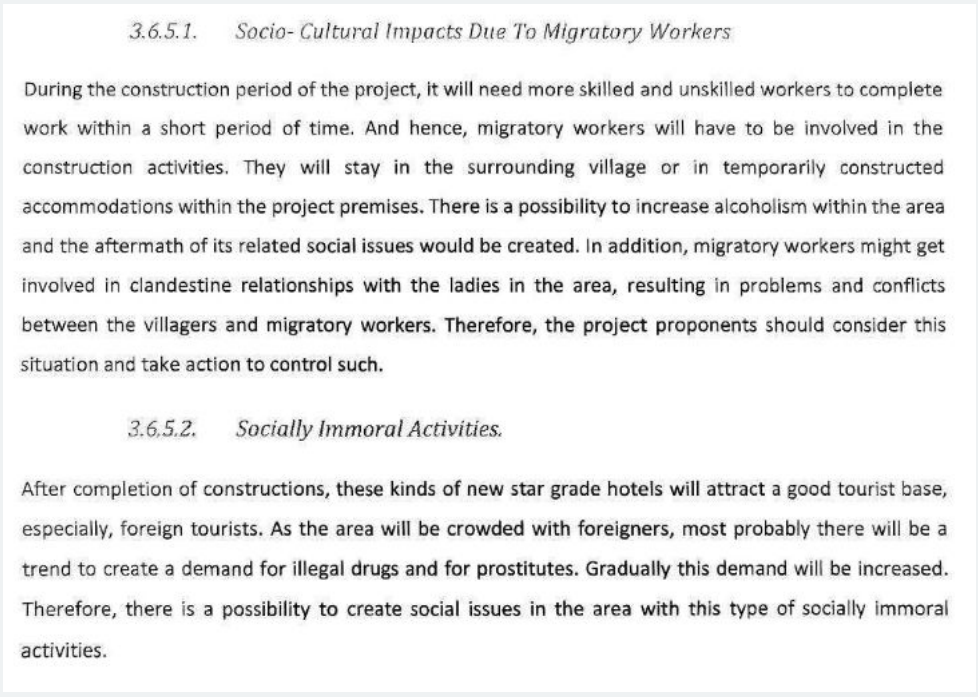
Finding 2: Including moral prescriptions and political implications when identifying impacts

The CEA Public Participation Handbook states that "questions of fairness, social justice, political, and economic policy" are outside the scope of the EIA process. However, when presenting social impacts, some reports tend to stray beyond the scope of EIAs into the realm of morality. Figure 49 highlights two examples. The first portrays adultery and prostitution as "serious problems" when discussing impacts on cultural values. Neither are offences in the Sri Lankan legal system. The report is silent on why adultery and prostitution merit mention in an EIA. The second example claims that construction workers will engage in "clandestine relationships with ladies in the area" and cause problems between villagers and workers, without any mention of the basis for or probability of such incidents arising.

Figure 49: Examples of imposing moral prescriptions when identifying impacts

> If the labour force of the Project is not properly managed and controlled, they may enter the nearby villagers and create unnecessary problems that affect the individuals and families in different manner. If the labourers are to spend the nights in the Project site without proper supervision, they may go to the villages for various purposes and remain in the village till late night. Such patterns of life may cause serious problems such as adultery, prostitution, child abuse, rape and property crimes such as theft and fraud. Consumption of alcohol may also cause inter-personal conflicts in or outside the project site.

Source: Solar Salt Manufacturing Project in Puttlam/Wanathavilluwa, na



3.6.5.1. Socio- Cultural Impacts Due To Migratory Workers

During the construction period of the project, it will need more skilled and unskilled workers to complete work within a short period of time. And hence, migratory workers will have to be involved in the construction activities. They will stay in the surrounding village or in temporarily constructed accommodations within the project premises. There is a possibility to increase alcoholism within the area and the aftermath of its related social issues would be created. In addition, migratory workers might get involved in clandestine relationships with the ladies in the area, resulting in problems and conflicts between the villagers and migratory workers. Therefore, the project proponents should consider this situation and take action to control such.

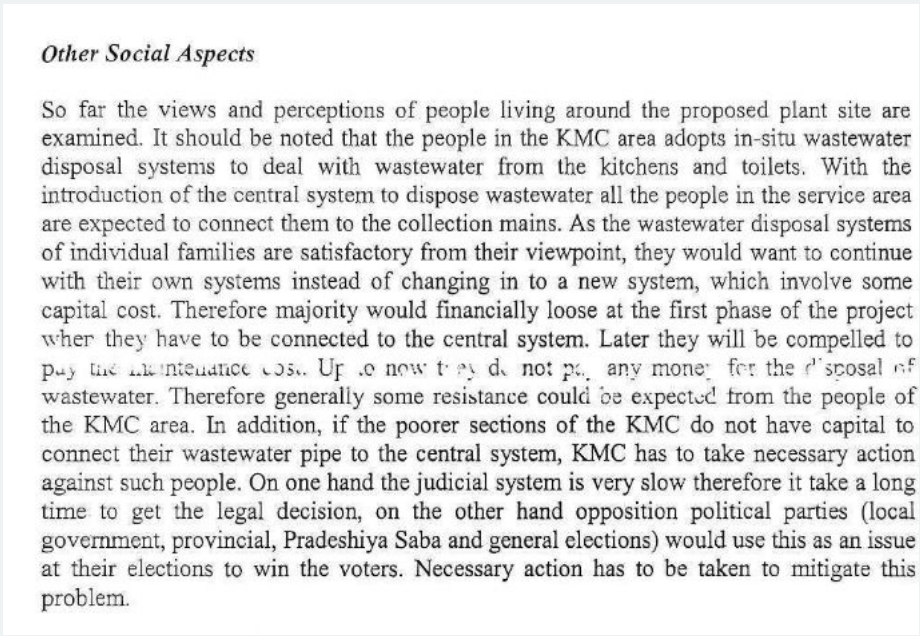
3.6.5.2. Socially Immoral Activities.

After completion of constructions, these kinds of new star grade hotels will attract a good tourist base, especially, foreign tourists. As the area will be crowded with foreigners, most probably there will be a trend to create a demand for illegal drugs and for prostitutes. Gradually this demand will be increased. Therefore, there is a possibility to create social issues in the area with this type of socially immoral activities.

Source: 192 Roomed, Melva Hotel Kosgoda Project at Duwemodera, Kosgoda, Balapitiya, 2016

Similarly, some reports include political implications of project related activities as potential impacts. Figure 50 highlights two such examples. In the first, the report claims that a larger labour force established through the project may give rise to trade unions, which are portrayed as a negative development and a threat to investment projects. The second example argues that there is a risk of opposition parties using potential issues of the project during election campaigns. Such impacts are beyond the scope of an EIA report and runs the risk of making EIA reports instruments of political propaganda.

Figure 50: Examples of including political implications when identifying impacts



Other Social Aspects

So far the views and perceptions of people living around the proposed plant site are examined. It should be noted that the people in the KMC area adopts in-situ wastewater disposal systems to deal with wastewater from the kitchens and toilets. With the introduction of the central system to dispose wastewater all the people in the service area are expected to connect them to the collection mains. As the wastewater disposal systems of individual families are satisfactory from their viewpoint, they would want to continue with their own systems instead of changing in to a new system, which involve some capital cost. Therefore majority would financially loose at the first phase of the project wher they have to be connected to the central system. Later they will be compelled to pay the maintenance cost. Up to now they do not pay any money for the disposal of wastewater. Therefore generally some resistance could be expected from the people of the KMC area. In addition, if the poorer sections of the KMC do not have capital to connect their wastewater pipe to the central system, KMC has to take necessary action against such people. On one hand the judicial system is very slow therefore it take a long time to get the legal decision, on the other hand opposition political parties (local government, provincial, Pradeshiya Saba and general elections) would use this as an issue at their elections to win the voters. Necessary action has to be taken to mitigate this problem.

Source: Kandy City Waste Water Disposal Project, 2005

Final EIA Report for the Proposed Export Processing Zone (EPZ), Mirijjawila, Hambanthota

4.3.9. Impact of trade union and political movements

Increasing labour force in the project site may provide impetus to the appearance of trade unions and their links with main stream politics in the country. Extremist political activities of such trade union and political moments may force a serious threat to the smooth functioning of the investment projects of the area.

Source: Mirijjawila Industrial zone, 2014

Finding 3: Including general and unsubstantiated benefit statements, including CSR plans

The EIA guidelines emphasise that "PPs should ensure the professional integrity, including scientific integrity of the discussions and analyses in EIAs." This creates an expectation that any impact (positive or negative) that is discussed in an EIA report is an outcome of a reasonable exercise of analysis. However, especially when discussing social impacts, EIA reports often present benefit statements with little to no justification. Two such benefits that frequently appear with little justification are employment benefits during the construction and operation phases of projects and increases in property values caused by projects. As shown in Figure 51, such statements are often speculative and vague. Given the lack of information provided, the reader has little ability to assess the credibility of such claims.

Figure 51: An example of employment benefits and increases in property values being included as unsubstantiated socio-economic benefits

(d) Project Benefits to the Local Community and Socio-Economic and Employment Benefits

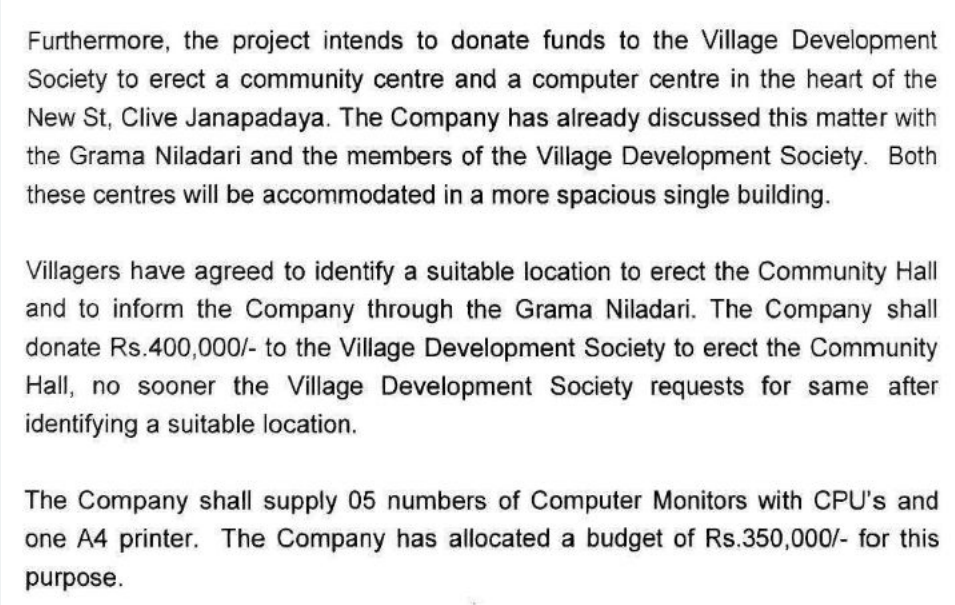
The local community may get a variety of socio-economic benefits which include access to direct and indirect employment opportunities and enhancement of socio economic conditions, increased property values and better markets for local fishery and agricultural products. There can also be an increased demand for transport services (land and boat) and provision of needs for tourists.

Source: 501 Roomed RIU Resort Hotel Project in Ahungalla, 2014

Some EIA reports feature proposed Corporate Social Responsibility (CSR) initiatives by the project proponent or the developer as socio-economic benefits arising from the project (See Figure 52). The use of CSR initiatives as benefits in EIA reports is an ambiguous subject in both international and local standards on EIAs. IFC's Performance Standards on responsible business conduct emphasize that CSR can complement but not replace application of environmental and

social safeguards.[105] When discussing how at times CSR is used to offset negative impacts from projects, the IFC Standards illustrate that "the financing of a local school does not compensate for a community's loss of land or access to water resources." Locally, the Guide for PAAs define "effects" to be positive or negative results caused by the action in question (the proposed project). It is unclear whether CSR initiatives, which are voluntary at the prerogative of the project proponent or developer, are such beneficial effects caused by the proposed project.

Figure 52: An example of CSR initiatives being included as socio-economic benefits



Furthermore, the project intends to donate funds to the Village Development Society to erect a community centre and a computer centre in the heart of the New St, Clive Janapadaya. The Company has already discussed this matter with the Grama Niladari and the members of the Village Development Society. Both these centres will be accommodated in a more spacious single building.

Villagers have agreed to identify a suitable location to erect the Community Hall and to inform the Company through the Grama Niladari. The Company shall donate Rs.400,000/- to the Village Development Society to erect the Community Hall, no sooner the Village Development Society requests for same after identifying a suitable location.

The Company shall supply 05 numbers of Computer Monitors with CPU's and one A4 printer. The Company has allocated a budget of Rs.350,000/- for this purpose.

Source: Koladeniya Mini-Hydro Power Project at New St. Clive Janapadaya in Koladeniya near Ginigathhena (Nuwara Eliya District), 2010

The CEA Q&A Booklet highlights that consulting communities during the EIA study will help build a rapport that will benefit the project. However, unsubstantiated benefit statements and CSR promises are likely to not always materialise, and therefore erode trust of communities regarding projects if such benefits do not accrue. This has been recognised by EIA reports themselves with the report for Enderamulla Town Development Project (2007) noting that "the villagers are suspicious about receiving the employment opportunities generated by the project, because according to past experiences from other projects, outsiders might be recruited though they have agreed to provide them."

Finding 4: Using standard templates for impact descriptions across different EIAs

Verbosity should be avoided when drafting an EIA report. The Guidelines for PAAs specify that "PPs should incorporate material into an EIA by reference when the effect will be to reduce bulk without impeding agency and public review of the action." There is an implication that EIA reports must prioritise content that is directly relevant to decide on the merits of the action in question.

105 Norad, IFC's Performance Standards: A Global Norm for Responsible Business Conduct (2020).

However, there were several instances where consultants were using standard templates of impact statements across different EIA reports. Figure 53 provides one such example where one standard description presenting an unsubstantiated list of negative social and cultural impacts arising from tourism have been included in two EIA reports with no alteration. However, the differences between the two projects are stark. The Tourism Development Project at Kuchchaveli, Trincomalee (2010), was an ambitious multi-purpose tourism project proposed by the Government Agent of Trincomalee with a project area of 526 acres. Through 48 investors and a total investment of LKR 17.5 billion, the project envisaged the establishment of 3060 hotel rooms and other leisure facilities. In contrast, the proposed Eco-Friendly Chalets and Resort in Kalpitiya (2012) was a standalone tourist accommodation with a project area of 46 hectares in Dutch Bay Island, Kalpitiya. With 105 villas and 115 chalets to be constructed in 3 phases with an investment of LKR 1.2 billion, the project targets high end tourists with a focus on sustainability. Given such differences, copy pasting unsubstantiated impact descriptions makes the two reports verbose by not adding any project specific information of value. Furthermore, since the two projects espouse different models and brands of tourism, claiming without evidence that certain negative impacts can arise from any tourism development is counterproductive to how specific tourism projects are positioned.

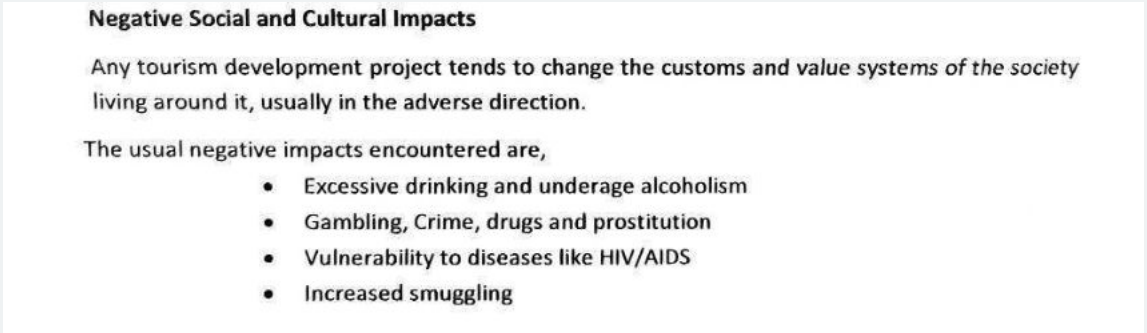
Figure 53: A standard template on negative impacts from tourism

4.2.9 Negative Social and Cultural Impacts

Any tourism development project tends to change the customs and value systems of the society living around it, usually in the adverse direction.
The usual negative impacts encountered are,

- Excessive drinking and underage alcoholism
- Gambling, Crime, drugs and prostitution
- Vulnerability to diseases like HIV/AIDS
- Increased smuggling
- Adverse cultural changes
- Unwanted lifestyle changes
- Negative changes in values and customs
- Sexual exploitation particularly affecting the poor women, girls and young men
- Family disruption
- Exclusion of locals from natural resources
- New cliques modifying social structure
- Traffic congestion and pollution, etc.

Source: Tourism Development Project at Kuchchaveli, Trincomalee, 2010



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- Family disruption
- Exclusion of locals from natural resources
- New cliques modifying social structure
- Traffic congestion and pollution, etc.

Source: Eco-Friendly Chalets and Resort in Kalpitiya, 2012

Figure 54: A standard template on socio-cultural impacts from migratory workers

3.6.5. Existing Environmental Problems And Issues And Any Social Cultural Conflicts That May Bar The Project

3.6.5.1. Socio- Cultural Impacts Due To Migratory Workers

During the construction period of the project, it will need more skilled and unskilled workers to complete work within a short period of time. And hence, migratory workers will have to be involved in the construction activities. They will stay in the surrounding village or in temporarily constructed accommodations within the project premises. There is a possibility to increase alcoholism within the area and the aftermath of its related social issues would be created. In addition, migratory workers might get involved in clandestine relationships with the ladies in the area, resulting in problems and conflicts between the villagers and migratory workers. Therefore, the project proponents should consider this situation and take action to control such.

Source: 192 Roomed, Melva Hotel Kosgoda Project at Duwemodera, Kosgoda, Balapitiya, 2016

4.2.8.2. Negative Impacts

Socio- cultural impacts due to migratory workers

During the construction period of the project, it will need more skilled and unskilled workers to complete work within a short period of time. And hence, migratory workers will have to be involved in the construction activities. They will stay in the temporarily constructed accommodations within the project premises or house in the village. There is a possibility to increase alcoholism within the area and the aftermath of its related social issues would be created. In addition, migratory workers might get involved in clandestine relationships with the ladies in the area, resulting in problems and conflicts between the villagers and migratory workers. Therefore, the project proponents should consider this situation and take action to control such issues.

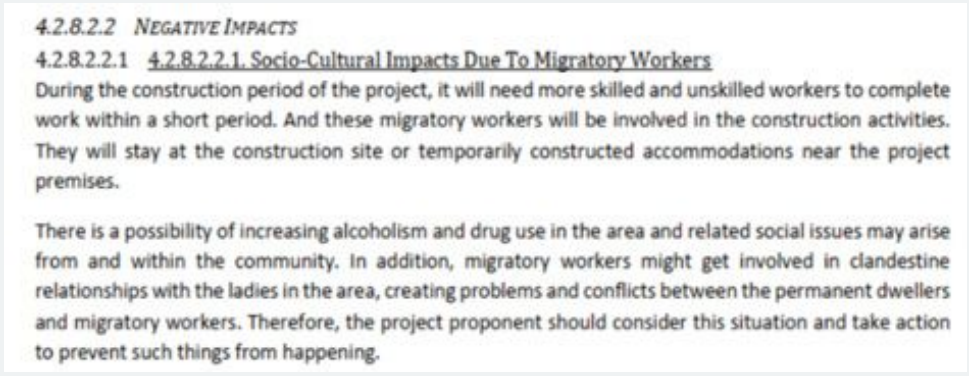
Source: The Beach Front 2, Uswetikeiyawa 112 Units Apartment Complex, 2018

4.2.8.3.2. 4.2.8.2.2. NEGATIVE IMPACTS

4.2.8.3.2.1. Socio- cultural impacts due to migratory workers

During the construction period of the project, it will need more skilled and unskilled workers to complete work within a short period of time. And hence, migratory workers will have to be involved in the construction activities. They will stay in the surrounding village or temporarily constructed accommodations within the project premises. There is a possibility to increase alcoholism within the area and the aftermath of its related social issues would be created. In addition, migratory workers might get involved in clandestine relationships with the ladies in the area, resulting in problems and conflicts between the villagers and migratory workers. Therefore, the project proponents should consider this situation and take action to control such.

Source: South Beach Weligama Apartments, 2021



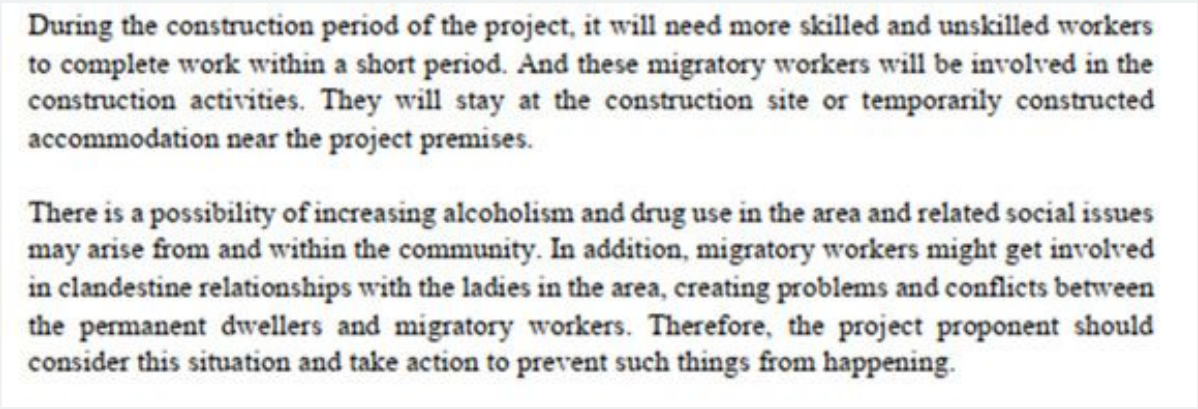
4.2.8.2.2 *Negative Impacts*

4.2.8.2.2.1 4.2.8.2.2.1. Socio-Cultural Impacts Due To Migratory Workers

During the construction period of the project, it will need more skilled and unskilled workers to complete work within a short period. And these migratory workers will be involved in the construction activities. They will stay at the construction site or temporarily constructed accommodations near the project premises.

There is a possibility of increasing alcoholism and drug use in the area and related social issues may arise from and within the community. In addition, migratory workers might get involved in clandestine relationships with the ladies in the area, creating problems and conflicts between the permanent dwellers and migratory workers. Therefore, the project proponent should consider this situation and take action to prevent such things from happening.

Source: Marino Tower Hotel Colombo 652 Roomed City Hotel Complex, 2021



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Source: 228 Units of Apartment Project No. 13, Archbishop Nicholas Marcus Fernando Mawatha, Bolawalana Negombo, 2025

Figure 54 is an example of a description about possible socio-cultural impacts caused by construction workers from outside the project area during the construction period. The description appears (almost identical) in 5 EIA reports published over a 9 year period. Not only are the claims made unsubstantiated, but the 5 projects are spread across four different districts, and are different in the scale of construction manpower ranging from 57 (228 Units of Apartment projects) to 300 (Marino Tower Hotel and South Beach Weligama Apartment projects). So, using the exact same impact description for these five projects is inappropriate. Interestingly, though the first four examples are reports by the same consultant, the final example from 2025 is a report by a different consultant. This may indicate that the use of such standard templates are extending beyond the use of the same consultant. Such practices contribute to both the verbosity and unreliability of EIA reports.

Finding 5: Annexures and tables of socio-economic surveys disclose personal identifiers and sensitive information

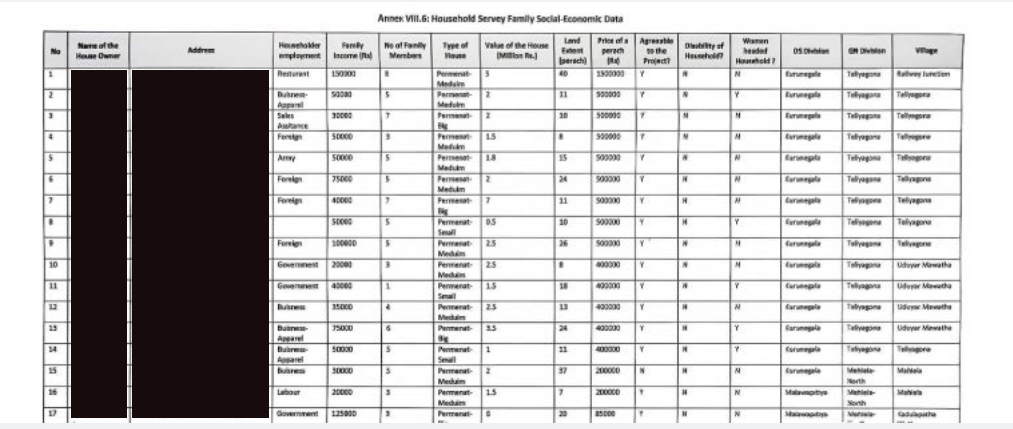
The guidelines are silent on the use and management of personal data when conducting EIAs. This is a significant gap especially because many EIA reports include such information in the main report or annexures. Most such instances feature personal information of survey and interview respondents. Figure 49 includes examples of different types of personal information that have been featured in selected EIA reports.Such information range from names, residential addresses, incomes, value of land and immovable assets, National ID card numbers, and telephone numbers. The volume of persons exposed are also not trivial. For example, for each of

the examples in Figure 55, the respective information of at least 50 people have been disclosed.

Internationally, standards such as the Aarhus Convention on Access to Environmental Information (1998), and the EU Environmental Information Directive (2003) emphasise that environmental information should not be disclosed at the cost of confidentiality of personal information. Similarly international best practice principles on EIA compliance and enforcement published by the International Association for Impact Assessment (IAIA) highlight that compliance systems must protect "sensitive personal information requiring privacy protections." IFIs and MDBs also include data protection requirements in their processes with the IFC Performance Standards on Environmental and Social Sustainability stating that the need for transparency must be balanced with the need to protect confidential information. Such personal data or information should not be associated with particular individuals. It illustrates that "sensitive information about affected communities such as income and health information, collected as part of the socioeconomic baseline information should not be disclosed in a way that can be attributed to individuals and households."[106] The Asian Infrastructure Investment Bank (AIIB) has a policy on personal data which extends across the bank's activities.[107]

Even though the Sri Lankan laws, regulations, and guidelines on EIAs are silent about the use and management of personal information, the recently enacted Personal Data Protection Act No. 9 of 2022 governs the use of such information by both public and private sector actors. The act and the amendments outline many obligations of actors collecting and using personal data and the rights held by people who are data subjects. Actors such as PAAs and PPs who request and use personal information must put a Data Management Programme in place which specify key aspects such as the uses of the data, storage and disposal, proportionality of data collection, and confidentiality. Furthermore, data subjects have the right to withdraw consent and object to processing in certain situations. So, establishing standards to manage such personal information collected and used in EIAs is a critical requirement both in emerging Sri Lankan legislation, development partner requirements, and international best practices.

Figure 55: Personal information included in EIA reports



Annex VIII.6: Household Servey Family Social-Economic Data

No	Name of the House Owner	Address	Householder employment	Family Income (Rs)	No of Family Members	Type of House	Value of the House (Million Rs.)	Land Extent (perch)	Price of a perch (Rs)	Agreeable to the Project?	Disability of Household?	Women headed Household ?	DS Division	GN Division	Village
1	[redacted]	[redacted]	Restorant	150000	8	Permenat-Medium	5	40	150000	Y	N	N	Kurunegala	Tellyagama	Railway Junction
2			Buisness-Apparel	50000	5	Permenat-Medium	2	11	200000	Y	N	Y	Kurunegala	Tellyagama	Tellyagama
3			Sales Assitance	30000	7	Permenat-Big	2	10	200000	Y	N	N	Kurunegala	Tellyagama	Tellyagama
4			Foreign	50000	5	Permenat-Medium	1.5	8	200000	Y	N	N	Kurunegala	Tellyagama	Tellyagama
5			Army	50000	5	Permenat-Medium	1.8	15	500000	Y	N	N	Kurunegala	Tellyagama	Tellyagama
6			Foreign	75000	5	Permenat-Medium	2	24	500000	Y	N	N	Kurunegala	Tellyagama	Tellyagama
7			Foreign	40000	7	Permenat-Big	7	11	500000	Y	N	N	Kurunegala	Tellyagama	Tellyagama
8				50000	5	Permenat-Small	0.5	10	500000	Y	N	Y	Kurunegala	Tellyagama	Tellyagama
9			Foreign	100000	5	Permenat-Medium	2.5	26	500000	Y	N	N	Kurunegala	Tellyagama	Tellyagama
10			Government	20000	3	Permenat-Medium	2.5	8	400000	Y	N	N	Kurunegala	Tellyagama	Udyyar Mawatha
11			Government	40000	1	Permenat-Small	1.5	18	400000	Y	N	Y	Kurunegala	Tellyagama	Udyyar Mawatha
12			Buisness	35000	4	Permenat-Medium	2.5	13	400000	Y	N	N	Kurunegala	Tellyagama	Udyyar Mawatha
13			Buisness-Apparel	75000	6	Permenat-Big	3.5	24	400000	Y	N	Y	Kurunegala	Tellyagama	Udyyar Mawatha
14			Buisness-Apparel	50000	5	Permenat-Small	1	11	400000	Y	N	Y	Kurunegala	Tellyagama	Tellyagama
15			Buisness	30000	5	Permenat-Medium	2	37	200000	N	N	N	Kurunegala	Mahiela-North	Mahiela
16			Labour	20000	3	Permenat-Medium	1.5	7	200000	Y	N	N	Malawapitiya	Mahiela-North	Mahiela
17			Government	125000	3	Permenat-[illegible]	6	20	85000	Y	N	N	Malawapitiya	Mahiela-[illegible]	Gadulapatha

Source: Railway Extension Project: Kurunegala to Habarana via Dabulla, 2017

106 IFC, "International Finance Corporation's Guidance Notes: Performance Standards on Environmental and Social Sustainability," 2012, https://documents1.worldbank.org/curated/en/454371481192973684/txt/110835-GN-English-2012-Full-Document.txt.

107 AIIB, "Policy on Personal Data Privacy," AIIB, 2021, https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-personal-data-privacy/policy-on-personal-data-privacy/index.html.

Name	Family size	Employment of the chief householder	Monthly income -Rs	No of employees in the family	Nature of house	Value of the house-Rs/Million
[redacted]	3	Private	7000	1	Permanent	0.5
	5	Business	8000	1	-do-	1
	4	No	15000	2	-do-	1
	5	Labor	11,500	3	Semi-permanent	Rs 75,000
	6	Business	9000	2	-do-	Rs 80,000
	4	Labor	11000	2	-do	Rs 80,000
	6	Business	25000	3	Permanent	2
	3	Business	15000	1	-do	1.5
	4	Police	14000	2	-do	0.6
	4	Private	13000	2	-do	0.7
	3	Teacher	12000	1	-do	4.5
	4	No	13000	2	-do	0.6

Source: Biyagama Deviation of the Outer Circular Highway to the City of Colombo, 2006

Serial No	1st owners Name	Present owner's Name	NIC #	Other members living in this house	relationship to owner	Electricity	Water	Floor aea SQft.	Telephone #
1	[redacted]	[redacted]	[redacted]	[redacted]	Husband Daughter	Yes	Common well	360	[redacted]
2					Husband	Yes	Common well	360	
3					Husband Daughter Son-in-law Grand son	Yes	Common well	324	
4					son son	Yes	Common well	360	
5					son	Yes	Common well	360	
6					Wife	Yes	Common well	360	
7						Yes	private well	336	
8					Wife son	No	Common well	180	
9					Wife son son	Yes	Common well	378	
10					Wife	Yes	Tap water	360	

Source: Prison Relocation Project at Millewa, Horana, 2021

6 POLICY RECOMMENDATIONS

The findings discussed above highlight several key areas of reform that are relevant to both public, private, and international actors that are involved in the Sri Lankan EIA process. The recommendations are categorised by four key areas of focus.

6.1 GOVERNANCE, MANAGEMENT, AND EVALUATION OF THE EIA PROCESS

Developing a systematic monitoring and evaluation mechanism on EIA reporting
As evidenced by this study, systematic analysis of EIA reporting provides data driven insights into how well reports fulfill their objectives and inform areas of course correction and reform. Qualitative insights suggest that currently there is no process systematically assessing EIA reporting quality over time. The CEA, as the lead institution under the NEA is ideally placed to establish a mechanism to conduct compliance and monitoring of EIA reporting quality annually. Especially given that the CEA now maintains a list of approved consultants, historical data on EIA reporting quality can inform decisions on reviewing such approvals.

In the pre economic crisis period from 2015 to 2022, an average of 11 EIA reports per year are included in the study sample, which is not an overwhelming number of reports annually. For this study, approximately 1 hour was spent in assessing an average report. If an internal criteria on EIA reporting quality and marking reports is established to assess reports published from 2025 onwards, the CEA and other PAAs can establish a rich time series dataset that can inform both internal and external EIA procedures. Crucially, such analyses can be used to evaluate the effectiveness of measures introduced to improve quality. The Netherlands Commission for Environmental Assessment (NCEA) leads global best practices on independent and systematic review on EIA reporting and quality, with its annual and sector-focused reports providing data-driven insights on both the current performance and avenues to improve the Dutch EIA process.[108]

Increasing PAA level access to consistent socio-economic expertise
Findings indicate that 90 percent of EIA report preparation teams included at least one socio-economic expert, which is expected since the analysis of social impacts is a key part of a typical EIA. However, key informant interviews suggest that across the different PAAs, access to socio-economic expertise can vary. Most EIA cells do not have resident socio-economic experts. If a need arises at the scoping and ToR preparation stage, a PAA such as the CEA will engage external socio-economic experts to assist and provide input. However, the pool of such resource people can be limited. So, increasing access to socio-economic expertise at the PAA level throughout the EIA process can contribute to better focus on socio-economic implications of a proposed project.

While including at least one officer with socio-economic expertise in each EIA cell of PAAs would be ideal, given current fiscal constraints and complexities in hiring processes, this option may

108 NCEA, "Netherlands Commission for Environmental Assessment - Annual Report 2023," 2023, https://jaarverslagen.eia.nl/2023/.

not be practically possible. A possible workaround is the establishment of an inter-institutional pool of expertise on socio-economic aspects based on the existing cadre of officials. A first step can be a stocktake on domain expertise across key ministries and institutions that are related to projects which require EIAs such as the Sri Lanka Land Development Corporation and ministries assigned with relevant subjects (e.g. Rural Development, Social Security and Community Empowerment, and Plantation and Community Infrastructure). The stocktake can be the basis for the inter-institutional pool of domain experts which can be drawn upon as needed by specific PAAs or the CEA for EIA related matters.

Assessing the applicability and revision of CEA Guidelines

As noted in Section 2, while the guidelines have been recognised as applicable de facto both by the CEA, PAAs, and the Supreme Court of Sri Lanka, its applicability to projects that fall beyond the NEA (such as the CCA and FFPA) are not clear. Furthermore, both key informant interviews and literature suggest that the CEA Public Participation (last revised in 1998) is not used by authorities anymore. So clarifying the guidelines' role, and formalising their applicability across all PAAs is key to ensuring that a consistent standard is applied to EIAs governed across all different laws and respective institutions.

In addition, the guidelines themselves need to undergo updates and revisions. Guidelines for PAAs and for Conducting Environmental Scoping were both last updated in 2006. The Simple Q&A Guidebook on EIAs was last updated in 2005. As highlighted in Section 4.1, the page limits on the entire report and the executive summary do not reflect the current practice. Therefore, such benchmarks need to be updated. Additionally, the guidelines need revisions to reflect current best practices on EIA processes including online-based activities such as public participation.

Standardising and streamlining ToR formats and report drafting procedures

A key finding in section 4 is the high inconsistencies in ToR requirements on EIA reporting quality both within and across PAAs. Given that quality requirements such as the reporting of methodologies, limitations, and data sources should not differ based on project specific characteristics, the inconsistency in ToR drafting indicates a need to standardise ToR formats. Given that ToRs nonetheless influence the quality of reporting (See section 4.2), standardising key quality requirements across ToRs issued by all PAAs will contribute to increasing reporting quality and reducing inconsistencies. However, such standardisation should be followed with increased scrutiny in compliance, especially given that this analysis found a large number of EIA reports which do not comply with ToR requirements on reporting quality. Equipping EIA cells in PAAs with rapid assessment checklists on quality requirements will help enforce the standardised ToR requirements.

Findings also indicate that the length, complexity, and the quality of reports vary based on the scale and social significance of projects. This suggests that the quality and drafting requirements may need to differ based on key project characteristics such as scale or sector. So instead of a standard ToR template as currently included in the CEA Guidelines, sector or scale specific ToR templates may be better suited to ensure the quality and usefulness of EIA reports. In practice, this already occurs. For example, the ToRs issued by the Mahaveli Authority of Sri Lanka (MASL) are of a completely different structure to those used by most other PAAs including the CEA.

It is assumed that specific projects governed by MASL such as Mini Hydro Plants may require different report formats. However, to ensure consistency, formality, and quality, establishing standard ToR templates may be necessary. Finally, executive summaries may also need stricter and standardised guidance regarding its format. Currently, both the length and the type of information included in executive summaries vary widely. Especially given that executive summaries are intended to be the first point of contact for the casual reader, they must be accessible.

Introducing a policy on the use and management of personal information in EIA reports
Given the nature of sensitive personal information that is included in EIA reports, a policy on the use and management of such information is a critical need. Key informants indicated usually the inclusion of personal and sensitive information of survey respondents is not at the request of PAAs. PAAs in most cases do not have use of such disaggregated information when making approval decisions on EIAs. So not only will the introduction of a policy safeguard people from data exploitation such as identity thefts, it will also reduce the bulkiness of reports since long annexures of personal information will not be included. This will reduce administrative costs of printing and hosting large digital files online as well.

In addition to how such information is reported, the policy should also cover how such data is managed. For instance, it should specify who should have access to the information, where and for how long such information will be stored, and how such information will be destroyed at the end of time limits. Furthermore, the administration of consent is a key component of this procedure. Currently it is unclear if the consultants and the respective PPs obtain consent from the survey respondents to feature their personal information. There should also be procedures to accommodate the withdrawal of consent by persons at a later stage. All of the above considerations are included in the Personal Data Protection Act. Given that the act is currently in force and the substantive elements of implementations are to be enforced next year, aligning this policy to the procedures and standards set by the PDPA will ensure a smooth transition to the overall national data protection regime.

Introducing guidelines on document formats
Key informant interviews suggest that currently there are no set guidelines on how the PPs should submit the digital version of the EIA reports. Typically such guidelines would cover aspects such as specifying acceptable file formats, naming conventions, size limits for digital hosting, and whether reports should be submitted as a whole or in parts. There are several reasons for why such guidelines should be introduced.

Firstly, as digital technologies such as large language models (e.g. ChatGPT, Gemini) and similar AI and machine learning based tools are increasingly used to process and analyse content, EIA report files should be compatible to be read by such tools. Therefore file formats such as searchable PDFs are key to optimise the use of new technologies. The CEA is already using such tools for archival purposes so standardising document formats will facilitate the process. Secondly, document formats will help increase digital accessibility of EIA reports during the public review process. For instance, there are six types of PDF standards recognised by the International Standards Organisation (ISO) which serve a variety of purposes such as archiving(PDF/A), readability for people with disabilities (PDF/UA), and processing quality

(PDF/X).[109] Given that some EIA reports are larger than 100 MB, establishing standards will help reduce processing costs and increase downloadability.[110]

6.2. INDUSTRY PRACTICE, TRAINING, AND KNOWLEDGE SHARING ON CONDUCTING EIAS

Introducing modules on socio-economic analyses in EIA training and qualification material
Several public and private sector actors such as the CEA, public universities, industry associations, and civil society organisations conduct training and knowledge sharing sessions on EIAs. The most notable of which were the annual intensive training workshops, last conducted in 2014 and 2015. Given the poor reporting quality of social impacts and the many instances where the scope and boundary of social impacts have been overstepped, there is a need to increase awareness on socio-economic analysis. Some topics that require particular attention, which were not seen in the syllabuses of the intensive training workshops, include objectives and scope of social assessments in EIA reports, best practices on conducting and reporting on empirical research on primary data and standards on information disclosure and referencing. There are several international resources from institutions such as the UNEP, the World Bank, and the IAIA that can be reference material.[111]

Increasing access to Sri Lankan socio-economic literature through institutional collaborations
The study found an alarmingly low number of existing socio-economic literature that is meaningfully included in EIA reports. While the reasons for this issue are not clear, an increase in access to socio-economic literature that can be useful for EIAs will contribute to changing this trend. The National Environmental Information Centre (NEIC) of the CEA houses the most extensive library dedicated to environmental subjects. This library is the most popular among both EIA practitioners and researchers. However, currently the library's catalogue of socio-economic studies is relatively thin compared to its collections of ecological and related subjects.

Given that the public university system in Sri Lanka consistently produces a volume of socio-economic studies especially through undergraduate and postgraduate theses and dissertations, connecting such academic institutions with the NEIC to create a catalogue of socio-economic literature classified by district would be highly useful for EIA research. Such collaborations can also include government institutions such as the CC&CRM, the UDA, and DWC, who also house subject matter specific libraries that may contain relevant socio-economic literature. Improving access to literature will also assist PAAs, researchers and public in verifying claims made in EIA reports.

109 Marco, "8 Types of PDF Standards – Each Serves a Unique Purpose," Marco, 2022, https://www.marconet.com/blog/8-types-of-pdf-standards-each-serves-a-unique-purpose.

110For example, sites such as the World Bank allows for documents to be downloaded in different formats based on the users requirement (PDF, TXT). See World Bank, "Disbursement Guidelines for Investment Project Financing (English)," Text/HTML, World Bank, 2017, https://documents.worldbank.org/en/publication/documents-reports/documentdetail.

111 Chapman et al., Good Practices in National Systems for Environmental and Social Impact Assessments: A Literature Review.

6.3. PUBLIC PARTICIPATION AND MONITORING

Introducing trilingual toolkits for rapid assessments of social impacts in EIA reports
The time period for public review (30 working days) may not be adequate for the public to meaningfully engage with EIA reports which are getting increasingly longer and complex. While extending the time period is one way to alleviate this pressure, enabling rapid assessment of critical information in EIA reports is another. There are many grassroot civil society organisations and activists who review and respond to EIA reports regarding socio-economic issues. Introducing trilingual toolkits and checklists that can guide non-technical users of EIA reports to check how critical information on social impacts such as methodologies of community consultation, and assumptions used when estimating social impacts will increase accessibility and public participation. The CEA Handbook on public participation is one such tool which is now defunct. Such toolkits can be formulated by either the CEA, private actors, or a collaboration of both.

Training media and journalists on using and assessing EIA reports
Print and social media has played a key role in mobilising the public on social concerns arising from proposed and approved projects. EIA reports are often used as a source of reference when discussing deficiencies in assessing impacts, designing, and implementing the project. Therefore, to ensure continued scrutiny on the quality of reporting, training media and journalists on how to use an EIA report and conduct rapid assessments on the quality of reporting and analysis will help improve public discourse on EIAs both during the public review period and thereafter when monitoring the implementation and operation of approved projects.

6.4. DOMESTIC AND FOREIGN LENDER CONSIDERATIONS

Informing development partner requirements and processes on the local practice of EIAs
Findings suggest that projects with development partner involvement tend to perform better on most reporting quality aspects including those on mitigation methods. However, given the poor overall standard of reporting in Sri Lanka, there is room for improvement, especially in reporting methodologies used to assess existing environments. So, if not already implemented, periodic assessment of EIA reports produced for proposed projects under respective development partner lending programmes can provide critical insight into both the state and the trend of reporting quality. This can also help assess if development partners experience differences in quality based on institutional factors such as the type of PAA and consultants.

Introducing toolkits on assessing reporting quality and substantive impact claims
Although local lenders such as banks use EIA reports as checkpoints when making decisions on project financing, key informants highlight that there is insufficient and inconsistent expertise among credit officers on how to use and assess EIA reports meaningfully in assessing lending risk. Social impacts, if incorrectly assessed and reported, pose significant investment risk as seen in instances like the Kalpitiya Resort Development Project where communities challenge the validity of the project due to insufficient impact analyses. So equipping credit officers and related staff in local lending institutions with the knowledge and tools on using EIA reports will help mobilise capital into better designed projects.

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8 ANNEXURES

8.1 ANNEX 1: DIFFERENCES BETWEEN EIA LAWS

Even through in practice, the procedures set by the NEA and accompanying legislation along with CEA as the lead institution are followed by other lead institutions, the four domestic laws that govern the Sri Lankan EIA process have subtle differences between each other in the text of the legislations themselves. Tables 5 to 8 summarise several relevant differences between the four laws.

Table 5: Definitions of an EIA provided in the domestic laws

Domestic Law (Section)	EIA Definition
NEA (S. 33) and NWPES ()S. 62	"environmental impact assessment report" • Is a written analysis of the predicted environmental project • Contains an environmental cost-benefit analysis, if such an analysis has been prepared • Includes a description of the project • Includes a description of the avoidable and unavoidable adverse environmental effect of the proposed prescribed project • Includes a description of alternative to the activity which might be less harmful to the environment together with the reasons why such alternatives were rejected • Includes a description of any Irreversible or irretrievable commitments of resources required by the proposed prescribed project.
CCA (S. 42)	"environmental impact assessment" • Is a written analysis of the predicted environmental consequences of a proposed development activity • Includes a description of the avoidable and unavoidable adverse environmental effects of the proposed development activity • Includes a description of alternatives to the activity which might be less harmful to the environment of the Coastal Zone, together with the reasons why such alternatives were rejected • Includes a description of any irreversible or irretrievable commitments of resources required by the proposed development activity.
FFPA	• No definition provided

Source: Author's construction using the respective legislation

Table 6: PAAs designated by the law

Domestic Law	PAAs designated by the law
NEA	Central Environmental Authority • Ministries with the following subject assignments: National Planning, Irrigation, Energy, Agriculture, Lands, Forests, Industries, Housing, Construction, Transport, Highways, Fisheries, Aquatic Resources, Plantation Industries • The Department of Coast Conservation and Coastal Resource Management • The Department of Wildlife Conservation • The Department of Forest Conservation • The Urban Development Authority • The Geological Survey and Mines Bureau • Sri Lanka Tourism Development Authority • The Mahaweli Authority of Sri Lanka • The Board of Investment of Sri Lanka
NWPES	• Provincial Environmental Authority • Provincial Ministry of Fisheries and Aquaculture
CCA and FFPA	• The respective lead institutions are the PAAs

Source: Author's construction using the respective legislation

Table 7: Identification of projects which require an environmental assessment

Domestic Law	Projects qualifying for EIA/IEE	Prescribed project definition (if any)
NEA	Prescribed project list provided by regulations	Only "prescribed projects" are subjected to IEE / EIA. The list of prescribed projects requiring an IEE / EIA under the provisions of the National Environmental Act as contained in the Gazette No. Gazette Extra Ordinary No. 772/22 dated 24.06.1993, 859/14 of 23.02.1995 and Gazette Extra Ordinary No. 1104/22 dated 05.11.1999.
CCA	The Director-General of Coast Conservation and Coastal Resource Management (DG of CC) has the discretion to identify which projects should follow the EIA process	
NWPES	Prescribed project list provided by the statute	Environmental Assessments are required for prescribed projects that have been gazetted in Gazette Extraordinary 1020/21 of 27th March, 1998. It specifies two lists of project types (a) where EIA/IEE is mandatory and (b) where the EA can be requested if the PAA decides so.
FFPA	The Director-General of Coast Conservation and Coastal Resource Management (DG of CC) has the discretion to identify which projects should follow the EIA process	

Source: Author's construction using the respective legislation

Table 8: Technical review procedure

Domestic Law	Technical review body	Timelimit
NEA	Technical Evaluation Committee appointed by the PAA	30 days
CCA	Coast Conservation and Coastal Resource Management Advisory Council	30 days
NWPES	Technical Evaluation Committee appointed by the PAA	30 days
FFPA	Appointed Committee	60 days

Source: Author's construction using the respective legislation

8.2 ANNEX 2: LIST OF SRI LANKAN LITERATURE RELEVANT TO EIA REPORT QUALITY

Table 9: Sri Lankan literature on EIA reports and quality considerations

Name	Author	Year
Innovative Public Participatory GIS Methodologies Adopted to Deal with the Social Impact Assessment Process Challenges: A Sri Lankan Experience.	Alagan and Aladuwaka	2012
Evaluation of Sustainability Assessment Practices in Mega Transport Infrastructure Projects in Sri Lanka: Special Reference to Expressway Projects	Bandara et al.	2019
Sri Lanka: a political ecology of socio-environmental conflicts and development projects	Camisani	2018
Defining the Public Interest, Negotiating Rights: The Influence of Environmental Impact Assessment Legislation in Sri Lanka	Caron	2003
The impact of accountability mechanisms on public sector environmental sustainability performance: A case study of Sri Lanka	de Silva et al	2020
Challenges Allied to the Effectiveness of the Environmental Impact Assessment in the Construction Industry of Sri Lanka	Edirisinghe and Kathriarachchi	2022
Public Participation Or Public Protest: A Critical Analysis Of Public Participation In Environmental Impact Assessment In Sri Lanka	Gamlath	2025
Environmental impact assessment of transport infrastructure projects in Sri Lanka: Way forward	Gamlath et al.	2014
A Critical Review of Ecological Impact Assessment in Sri Lanka: with particular reference to the shrimp aquaculture industry	Gunawardena	2001
A review on the effectiveness of the Environmental Impact Assessment report of the proposed Mullikulam windfarm-Sri Lanka: Evaluating the site selection, mitigatory ...	Hamza	2024
Effectiveness of Environmental Impact Assessment (EIA) in addressing development-induced disasters: a comparison of the EIA processes of Sri Lanka and New Zealand	Hapuarachchi et al	2016
Environmental Impact Assessment: The Sri Lankan Experience	Hennayake et al	1997
Effectiveness of the Environment Impact Assessment on Sustainable Development in Sri Lanka: A Legal Perspective	Jayaratne and Herath	2019
Effect of social and environmental factors on expressway construction in Sri Lanka	Karunathilaka et al.	2021
The environmental impact assessment process in Sri Lanka	Kodituwakku	2004
The EIA Process and the Upper Kotmale Hydropower Project	Kodituwakku and Moonesinghe	2005
Environmental assessment in Sri Lanka: its status and the potential for the introduction of strategic environmental assessment	Mackee et al.	2001
Incorporating socio-environmental considerations into project assessment models using multi-criteria analysis: A case study of Sri Lankan hydropower projects	Morimoto	2013
A review of health in environment impact assessments for road development projects in Sri Lanka	Perera et al.	2021
Impact of environmental law and physical planning law to the construction projects in Sri Lanka	Rathnasinghe et al.	2020
A quality review of EIA: A comparative study of state-funded and International Aid Agency funded development projects in Sri Lanka	Ravi et al.	2023
The Role of Environmental Impact Assessment Report in Ensuring the Sustainable Development in Sri Lanka	Samaradiwakara	2024

A critical review of environmental impact statements in Sri Lanka with particular reference to ecological impact assessment	Samarakoon and Rowan	2008
Small Hydropower Development and Environment: A Case Study on Sri Lanka Water Resources Science and Technology	Silva and Silva	2016
EIA theories and practice: balancing conservation and development in Sri Lanka	Vidyaratne	2006
Challenges and issues of environmental protection instruments related to infrastructure development projects in Sri Lanka	Wijerathna and Abeynayake	2021
Public Participation in Environmental Assessment of Development Projects-The Sri Lankan Situation	Wijesekera and Weerakkody	2006
Integrating Heritage Impact Assessment (HIA) into Environmental Impact Assessment (EIA) as a part of Environmental Management; case study - Northern Expressway of Sri Lanka	Yahampath	2014
Incorporating Social Impact Dimensions in Project Planning: Examples from Bangladesh, Nepal, Pakistan and Sri Lanka	Zaman and Gonnetilleke	2016
Challenges for environmental impact assessment in Sri Lanka	Zubair	2001

Source: Author's compilation

8.3 ANNEX 3: METHODOLOGY AND CONSIDERATIONS ON DATA COLLECTION

The data collection process involved compiling an exhaustive database of English versions of EIA reports. The reports were sources from both the public domain and institutional repositories. All the reports from the public domain were in PDF format while reports sourced from institutional repositories were predominantly hard copies. In such instances, photographs were taken of report sections relevant to social impacts, the executive summaries, and relevant annexures such as the TORs. Table 10 provides an overview into the sources and the respective formats of the EIA reports obtained.

Table 10: Overview of the sources and formats of the analysed EIA reports

Source	Format	Number of EIA reports
National Environment Information Centre - CEA	Physical	177
CC&CRMD	PDF	9
Online	PDF	64
Total		250

Source: Author's construction

The total population of EIA reports was not possible to be estimated given than there is no publicly available inventory of all published EIA reports. The NEIC of the CEA possesses the most extensive collection of EIAs in the country. Key informants highlighted that usually any EIA report submitted to the CEA should be forwarded to the library. The library registrar records 287 EIA reports to date. However, this is not a reliable estimate as some of the recorded 287 reports contain duplicates and addendums to reports recorded separately. Furthermore, the author came across reports in the public domain and the CC&CRMD which were not recorded in the CEA database. Combining all sources, the author was able to record mentions of 305 EIA reports.

So, assuming the existence of at least 300 EIA reports, the sample of reports assessed in this study can be considered at most 83 per cent of the total Sri Lankan EIA reports published during the study period of 1991 to 2025.

8.4 ANNEX 4: FULL LIST OF EIA REPORTS ASSESSED FOR THE STUDY

Table 11: List of EIA reports assessed for the study

Title	Year	Report Type
Wirawila Walk Inn Ltd	NA	EIA
Dutch Bay 150 MW + 23.8 Bess Renewable Energy Wind Power Project - Kalpitiya	2025	EIA
220 Units of Apartment Project - No. 106/106A, Galle Road, Colombo 03	2025	EIA
228 Units of Apartment Project No. 13, Archbishop Nicholas Marcus Fernando Mawatha, Bolawalana Negombo	2025	EIA
Infinitum Energy Hambantota 100MW (125MW) Solar PVC Power Project at Suriyaweva, Hambantota by IEGS Lanka Project Ltd	2025	EIA
Development of a 700 MW Solar Power Plant at Poonakary Tank and its Irrigation Infrastructure at the Lower and Kudamuruddi Tanks	2025	EIA
107 Units of Condominium Apartment Building and Seperate Non-COndominium 17 villa houses project at Mudilligahawatta, Kudawaskaduwa, Kalutara	2025	EIA
113 Room EcoTourist Resort Project At Erumativu Island	2024	EIA
250 MW Mannar Wind Power Project (PHASE II)	2024	EIA
Mundeni Ary River Basin Development Project In Batticoloa And Ampara Districts	2024	EIA
Digana By CPG Proposed Villa Project At Digana, Kandy	2024	SEIA
Central Expressway Project (Section 1) Gampaha Interchange	2024	SEIA
Residential Housing Project - Dambagastenna Estate, Victoria Dam Road, Doraliyadda	2024	EIA
Reclamation Under The Galle Port Development Project	2024	SEIA
Colombo North Port	2023	EIA
134MW Wind Farm Project (PHASE II), Pooneryn	2023	EIA
Digana By CPG Proposed Villa Project At Digana, Kandy	2023	EIA
Sri Lanka Ocean University Development	2022	EIA
Mannar Wind Power Project - Phase I Extension	2022	EIA
Mullikulam Wind Farm with Grid Connecting 220kv Transmission Line & Wind Farm Collector Substation	2022	EIA
Development of Four Lane Elevated Highway from New Kelani Briidge to Athurigiriya Phase II	2022	EIA
Yatimahana Reservoir Project in Mawanella	2022	EIA
Kumbukkan Oya Reservoir Development Project in Monaragala District	2022	EIA
Durian Cultivation Project at Nagasthenna Estate, Yatiyantota	2022	EIA
Wastewater Disposal Infrastructure for Negombo	2022	EIA
Setting Up Of 0.5 Mtpa Greenfield Integrated Steel plant In The Mirijjawila Export Processing Zone in Hambantota, Sri Lanka By Ceylon Steel Corporation Limited	2022	EIA
Alterations to the Salinity Barrier at Ambatale in Kelani River	2022	EIA
400 kV Transmission Line Project Kerawalapitiya - Kirindiwela	2022	EIA
Wastewater Disposal System for Ja- Ela/ Ekala- Stage II	2022	EIA
Prison Relocation Project at Millewa, Horana	2021	EIA
350 MW RNLG Combined Cycle Power Plant at Kerawalpitiya on BOOT Basis	2021	EIA
Development of Land at Muthurajawela for CEB	2021	EIA
South Beach Weligama Apartments	2021	EIA

Sea Water Reverse Osmosis (Desalination) System, Sea Outfall for Araliya Unawatuna Hotel Project and Effluent Treatment Facility for Water Treatment for Dutch Canal, Unawatuna	2021	EIA
100mw Solar Park In Siyambalanduwa, Monaragala District	2021	EIA
Kelani Valley Railway Line Improvement Program Phase 1 - Maradana up to Angampitiya (38+380km)	2021	EIA
Reinstatement of Kudawilachchiya Tank Project	2021	EIA
Textile Zone at Punnaikudah, Eravur, Batticaloa	2021	EIA
Recreational Beach Area/Sea Water Front Development Project From Colpetty To Dehiwala Canal Outlet-Reclamation Phase	2021	EIA
Marino Tower Hotel Colombo 652 Roomed City Hotel Complex	2021	EIA
Construction Of Harbour Facilities At Haraspola, Balapitiya In Galle District	2021	EIA
Seethawaka Ganga Hydropower Project at Dehiowta (24 MW)	2020	EIA
Link Road to Ambepussa-Kurunegala-Trincomalee Road- Central Expressway Project (CEP) Section 02	2020	SEIA
Western Region Light Rail Transit Project - Volume I	2020	EIA
Rehabilitation and Augmentation of Embilipitiya Paper Mill	2020	EIA
Kivul Oya Reservoir Project	2020	EIA
Northern Province Sustainable Fisheries Development Project	2020	EIA
Mining Of Heavy Mineral Sands Along the Akkaraiupattu - Komari Ocoastal Stretch (Oluvil Mineral Sands Project) And Establishment Of Mineral Sand Processing Plant At The Oluvil Port Premises In Ampara District In Eastern Province	2020	EIA
Rehabilitation of Port of Kankesanturai (KKS) in Jaffna District	2019	EIA
National High Altitude Sports Complex Project in Nuwara Eliya	2019	EIA
Extension of Pipe Borne Sewerage project for Dehiwala Mt. Lavinia Municipal Council Area.	2019	EIA
Elevated Highway from New Kelani Bridge to Rajagiriya with a Link to Baseline Road	2019	EIA
Vadamarahchi Lagoon for Supply of Portable Water to the Jaffna Peninsular through the development of Water Resources in the Vadamarachchi Lagoon	2019	EIA
Sri Jayawardenapura Kotte Wastewater Collection, treatment, and Disposal Project	2019	EIA
34 roomed Kalamatiya Cabana Project, Hungama	2019	EIA
Lng / Gas Infrastructure Development Project	2019	EIA
Apartment Development Project In Thalahena, Negombo	2019	EIA
Change of the location of the interchange proposed near Dandeniya to Aparekka of Extension of Southern Expressway from Matara to Mattala Project	2018	SEIA
The Beach Front 2, Uswetikeiyawa 112 Units Apartment Complex	2018	EIA
Aqua Vista Apartment Development Project	2018	EIA
Durian Plantation At Mapakanda, Nawalapitiya	2018	EIA
Lower Malwathu Oya Reservoir Project	2018	EIA
Colombo Rail Transit (LRT) Project 2018	2018	EIA
Ruwanpura Expressway Project	2018	EIA
Wastewater Collection, Treatment and Disposal System for Chilaw Town	2018	EIA
Wastewater Collection, Treatment and Disposal System for Puttalam Town	2018	EIA
Yan Oya Reservoir Project	2018	SEIA
136 Units Of Residential Apartment Complex At Randombe North, Balapitiya	2018	EIA
Mining Of Heavy Mineral Sands Along The Kokilai Kokkuthoduwai Coastal Stretch And Establishment Of Mineral Sand Processing Plant At Kokilai In Mullaitivu District	2018	EIA
Kadawatha Interchange to link Outer Circular Highway and Central Expressway	2017	SEIA
Krrish Transworks Mixed Development Project	2017	EIA
Development Activities and Infrastructure Facilities within the Reclaimed Land Area of Proposed Colombo Port City Development Project	2017	EIA
Railway Extension Project: Kurunegala to Habarana via Dabulla	2017	EIA
Metro Solid Waste Management	2017	EIA

Matara Stage IV Water Supply Project, Matara	2017	EIA
Construction of Salinity Barrier at Kalu Ganga	2017	EIA
Maduru Oya Right Bank Development Project	2017	EIA
Broadlands Hydropower Project	2017	SEIA
Offshore Sand Extraction Project At Kerawalapitiya	2016	SEIA
Central Expressway Project from Pothuhera to Galagedara	2016	EIA
Central Expressway Project Kadawatha to Dambulla (Sections 01, 02 and 04)	2016	EIA
Mixed Development Project at Gannoruwa Road, Kandy	2016	EIA
Diggala Mini Hydro	2016	SEIA
192 Roomed, Melva Hotel Kosgoda Project at Duwemodera, Kosgoda, Balapitiya	2016	EIA
Moragolla Hydropower Project	2016	SEIA
Basnagoda Reservoir Project	2016	EIA
250 Roomed Araliya Unawatuna Beach Hotel Project in Unawatuna	2016	EIA
Jaffna-Kilinochchi Water Supply and Sanitation Project	2016	EIA
Export Processing Zone (Epz) â€ Il Perth Estate, Horana (Revised Project	2016	SEIA
Five Star Hotel Grand Palace Haragama, Kandy	2016	SEIA
Waste to Energy Project at Sri Lanka Board of Investment Land, Dompe	2016	SEIA
Establishment of Integrated Sugar Industry (1000 TCD Sugar Plant, 4 MW Co-Gen Power Plant, Bio-Compost Unit, 800ha Sugar Cane Plantation)	2016	EIA
212 Roomed Ambassador Resort & Spa Hotel Project in Thalaramba, Matara	2016	EIA
Second New Kelani Bridge Project (Retaining of the Radioactive Material Disposal Facility of the Sri Lanka Atomic Energy Board at the Existing Location with Strengthening of the Structure)	2016	SEIA
Colombo Port City	2015	SEIA
Upper Elehara Canal (UEC)	2015	EIA
North Western Province (NWP) Canal Project	2015	EIA
Bogahahena - Kukula Mini Hydro Power Project at Bulathsinhala	2015	EIA
Metro Colombo Solid Waste Management Project	2015	EIA
Trincomalee Thermal Power Project (2x250 MW)	2015	EIA
136 Units Of Residential Apartment Complex At Randombe North, Balapitiya	2015	EIA
Northern Expressway 00- Stage 1, 2 and Ambepussa Link	2014	EIA
Mirijjawila Industrial zone	2014	EIA
Kalugal Oya	2014	EIA
Hambantota Express Way	2014	EIA
Wastewater Collection, Treatment and Disposal System for Hambantota New Township	2014	EIA
Dambulu Oya Reservoir Mini Hydro Power Project, Dambulu Oya Reservoir, Dambulla	2014	EIA
Hapugahakumbura Walawa Mini Hydro Power Project at Balangoda in Ratnapura District	2014	EIA
501 Roomed RIU Resort Hotel Project in Ahungalla	2014	EIA
Extension of Southern Expressway from Matara to Mattala (Hambantota)	2013	EIA
Second New Kelani Bridge Project: A Project for Traffic Improvement around Existing New Kelani Bridge	2013	EIA
Yan Oya Reservoir Project	2013	EIA
Bawana Health Retreat at Rekawa West, Tangalla	2013	EIA
Establishment of a composting plant and a sanitary landfill site at Gonadikawatta in Udunuwara Pradeshiya Sabha limits in Kandy District	2013	EIA
Athurugiriya Interchange to the Outer Circular Highway to the City of Colombo Project	2013	SEIA
Small Holder Farmer Based Bibile Sugar - Power - Dairy - Homestead Farms in Intergrated Development Project	2013	EIA
Morana Reservoir Project in Badulla District	2013	EIA
Surface Water Extraction From A Reservoir Across Per Aru Vavuniya District	2012	EIA
Mahagona Wewa Irrigation Project	2012	EIA

Moragolla Hydropower Project - Final Report	2012	EIA
Uma Oya Multipurpose Development Project - Volume 1	2012	EIA
Eco-Friendly Meditation Retreat at Udawalawa	2012	EIA
Revised EIA for 150 Roomed Four Star Resort Project in Vellai Island in Kalpitiya	2012	EIA
Kalpitiya	2012	EIA
50 Villas and 410 Roomed 5 Star Deluxe Hotel Project in Chithragala, Hambantota (Shangri-La)	2012	EIA
650 Roomed Luxury Hotel with 300 Apartments Mixed Development Project in Colombo (Shangri-La)	2012	EIA
Four Star Beach Resort at Sanathoduwa, Mukkuthoduwawa, Puttalam district	2012	EIA
Eco-Friendly Chalets and Resort in Kalpitiya	2012	EIA
Mass Scale Waste to Energy Plant for Kotte Waste Management Zone, Kaduwela, Western Province, Sri Lanka	2012	EIA
Kiula Mini Hydro Power Project on Suduganga	2012	EIA
Four Star 56 Room Resort Hotel in Kammala North, Waikkala, Wennappuwa	2012	EIA
Waste to Energy Project at Meetotamulla	2012	EIA
Koggala eco-five star villa resort project, Koggala, Galle	2012	EIA
Mawanana Mini Hydro Power Project at Neluwa	2011	SEIA
Samudra Beach Resort at Nape, Kosgoda, Balapitiya	2011	EIA
Four Star Resort at Waskaduwa	2011	EIA
Alternation to the Interchange at Kerawalapitiya of the Outer Circular Highway to the City of Colombo Project	2011	SEIA
Rehabilitation of Gohagoda Dumpsite and Establishment of an Integrated Solid Wast Management System for Kandy Municipal Council	2011	EIA
Colombo Port City Development Project (500 Acres)	2011	EIA
Surfactant and Detergent Manufacturing Industry	2011	EIA
Greener Water Grand Beach Resort (380 Room Hotel Project)	2011	EIA
Forest Rock Garden Hotel at Nochchiyagama, Anuradhapura	2011	EIA
Diggala Mini Hydro Power Project on Suduganga	2011	EIA
Ankanda Mini Hydro Power Project on Suduganga	2011	EIA
Exploratory/Appraisal Drilling in SL-2007-01-001 Block, Gulf of Mannar	2011	EIA
Uma Oya Multipurpose Development Project	2010	EIA
Tourism Development Project at Kuchchaveli, Trincomalee	2010	EIA
Timber Extraction and Replanting of Kelebokka State Plantation, Kelebokka	2010	EIA
Timber Extraction and Replanting of Alakolle State Plantation, Alakolle of	2010	EIA
Sri Lanka State Plantation Corporation	2010	EIA
Agricultural Land Development Project at Lorawatte, Doluwa	2010	EIA
Owala mini hydro power project at Sudu ganga matale district	2010	EIA
Kitulgala Mini hydro power project	2010	EIA
Ross estate mini hydro project on sudu ganga at ross estate in iriyagolla near Matale	2010	EIA
Koladeniya Mini-Hydro Power Project at New St. Clive Janapadaya in Koladeniya near Ginigathhena (Nuwara Eliya District)	2010	EIA
SEIA Development of Rajjammana Mini Hydropower Project	2010	SEIA
Passikudah National Holiday Resort	2010	EIA
Enderamulla Town Development Project	2009	EIA
Solar Salt Manufacturing Project in Puttlam/Wanathavilluwa	2009	EIA
SEIA Alternate Highway (Expressway) between Colombo and Kandy	2009	SEIA
Iriyagama New Town Development Project	2009	EIA
Development of Airport at Mattala	2009	EIA
Agricultural Land Development Project to Cultivate Coconut, Rubber and Minor Export Crops Siyambalanduwa	2008	EIA

Converting the Landfill Operation into a Fully Integrated Multifunction Resource Recovery and Bio Conversion Facility at Karadiyana, Sri Lanka	2008	EIA
Matara - Kataragama Railway Extension	2008	EIA
Branford Small Scale Hydropower Project	2008	EIA
Co-processing of Scheduled Wastes in Kiln of Cement Plant at Holcim Cement Works - Puttalam	2008	EIA
Gem Mining Project in 3 Hectares at Kotiyagala Estate - Chapalton Division	2008	EIA
Gem Mining Project in 2.6 Hectares at Bogowanthalawa Estate - Lower Division	2008	EIA
Clinical Waste Management Project Using Hydroclave Machine for Private Sector Hospitals in Colombo District	2008	EIA
Augmentation of scale of mining and manufacture of Single Super Phosphate Fertilizer using the local phosphate resources at Eppawala	2008	EIA
Kalu Ganga Reservoir and Agricultural Extension Project	2008	EIA
Mawanana Mini Hydro Power Project	2008	EIA
Offshore sand extraction for the construction industry, Kerawalapitiya	2007	EIA
Condominium Type Apartment Complex at 51/3, Srimath Kuda Ratwatte Mawatha, Kandy	2007	EIA
Colombo-Kandy Highway Interchange of the Outer Circular Highway to the City of Colombo	2007	SEIA
Processing of Used Engine Oil and Waste Ship Oil to Manufacture Lubricating Oil	2007	EIA
Export processing zone - II at Perth Estate, Horana	2007	EIA
Mixed Development Project Havelock City	2007	EIA
2nd International Air Port at Weerawila in Hambantota District, Sri Lanka	2007	EIA
Condominium Type Apartment Complex in Part of 51/2 Srimath Kuda Ratwatte Mawatha Kandy	2006	EIA
Rambukkan Oya Reseviour Project	2006	EIA
Engineered Landfill Site, Kaduwela	2006	EIA
300MW Multi fuel operated combined cycle power plant Kerawalapitiya 2006 EIA	2006	EIA
Alternations Made to Original Diyawanna Uyana Project	2006	SEIA
Peacock Rawana Country Club	2006	EIA
Gatambe Minihydro Power Project on Mahaweli Ganga	2006	EIA
Biyagama Deviation of the Outer Circular Highway to the City of Colombo	2006	SEIA
Rajjammana Small Scale Hydro Power Project	2006	EIA
Magnetite Mining Site Horakagodakanda Range, Buttala	2006	EIA
Biyagama Export Processing Zone-II at Keragala, Henegama	2005	EIA
Evason Hideaway Resort and SPA Project at Maduganga, Balapitiya	2005	EIA
Salinity Barrier at Walawe Ganga, Hambantota	2005	EIA
Nuwara Eliya Group Town Water Supply Projec	2005	EIA
Colombo Port Efficiency and Expansion Project 2005 EIA	2005	EIA
Kandy South Water Supply Project	2005	EIA
Colombo Katunayake Expressway	2005	EIA
Kandy City Waste Water Disposal Project	2005	EIA
Autoclaves for sterilization of healthcare waste generated by Ministry of Healthcare, Nutrition and Uva Wellassa Development (MHN and UWD) administered institutions located within the Colombo Municipal Council (CMC) area	2004	EIA
SEIA Waste Water Disposal System for Ekala/Ja-Ela	2004	SEIA
Waste Water Disposal System for Ratmalana/Moratuwa	2004	EIA
Alterations to the Diyawanna Uyana Project	2004	SEIA
Broadlands (35 MW) Hydropower Project	2004	EIA
Quality Enhancement of Lunugamvehera National Park in the Menik Ganga and Kirindi Oya Basin by Harnessing the Development of Water Resources of Menik Ganga	2004	EIA
Outer Circular Highway to the City of Colombo Project (From Malambe-Athurugiriya Highway Crossing to Avissawella-Colombo Highway	2004	SEIA
Southern Extension of the Baseline Road Project	2004	EIA

Deduru Oya Reservoir Project	2003	EIA
Lionvert Refinery and Power Plant	2003	EIA
100 MW power plant at Embilipitiya	2003	EIA
Biolan - Waste to Energy ProjectManufacture of Bio-Fertilizer and Generation of Bio Gas Project at Ekala - Ja Ela (bio lan)	2003	EIA
Salinity Barrier at Ambatale in Kelani River	2003	EIA
100 MW Thermal Power Plant at Puttalam	2003	EIA
Cashew Development Project at Wilachchiya - Thantirimale	2003	EIA
Water Resources Development Works - Menik Ganga at Kuda Gal Amuna	2003	EIA
Offshore Sand Mining:Wadduwa, Kalutara-Payagala area	2002	EIA
Offshore Sand Mining:Maha Oya-Lansigama area	2002	EIA
Uplands Reservoir for Greater Kandy Water Supply Augmentation Project	2002	EIA
Mining and mineral processing of heavy mineral sand for export at Hambantota	2001	EIA
Supplementary Report for the Establishment of a 20 MW Diesel Power Plant at Horana Export Processing Zone	2001	SEIA
Muthurajawela Tank Farm, Pipeline and Sub-Sea Loading Facilities	2001	EIA
Export Processing Zone at Horana	2001	EIA
Commercial Port at Oluvil	2000	EIA
Dodanduwa Fishery Harbour	2000	EIA
Offshore Sand Mining for the Colombo Katunayake Expressway Project	2000	EIA
Development of Galle Port	2000	EIA
The Study on the Outer Circular Highway to the City of Colombo - Volume 5	2000	EIA
Fruit Cultivation and Processing Project at Ralmaduwa, Eluwankulama	1999	EIA
Sinharaja Resort Hotel and Golf Course at Rakwana	1999	EIA
Alleviation of Poverty in the Sittaram Palatha with Diversion of Weli Oya 1999	1999	EIA
163 MW Combined Cycle Gas Turbine: Kelanitissa, Colombo, Sri Lanka	1999	EIA
Pelwatte Golf and Country Resort	1999	EIA
Southern Expressway Development project	1999	EIA
Moragahakanda Agriculture Development Project	1998	EIA
Development of the Fishery Harbour at Kudawella	1998	EIA
Diversion of Mau Ara to Malala Oya Basin	1998	EIA
Barge Mounted Thermal Power Plant within the Port of Colombo	1998	EIA
Dickowita Fishery Harbour	1997	EIA
Kosmulla Lankagama Road Development Project	1997	EIA
Implementation of wastewater collection system, treatment facilities and disposal to service the Moratuwa/Ratmalana industrial area	1997	EIA
Industrial Estate at Fullerton - Kalutara	1997	EIA
Sanitary Landfill, Alupotha Division, Salawa Estate	1997	EIA
Colombo - Katunayake Expressway Project	1997	EIA
Restoration of Five Irrigation Tanks in Polonnaruwa District	1996	EIA
Cement Grinding Plant in the Galle District	1996	EIA
Shrimp Farming Complex at Koholankala, Hambantota1996	1996	EIA
LPG Import Terminal at Kerawalapitiya	1996	EIA
Integrated Petroleum Refinery and 300 MW Co-generation Power Plant at Hambantota	1996	EIA
Aqua Pearl Villa Hotel Project, Bolgoda	1995	EIA
120/150 MW Combined Cycle Power Plant at Kelanitissa	1995	EIA
250 Roomed Hotel Project at Pothupitiya/Kuda-Waskaduwa	1995	EIA
Rajawella Golf and Hotel Project	1993	EIA
Hotel Project at Kandalama	1991	EIA

Source: Author's construction

8.5 ANNEX 5: OVERVIEW OF THE CONSTRUCTED DATASET AND DESCRIPTIVE STATISTICS

The dataset used for the analysis consisted of three types of variables: (1) variables containing unprocessed information from the report, (2) variables which were constructed by the author, and (3) variables based on the assessment criteria. Table 12 provides an overview into the key variables used for analysis, including the definition and the sample size of each variable. Sample sizes change because information relevant to variables may not be ascertained for some reports. The variables based on the executive summaries and TORs are dependant on the number of reports that contained either or both elements.

Table 12: Overview of dataset variables

Variable name	Definition, if constructed	Sampe size
1. Variables using unprocessed information		
Year of report		249
Type of Report		250
Number of total pages		250
Number of pages – Executive Summary		238
PP		250
PAA		248
EIA preparers		250
Size of EIA preparing team		227
Inclusion of Socio-economic expert in EIA preparing team		225
Project location - District		250
2. Constructed variables		
Type of PP	PP is categorised into public and private sector	250
Type of Consultant	Consultant is categorised into if being presented as a consultancy firm or not	
Type of Project	Projects are classified into sectors based on existing literature	250
Large-scale project	The projects in the top two deciles of the following four scale-based metrics were grouped together to form this variable: (1) Size of Project Investment (Real Value), (2) Size of Project site in Hectares, (3) The number of workers needed for the construction stage and, (4) Number of years taken for the construction phase	250
Involves resettlement	If a project mentions the relocation of at least one household or not	250
Involvement of a Development Partner	If a multilateral or a bilateral lender or donor is mentioned in the report as a source of finance or not	154
Type of Financing mechanism	Projects are classified based on the source of finance: (1) Purely Private Sector (2) Purely Public Sector/ Development Partner, and (3) Mix of both including PPP models	153

Source: Author's Construction

The only variable that was constructed relying on a data source other than the assessed EIA reports is on the approval outcome of the project. There were two publicly accessible sources to obtain EIA report level data on whether the project was approved or not. First are CEA Annual Reports from 1991 to 2023 which typically contain the names of projects which were approved and rejected in the reporting year. Second is a compilation of newspaper snippets maintained by the CEA library which contain newspaper announcements of approved projects as mandated by the domestic laws. Both above sources are not complete, as some Annual Reports do not disclose the relevant data while the collection of newspaper snippets may not be exhaustive.

However, when analysing the data from the above two sources what is clear is that an overwhelming number of projects that undergo an EIA do not get rejected. For instance, the Annual Reports from 1991-2023 report approximately 130 approvals compared to only 8 rejections across the span of 22 years. 128 out of the 250 reports included in the assessment are from approved projects while only 2 were rejected. Information on the approval status of the remaining 120 reports were not available. Key informants also confirmed that only a very few projects are rejected outright while most are conditionally approved. So given the low sample size and the unreliability of data, the study did not assess the relationship between reporting quality and approval outcomes of EIA reports.

Provided below are relevant descriptive statistics on the nature and features of the EIA reports assessed in the study.

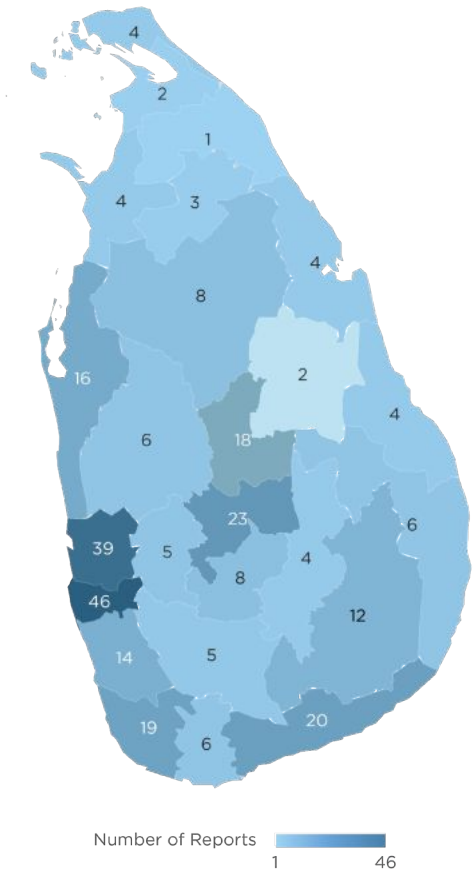
Out of the 250 reports, 238 contained executive summaries that could be located while the ToRs of 237 reports were located. As seen in Figure 56, most of the reports assessed are EIAs while only 12 per cent are SEIAs.

Figure 56: Assessed EIA reports by type and year

Source: Author's Construction

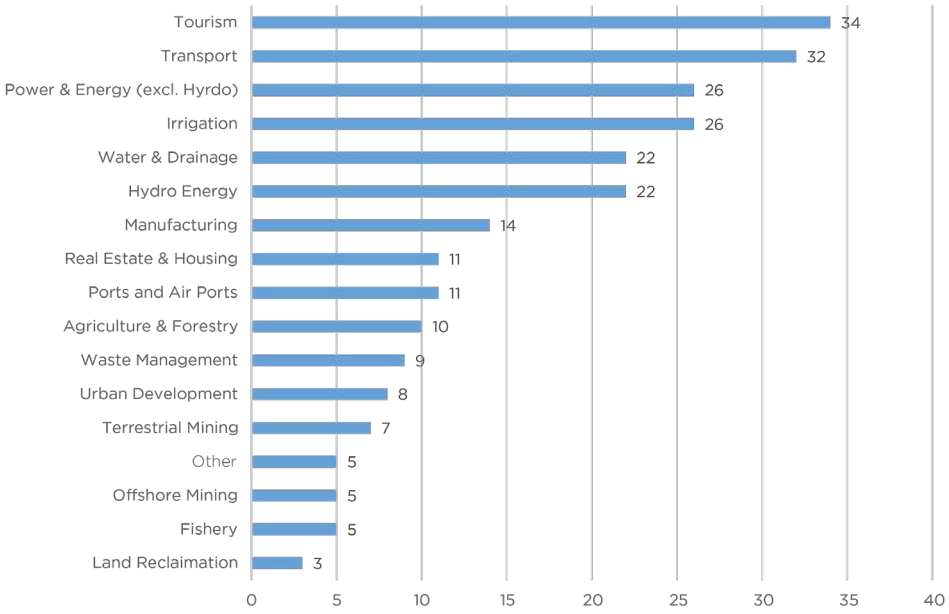
The assessed reports were from proposed projects covering all 25 districts (See Figure 57) and a range of sectors with Tourism and Transport being the most represented (See Figure 58).

Figure 57: Assessed EIA reports by district of project location



Source: Author's Construction

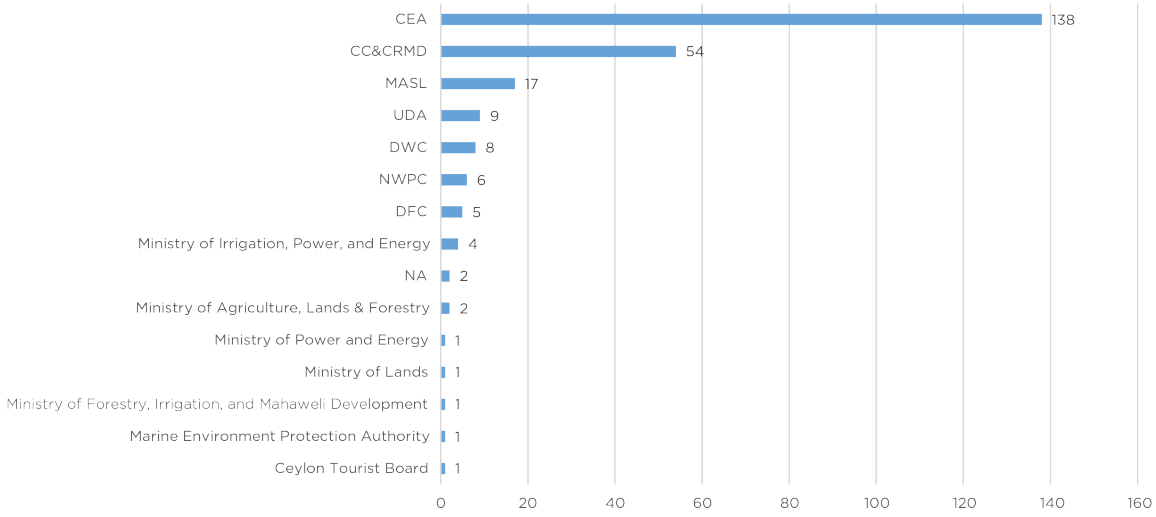
Figure 58: Assessed EIA Reports, by Project Type/Sector



Source: Author's Construction

Although the study did not assess which domestic law each individual report was stipulated under, when looking at the distribution of the assessed EIA reports by PAA an overwhelming majority have been conducted pursuant to the NEA (See Figure 59). CEA and other PAAs operating within the NEA excluding the three lead institutions of the other domestic laws have overseen 180 reports (73 per cent).

Figure 59: Assessed EIA Reports, by PAA



Source: Author's Construction

A total of 131 different PPs have conducted the 250 EIA reports, with each PP conducting approximately two EIA reports on average. The Road Development Authority (26 reports), National Water Supply and Drainage Board (22 reports), Irrigation Department (17 reports), and Ceylon Electricity Board (10 reports) are the most frequent PPs. 97 out of the 131 PPs are from the private sector while the remaining 34 PPs are public institutions.

76 consultant firms and institutions feature in the assessed EIA reports while 46 reports have been compiled by a team of preparers who are not affiliated with a firm or an institution. The 76 institutional consultants have conducted approximately 2.6 reports on average. The Central Engineering Consultancy Bureau has compiled the highest number of reports in the sample (19 reports) followed by EML Consultants (16 reports).

8.6 ANNEX 6: KEY INFORMANT INTERVIEW PROFILES

The study conducted several interviews with key experts during the course of the assessment to validate and clarify methodological and practical considerations. Brief descriptions of the key informant interviews are provided in Table 13 below.

Table 13: Overview of Key Informant Interviews ow.

KII Code	Occupation/expertise of interviewee	Date
KII01	Environmental expert and EIA consultant	16th May 2025
KII02	Environmental Lawyer	19th May 2025
KII03	Grassroots activist	26th May 2025
KII04	Researcher and activist on economic justice	23rd May 2025
KII05	Public officer in a PAA	10th June 2025
KII06	Public officer in a PAA	17th June 2025
KII07	Public officer heading a PAA EIA unit	24th November 2025
KII08	EIA expert and Environmental activist	2nd January 2026

Source: Author's compilation

8.7 ANNEX 7: METHODOLOGIES USED FOR TEXT-BASED ANALYSIS OF EXECUTIVE SUMMARIES

The assessment included two text-based analyses that were conducted on the Executive Summaries of Reports. 238 executive summaries from the assessed 250 EIA reports were in either PDF or image format. The first step was to extract the text of the executive summaries and creating a corpus. The executive summaries in PDF format were converted to text using Microsoft Word. After trying out several tools of OCR engines such as Tesseract and LLMs such as ChatGPT 5.2, the author found Google Gemini 3 Pro to be the most robust in producing a near identical transcription of the exact text. 227 out of the 238 executive summaries were successfully extracted as plain text. Thereafter, the extracted text was manually cross checked with the source documents and a corpus was created. Contents in tables were included as plain text.
The analysis on the technicality of language used in executive summaries was conducted on R. The methodology closely followed McKie and Rust (2021), using the widely accepted Flesch Reading Ease Scores.

The analysis on the objectivity of language used in executive summaries was more experimental. A criterion was co-developed with the assistance of ChatGPT 5.2 covering three dimensions relevant to objectivity (See Table 14). Thereafter, the analysis was run by ChatGPT 5.2 in Extended thinking mode on the corpus with each executive summary text being attributed a score from 0 (very objective) to 4 (very biased) on each of the dimensions.

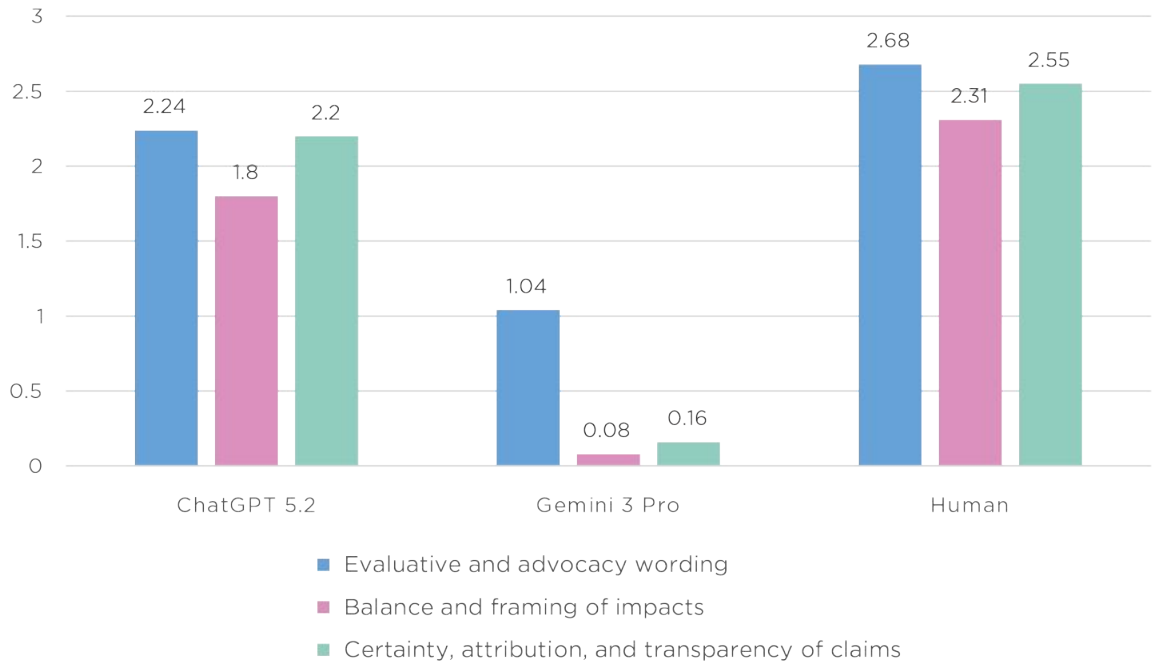
Table 14: Overview of Objectivity Dimensions

Dimension name	Areas of focus
Evaluative and advocacy wording	Promotional or dismissive tone; value judgements and "selling" language; loaded adjectives/adverbs (e.g., world-class, highly beneficial, negligible) presented without neutral qualification.
Balance and framing of impacts	Whether benefits and adverse impacts are described with comparable care; downplaying/exaggeration through framing; "mitigation-as-guarantee" wording (e.g., no impacts will occur, will eliminate impacts) vs acknowledging residual risk.
Certainty, attribution, and transparency of claims	Use of absolutes vs calibrated uncertainty; clarity on who says/estimates what (attribution) versus vague authority (e.g., it is clear); transparency about limits/assumptions in plain language.

Source: ChatGPT 5.2 and Author's construction

Using an LLM to assess objectivity of language has many limitations including biases in training data used by the LLM, lack of local EIA documentation to provide better context, and nuances of English being a second language in Sri Lanka. While the prompt explicitly highlighted these elements, it is important to note that the result of this assessment is inherently preliminary in nature. However, to assess the robustness, a sample of 25 executive summaries stratified by the type of source document (PDF or Image) were extracted and given to be scored by Gemini 3 Pro and a person who is a college graduate. As seen in Figure 60, the scores vary widely across the three assessors, with Gemini 3 Pro particularly lenient with the scoring while the human is the strictest. However, the relative direction of the three dimensions are similar with all three assessors finding evaluative and advocacy wording being the least objective and the balance and framing of impacts being relatively more objective.

Figure 60: Dimensions of objectivity, by assessor



Source: Author's construction using ChatGPT 5.2 and Gemini 3 Pro

8.8 ANNEX 8: METHODOLOGIES AND STATISTICAL TABLES FOR CORRELATION ANALYSES

Provided below are the descriptive statistics, descriptions of statistical methodologies, and summary tables of results relevant to each of the visualisations presented in Section 5.2. All analysis was conducted on R, with coding assistance provided by Google Gemini 3 Pro.

Analyses used for Finding 1

For the analysis visualised in Figure 34 and Figure 35 respectively, logistic regressions (Quasibinomial Generalised Linear Model) were run on each of the chosen five dimensions (Table 15) and the corresponding ToR requirements (Table 16)

Table 15: Trend analysis of Selected Dimensions.

Dimension	Odds_Ratio	CI_Low	CI_High	P_Value	Sig
Existing Env Methodology	1.0212	0.9853	1.0584	0.2512	ns
Impact Methodology	1.0311	0.9994	1.0645	0.0572	ns
Impact Classified	1.0502	1.0171	1.0858	0.0035	*
Mitigation Effectiveness	1.0610	1.0182	1.1089	0.0067	*
Mitigation Rationale	1.0454	1.0129	1.0800	0.0070	*
Disclosure of Data Sources	1.0335	1.0089	1.0591	0.0082	*

Note: Odds Ratio > 1 indicates the fulfilment of the dimension is becoming more frequent over time.

Table 16: Trend analysis of Selected ToR Requirements

ToR Requirement	Odds_Ratio	CI_Low	CI_High	P_Value	Sig
Existing Env methodology	0.9957	0.9624	1.0303	0.8052	ns
Impact Methodology	0.9443	0.9130	0.9753	0.0008	***
Impact Classified	1.0209	0.9841	1.0592	0.2693	ns
Mitigation Effectiveness	1.0587	1.0162	1.1044	0.0074	*
Mitigation Rationale	1.0792	1.0420	1.1197	0.0000	***

Note: Odds Ratio > 1 indicates the requirement is becoming more frequent over time.

Analyses used for Finding 2

Results included in Table 17 were visualised in Figure 36, to highlight the influence of ToR requirements on selected dimensions of report quality.

Table 17: Influence of ToR requirements on report quality dimensions

Analysis	N (No Req)	Mean (No Req)	N (Has Req)	Mean (Has Req)	Mean (Has Req)	p-value	Significance
Existing env methodology	141	0.67	91	0.87	19.4 pp	0.0003	***
Impact Classified*	57	0.32	184	0.51	19.0 pp	0.0101	*
Impact Methodology							
Mitigation Effectiveness	46	0.15	190	0.21	5.8 pp	0.3435	ns
Mitigation Rationale	91	0.42	145	0.57	15.5 pp	0.0207	*

*Note: Significance: *** p<0.001, ** p<0.01, * p<0.05. Mean: Represents the percentage of success.*

Analyses used for Finding 3

Results included in Table 16 summarise visualisations in Figure 37 and 38, which highlight that project specific characteristics such as scale and involving resettlement or not impacts both the complexity and quality of EIA reports.

Table 18: Influence of Project Specific Characteristics on EIA reports

Outcome Metric	Condition Present?	N (No)	Mean (No)	N (Yes)	Mean (Yes)	Diff	p-value	Sig.
Report Length (Pages)	Large-scale project	144	120.42	106	184.39	63.96	0.0000	***
	Involves Resettlement	167	133.99	83	174.81	40.81	0.0007	***
Verification Score (0-1)	Large-scale project	143	0.47	105	0.58	0.10	0.0320	***
	Involves Resettlement	165	0.47	83	0.61	0.15	0.0019	***
Large-scale project		143	0.83	106	0.93	0.10	0.0108	*

Outcome Metric	Condition Present?	N (No)	Mean (No)	N (Yes)	Mean (Yes)	Diff	p-value	Sig.
Primary Data Used (%)	Involves Resettlement	166	0.82	83	0.99	0.17	0.0000	.***
Impacts Classified (%)	Large-scale project	143	0.40	106	0.52	0.12	0.0606	ns
	Involves Resettlement	166	0.37	83	0.611	0.25	0.0002	***

*Note: Significance: *** p<0.001, ** p<0.01, * p<0.05. Mean: Represents the percentage of success for binary variables. For report length, Mean = Average Pages*

Analyses used for Finding 4

Finding 4 explores the intra and inter PAA variation in both selected quality dimensions and ToR requirements (See Figure 39).

Intra PAA variation was measured using Normalised Shannon Entropy given that the variables are binary or categorical. Entropy captures the uncertainty associated with the fulfilment of the quality dimension or the appearance of a ToR requirement. A score of 0 indicates perfect consistency and a score of 1 indicates complete unpredictability. The scores were normalised to a 0-1 scale given that both the sample sizes and the number of categories of the different variables vary.

As highlighted above, given the nature of the variables, Inter PAA variation was measured using Cramer's V which quantifies the strength of the relationship between the PAAs and the selected quality dimensions and ToR requirements. A score of 0 indicates that PAAs are identical while a score of 1 indicates that PAAs are completely different to each other. Table 19 provides the summary results which are visualised in Figure 39. The categories of system classification were coined by the Author assisted by Google Gemini 3 Pro.
In order to calculate both inter and intra PAA variations, a sufficient sample size of EIA reports per PAA is required. Therefore, this analysis was run on the PAAs with the most number of EIA reports: CEA (138 reports), CC&CRMD (50 reports) and the Mahaweli Authority of Sri Lanka (16 reports).

Table 19: Inter and Intra PAA variation of quality dimensions and ToR requirements

Variable	Type	Total_N	Inter_CramersV	Intra_Entropy	System_ Classification
TOR: Exec Summary	Requirement	200	0.345	0.654	Disorganized Tribes
TOR: Existing Env	Requirement	200	0.142	0.734	Universal Chaos
TOR: Impact	Requirement	200	0.323	0.682	Disorganized Tribes
TOR: Mitigation	Requirement	200	0.287	0.744	Universal Chaos
Dim: Existing Env Method	Dimension	208	0.251	0.793	Universal Chaos
Dim: Impact Method	Dimension	208	0.320	0.919	Disorganized Tribes
Dim: Impact Classif.	Dimension	208	0.238	0.947	Universal Chaos
Dim: Mitig Eff.	Dimension	208	0.200	0.717	Universal Chaos
Dim: Mitig Rat.	Dimension	208	0.097	0.993	Universal Chaos
Dim: Data Disclosure	Dimension	208	0.203	0.951	Universal Chaos

Figure 40 illustrates the intra and inter PAA variation across time using a sliding window analysis. A sliding window aggregates data into moving 10-year blocks. The time range of 10 years was chosen arbitrarily. A sliding window analysis was used since the sample sizes of EIA reports across years vary significantly and both Shannon Entropy and Cramer's V are highly sensitive to such changes. Only CEA and CC&CRMD were chosen since they had sufficient sample sizes across years for a temporal analysis. Tables 20 and 21 provide summary results for inter and intra variation respectively.

Table 20: Temporal (Sliding Window) analysis of Inter-PAA variation between CEA and CC&CRMD

Variable	Metric_Type	Annual_Change	P_Value	Trend_Direction
Report: Env Quality	Inte	0.0088	0.0000	Increasing (Worsening)
Report: Impact Class	Inter	0.0089	0.0122	Increasing (Worsening)
Report: Impact Method	Inter	0.0182	0.0000	Increasing (Worsening)
Report: Mitig Eff.	Inter	0.0095	0.0002	Increasing (Worsening)
Report: Mitig Rat.	Inter	-0.0003	0.8996	Stable (No Change)
Report: Verification	Inter	-0.0058	0.0030	Decreasing (Improving)
TOR: Env Section	Inter	-0.0169	0.0000	Decreasing (Improving)
TOR: Exec Summary	Inter	0.0133	0.0000	Increasing (Worsening)
TOR: Impact	Inter	-0.0200	0.0000	Decreasing (Improving)
TOR: Mitigation	Inter	0.0011	0.8316	Stable (No Change)

Table 21: Temporal (Sliding Window) analysis of Intra-PAA variation in CEA and CC&CRMD

Variable	Metric_Type	Annual_Change	P_Value	Trend_Direction
Report: Env Quality	Intra	-0.0123	0.0000	Decreasing (Improving)
Report: Impact Class	Intra	0.0031	0.0072	Increasing (Worsening)
Report: Impact Method	Intra	-0.0073	0.0000	Decreasing (Improving)
Report: Mitig Eff.	Intra	0.0029	0.1388	Stable (No Change)
Report: Mitig Rat.	Intra	0.0005	0.5340	Stable (No Change)
Report: Verification	Intra	0.0019	0.0624	Increasing (Worsening)
TOR: Env Section	Intra	0.0162	0.0000	Increasing (Worsening)
TOR: Exec Summary	Intra	-0.0200	0.0000	Decreasing (Improving)
TOR: Impact	Intra	-0.0134	0.0000	Decreasing (Improving)
TOR: Mitigation	Intra	-0.0158	0.0000	Decreasing (Improving)

Analyses used for Finding 5

Finding 5 mirrors the analysis conducted in Finding 4 for consultants, instead of PAAs. Both the inter and intra variation of selected quality dimensions among consultancy firms and institutions are assessed using Shannon Entropy and Cramer's V. Consultant teams without institutional affiliations were excluded along with consultancy firms and insisutions which had less than 3 EIA reports. A total of 23 institution consultants had atleast 3 reports and were included in this analysis. Table 22 provides the summary results used to create Figure 41.

Table 22: Inter and Intra Consultant variation of quality dimensions

Variable	Consultants_ Included	Inter_Diff	Intra_Chaos	Market_State
Dim: Existing Env Method	23	0.466	0.506	Disorganized Firms
Dim: Impact Method	23	0.538	0.724	Disorganized Firms
Dim: Impact Classif.	23	0.554	0.708	Disorganized Firms
Dim: Mitig Eff.	23	0.477	0.576	Disorganized Firms
Dim: Mitig Rat.	23	0.435	0.812	Disorganized Firms
Dim: Data Disclosure	23	0.498	0.842	Disorganized Firms

Analyses used for Finding 6

Finding 6 (in Figures 42 to 46) presents results from a series of basic Multivariable Logistic Regressions exploring the relationship between institutional factors and selected dimensions of report quality. Table 23 provides a complete summary of the regression results. Each regression controls for Project Scale and ToR requirements.

Table 23: Overview of regressions run on the effect of institutional factors on dimensions of report quality

Model	Outcome	Comparison Group	Odds Ratio	CI Lower	CI Upper	P-Value
Consultancy Type	Existing Env Method	Non-Institutional	0.68	0.33	1.45	0.3118
	Impact Method	Non-Institutional	0.80	0.39	1.62	0.5287
	Impact Class	Non-Institutional	0.82	0.39	1.68	0.5874
	Mitig Effectiveness	Non-Institutional	0.91	0.34	2.20	0.8349
	Mitig Rationale	Non-Institutional	0.67	0.32	1.36	0.2695
	Data Verification	Non-Institutional	0.57	0.28	1.17	0.1216
Proponent Type	Existing Env Method	Public	1.46	0.73	2.94	0.2888
	Impact Method	Public	1.99	1.07	3.74	0.0297
	Impact Class	Public	1.10	0.59	2.03	0.7707
	Mitig Effectiveness	Public	1.91	0.87	4.39	0.1146
	Mitig Rationale	Public	2.44	1.32	4.53	0.0045
	Data Verification	Public	1.35	0.70	2.62	0.3649

Development Partner	Existing Env Method	No Partner	0.79	0.32	1.96	0.6030
	Impact Method	No Partner	1.65	0.77	3.54	0.1968
	Impact Class	No Partner	1.10	0.51	2.32	0.8063
	Mitig Effectiveness	No Partner	1.59	0.66	3.78	0.2905
	Mitig Rationale	No Partner	0.95	0.44	2.06	0.8958
	Data Verification	No Partner	1.28	0.56	3.04	0.5641
Socio-Econ Expert	Existing Env Method		5.46	2.24	13.82	0.0002
	Impact Method		1.78	0.76	4.37	0.1913
	Impact Class		1.52	0.64	3.82	0.3539
	Mitig Effectiveness		3.17	0.85	20.63	0.1355
	Mitig Rationale		2.34	0.95	6.20	0.0715
	Data Verification		5.13	2.13	12.96	0.0003
Financing Mechanism	Existing Env Method	Private	0.80	0.24	2.48	0.7008
	Existing Env Method	Public	1.63	0.46	5.52	0.4315
	Impact Method	Private	0.44	0.15	1.26	0.1245
	Impact Method	Public	1.69	0.61	4.64	0.3063
	Impact Class	Private	0.41	0.13	1.23	0.1127
	Impact Class	Public	0.77	0.26	2.14	0.6165
	Mitig Effectiveness	Private	1.49	0.37	7.67	0.5970
	Mitig Effectiveness	Public	2.92	0.85	13.57	0.1176
	Mitig Rationale	Private	0.67	0.23	1.89	0.4475
	Mitig Rationale	Public	0.61	0.21	1.67	0.3434
	Data Verification	Private	1.43	0.50	4.03	0.5002
	Data Verification	Public	2.84	0.96	8.51	0.0583

CENTRE FOR A SMART FUTURE

Centre for a Smart Future (CSF) is a Colombo-based think-tank with researchers, advisors, and partners around the world.

We conduct high-quality research, promote collaboration across disciplines, and generate actionable ideas. Our current work is anchored to influencing a just recovery from Sri Lanka's polycrisis, with the environment and human wellbeing at the core. Our research has partnered with organisations such as Institute of Development Studies, London School of Economics, International Labour Organization, Open Society Foundation, Blue Resources Trust, and Biodiversity Sri Lanka. What sets us apart is our interdisciplinary approach to research and policy advocacy. We like being imaginative in how we think about challenges and solutions.

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