but perhaps not sufficient to achieve quality of work and integrity of approach. To that end, or to aspire to excellence, EIA practitioners need to cultivate other, more positive virtues. Five core values, inspired by the ideas of Roger Grudin (1990), might be:

- **Wisdom** — which comes from the accumulation of experience within a framework of EIA knowledge and understanding;
- **Creativity** — the ability to produce new ideas and insights to address established or emerging challenges;
- **Innovation** — the application of wisdom and creativity to make positive changes that resolve problems;
- **Courage** — the mental or moral strength to remain true to our principles and ethics in the face of adversity and pressure to do the opposite; and
- **Humility** — to acknowledge the inherent limitations of EIA work (such as prediction in the face of uncertainty) and to avoid non-discovery (the recycling of conventional wisdom is endemic in the literature and, yes, I plead guilty also).

### In conclusion

The authors have taken direct aim at ten debased currencies of EIA malpractice and provided a provocative characterization of poor quality work (nobody can accuse them of being afraid to court controversy). If nothing else, they remind us that many assessments fall far short of meeting the gold standard of good practice and have only nodding acquaintance with the concepts and methodologies normally on offer in these pages. Despite the above reservations, I concede them the benefit of the doubt on their claim that “most of the problems” can be solved simply through a common-sense approach.

Obviously that will help, but it is not clear to me how this change is to happen. The authors’ repetition of standard bromides is not convincing and there is little discussion of other actions. Otherwise, I found their broadside at mediocrity to be provocative as advertised, slightly unnerving (as their gunsights turn to riposte), sometimes intemperate (surely not every EIS lies) and invigorating in its critical use of humor (hitherto only an infrequent and accidental visitor to these pages).

### A last word

The authors also cite Anon (popular elsewhere but a stranger in the Manchester school of EIA). Perhaps the last word should come from the same canon:

> To make a reputation when other ways are barred
> You take something very simple and make it very hard
> Happily now that EIA is here to stay
> We can measure quality in fees per day
> And when common sense is in short supply
> Remember words per page is what you buy

### References


### Riposte: a common-sense approach to the use of common sense in EIA

**William A Ross, Angus Morrison-Saunders and Ross Marshall**

Our ‘common sense’ article, which started life as ‘the rant’ during the IAIA’04 conference, was an attempt to provoke discussion on how improvements could be made in three key areas of professional practice in impact assessment. The five responses indicate some success. All five contributors have
identified problems in practice and have suggested means of improving performance in the three areas, even if these are not always what we expected. At risk of rapidly forming a second generation to Wood and Sadler’s ‘grumpy old men’ of EIA (IAIA’05 Conference), we would like to further explore our ranting themes in light of the comments received.

First, though, some comment on the nature of common sense itself (or at least what we mean by it!) is warranted. Individuals have their own internalized notion of what is common sense to them, as most of our respondents pointed out. We accept this and do not profess that some simple sense of common sense should magically apply across all stakeholders in EIA. This is patently absurd. However, a dictionary definition runs along the lines of “sound, practical perception or understanding”.

Thus to apply a common-sense approach to EIA implies that consistent methods that are internally robust be used. To this, we would add that EIA should remain pragmatic, objective and transparent, with hysteria, angst and pseudo-scientific complexity kept to a minimum! We briefly revisit our three key concerns again from this perspective and in the light of the previous five responses.

Joe Weston, Elvis Au and Richard Morgan all point out the subjective and value-laden nature of EIA activities (especially determination of significance and hence, by default, scoping) and Luis Sánchez notes how “environmental conflicts can easily become emotional issues”. It is unrealistic to expect consensus across public, proponent and regulator participants in EIA, but this does not mean that a post-modernist ‘anything goes’ approach should prevail.

Richard Morgan suggests we have too little respect for public input into scoping, a claim we emphatically reject. Public participation is one of the cornerstones of EIA, but there is a world of difference between scoping for information relevant to development, and scoping for public opinions relating to the scheme.

Joe Weston points out some of the difficulties in using common sense and of including societal values in project decision-making. We believe he makes the case well but a little too forcefully. If his ideas were followed too literally, the public interest test for development projects (the widely applied rule that a proposed project should be approved only if it is in the public interest) would be rejected as arbitrary and capricious. EIA would be replaced by the postal ballot.

We stand by our previous call to rein in the boundaries during scoping to focus on what matters inherently for decision-making. While the proponent can play an important role here, notwithstanding the tendency noted by Joe Weston for proponents to operate in fear of potential legal challenge and thereby include ‘everything and nothing’ in an EIS (a situation that is counter to their purpose of seeking fast and efficient development approval), regulators need to take a firm stand on this point.

Richard Fuggle observes, all too correctly, that EIA practice in developing countries is very different from that often practiced in developed countries and, correspondingly, different common-sense ways of overcoming barriers are needed in these countries. Most importantly, he observes that government regulators lack the expertise to judge EIAs and hence to improve EIA practice. We agree and believe that the first necessary practice in developing countries is to build in-house capacity for EIA regulators in a manner that meets the cultural decision-making of that country or society. In the meantime, Richard Fuggle suggests some alternative strategies that can help.

It is interesting to note that EIA in Hong Kong, through a concerted drive by its regulators, came from ‘not-on-the-map’ in 1990 to world prominence less than a decade later. Where there is a political appetite for environmental improvement, setting your own benchmark for EIA performance appropriate to the scale, nature and forms of development of concern is a practical option for those frustrated by poorly implemented EIA practices. Waiting for proponents to improve through some Darwinian form of selection will ultimately prove disappointing! We note that Elvis Au points out the critical importance of making continuous improvements in EIA, a practice that led to the changes seen in Hong Kong.

Clearly, the determination of significance is a relativistic values-based activity, but our chief bugbear with this central tenet of EIA concerns inconsistent explanation of the concept when used in EIAs. We support Richard Morgan’s calls for methodological approaches to EIA. Common sense says that the basis for determining significance in a given EIA needs to be noted (for instance, Table 1 in our original paper) but then must be subsequently followed throughout the EIS! This would overcome the difficulties that Elvis Au noted for “lay decision-makers and lay persons to understand the issues” presented in EIA documents. If we cannot achieve this simple goal, we have failed as both professionals and as a global profession.

Treating scoping and significance with a good deal of common sense would automatically lead to better quality (and appropriate sized) EIAs and would avoid the practice noted by Luis Sánchez that it is “better to treat many topics with equal superficiality than to study in depth a few significant issues”. Yet Sanchez also observes the existence of good EIA standards of practice that need to be more widely adopted, thus suggesting that the tools for improvement are there but are rarely sought out and applied by some practitioners. Common sense constantly urges us not to ‘reinvent the wheel’ or to argue over what colour it should be: we know how to do good EIA, we just need to do it!

As the saying goes, ‘many a true word is spoken...
in jest’. While we spoke in jest at IAIA’04 with our ranting tongues very firmly in our cheeks, our paper points out the need for significant improvements in EIA practice if we are to be taken seriously by clients, the public and governments. Our rant should be taken seriously; let us all apply more common sense in EIA.

Notes

1. Much as we would like to take up Luis Sanchez’ implied invitation to discuss the fourth area of EIA deficiency: follow-up, alas, space limitations thwart us here but we could direct him to a very good book on the subject! [Angus Morrison-Saunders and Jos Arts, eds. 2004. Assessing Impact: Handbook of EIA and SEA Follow-up. London, Earthscan, 2004. ISBN 1-84407-139-1].