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EFFECTIVENESS OF EIA SYSTEMS: DIMENSIONS, CRITERIA, AND THE BANGLADESH CONTEXT

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1. Introduction

Environmental Impact Assessment (EIA), if properly implemented, can alleviate environmental risks significantly. Moreover, an effective EIA system can ensure a sustainable economic development i.e. a development which takes an approach that presupposes economic development without hampering the ecological equilibrium. However, EIA systems as a whole, sometimes, suffer many criticisms. For instance, Bond et al. states that ‘EIA is sometimes perceived as a barrier to development due to its requirements for rigorous participatory processes and scientific investigation, which may often be viewed as overly time-consuming and expensive’ (Bond et al., 2014).¹ Again, ‘one of the challenges is that the EIA process is viewed as being anti-development and time-consuming as the majority of stakeholders and the public do not understand its importance. It is also considered to rely on technical inputs, is costly, and requires preparation and follow-up/public consultation. On the other hand, many project proponents do not view EIA as useful. Project proponents often view EIA as a requirement to be completed, an obstacle to be jumped along the way to project implementation and this particular obstacle impose risks on project proponents due to that EIA often forces a public disclosure of impacts, and the information on impacts can strengthen the hand of a project’s opponents.’² Nonetheless, the widespread practice of EIA supports the argument that today, irrespective of these criticisms, EIA is one of the most effective environmental management tools ‘because EIA has made much progress over the years, and the procedures and the practices have been refined’³. Thus, EIA has the potential to alleviate environmental risks arising out of industrial projects and units if it works successfully but one should be mindful that ‘effectiveness’ is the ‘*sine qua non*’ of a successful EIA system.

Determination of the degree of ‘effectiveness’ of an EIA system— in no respect an easy task

¹ Pope J Bond, Morrison-Saunders and Gunn J. F Retief, ‘Impact Assessment: Eroding Benefits through Streamlining?’ *Environ Impact Assess Rev* 46–53.

² Francina Pashukeni Kaunalenga Junias and Dietlinde Nakwaya Jacobus, ‘Evaluation of Performance and Effectiveness of EIA System in Namibia’ 2024 Vol.9 Issue 5 *International Journal of Novel Research and Development*

³ Cristian Cannao and Giuseppe Onni, ‘A Methodological Approach on the Procedural Effectiveness of EIA: the Case of Sardinia’ (2019) 6:1 *City Territory and Architecture*

and it becomes more complex due to the fact that there are no universally recognized criteria available for such determination. This chapter firstly makes a comprehensive examination of the dimensions and criteria available for determining the ‘effectiveness’ of a given EIA system and then evaluates the EIA system of Bangladesh against those criteria.

2. Meaning of the term ‘Effectiveness’ in the Context of EIA

As a general concept, effectiveness is defined as the degree to which objectives are achieved and the extent to which targeted problems are solved⁴. Fraser defines effectiveness as ‘a measure of the match between stated goals and their achievement’⁵. However, in the context of EIA Sadler, who is recognized as one of the most celebrated authorities in the subject of ‘EIA effectiveness’, states that ‘effectiveness’ signifies ‘how well something works or whether it works as intended and meet the purposes for which it was designed’⁶. Thus, it can be said that the effectiveness of an EIA system should be assessed with reference to the objectives it sought to achieve i.e. whether the EIA system is functioning as it was intended to. Therefore, there must be a rational relationship between the objectives and outcomes of an EIA system. It is as much effective as the distance between the objectives and outcomes is less and conversely it is as less effective as such distance is high. Objectives in the context of EIA can be divided into two broad categories i.e. *proximate and long term*⁷. So, the effectiveness of an EIA system depends on its performance in the fulfillment of such proximate and long term objectives.

3. Dimensions of EIA Effectiveness

The literature on EIA is large⁸ and different authorities have suggested that EIA effectiveness be assessed from different points of view. Olorundami’s thesis identifies multiple approaches in this regard. For instance, Arts et al. describe effectiveness at system level as one which requires proper legislation in place and other context fixed requirements, like a governance mechanism. At project level, effectiveness depends on the capacity and interests of actors

⁴ Tokunbo Alaga Olorundami, ‘Environmental Impact Assessment (EIA) Effectiveness and “Local Context”: The Case of Nigeria’ (PhD Thesis, Newcastle University 2021) 24 [Citing Business Dictionary 2018]

⁵ M Fraser, ‘Quality in Higher Education: An Intergenerational Perspective’ in D Green (Ed.) ‘*What is Quality in Higher Education?*’ (1994)

⁶ B Sadler, ‘International Study of the Effectiveness of Environmental Assessment. Final Report: Environmental Assessment in a Changing World: Evaluating Practice to Improve Performance.’ 37 available at <https://publications.gc.ca/site/archivearchived.html?url=https://publications.gc.ca/collections/collection_2017/acee-ceaa/En106-37-1996-eng.pdf> accessed on 5 January 2026

⁷ Cristian Cannao and Giuseppe Onni (n.3)

⁸ Judith Petts, ‘Introduction to Environmental Impact Assessment in Practice: Fulfilled Potential or Wasted Opportunity?’ in Judith Petts (ed.), ‘*Handbook of Environmental Impact Assessment, Volume II: Environmental Impact Assessment in Practice: Impacts and Limitations*’ (Blackwell Science Ltd.) 5

engaged in the EIA process, the power relations involved in the process and the level of interest the decision makers have in environmental protection and sustainability.⁹ Bond et al. framed effectiveness around any process that directs decision making towards sustainability. While this may be helpful, there is no consensus on the issue of sustainability, thus leaving the question open-ended¹⁰. For Kolhoff et al. EIA effectiveness can be evaluated at the organizational level. This involves looking at the capacity of an organization to deliver an effective assessment for sound decision making¹¹. Sadler articulated that EIA effectiveness be determined from procedural, substantive and transactive perspectives¹². Moreover, A.L. Caro-Gonzalez et al. in their paper detected other dimensions such as normative, pluralism, sustainability dimensions etc.¹³. Alberts et al. added another dimension namely legitimacy dimension¹⁴. Though there are different categories of dimensions suggested by different authorities, Sadler's classification of dimensions still considered as the most acceptable one. Sustainability is suggested by some scholars as a separate dimension it is in fact an amplified version of substantive dimension. Normative dimension, on the other hand, suggests that EIA effectiveness be measured in terms of its (a particular EIA system's) degree of conformity with the accepted individual and social norms.

Sadler states *procedural effectiveness* relates to the question that 'does the EA process conform to established provisions and principles?'¹⁵ This category often includes one or more qualitative cases, review documents, policies, legislations, and or historical contexts¹⁶. 'In this category of effectiveness, the assessment conforms to acceptable guiding principles, whereby the process should be open, fair, and objective includes good consultation techniques to facilitate participation and feedback provision. However, this criterion is influenced by factors such as political context and availability of resources, policy framework, active public

⁹ Tokunbo Alaga Olorundami (n.4) [citing J. Arts, , Runhaar, Fischer, Jha-Thakur, , Laerhoven, Driessen, & Onyango (2012). 'The effectiveness of EIA as an instrument for environmental governance: reflecting on 25 years of EIA practice in the Netherlands and the UK'.]

¹⁰ Ibid.[Citing Bond, Pope, Morrison-Saunders & Retief (2016) 'A game theory perspective on environmental assessment: What games are played and what does this tell us about decision making rationality and legitimacy?' *Environmental Impact Assessment Review*, 57]

¹¹ Ibid. [Citing A. J Kolhoff, Runhaar, T. Gugushvili, G. Sonderegger, Van der Leest, &Driessen (2016), 'The influence of actor capacities on EIA system performance in low and middle income countries—Cases from Georgia and Ghana' *Environmental Impact Assessment Review*, 57]

¹² B. Sadler (n.6)

¹³ Ana L. Caro-Gonzalez, Andreea Nita, Javier Toro, Montserrat Zamorano, 'From procedural to transformative: A review of the evolution of effectiveness in EIA' 103 (2023) *Environmental Impact Assessment Review*

¹⁴ R C Alberts, F P Retief, D P Cilliers, C Roos, Morgan H, 'Environment Impact Assessment (EIA) Effectiveness in Protected Areas' 2021 Vol. 39 *Impact Assessment and Project Appraisals* 290, 291

¹⁵ B. Sadler (n.6) 39

¹⁶ Francina Pashukeni Kaunalenga Junias and Dietlinde Nakwaya Jacobus (n.2)

participation, knowledge, and experiences of the impact assessment professionals'¹⁷. With respect to *substantive dimension* Sadler set the question that 'does the EIA achieve the objectives set and result in environmental protection?'¹⁸ The ultimate object of EIA is to ensure environmental protection by its precautionary approaches. Substantive effectiveness refers to the degree of success of EIA system in that effect. However, Cashmore et al. subdivided this dimension into three aspects. They are—i) the rationality dimension focusing on decision making which is understood as a rational exercise or a political exercise, ii) the decision dimension which questions whether the purpose of EIA is to influence or inform decisions, and iii) the sustainability dimension which encompasses the relationship between EIA and sustainable development.¹⁹ Sadler's third question relates to *transactive dimension* and asks 'does EA assessment delivers outcomes at least cost and in minimum time possible?''²⁰ Transactive effectiveness approaches the EIA process in a proficient way, looking at the achievement of objectives and the resources invested in terms of human resources, cost and time²¹. The investment of resources during the impact evaluation implementation process can be evaluated based on four criteria, i) time, ii) financial resources, iii) skills, and iv) role specification²².

4. Criteria for (EIA) System Evaluation

Dimensions are broad view points from the perspective of which effectiveness of a given EIA system should be assessed but criteria are the specific elements of dimensions which should be employed in making such assessment. In respect of criteria Petts states 'the first requirement of evaluation is an agreed set of criteria of effectiveness. The concept of agreement between all interested parties (political, legal, regulatory, development, public) is considered important and how this can be achieved perhaps presents one of the greatest challenges'²³. Then he suggested some criteria for system evaluation which includes—

- *clarity* of legal provisions;

¹⁷ C Chanchitpricha, A Bond, 'Conceptualizing the effectiveness of the Impact Assessment Process' 2013 Issue 43 *Environmental Impact Assessment Review*

¹⁸ B. Sadler (n.15)

¹⁹ M Cashmore, R Gwilliam, R Morgan, D Cobb, A Bond 'The interminable issue of effectiveness: substantive purposes, outcomes and research challenges in the advancement of environmental impact assessment theory' 2004 Issue 22 *Impact Assess. Proj. Apprais* 295–310 available at < <https://doi.org/10.3152/147154604781765860>>

²⁰ Sadler (n.15)

²¹ Ana L. Caro-Gonzalez, Andreea Nita, Javier Toro, Montserrat Zamorano (n.13)

²² Ibid. [Citing V Theophilou, A Bond, M Cashmore, 2010 'Application of the SEA directive to EU structural funds: perspectives on effectiveness' *Environ. Impact Assess. Rev.* 30, 136–144]

²³ Judith Petts (n.8) 6

- *comprehensiveness* in terms of coverage of significant environmental actions and impacts;
- *transparency* of decision making;
- *openness* in terms of opportunities for public participation and review and understanding of the decision;
- *efficiency* in terms of cost and time; and
- *robustness* of assessment and quality of the EIA report²⁴.

The Canadian Environmental Assessment Research Council adopted three broad criteria for assessing the success of an EIA system. Three criteria are—effectiveness, efficiency and fairness²⁵. An EIA system is *effective* if information generated in the EIA contributed to decision making, predictions of the effectiveness of impact management measures were accurate and proposed mitigatory and compensatory measures achieved approved management objectives²⁶. *Efficiency* criteria are satisfied if, for example: EIA decisions are timely relative to economic and other factors that determine project decisions and costs of conducting EIA and managing inputs during project implementation can be determined and are reasonable²⁷. *Fairness* criteria are satisfied if, for example: all interested parties (stakeholders) have equal opportunity to influence the decision before it is made; and people directly affected by projects have equal access to compensation²⁸.

Wood articulated a comprehensive list of 14 criteria and applied them in accessing the effectiveness of EIA systems of eight jurisdictions which include US, California, UK, the Netherlands, Canada, Australia, Western Australia and New Zealand²⁹. He suggested the effectiveness of EIA systems may be assessed by answering 14 questions³⁰. These are—

1. Whether the EIA system based on clear and specific legal provisions?
2. Whether the relevant environmental impacts of all significant actions be assessed?
3. Whether evidence of the consideration, by the proponents, of the environmental impacts of reasonable alternative actions be demonstrated in the EIA process?
4. Whether

²⁴ Ibid.

²⁵ Canadian Environmental Assessment Council, *Evaluating Environmental Impact Assessment: An Action Prospectus* 1988 P. 1-2 available at < https://publications.gc.ca/collections/collection_2017/acee-ceaa/En106-11-1988-eng.pdf > accessed on 9 January 2026

²⁶ Ibid.

²⁷ Ibid.

²⁸ Ibid.

²⁹ Christopher Wood, 'Comparative Evaluation of Environmental Impact Assessment Systems' in Judith Petts (ed.), *Handbook of Environmental Impact Assessment, Volume II: Environmental Impact Assessment in Practice: Impacts and Limitations* (Blackwell Science Ltd.) 15

³⁰ Ibid.

screening of actions for environmental significance must take place? 5. Whether scoping of the environmental impacts of actions take place? 6. Whether EIA reports meet prescribed content requirements and do checks to release of inadequate EIA reports exists? 7. Whether EIA reports must be publicly reviewed and proponents respond to the points raised? 8. Whether the findings of the EIA reports be a central determinant of the decision on the action? 9. Whether monitoring of actions impacts be undertaken and it is linked to the earlier stages of EIA process? 10. Whether the mitigation of impacts be considered at the various stages of EIA system? 11. Whether participation and consultation take place prior to, and, following, EIA publication? 12. Whether the EIA system be monitored and, if necessary, be necessary be amended to incorporate feedback from experience? 13. Are the financial costs and time requirements are acceptable to those involved in the EIA process? 14. Does the EIA system apply to significant policies, plans or programs as well as to projects?

Though Wood's model is largely comprehensive one but it does not cover challenges like corruption, adequacy of personnel and resources of environmental decision making agencies, competency and relevant experience of EIA teams, manipulation of environmental data, resolution of disputes arising out of EIA processes etc.

5. EIA System of Bangladesh: How Much Effective?

The EIA system of Bangladesh is regulated by three main instruments i.e. the Environmental Conservation Act (ECA) 1995, the Environmental Conservation Rules (ECR) 2023 and the EIA Guidelines for Industries (hereinafter referred to as 'Guidelines') 2021. However, it must be kept in mind that the ECR 2023 substituted the previous Rules of 1997. The previous section of this chapter has identified the criteria which should be applied while assessing the effectiveness of any given EIA system. Now it is pertinent to examine how far the new EIA system of Bangladesh satisfies these criteria. Following subsections makes an inquiry in this respect.

5.1 Clarity of Legal Provisions

From a broader perspective the EIA system of Bangladesh appears to be based on clear legal provisions. However, on a closer look into the provisions of ECA 1995, ECR 2023 and Guidelines 2021 drives us to a different conclusion. Firstly, the Guidelines 2021 was adopted before the ECR 2023 and was drafted maintaining its consistency with the erstwhile Environmental Conservation Rules 1997 which did not contain clear provisions regarding

public participation and environmental management plan. Today, the Guidelines still claims that the EIA regime of Bangladesh does not contain these provisions whereas the ECR 2023 makes detailed provisions on these matters. Secondly, there are certain provisions in the ECR 2023 which are not sufficiently clear, for instance, provisions are made that the Environmental Clearance Certificate Committee (ECCC) should consider social impacts assessment but nothing is said about when social impact assessment be made and whether it is an integral part of formal EIA process. Thirdly, it is clear from the relevant provisions that in respect of ‘green’ and ‘yellow’ categories of industrial units or projects no EIA is required and in respect of ‘red category’ industrial unit or projects EIA mandatory³¹ but in respect of orange category industrial units the decision with respect whether EIA is required depends on the satisfaction of the ECCC³². The matter of confusion here is that the ECR 2023 is completely silent regarding whether the procedure followed in case of red category industrial units and projects is also applicable to orange category industrial units and projects. Other confusions in this regard are—whether the same *terms of reference, same reporting procedure etc.* are applicable when the ECCC decides that an EIA is required in respect of an ‘orange category’ industrial unit. In other respects, however, the EIA regime of Bangladesh provides sufficient clear provisions. For instance, provisions as to EIA authorities, fees, Appellate authority, public participation etc the EIA regime of Bangladesh is reasonable precise and clear.

5.2 Comprehensiveness

The EIA system of Bangladesh provides comprehensive rules regarding determination of activities, interventions, projects which fall within the coverage of EIA requirement. As argued in chapter 3 that in deciding which industries may cause significant environmental damage that justifies EIA’s implementation, the EIA system of Bangladesh adopts a ‘hybrid model’ containing both ‘case by case’ and ‘inclusion list’ approaches. Inclusion list model is followed in the case of red category industrial units and the list contains 72 industrial units in respect of which EIA is mandatory³³. ‘Case by case’ model adopted in two cases—firstly in the case of orange categories industries the ECCC decides whether an EIA is required in any particular case³⁴ and the other case is one where an industrial unit or project not included in the ‘Red Category’ list, may have similar adverse impact requiring EIA. To deal with such possible circumstances, ‘schedule XIV’ provides general standards for the inclusion of any industrial

³¹ The Environmental Conservation Rules 2023 rr 9, 10,11,12, 14

³² Ibid. r.13

³³ Ibid. schedule I

³⁴ Ibid. r. 13(6)

unit or project to the Red Category³⁵. The effect of these rules is that-any industrial unit having significant environmental damaging capacity is covered by EIA requirements.

Another aspect of comprehensiveness relates whether an EIA system requires assessment of environmental, social, cumulative impacts. In this regard, the ECR 2023 requires that an EIA Report must identify significant direct and cumulative impacts of the proposed project or unit³⁶. In practice, the DoE approves those reports which cover sufficiently wide categories of impacts. For instance, the ‘EIA Report for 635 Mw Coal Based Thermal Power Plant at Matarbari, Moheshkhali, Cox’s Bazar³⁷’ identifies possible impacts on different components of environment including soil, air, natural resources, livelihood at different stages of project implementation including pre-construction, during construction and operation stages. Moreover it predicts and evaluates social impacts as well. Again, ‘Updating of the Environmental Impact Assessment (EIA) Report for Dhaka Mass Rapid Transit Development Project (Line 5): Northern Route’³⁸ covers impacts upon air, surface water, ground water, urban drainage, local economy, social service facilities, cultural heritages, local conflicting interests, child rights, women rights etc. Thus, the EIA system of Bangladesh is comprehensive in covering both activities and impacts.

5.3 Transparency

Transparency of the EIA system of Bangladesh can be assessed in terms of transparency of the legal provisions and practices of the DoE. As far as the legal provision are concerned the ECR 2023 ensures transparency in three respects—*firstly*, when a term of reference for a proposed EIA or the EIA report is not granted approval then the DoE must communicate in writing the reasons to the proponent³⁹. *Secondly*, the ECCC may invite the proponent in its meeting for obtaining explanations concerning any issues in the EIA report⁴⁰. *Thirdly*, when an EIA report is not approved by the DoE then the proponent may make an appeal to the appellate authority for reviewing the decision⁴¹. The practice of DoE, on the other hand, is not sufficiently transparent. Though the minutes of the meetings of the ECCC, are regularly published on

³⁵ Ibid. schedule XIV

³⁶ Ibid. schedule XI

³⁷ Available at https://doe.portal.gov.bd/sites/default/files/files/doe.portal.gov.bd/page/0e9d9294_a6cc_4593_9e24_2b25522eb875/2024-10-02-06-08-6cca55d5e033857eeca1aea94adda6013.pdf > accessed on 11 January 2026

³⁸ Available at https://dmtcl.portal.gov.bd/sites/default/files/files/dmtcl.portal.gov.bd/page/29d37156_8bc9_4bb2_bd52_1bb73be6c65a/2022-10-25-09-03-a5c4019e79cea75434e13888e1ceef2.pdf > accessed on 11 January 2026

³⁹ The Environmental Conservation Rules 2023 rr. 14(6), 18(5)

⁴⁰ Ibid. 17(1)

⁴¹ Ibid. rule 24

DoE's website⁴² but 'The Environmental Impact Assessment (EIA) reports of different projects, including megaprojects of the country (such as Rampal, Matarbari, Padma Bridge etc.) are also not published on the website (on a regular basis)'⁴³. In addition, EIA reports are not also published on a regular basis for public comments but an annual report containing statistics relating the total ECC applications received and approvals granted during the year by different offices of the DoE.

5.4 Openness in Terms of Public Participation

As mentioned in chapter 4 that the Environmental Conservation Rules of 1997 did not provided for measurers of public participation, The ECR 2023, however, has filled up this void and has made explicit provisions in this regard. In addition, the Guidelines 2021 sets out a specific chapter on this topic which specifies the relevant public and techniques for public consultation. Two incidental issues can be mentioned here which are not clearly articulated in the EIA regime of Bangladesh. One relates to the question that whether public participation is mandatory in all EIA's as the ECR 2023 states public consultation be conducted in 'appropriate cases' but it remained silent about the precise meaning the phrase 'appropriate cases'. The substantive rule laying down public participation requirement specifies that public participation be conducted in respect of 'red category' industrial units. This provision accelerates the second issue that does '*public participation*' is also a mandatory requirement for 'orange category' industrial units? Nonetheless, the new EIA regime of Bangladesh expressly recognizes public involvement in the environmental decision making which may have impacts upon them.

5.5 Efficiency in Terms of Cost and Time

The ECR 2023 points out specific time frames for granting approval to EIA reports and terms of reference. Firstly, approval to the *terms of reference* of EIA shall be granted by the concerned office of the DoE, subject to the approval of the DG, within 30 working days from the date of making the application for '*cite clearance certificate*'⁴⁴. After getting the approval to *the term of reference* the proponent has to conduct EIA by appropriate EIA advisors in accordance with the relevant provisions and following systematic steps. Secondly, When EIA is complete in

⁴² Available at < <https://doe.portal.gov.bd/site/page/845c8b2a-d6df-459f-b3aa-0fb4ff7a1c27>> accessed on 11 January 2026

⁴³ TIB, '*Governance Challenges of the Department of Environment and Way Forward*' (TIB, 2022) 7 available at < https://ti-bangladesh.org/images/2021/report/DoE_ES_English.pdf> accessed on 11 January 2026

⁴⁴ The Environmental Conservation Rules 2023, r. 14(6)

respect of any industrial unit or project, the EIA report is needed to be submitted to the ECCC⁴⁵. The DoE shall give approval to this report within 30 working days⁴⁶. Thus, the EIA system is efficient enough in terms of time limit. But in respect of cost the EIA system of Bangladesh is not efficient because it does not specifies the *criteria* for calculating or amount of *fees* to be given to the environmental experts who conducts EIA. In the absence of any guidelines regarding the determination of appropriate fee the enlisted experts may claim excessive fees. In addition to this corrupt practices increase the cost of the process of EIA enormously. TIB's report has claimed that 'about 66% of the surveyed industries made illegal financial transactions through collusion at various stages of obtaining environmental clearance⁴⁷ and the average amount of corruption in every case ranges from a minimum of BDT. 36,000 to a maximum BDT. 1,08,800⁴⁸.

5.6 Application of Wood's Model into the EIA System of Bangladesh

The previous section has mentioned the fourteen criteria propagated by Christopher Wood for assessing the effectiveness of any given EIA system, now it is pertinent to apply his test into the EIA system of Bangladesh.

Evaluation Criterion	Whether System of Bangladesh Satisfies It?	Evaluation Criterion	Whether System of Bangladesh Satisfies It?
1)-Whether the EIA system based on clear and specific legal provisions?	Partially, yes.	8) Whether the findings of the EIA reports be a central determinant of the decision on the action?	'Gap between theory and practice'— theoretically :Yes But TIB's report shows in majority cases corruption prevails.
2) Whether the relevant environmental impacts of all significant actions be	Yes.	9) Whether monitoring of actions impacts be undertaken and it is linked to the earlier	Yes, in the process of monitoring— negative impacts needed to be monitored. [schedule

⁴⁵ Ibid. r. 15(5)

⁴⁶ Ibid. r.18(2)

⁴⁷ TIB (n.43) 12

⁴⁸ Ibid.

assessed?		stages of EIA process?	XI]
3) Whether evidence of the consideration, by the proponents, of the environmental impacts of reasonable alternative actions be demonstrated in the EIA process?	No, consideration of alternatives is a part of mitigation planning.	10) Whether the mitigation of impacts be considered at the various stages of EIA system?	Mitigation: Yes Whether required at various stages: No provision is made.
4) Whether screening of actions for environmental significance must take place?	Yes, by applying both 'case by case' and 'inclusion list' model.	11) Whether participation and consultation take place prior to, and, following, EIA publication?	Public Participation: Yes When: following EIA publication.
5) Whether scoping of the environmental impacts of actions take place?	Yes.	12) Whether the EIA system be monitored and, if necessary, be necessary be amended to incorporate feedback from experience?	No. the EIA Guidelines 2021 has becomes obsolete (due to the adoption of ECR 2023) yet no updated Guidelines are made.
6) Whether EIA reports meet prescribed content requirements and do checks to release of inadequate EIA reports exists?	Content: Yes Check: the ECR 2023 provides strong guidelines as to contents in its schedule XII but no check on adequacy of EIA report prior publication exists.	13) Are the financial costs and time requirements are acceptable to those involved in the EIA process?	Time: Reasonable (up to 30 working days for 'terms of reference' approval and up to 30 working days for EIA report approval from the date of submission of EIA

			report] Cost: No Guidelines or specified amount provided.
7) Whether EIA reports must be publicly reviewed and proponents respond to the points raised?	No, it is reviewed by the ECCC in its meetings and proponent(s) may be invited to give explanation. But ECCC meeting's minutes are published.	14) Does the EIA system apply to significant policies, plans or programs as well as to projects?	Yes. [Schedule I & Xiv] [ECR 2023 rule 13(6)

Table- Wood's Criteria for System Evaluation & BD EIA System

6. Conclusion

From the abovementioned discussion it is clear that though in many respect the EIA system of Bangladesh contains worldwide recognized principles but still it is not entirely effective. In order to make it more effective so that it can contribute in alleviating environmental risks many provisions and practices needed to be updated. The following chapter of this dissertation makes an elaborate list on recommendations in this respect.

