

Simplification of environmental and other impact assessments – results from an international online survey

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Abstract

Results from an international online survey on simplification efforts in environmental assessment (EA) and other types of impacts assessments (IAs) are presented. The survey, which was conducted between July and October 2022, captured responses from 45 participants who reported on developments in a total of 26 EA / IA systems. Whilst in about three quarters of these systems simplification efforts are either currently underway or planned, in particular with regards to reducing costs and time necessary for EA / IA, opposite developments were also reported on in two thirds of the systems, including an extension of existing requirements, such as the consideration of further aspects in EA / IA and the coverage of additional actions subject to assessment. The findings are a reflection of the increasing complexities of the contexts within which EAs / IAs are applied, and highlight the need for further empirical research on simplification efforts.

Introduction

Environmental Assessment (EA) as a participatory *ex-ante* assessment procedure of policies, plans, programmes and projects was first introduced in the US through the National Environmental Policy Act (NEPA) in 1969. Subsequently, it spread to jurisdictions world-wide, not just as EA (encompassing both, environmental impact assessment – EIA – of projects; see Fonseca, 2022; and strategic environmental assessment – SEA – of policies, plans and programmes; see Fischer and González, 2021) but increasingly also as Health Impact Assessment (HIA), Social Impact Assessment (SIA), Sustainability Assessment (SA) and numerous other types of impact assessment (IA; see Fischer, 2014; Fischer and Cave, 2018; Vanclay & Esteves, 2011; Morrison-Saunders et al, 2015). According to the Netherlands Environmental Assessment Commission (2022), project EIA is a legal requirement in 187 of the 195 officially recognised countries by the United Nations and SEA in over 60 countries.

Over the past three decades, many initiatives internationally have aimed at accelerating project development processes, in particular with regards to infrastructure planning. In this context, Faith-Ell and Fischer (2021, p169) reported on initiatives in the Netherlands, Germany, Switzerland and the UK. Globally, there are many more in both, developed and developing economies (see e.g. Bond et al., 2014; HeraldSun, 2022; Kannon, 2022; LuatVientnam, 2022, Kurmayer 2022). These appear to be routinely associated with attempts to ‘simplify’ environmental assessment, other IAs and related

licensing and permitting applications (see Fonseca and Rodrigues, 2017; Enriquez-de-Salamanca, 2021; Fischer, 2022). Whilst, up until recently, the focus of simplification¹ was mainly on reducing the number of EAs / IAs overall and reducing associated timeframes and unwanted administrative burdens² (at times also referred to as ‘streamlining’; see Bond et al, 2014), more recently attempts appear to be going further to include initiatives to either replace EIA and SEA (e.g. with environmental outcomes report in the UK, see Fischer, 2022; 2023a) or abolishing it altogether for particular applications (as happened in the case of small and medium-sized projects in the Brazilian state of Minas Gerais; see Fonseca and Rodrigues, 2017).

The main driving forces behind simplification efforts are perceptions that EAs / IAs (Roos et al, 2020; Fischer, 2021):

- are too expensive;
- take too long;
- get in the way of development;
- are ineffective in helping us protect the environment or to meet environmental objectives.

In this context, simplification initiatives frequently appear to be connected with changing political agendas and responses to economic downturns (Bond et al, 2014). Ultimately, simplification is hoped to lead to easier investments (Mallya, 2020), to a reduction of the risk of complications due to possible EA / IA predictions on potentially significant impacts of developments (Morrison-Saunders and Fischer, 2006) and to a reduction of the time and costs needed for implementation actions (Kotzé and Van Der Walt, 2003; Retief and Chabalala, 2009; Dourado, 2020). However, evidence for claims that EAs / IAs are indeed having these negative effects (and therefore should be simplified) is usually not provided. Whilst current EA / IA regimes throughout the world undoubtedly have weaknesses and face numerous challenges (Jha-Thakur and Fischer, 2016; UVP report, 2016a; b; Geißler et al. 2022; Jha-Thakur and Khosravi, 2021)³, criticism often appears to be overly simplistic, e.g. blaming EA / IA for delays caused by other factors, for example, public opposition to ‘unpopular’ projects (see e.g. Alberts et al, 2021).

Disregarding these issues, simplification is high on the agenda in many countries, and associated efforts take different shapes and forms. Up until now, who is driving these efforts and what is included have been poorly understood, though. It is within this context that this paper presents result of an international survey on EA / IA simplification efforts. Subsequently, the research methodology is first introduced, before results are presented and further reflections of the survey participants are summarised. Finally, conclusions are drawn.

With this paper, we hope to start a more systematic effort of keeping track of EA and IA simplification efforts globally. This is of great importance at a time when EA and other IA tools are, on the one hand,

¹ According to the Oxford Dictionary, simplification is ‘the process of making something easier to do or understand’. In actual IA practice the term ‘simplification’ is often used interchangeably with other terms such as streamlining, optimization, modernization.

² In their 2009 ‘Report on the Application and Effectiveness of the EIA Directive’, the Commission of the European Communities (CEC) concluded that it had the potential ‘for a future simplification exercise, the aim being to identify overlaps, gaps and potential for reducing regulatory and administrative burdens, in particular regarding transboundary projects’.

³ The seeds for current challenges in some systems were already laid when introducing EA / IA into existing policy, plan, programme and project making, for example by ignoring EA / IA elements that were already covered and therefore ‘doubling’ certain efforts; in this context, for SEA in Germany see Fischer, 2005.

increasingly criticised by those wanting to see more speedy development decisions, but when, on the other hand, they are also urgently needed to support transformations of societies in the context of the biodiversity and climate crises and implementing the UN sustainable development goals (see e.g. Fischer, 2023b; Kørnøv et al, 2020; Alberts et al, 2021).

Methodology

An online questionnaire was designed using the SurveyMonkey® platform. The questionnaire consisted of six main questions preceded by one initial question about respondents' geographical location ('What country / area do you work in/ represent?') and a final identification question, in case a participant was interested in the survey results. The answers to the main survey questions were compiled in an anonymous manner. Whilst three of the main questions were answerable with either a 'yes' or a 'no', three were open-ended, asking for explanations, as follows:

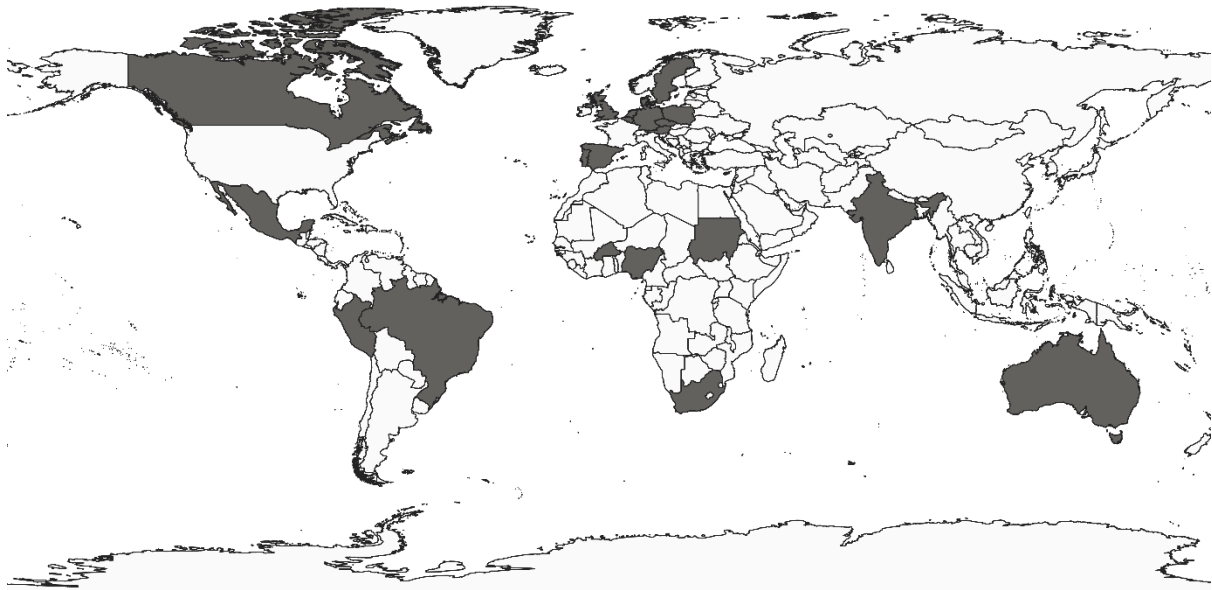
1. Have / are any efforts been / being made to reduce or 'simplify' environmental or other impact assessment requirements / practices in the country / area you work in / represent?
2. Are there any plans to reduce or 'simplify' environmental and other impact assessment requirements / practices in the country / area you work in / represent?
3. If you answered 'yes' to 1. / 2.; what is the nature of those reduction / 'simplification' efforts?
4. Is there any evidence available on the implications / effects of reduction / 'simplification'?
5. Rather than reducing or 'simplifying' environmental or other impact assessment requirements in the country / area you work in / represent, do you observe the opposite? i.e. have / are any efforts been / being made to extend environmental or other impact assessment requirements? If yes, please specify
6. What are the arguments/the reasoning for streamlining/simplifying impact assessment requirements/practices?

Questions were designed by the authors with the aim of obtaining basic information on simplification efforts internationally. Calls for contributing to the survey were made via the membership communication platform of the International Association for Impact Assessment (IAIA), 'IAIA connect', and through LinkedIn (a business and employment oriented online service). Furthermore, international experts from the public and private sectors, as well as academics and researchers, were directly contacted, either through email or during professional meetings and conferences. The survey was online from the beginning of July until the end of October 2022.

This non-funded initiative took the shape of an experimental endeavour and it was not intended to obtain an exhaustive picture of all systems globally. This would require a much greater research effort. The main aim was to obtain an initial impression of current simplification initiatives internationally and to create an informed position for engaging in further in-depth research in the future. The limitations associated with this approach are acknowledged by the authors and are outlined at the end of the paper.

Over the four months that the survey was online, a total of 45 responses were obtained. 43 of the respondents provided a name, affiliation and email address, which showed that all of them were EA / IA practitioners, either working as consultants or in development banks, authorities or higher education and research. These represent 20 national (Figure 1), four regional (also included in Figure 1 through the associated country) and two international (development banks) EA / IA systems.

Figure 1 – National and regional EA / IA systems reported on by repondents



The survey thus captured a total of 26 EA systems internationally, as is shown in Table 1. One of the responses reported efforts in ‘low/middle income countries’, but a decision was taken to exclude this response, as this label (low/middle income countries) includes over 130 countries, thus being potentially misleading. One should note, however, that a number of middle and low income countries are included in the survey results (e.g. Brazil, Burkina Faso, India, Nigeria, Peru, Mexico, South Africa and Sudan; also, the AfDB and ADB work within these countries) and these indicate that the emerging picture here is not entirely consistent (similarly to high income countries).

In the following section, results for the 26 systems presented in Table 1 are provided. The authors hope that the results will stimulate the emerging international discussion on EA / IA simplification. Further evidence for specific countries is provided by Faith-Ell (2023) for Sweden, González and Sobrini (2023) for Spain, Fonseca (2023) for Brazil, Geißler and Jiricka-Pürerer (2023) for Germany and Austria, Arts et al (2023) for the Netherlands, Noble (2023) for Canada, Kørnøv and Lyhne (2023) for Denmark, Alberts et al (2023) for South Africa, Haładyj et al (2023) for Poland, Jha-Thakur (2023) for India and Fischer (2023a) for the UK. Earlier works on EA / IA streamlining and simplification include those by Gibson (2012) for Canada and Middle et al (2013) for Australia.

Table 1 – The 26 EA systems represented in the survey⁴

1	Australia	National
2	Austria (2 respondents)	
3	Brazil	
4	Burkina Faso	
5	Canada (3 respondents)	
6	Czechia	
7	Denmark	
8	Germany (4 respondents)*	
9	India	
10	Mexico	
11	Netherlands	
12	Nigeria (2 respondents)	
13	Peru	
14	Poland (2 respondents)	
15	Portugal	
16	South Africa (9 respondents) *	
17	Spain	
18	Sudan	
19	Sweden	
20	UK (3 respondents)	
21	Flanders (Belgium region)	Regional
22	New South Wales (Australian state)	
23	Wales (UK nation)	
24	Western Australia (Australian state)	
25	Asian Development Bank (ADB)	International
26	African Development Bank (AfDB)	

* The higher numbers for the systems from South Africa and Germany were likely due to the survey being mentioned at national EA conferences in those countries.

Results

As expected, simplification and streamlining efforts were conducted in the majority of countries involved. For 19 of the 26 systems the question whether any efforts have been or are being made to simplify environmental or other impact assessment requirements and practices in the country or area a respondent is representing was answered with a ‘yes’ and for seven systems with a ‘no’. Those who said ‘no’ included both the Asian and African Development Banks, as well as respondents for Burkina Faso, Sudan, Czechia, Sweden and Western Australia.

Simplification is an ongoing process and 18 respondents said that there were further plans on reducing or simplifying EA and / or other IA requirements and practices. Eight stated that there weren’t any. The latter include some systems already appearing as ‘Nos’ to the first question, namely the Asian and African Development Banks, as well as Burkina Faso, Sudan, Sweden and Western Australia. In

⁴ Whilst it would be desirable to also state associated pieces of legislation and guidance, this is not something we included in the survey question. It is likely that (a) this would have made the survey a lot more complicated, due to the sheer number of pieces of legislation / guidance that may be relevant (in the UK alone, EIA has been transposed in over 40 regulations; see Fothergill and Fischer, 2022); and (b) connected with the former point, it would be very likely there would have been major gaps in any resulting list

addition, the respondents from Mexico and Canada stated that there were no further plans for simplification.

The next question dealt with the nature of ‘simplification’ efforts in the event that a respondent answered ‘yes’ to either or both of the previous two questions. Participants reported a diverse range of simplification efforts, such as changes in timeframes, legal framing conditions and procedural elements. Table 2 synthesizes the main categories of efforts (i.e. their nature) and their associated EA / IA systems.

Table 2: Nature and location of the identified EA / IA simplification efforts

Nature of simplification efforts	Reported in the following systems
Reducing EA timescales / timelines by either reducing procedural requirements or by streamlining / fast-tracking procedures	Canada, South Africa, Germany, UK, Portugal, Brazil, Austria, Poland Spain and New South Wales. In India this was said to include less stringent requirements for monitoring and for both, India and Brazil, less extensive public participation requirements were also mentioned.
Simplification of EA for certain projects / exclusion of certain types of projects from EA	South Africa, Peru, Canada, Germany, UK, Denmark, Portugal, Brazil and Mexico. In the cases of Germany, Denmark and Portugal, these efforts were said to apply to projects of the green economy and were based on a wider European Union initiative.
Reducing the length of EA documents by including fewer aspects and through e.g. digitalisation / online baseline information and associated with it better accessibility ⁵	UK, Australia, Nigeria and Brazil. Efforts to include fewer aspects in EA were also said to be in place in Peru, the UK and Brazil.
Reducing (‘simplifying’) standards and norms for assessments and simplifying guidelines.	South Africa, the Netherlands, <i>Flanders</i> and the <i>UK*</i> .
Reducing ‘thinking’ in EA towards a tick-box exercise	South Africa, with particular reference to a national online screening tool.
Reducing safeguards, such as making the involvement of the Netherlands EA Commission and the Flemish government’s ‘Team EIA’ optional only	Netherlands, Flanders
Curtailing rights to legally challenge decisions on developments	Poland
Refocusing EA away from prediction to mitigation and monitoring	Wales (related to flood risk management) and Brazil
The introduction of a rapid assessment framework for certain types of development	New South Wales
Integration of water framework directive associated EA with climate change associated IAs	Germany

* *When in italics, then the respondent stated that this had not yet taken effect.*

⁵ Next to being perceived as expressions of simplification, digitisation and better accessibility can also be understood as being optimization focused (according to the Oxford Dictionary optimization is the process of finding the best possible solution to a problem) . This is important, as whereas simplification tends to raise some skepticism by EA / IA advocates, optimization is often seen as an improvement (Bojārs et al, 2016).

In addition to the points outlined in Table 2, in the UK, there are currently plans for the development of an entirely new instrument, so-called 'Environmental Outcome Reports' (Fischer 2022; 2023b). Furthermore, the respondent from Flanders stated that they *'are developing an online screening tool, for both projects and land use plans. Users will have to enter data about the project/plan, [and] the tool will show 'sensitivities' on several maps. The combination of both will lead to a 'guided' conclusion on significance of effects'*. And finally, respondents from India and Mexico stated that as part of simplification efforts, post-facto environmental clearances were being legitimised.

In addition to the explanations on simplification activities, respondents were also asked about the arguments and the reasons behind current actions towards simplification. These are largely in line with the four main reasons stated in the introduction. Respondents made explicit reference to the following:

- Either too limited financial resources being available or EAs being perceived as too costly (mentioned by the respondent for the Netherlands);
- Perceived delays to development (mentioned by respondents for the UK, Nigeria, India, Canada, Brazil, Poland and the Netherlands);
- Documents that are too lengthy and (as a result) not comprehensible (mentioned by respondents for the UK and Brazil);
- EAs that are not tailored to the purpose of a particular situation (mentioned by the respondent for the UK), as well as administrative burdens for plans / programmes that have insignificant impacts (mentioned by the respondent for Spain);
- EAs that are perceived as putting a break on development and economic growth and that are said to be too costly for businesses (mentioned by respondents for the UK, Australia, South Africa, India, Peru, Canada and Brazil);
- Stakeholder pressure to simplify current EA requirements (mentioned by the respondent for Nigeria);
- The need to develop clean, carbon efficient, reliable and affordable energy more quickly (mentioned by respondents for South Africa, Austria, Germany, Denmark, Portugal, Spain);
- The perception that comprehensive EAs are not leading to better, more environmentally friendly decisions (mentioned by the respondent for Brazil);
- The perception that more participation is not necessarily a good thing for the environment (mentioned by the respondent for Brazil);
- A perception that EA needs to become more relevant (mentioned by the respondent for Austria);
- The need to finish projects during an election cycle (mentioned by the respondent for Mexico).

In addition to the above points, respondents answering for Portugal and Germany also mentioned the need for IA to change, based on pressures associated with the COVID19 pandemic (with regards to e.g. the need for finding different ways of conducting public participation) as well as the current war in Ukraine (here in particular with regards to changing energy provisions and the perceived need to speed up approval procedures for e.g. LNG – liquefied natural gas – terminals).

The final two questions of the survey focused on whether the reverse to simplification was observed; 'rather than reducing or simplifying environmental or other impact assessment requirements in the country / area you work in / represent, the opposite is observed, i.e. efforts have been / are being made to extend environmental or other impact assessment requirements'. In this context, it was explained that this could also happen unintentionally.

In 16 of the 26 systems represented in the survey, an extension of existing requirements and practices was said to occur. In 12 systems, where simplification attempts were said to either be made or planned, this was also stated to be the case, including in Australia, Brazil, Canada, Czechia, Denmark, Flanders, Germany, New South Wales, Portugal, Poland, the UK and Wales. Furthermore, according to the respondents, no simplification was planned within EA practices in the four systems of the Asian Development Bank, Burkina Faso, Sweden and Western Australia. Instead here, existing EA practices were planned to be extended. The only system where neither simplification nor extension attempts were said to be made is Sudan. A possible reason may be that the current system appears to be operating already at a rather basic level (Al Tourabi, 2007; Ali and Idris, 2016).

With regards to extending existing IA requirements, the respondents noted the following:

- For the ADB: more parameters have been / are being included in safeguard policies;
- For Burkina Faso: The EA system has moved towards awarding accreditation for those preparing assessment reports;
- For Flanders: There is an intention to make EIA mandatory for projects that previously were voluntary;
- For the UK: The technical scope of EA and other IAs has continuously been extending with an increasing number of aspects being included; this has led to more extensive documentation;
- For Australia: Offshore wind developments now require the preparation of EA; furthermore, there is now a provision to include the consideration of greenhouse gases in EA, as well as cumulative impacts and more (and better) alternatives;
- For Canada: The 2019 EA reforms have led to a broadening scope, with aspects such as greenhouse gas emissions and gender being included;
- For Czechia: EA has experienced increasing complexity because of widening demands; also, EA screening reports are said to have become quasi EIA reports;
- For Denmark: A better integration of the sustainable developments goals (SDGs) in EA has been sought, which has led to the inclusion of more aspects in EA;
- For Western Australia: the 2020 amendments have led to a formal requirement for the consideration of alternatives in EA;
- For Portugal: EAs now have to consider greenhouse gas emissions and the 'do no significant harm' principle applies;
- For Germany: permitting requirements have been extended and there are new (additional) assessments that are increasingly carried out;
- For Brazil: an extension of requirements has happened in exceptional cases, for example in the state of Minas Gerais where EIA was initially simplified in 2004 with many projects becoming EIA exempt; however, this created so many problems that the state government had to roll back on those simplification efforts;
- For the Netherlands: A 'sustainability check' was introduced for certain projects;
- For Sweden: the extension here consists of providing additional funds to authorities in order to support them to do permits more quickly and to strengthen the quality of assessments, in particular the consideration of alternatives; also, SEA requirements were extended; and
- For Poland: a change in required data file formats; now only PDF, Excel or Word are required and not SHP (a geospatial vector data format for GIS); this is making it more difficult to e.g. conduct cumulative impact assessments for all environmental components;
- For New South Wales: Requirements have been extended, in particular for Social Impact Assessment for state significant development (SSD) projects and for large-scale solar energy developments.

In addition to the reasons provided above, respondents for two countries who had said that EA / IA requirements or practice was not becoming more extensive still observed increasing levels of complexity. One respondent from South Africa remarked that they thought the national web-based

screening tool which was supposed to simplify EA was actually achieving the opposite. Furthermore, the respondent from Austria stated that non-governmental organizations (NGOs) were continuously asking for more baseline data.

Further reflections on EA and IA by respondents

Whilst not being explicitly asked to do so, a number of participants provided further comments and reflections on current EA and IA practices and the implications of already applied simplification approaches. These are briefly summarised below.

One respondent suggested that current simplification efforts appeared ill conceived because *'EIA is different from other certificates; it takes longer as it's about continuous monitoring and management'*. Another one remarked that *'whilst lip service was being paid to the triple bottom line [in EA / IA] there was no intention to deliver on it'*.

Arguing in the same vein, one respondent expressed the concern that the removal of requirements for more detailed assessments could result in more significant social and environmental impacts. Similarly, another one stated that *'streamlining has risks for environmental protection'*; with another respondent adding that: *'the net result [of simplification efforts] is a decline in standards, decline in quality and poorer decisions (cynically, we can now blame climate change!).'*

In this context, one respondent noted that: *'the quality of EIA / SEA reports seems to decline (confirmed by court cases)'*. A key challenge for EA was seen by one respondent to be *'incompetent staff'* at decision making authorities, with another one suggesting that simplification through quantification was the wrong approach: *'Taking phony comfort in 'numbers/values' when assessment is based on professional understanding and judgement (assigning values to value judgements and then performing arithmetic or statistics across non-empirical data is nonsense), yet, somehow brings a measure of comfort to officials'*

In more general terms, one respondent was highly critical of current efforts to reform EA / IA, suggesting that: *'The focus of ESIA [Environmental and Social Impact Assessment] has been lost, we adopt a shotgun approach in the hope of addressing everything rather than focusing on issues, especially key issues'*.

Conclusions

In this paper, results from an online survey on simplification efforts on environmental and other impact assessments with practitioners and experts, conducted between July and October 2022, are presented. A total of 45 responses were obtained on 26 EA / IA systems, with 43 of the respondees indicating their affiliation. All of them were EA / IA practitioners and / or researchers. In about three out of four systems, current simplification efforts were observed, with more than two thirds also stating that there were plans for future / further efforts. Simplification efforts were manifold, including removing EA / IA requirements for certain types of development; shortening processes by either reducing timelines or removing certain procedural requirements; including fewer aspects in assessment; reducing the length of documentation; reducing quality (assurance) standards / safeguards; and integrating different types of assessments. Two of the efforts to shorten time frames were not about reducing requirements, but rather involved providing further funds to authorities, so

that decisions could be made more quickly and by enhancing competencies of those preparing EAs / IAs through accreditation.

Furthermore, over 60% of the respondents noted that, at times, EA / IA requirements and / or practice were becoming more extensive and / or more complex. In other words, that ironically simplification came in parallel with further complication. Main elements of this were said to include an increase in the number of aspects covered in EA / IA, the inclusion of further types of development requiring EA / IA and also the coverage of new types of IA. In this context, the introduction of the concept of sustainability as an aim of EIA arguably further complicated matters because of its weak conceptual basis and lack of commonly agreed definition / understanding (see for example Roos et al, 2020).

Results indicate that EA / IA systems are currently operating in complex environments. On the one hand, there is pressure to make EA / IA processes and documents shorter, leaner and cheaper, whilst on the other hand, and often in the same systems, EA / IA is asked to take account of an increasingly complex world that comes with an increasing number of aspects being considered important in policy, plan and project development, for example, climate change, gender, equality, as well as wider social and environmental issues. Roos et al (2020) have highlighted that in the South African context, this requirement for EA to deliver beyond its initial environmental mandate, is arguably one of the greatest frustrations faced by regulators.

Responses make it clear that there are various risks associated with simplification, most importantly a possible failure to achieve ambitious environmental and social standards and targets. Also, there is a danger that simplification efforts lead to the opposite, i.e. making EA / IA more difficult and complicated, which might even lead to unintended consequences such as increased procedural inefficiency.

The results from the survey represent a first step in developing a better understanding of the direction in which EA / IA systems are currently progressing internationally. What is clear is that in the absence of robust empirical evidence for actual, rather than perceived weaknesses or negative performance of EA / IA systems, not only might such systems be weakened, but there is a real risk of accelerating environmental decline and exacerbating social challenges (see Fischer , 2023b). A cautious approach is therefore needed towards EA / IA systems' reforms. Greater focus in the research community on outlining empirical evidence for the actual benefits of having EA / IA systems is also needed. Where shortcomings or negative impacts of EA / IA systems are identified, the root causes of these need to be fully understood before sweeping changes are suggested and implemented. However, there can be no doubt that we need to develop EA and IA further in order to make them more effective than they currently are.

Limitations of the research underlying this paper

The research underlying this paper was unfunded, with the main purpose being to gain an initial impression of what IA 'simplification' measures may look like and how extensive they are globally. The authors acknowledge that asking six questions only means that a limited number of aspects are covered. In order to limit the risk of – unintentionally – omitting important issues, open ended questions were included, asking respondents for their opinions, rather than just allowing for simple 'yes' or 'no' answer. Furthermore, an obvious limitation is the limited number of IA systems covered by respondents and also the fact that whilst some countries had numerous respondents contributing (e.g. South Africa had 9), most are represented by one respondent only. This means some answers

may reflect personal opinions that are not necessarily shared by others. Finally, and associated with the last point, the results presented in this paper do not go into a lot of depth with regards to establishing interpretations and explanations. For this reason respondents were invited to write more in-depth letters about the initiatives in their countries. Eleven letters were received on 12 systems (and subjected to peer review) that are published alongside this paper in the associated special issue of *Impact Assessment and Project Appraisal*.

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