

HKIEIA 2022 EIA Webinar Series

## Getting to Grips with Climate Change in EIA

Josh Fothergill FIEMA CENV

26th July 2022



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#### **EIA Webinar Series** 2022

21 June -**Proportionate EIA** 

[Recording available online]

26 July - EIA & Climate Change

Digital EIA 30 Aug

**EIA** and the SDGs 11 Oct





#### **Outline:**

- Climate Change & EIA Professionals
- Climate Change's inclusion as an element within EIA
- Hong Kong, Climate Change & EIĂ
- Getting to grips with CC in EIA practice
- Q&A session





# Climate Change and EIA Professionals



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## This webinar assumes agreement across the audience on the following:

- Climate Change is real and scientifically agreed on
- Current warming trends are driven by human activities
- GHG emissions must peak & fall as soon as possible to limit impacts
- Impacts of changing climate already being seen across world
- A certain proportion of climate impact is now 'locked-in'

Note: GHG = Greenhouse Gases:

Carbon Dioxide, Methane, Nitrous Oxide, Fluorinated Gases



## IA Professionals Priorities Plans / Projects & Climate Change

- Ensure Climate Change is being considered
  - Greenhouse Gas Emissions ("Carbon")
  - · Resilience of project
  - Combined impacts project and CC on environment
- Engage and add value to the above discussions
- Utilise existing project activity related to understanding GHG emissions and climate related risks in IA process as needed
- Push for:
  - Strong application of GHG Mitigation Hierarchy
  - Further assessment of CC if you view approach being taken is not sufficient



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## The Carbon Reduction Hierarchy It has greater value at IA stage of a Project

PAS 2080: 2016

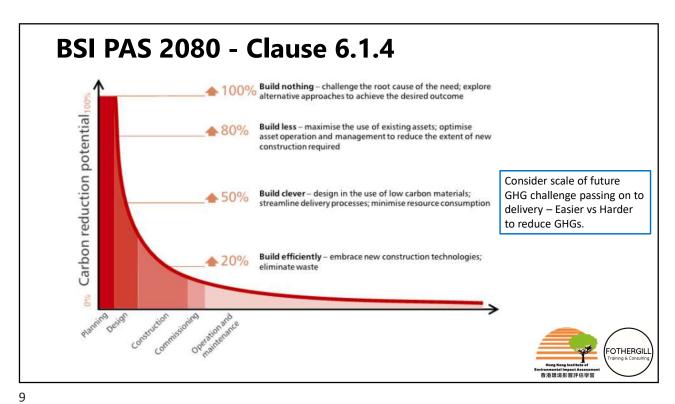
- Build Nothing
- Build Less
- Build Clever
- Build Efficiently

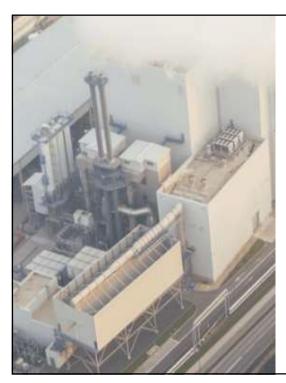


Or In broader terms
IEMA GHG Hierarchy (circa 2009)

- Eliminate
- Reduce
- Substitute
- Compensate







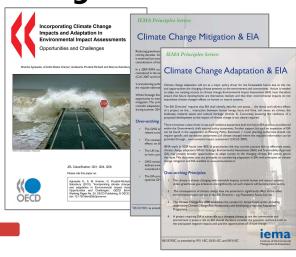
### The inclusion of Climate Change as an element in EIA





- effectiveness notes need to improve focus on CC (Jul, **09**)
- Pfr Lord Stern wins IAIA Global Award
- 2 x IAIA Symposia on IA & CC in Washington DC and Aalborg
- IEMA launches first principles on GHG and CCA in EIA.
- OECD launches EIA & CC report: Opportunities and Challenges







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#### 2013: The 'start' of CC & IA Guidance

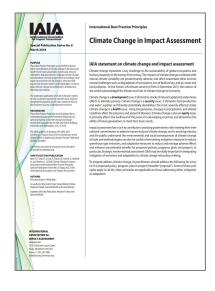


- IAIA Global Best Practice Principles IA & CC launched (published 2012)
- IAIA FasTips on Climate Smart **Decisions**
- EC Guidance on:
  - CC in EIA
  - CC in SEA

Unfortunately, none of these early documents provided clear methods / step by step guidance...



#### **IAIA Best Practice Principles**

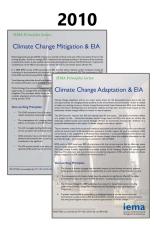


- Original in 2012 as a result of discussions from 2010 symposia on IA & CC
- Updated in 2018:
  - Increasing focus on breadth of CC risks in terms of adaptation & resilience not just environment, but also:
    - Development
    - **Security** (of supply = water / food)
    - Health and
    - Equity



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#### IEMA's leading role in CC & EIA Guidance







- EIA + CCR&A '20: Updates = lessons learnt and case studies.
- EIA + GHG '22: Updates = lessons learnt and improved context



## In the EU Climate has been covered in the legislation since 2014 (...or before or after 2017...)

#### Article 3 of Directive 2011/92/EU as amended by 2014/52/EU

- 1. The environmental impact assessment shall identify, describe and assess in an appropriate manner... the direct and indirect significant effects of a project on the following factors:
- (a) human beings, fauna and flora population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
- (c) land, soil, water, air and **climate** and landscape;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in points (a) to (d).



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## CC in EIA Some Approaches Beyond Europe

Canada: Impact Assessment Act (2019)

Section 22(1)(b)(i) requires the <u>body conducting the assessment</u> to consider the extent to which the project may contribute to / hinder Canadian Government's ability to meet its obligations and commitments in respect of climate change.

Section 63(e) provides that <u>in granting Ministerial approval</u> to an EIA project the Minister <u>must consider</u> extent the project may contribute to / hinder Canadian Government's ability to meet its obligations and commitments in response of climate change.

Published Strategic Assessment of CC Guide - October 2020, reviewed every 5yrs

Australia: Brought in @ State level - Federal EIA has restricted scope

Western Australia EIA includes GHG emissions under Air.



#### **CC** within ESIA

#### **Development Financing + Support**

#### **Examples**:

- DFID embedded CC trained staff
- NCEA capacity building
- World Bank ESF Vision for SD:

"within the parameters of a project, the Bank seeks to:

 Address project-level impacts on climate change and consider the impacts of climate change on the selection, siting, planning, design and implementation and decommissioning of projects

"The **environmental and social assessment**, informed by the scoping of the issues, will take into account all relevant environmental and social risks and impacts of the project, including:

(a) Environmental risks and impacts, including:

(iii) those related to climate change..."

**ESS3** – Resource Efficiency & Pollution Prev+Mgnt:

**ESS4** – Community Health and Safety

ESS6 - Biodiversity Conservation & Sust Mngt living Nat Systems



EIA & CC workshop – Amman (July'22) NCEA, GIZ and Ministry for Environment of Jordan



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#### **Hong Kong**

## Climate Change and EIA



**Serious flooding of coastal areas** 2018: Heng Fa Chuen during Super Typhoon Mangkhut





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## CC Vulnerability Assessment (ERM for EPD 2010) A Study of Climate Change in Hong Kong - Feasibility Study – Apdx C:

#### Defining Consequence

Consequence	Definition	Defining Likelihood	
High	Likely <sup>1</sup> to cause:	Dejining L	ikelinoou
	<ul> <li>Serious loss of life and limb (over 100 affected)</li> </ul>		
	<ul> <li>Creation of large number of permanent or temporary climate change refugees (over 5,000 people)</li> </ul>	Likelihood	Definition
	Permanent loss or irreversible change to ecosystem or majority of	High	Likely (a) to occur several times a year
	component species  Permanent loss of majority of sector revenue	Medium	Likely to occur on an annual basis
	Destruction or serious damage to key assets	Low	Likely to occur on a decadal basis
	Serious interruption to sector activities for over I month	Low	Likely to occur on a decadar basis
Medium	Likely to cause:		
	<ul> <li>Some loss of life and limb (over 10 affected)</li> </ul>		
	<ul> <li>Creation of permanent or temporary climate change refugees (&lt;5000 people)</li> </ul>		
	Permanent loss or irreversible change to some component species within		
	<ul> <li>ecosystem</li> <li>Permanent loss of minority of sector revenue, temporary loss of majority</li> </ul>		
	of sector revenue		
	Damage to key assets		
	Interruption to sector activities for over 1 week		
Low	Likely to cause:		
	Risk of non life threatening injury		
	<ul> <li>Creation of temporary climate change refugees (0-500)</li> </ul>		
	<ul> <li>Temporary damage, reversible change to ecosystem, loss of small number</li> </ul>		
	of component species		<del></del>
	<ul> <li>Temporary loss of minority of sector revenue</li> </ul>		
	Minor damage to assets		Hong Kong I
	<ul> <li>Minor interruption to sector activities for &lt; 1 week</li> </ul>		Environmental Imp



#### Human Health - Medium / High Vulnerability

- Increase in surface temperature;
- Changes in precipitation patterns;
- Changes in frequency and/or severity of extreme climate / weather
- · events;
- Decreased global solar radiation;
- Changes in the survival of some pathogens and disease patterns;
- Changes in respiratory, vector-borne, water-borne and food-borne diseases;
- Impacts on health and external infrastructure; and,
- Health and safety of workforce and the general population.



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#### Biodiversity – High vulnerability

- Increase in surface and sea surface temperatures;
- · Changes in frequency and/or severity of extreme weather events;
- · Changes in precipitation patterns;
- · Ocean acidification;
- · Onset of hypoxic conditions;
- More frequent hyposaline events;
- Changes in terrestrial and marine species distribution/occurrence;
- Changes to Montane habitat;
- · Changes in Hong Kong ecological communities;
- · Wash out of streams;
- · Increased risk of storm damage to woodlands; and
- Changes in the size of intertidal habitats and sedimentation rates due to sea level rise.



#### Built Environment – Medium / High Vulnerability

- Increase in surface temperatures;
- Changes in frequency and/or severity of extreme weather events;
- Changes in precipitation patterns;
- · Sea level rise;
- Impacts on the building stock and slope stability;
- Impacts on transport, communication and drainage (including stormwater drainage, sewerage systems and wastewater treatment facilities) infrastructure; and,
- Health and safety of workforce, building occupants and tenants.



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#### Climate Change's influence in Hong Kong

#### Recent climatic extremes

2020: **Recorded 47 "very hot days"** (>=33C)

Beyond previous worst-case projections for 2030 (40days) or 2040 (46 days)

Forecasts – IPPC AR6 (Aug 2021)

Annual mean sea level in 2100 likely to rise 0.37m - 1.08 m relative to '95-14 average (SSP2-4.5 low – SSP5-8.5 high)

Temperature will rise with more and higher periods of intense heat It will be wetter by end of century 7-10% more rainfall, but distribution of this is less clear

Global mean tropical cyclone intensity is likely to increase



#### Hong Kong's Climate Change Action Plan

#### "Hong Kong will strive to achieve carbon neutrality before 2050"

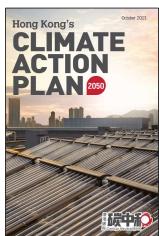
HK Chief Executive 2020 Policy Address - November 2020

#### **Headline Targets**

- <2035 = 50% reduction carbon emissions vs 2005</li>
- <2050 = Hong Kong is carbon neutral</li>

#### Four key strategies

- Net-zero Electricity Generation
- Energy Saving and Green Buildings
- Green Transport
- Waste Reduction





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#### **HKCC Action Plan provides areas IA** can test beyond GHG targets

Carbon Neutrality of strategic growth areas

- · New Territories North, and
- · Artificial islands in the Central Waters
- New development areas build low-carbon liveable communities, incl:
  - · Direct Cooling Systems,
  - · Green and Sustainable Design reducing energy consumption,
  - providing railway services, and
  - Installing charging networks for EVs at an early stage.
- Save energy through proper land use planning
  - · Building layout,
  - · Green public mobility options (e.g. walking and cycling), and
  - setting up waste separation and recycling facilities in communities



#### **HKCC Action Plan**



#### Resilience







emergencies

Prepare for

What are the implications of:

increases in typhoons, landslides, floods (both storm surges and rainstorms), droughts, future sea level rise, extreme heat

to the environmental receptors considered under the EIA Ordinance?





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#### **EIA Ordinance Current definitions** re: Lack of direct GHG and CC coverage

environment (環境)—

(a)means the components of the earth; and

(b)includes—

(i)land, water, air and all layers of the atmosphere;

(ii)all organic and inorganic matter and living organisms; and

(iii)the interacting natural systems that include any of the things referred to in subparagraph (i) or (ii);

environmental impact (環境影響), for a designated project, means—

(a)an on-site or off-site change that the project may cause in the environment; (b)an effect of the change on-

- (i)the well-being of people, flora, fauna and ecosystems; (Amended E.R. 1 of 2021)
- · (ii)physical and cultural heritage;
- · (iii)a structure, site or other thing that is of historical or archaeological significance;

(c)an on-site or off-site effect on any of the things referred to in paragraph (b) from activities carried on for the project;

(d)a change to the project that the environment may cause, whether the change or effect occurs within or outside the site of the project;



**Indirect** 

CC coverage



#### Climate Change in the future HK EIA Ordinance?



#### Not my place to seek to direct this in Hong Kong!

#### **GHGs**

I understand there are existing tools which help ensure GHG considerations factors in the design and consenting process.

#### CCR&A

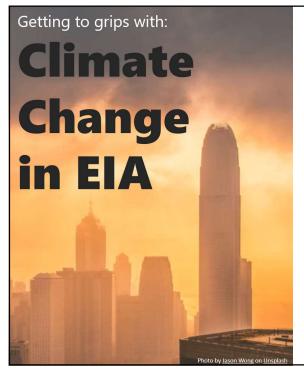
However, within existing EIA Ordinance environmental topics:

- How might CC impacts affect the receptor into future? and
- Could considering the effects of the project + CC impacts on a receptor change the significance of the EIAs findings?

Answering these forms an increasing component of good international EIA practice.

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## Getting to grips with Climate Change in

**EIA Practice** 



#### Getting to grips with CC in EIA

Consideration of climate change in EIA is generally found to relate to three areas of risk:

- The development's GHG emissions
- The development's risks from / resilience to CC effects
- The combined effect of CC and the Development on other (traditional) Environmental receptors



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#### **Climate Change** (GHG) + EIA **An increasing area for legal challenge**

- European Court of Justice (C-121/21 R) Czech Republic v Poland
  - Extension of life of lignite mine permission without EIA
  - Interim Ruling (May'21) immediately cease lignite extraction @ Turow mine
  - Failed to comply (Sept'21) imposed penalty Euro 500,000/day
  - Final Ruling Feb'22, but... currently only available in French and Polish.
- UK cases related to both Heathrow and Stanstead airport expansions and the M4 Relief Road (S.Wales)
- Mar'22: Breadth of GHG assessment in UK EIA (Finch vs Surrey CC). Oil
  well, permission, EIA's GHG assessment only considered those within site
  not usage of extracted oil. Judge dismissed appeal stating:

"the necessary causal connection between the proposed development and the impacts of 'scope 3' emissions was absent in this case"

## Considering GHG Emissions in EIA practice



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#### Scoping the EIA's GHG assessment Scope and Boundary decisions

Increasingly expectations in EIA Good Practice around GHG that the assessment moves beyond the simpler calculations of construction and operation emissions to an estimation of the **whole life carbon effect**.

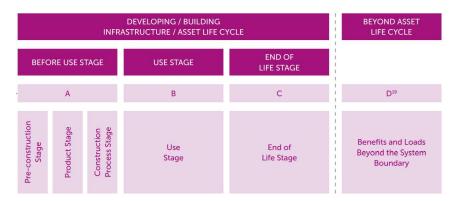
This pushes further into considering Scope 3 emissions:

- Scope 1 = Direct Emissions from operations of development.
- Scope 2 = Indirect GHG emissions from purchased power related to development (electricity, heating, colling, etc)
- **Scope 3** = All indirect emissions (not included in scope 2) that occur in the value chain of the development, both upstream and downstream.

The assessment of GHG in EIA therefore needs a justified **System Boundary** and a clear explanation of life cycle stages scoped in.



## **PAS 2080**: Modular Approach to GHG Ast Systems Boundary and life cycle stages



Certain life cycle stages may be excluded to deliver proportionate EIA, but must be professionally justified and transparently explained.

> invironmental Impact Assessme 香港環境影響評估學館

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Multiple GHG assessment demands can exist for a project - Sensible seek a single approach with the scope to provide evidence for all requirements.

Example: UK from both EIA + CEEQUAL / BREEAM.

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## Defining the GHG baseline now <u>and</u> in the future is important

The GHG baseline provides the point from which the project's net GHG impacts are assessed from and reported against.

Two approaches can be applied, sometimes both are needed:

- i. Those GHG emissions within the defined assessment boundary without the proposed project.
- ii. GHG emissions from a 'standard' project of the type proposed.

Future baseline should consider operational <u>and</u> user emissions without the proposed development.

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## Assessment and Significance of GHG in EIA

**Assessment** requires collection of data on materials sources of GHG within scope, confirmation of emission factors (e.g. grid electricity, construction materials, transport) and calculation of GHG inventory.

• *Uncertainty* in data / methods can be handled via sensitivity testing

#### **GHG Significance – challenge for EIA, but gaining clarity** (IEMA'22)

- all new GHG emissions contribute to –ve environmental impact; but a project may replace activity that had higher GHG profile.
- GHG Significance therefore based on net impact over its life-time.
- GHG targets enable EIA significance to move from consideration at global scale to a more practical basis for significance evaluation.

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#### **EIA - GHG Significance**

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Environmental Impact Assessme 香港環境影響評估學會

EIA GHG significance not about:

- whether the project emits GHG emissions,
- the magnitude of its GHG emissions alone

Effective evaluation project GHG significance in EIA is demonstrating how it contributes to reducing GHG emissions relative to a comparable baseline consistent with the relevant net zero trajectory by xx date

Contextualized by location, sector, city, etc.

Sector-based
e.g. rall sector
emissions and reduction goals in the UK

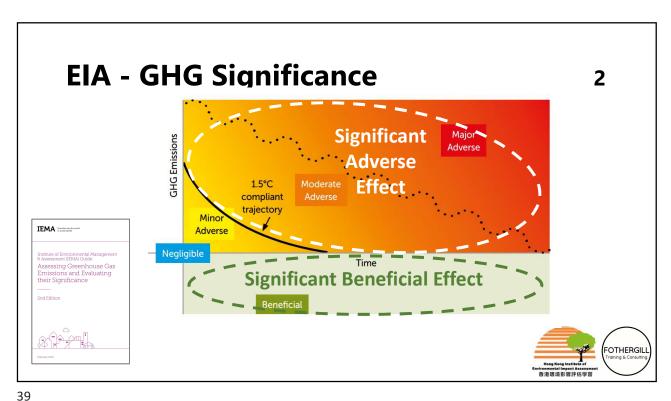
National
e.g. UK carbon budget

National
e.g. UK carbon budgets and net zero trajectory

Sector-based
e.g. policy measures to decarbonise electricity generation

Performance standards
e.g. UK GBC's net zero carbon home





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#### **EIA - GHG Significance**

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**Major adverse** - locks in emissions + makes no meaningful contribution towards net zero trajectory:

- the project's GHG impacts are not mitigated or
- GHG impacts are only compliant with do-minimum standards set through regulation, and do not provide further reductions required by existing local and national policy for projects of this type.



**Moderate adverse** - falls short of fully contributing to the (UK's) trajectory towards net zero.

- the project's GHG impacts are partially mitigated
- Partially meet applicable existing / emerging policy requirements but don't fully contribute to decarbonization in line with local / national policy goals for projects of this type.

# Examples of GHG in EIA Guides (and other tools)



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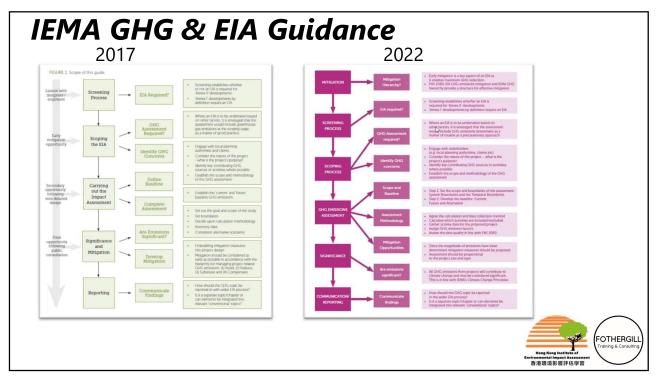
#### Western Australian's Approach

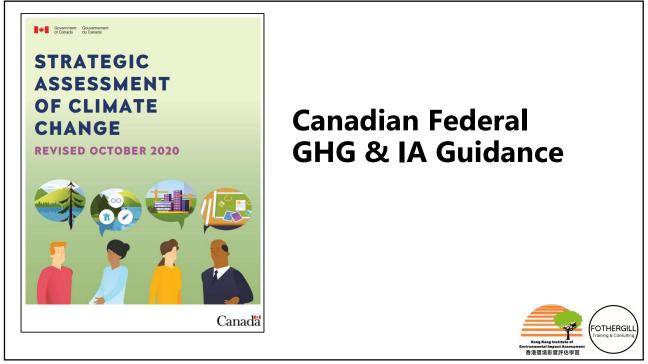
- Credible estimates lifetime emissions: Sc1,2+3
  - Annual & Total
  - Breakdown of key sources
  - Projected emissions intensity vs benchmark
- GHG Management Plan, minimum coverage
  - Intended lifetime reductions Scope 1 emissions
  - Interim and long-term targets related to above
  - Strategies demonstrating all reasonable and practical GHG hierarchy applied
- Measures to Avoid, Reduce and Offset GHG emissions
  - Best practice design vs comparable facilities
  - Continuous improvement to reduce emissions over time
  - GHG emissions offsetting package for some / all residual emissions.

**Common Challenges** 



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## Considering the project's CC Resilience in EIA practice



## CC Risk Assessment of the Project's Resilience

At its core are 3 key steps:

- 1) Identifying potential climate change risks to the project.
- 2) Assessing these risks (including option to define severity).
- 3) Defining mitigatory actions to reduce the likelihood / impact of the identified risks.

This could sit aside the EIA process, <u>but</u> the project itself may be considered a receptor: residential / transport infrastructure linked to <u>well-being of people</u>.



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## **Examples of CC Risk Assessment Methodologies**

Appendix 1 of IEMA's 2020 EIA & CCR&A Guide highlights two useful methodological examples:

- The CCRA approach defined by Canada's Public Infrastructure Engineering Vulnerability Committee (PIEVC)
- The C40 Cities climate change risk assessment guidance (2018)



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## **European Commission - Technical guidance Climate proofing of infrastructure in the period 2021-2027** (2021/C 373/01)

Annex D - Climate proofing and EIA

#### **D3 – Understanding key CC Adaptation Concerns**:

- How might implementing the project be affected by climate change?
- How might the project need to adapt to a changing climate and possible extreme events?
- Will the project influence the climate vulnerability of people and assets in its vicinity?

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#### **Examples: CC Res&Adapt in Project EIA**

IEMA (2020) EIA Guide to CCR&A - Appendix 2, UK examples:

- Turley Energy from Waste facility
- Arup Expansion of Stanstead Airport
- Multiple consultancies High Speed 2, Phase 1 and 2a

#### NCEA & IAIA (2017) Environmental Assessment for Climate Smart Decision Making

- **EIAs**: Denmark Waste Management, UK Urban Development, Netherlands Water Management.
- **ESIAs**: Belize Infrastructure, South Africa Port Development, Philippines Infrastructure.

**Note**: The NCEA is seeing good examples of CCA in Netherland EIA practice and is currently updating its **SEA** & CC Adaptation Fact Sheet with additional experience from practice in the Netherlands.

Considering combined effects of the project and CC on other receptors in EIA practice



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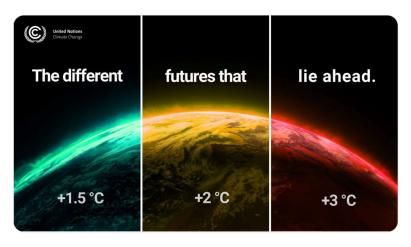
## Climate change needs to be considered in EIA of future impacts on other topics

- The climate is already changing and will continue to do so over the lifetime of our EIA projects even if GHG emissions end today.
- EIA is required to consider a project's effects on the environment against the baseline.
- Climate change may mean that status of the baseline changes over the project's lifetime.

EIA's consideration of climate change adaptation helps to ensure the combined effect of the project <u>and the changed climate</u> on receptors is considered and the consequences understood.



## **Refresher:** Different CC Scenarios do not have linear impacts (UNFCCC, July 2021)





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## **Refresher:** Different CC Scenarios do not have linear impacts (UNFCCC, July 2021)





## **Refresher:** Different CC Scenarios do not have linear impacts (UNFCCC, July 2021)





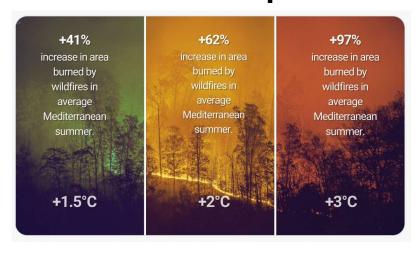
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## **Refresher:** Different CC Scenarios do not have linear impacts (UNFCCC, July 2021)





## **Refresher:** Different CC Scenarios do not have linear impacts (UNFCCC, July 2021)





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#### IEMA EIA Guide to CCR&A (2nd Edition – 2020)



- Step 0: Build climate resilience into the project
- Step 1: Scope CCA into the EIA
- Step 2: Define the future baseline
- Step 3: ID receptor CC vulnerability + sensitivity
- Step 4: ID and determine magnitude of effects
- Step 5: Evaluate significance
- Step 6: Develop EIA mitigation measures
- Step 7: Monitoring and adaptive management



#### **Defining Future Baseline**

- The current baseline is generally defined by historic climate conditions, but the future baseline under CC will be different.
- Selecting an appropriate Climate Projection / Scenario for the assessment is key.
- This selection should include stakeholder engagement and consider:
  - Timescale of future baseline (long lasting projects may need 2+)
  - Which percentile within the scenario should be tested
  - Whether other scenarios are needed for **sensitivity testing** of very vulnerable / high-value receptors.

**UK** - IEMA Guide recommends RCP 8.5 (highest impact scenario) is applied in UK in absence of other advice.



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## Receptor Sensitivity and Vulnerability to Climate Change

**Susceptibility** = the receptors ability to be affected by a change [i.e. a lack of receptor resilience to predicted CC conditions]

**Vulnerability** = the receptors potential exposure to a change

- IEMA's 2020 Guide provides definitions of High, Moderate and Low for both of the above.
- Defining the above for different receptors should involve those with CCA expertise, topic experts + ideally key stakeholders

#### **Assessment and Significance**

In effect we are looking at a cumulative effect on the receptor = the impacts of climate change on the future baseline + effects of the project on that receptor.

The project's 'normal' EIA effects per topic are collated and checked against the combined CCA Sensitivity & Vulnerability analysis.

Receptors identified as 'at risk' from CC are reassessed considering:

- How projected future climate could alter probability <u>or</u> consequence of the project's effects, and
- Whether completely new effects could arise.

Significance should be re-evaluated based on the findings.



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## Reporting CC considerations in the Environmental Statement



#### **Proportionate EIA:**

#### Coordinating positive CC actions enhancing EIA

Remember *Proportionate EIA* should turn the complex world of:

- Environmental Policy + Legislation
- Development + Environmental interactions into a simple to follow coherent narrative that influences design and informs decision-making, including the public's role in this.
- How far is CC scoped into the assessment?
- Which aspects of CC will EIA focus on? What is considered elsewhere?
- GHG: Quantified / qualitative? If quantified how far will this go?
- How will CC issues be covered in the EIS?
- How much detail is needed in the main report vs Appendices?



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## The inclusion of CC in EIA need not mean more EIS Chapters

Consider coverage within existing content first:

- Context chapters Project Description, especially if aspects of CC are scoped out of the EIA process (e.g. GHG due to quantification elsewhere)
- Scoping Chapter How have the three key aspects of CC been considered in the EIA process? Did stakeholders make comment?
- Existing Topic Chapters Especially when discussing the impacts of CC on the future baseline and its combined effects with the project (often operational)

If a new chapter/s is included in your EIS...

 Be clear which aspects of CC are covered within it and where other relevant information is covered – The above, EIS Appendices, other parts of the development's application documentation.

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# Climate Change in EIA SUMMARY



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#### **Summary CC & EIA**

- As an IA professional helping develop a plan / project you have a professional responsibility to ensure CC issues are discuss and to engage in those discussions.
- Key to start point with the GHG mitigation hierarchy and apply this as early as possible to save costs and maximize GHG avoidance / reduction.
- EIA process may not lead GHG considerations for your project, but it's impact combined with CC effects on receptors is something you should be considering, which can include the project's own resilience.
- Assessment decisions will need to be made and set out transparently:
  - GHG: Scope 1 > 2 > 3? Quantified / not? Which GHG factors? Sign vs GHG Target
  - CCR&A: Which CC scenario? Any sensitivity testing to others?



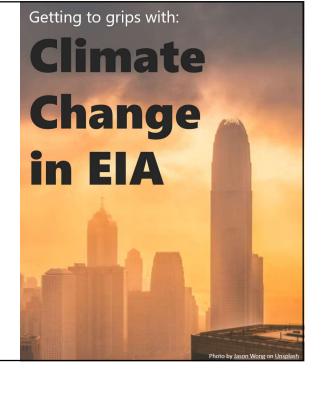




## Post-webinar availability

All HKI EIA members will be emailed links to both a:

- recording of today's presentation on YouTube
- PDF of the slide deck





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# Opportunities for EIA through digital approaches and technology Josh Fothergill FEIMA CEnv Tuesday, 30 August '22 Founder & Director Tpm - 8:30pm Fothergill Training & Consulting Ltd Online Platform: Zoom The webinar will focus on how IA practice is changing as it adopts the opportunities made available through new digital approaches and technologies, including cloud computing, Artificial Intelligence and virtual reality. The session will draw on insights from FothergillTC's study that led to our joint publication with the International Association for Impact Assessment - The State of Digital IA Practice (December 2021). Photo by Daniam Chou on Unsplash

## Next Webinar in 2022 EIA Series

#### 30 AUGUST - Digital EIA

**Registration opens ~13<sup>th</sup> August**, look out for the HKI EIA invitation email in your inbox.

11 OCT - EIA and the SDGs



