

EBRD COVID-19 Resilience Framework - Environmental and Social Assessment Training Programme

PR6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources – ESDD Guidance

Introduction

PR6 recognises that the conservation of biodiversity and sustainable management of living natural resources are fundamental to environmental and social sustainability.

In accordance with Guidance Note 6 (GN6) which accompanies PR6, Clients are expected to take a systematic approach to describe the biodiversity and ecosystem services where a Project is located, assess and mitigate impacts and implement monitoring and evaluation to inform management decisions throughout the life of a planned development. PR6 requires a precautionary approach to biodiversity conservation: where an action may have an adverse impact on biodiversity but there is uncertainty as to its likelihood or consequence, it should be assumed that impacts are significant and appropriate mitigation should be implemented.

Projects must be structured to meet European Union (EU) policies, substantive standards and requirements, regardless of geographic location. From a PR6 perspective, the EU Environmental Impact Assessment, Habitats and Birds Directives are particularly relevant¹. Some Projects may have specific obligations under these directives that require specific assessments and reporting. When host country regulations differ from EU substantive environmental standards, Projects are required to meet whichever is more stringent. GN6 should be consulted for an explanation of how the EBRD expects its requirements to be aligned with the specific requirements of EU Policies and Directives.

It is important to note that the overall aim of any ESDD assignment, regardless of the specific characteristics of an individual Project, is to:

- identify and assess potentially significant, existing and future, adverse environmental and social impacts associated with the Client's current operations and the Project;
- assess compliance with applicable laws and EBRD's Environmental and Social Policy (2019);

¹ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, p.7) as amended.

- Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, p. 7–25).

- Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private Projects on the environment (OJ L 175, 5.7.1985, p. 40– 8), as amended.

- determine the measures needed to prevent or minimise and mitigate the adverse impacts; and
- identify potential environmental and social opportunities, including those that would improve the environmental and social sustainability of the Project and the current operations.

The ESDD process should be commensurate with, and proportional to, the scale and magnitude of the Project, and the associated environmental and social risks and impacts. The ESDD will cover, in an integrated way, all relevant direct and indirect environmental and social risks and impacts of the Client's operations, the Project and the relevant stages of the Project cycle (e.g. pre-construction, construction, operation, and decommissioning or closure and reinstatement).

EBRD uses the following definitions relevant to this PR:

Biodiversity refers to the “*variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems*” as defined by the Convention on Biological Diversity.

Ecosystem services refer to the benefits that people, including businesses, derive from ecosystems.

Habitat refers to a terrestrial, freshwater or marine geographic unit or airway that supports assemblages of living organisms and their interactions with the non-living environment.

Critical Habitat is a category of habitat that supports highly irreplaceable and threatened biodiversity or ecosystems and the ecological processes and functions needed to sustain them. Areas identified as critical habitat hold the highest tier of irreplaceable (existing in few places) and vulnerable (at high risk of being lost) biodiversity features.

Living natural resources refers to the plants and animals cultivated for human or animal consumption and use, whether in the wild or in a cultivated situation, including trees used for forestry, and plants used as crops or farmed livestock.

No Net Loss refers to the situation when losses of specific biodiversity features or Ecosystem Service (ES) from a development impact are balanced by equivalent gains. **Net gain** is achieved when gains exceed losses.

Priority biodiversity features are a sub-set of biodiversity that is irreplaceable or vulnerable, but at a lower priority level than critical habitats (as defined in PR6 paragraph 12).

The guidance on PR6 is presented across each of the three ESDD tasks:

Task 1 – Review of existing documentation

The following documents should be requested from the Client for review:

- the Client's policy on biodiversity and ecosystem services, if they have one (this may include details of any corporate commitment to No Net Loss or a Net Positive outcome);
- biodiversity sections of annual performance or monitoring reports;
- environmental and social impact assessment reports;
- appropriate assessment reports from assessments prepared to comply with the EU Habitats Directive;
- biodiversity baseline survey reports supported by relevant field data or field survey reports, results of stakeholder consultations and results of key desk searches;
- Critical Habitat Assessment (CHA);
- biodiversity management or action plans;
- other management plans that include biodiversity commitments, such as transport management plan, stakeholder engagement plan, footprint management plan etc;
- biodiversity offset strategy;
- biodiversity monitoring and evaluation plan and monitoring reports;
- ecosystem services review reports, supported by relevant social impact documentation such as focus group discussions or household surveys focusing on use of, or access to, ecosystems to support livelihood or wellbeing;
- Supplementary specialist technical reports as appropriate (for example noise studies if species sensitive to noise are present; air quality studies if vegetation sensitive to atmospheric pollution deposition is present); and
- any government inspection or monitoring reports.

PR6 Requirement	Issues to consider
<i>Establishing the baseline</i> The assessment process will characterise baseline conditions.	
The study area must be large enough to encompass a Project's direct and indirect impacts and to characterize the ecological patterns, processes, and functions occurring in the landscape or seascape where the Project will be developed. (PR6 para 8).	A robust baseline is essential for impacts to be assessed and evaluated on the basis of good evidence. If Projects have weak baseline data, (or do not start their baseline assessments in time), they often have weak biodiversity action plans and outcomes. Check whether the baseline information is sufficient to: • undertake a robust impact assessment; • provide a broad perspective on background threats and pressures to biodiversity; • cover the full range of biodiversity features (areas, habitats, species populations) that could be affected; • identify features requiring particular attention in impact assessment and mitigation planning; and • give an indication of trends over time (not just a snapshot of current conditions). Check that the following steps have been followed in accordance with GN6: 1. defining the study area at the appropriate spatial scale; 2. scoping; 3. conducting field work; and, 4. critical habitat assessment. The study area for biodiversity baseline scoping, desk reviews and field work may differ significantly from the Project Affected Area. Understanding the ecological processes and functions that sustain biodiversity (e.g. migratory corridors or hydrology) often requires a wider spatial scope than needed for other PRs.

PR6 Requirement	Issues to consider
	Is there a clearly defined and mapped study area, including both area of influence and a broader ecological context? Is a clear rationale provided to show how this reflects distributions of habitats and species (including potential priority or critical features) and the ecological processes and functions needed to sustain them? Does the study area cover all relevant areas and features that could be exposed to Project-related risks and impacts, including direct, indirect and cumulative impacts? Is a clear and defensible rationale provided for definition of the Project affected area (for example maximum effect distance for noise or limits of anticipated demographic change induced by the Project)? Are there up to date maps of land use, vegetation types and their overlap with the Project affected area? Is the Study Area ecologically defined (as needed for critical habitat assessment) or is it inappropriately constrained by artificial boundaries or limits that do not reflect ecological distributions or processes?
<i>Scoping</i>	
In planning and carrying out biodiversity related baseline and impact assessments, the Client will refer to relevant good practice guidance, utilising desktop review, consultation with experts and field-based approaches as required. (PR6 para. 7).	Scoping is a key part of the ESIA process and should underpin selection of methods for baseline assessment, based on presence of important biodiversity features, and ecosystem services in the Study Area. Has an explicit scoping exercise been undertaken in accordance with recent good practice guidance? Have desktop analyses and literature reviews used the most recently available data from the appropriate sources e.g. global, regional and national red lists and the Integrated Biodiversity Assessment Tool (IBAT)? https://www.ibatforbusiness.org/ Has a reference list been provided for all

PR6 Requirement	Issues to consider
	resources used and experts consulted? Do species taxonomy and nomenclature align with global/ national threatened species lists)? Have credible, independent consultants with relevant experience been involved or consulted? Have sufficient efforts been made to identify important areas, habitats, species and ecosystem services in accordance with GN6, including (inter alia) priority habitats and species protected under the EU Habitats Directive, threatened species and habitats on national and global red lists, Natura 2000 Sites, Key Biodiversity Areas, legally protected areas and Ecosystem Services with potential to have both high importance to relevant stakeholders and limited substitutes. Check that a thorough search has been done for all such features that may require further focused assessment.
<i>Fieldwork</i>	
The Client will refer to field-based approaches as required (PR6, para 7). (PR6 implies that the need for field-based approaches is determined by level of risk and the need for a robust evidence-base to assess the full range of impacts referred to in the PR). The assessment process will characterize the baseline conditions to a degree that is proportional and specific to the anticipated risk and significance of impacts (PR6 para 7).	Field work is necessary to complete the baseline study. Specialists in the relevant fields should conduct the work, following Good International Practice (GIP). A more detailed survey is needed if risks and uncertainty are high, or if the information presented is not sufficient to exclude the possibility of effects on priority features or critical habitat. If field surveys are used for baseline studies, methods should be clearly explained in the ESIA reports/ annexes. Original survey data should be available for review. Is a clear explanation of survey methodology provided, specifying the date, location, timing, frequency and duration of studies, the approaches and methods used and highlighting any limitations or gaps? Are methods documented in a way that allows a clear understanding of the approach and facilitates replication if required?

PR6 Requirement	Issues to consider
	Have appropriate taxa been covered? Was there sufficient sampling or survey effort? Were adequate studies carried out to cover seasonal differences? Have suitably qualified specialists been engaged, for example to cover the full range of taxa affected by the Project and with appropriate geographic expertise? Was the level of fieldwork commensurate with and proportional to the potential risks and impacts of the planned development? - For low-risk Projects with well-documented/ understood biodiversity, desktop review supported by ground-truthing may be adequate; - For more complex Projects, comprehensive baseline assessments involving field surveys are likely to be necessary, as well as input (and ideally peer review) from credible external experts or organisations. For all Projects, check there is adequate baseline coverage of the Project in its entirety. This might include areas allocated for associated facilities or ancillary infrastructure. If necessary, field studies have not yet been conducted, is there time for them to be carried out at a suitable time of year in time for key mitigation and management decisions to be made?
PR6 (para 8). The baseline and impact assessment must reflect concerns of potentially affected communities and, where relevant, other stakeholders.	Stakeholders should have been identified and consulted, including beneficiaries of ecosystem services generated in the area. Have interested/ affected stakeholders been identified and consulted regarding potential impacts on biodiversity and/or ecosystem services and the extent to which they value or depend on them?

PR6 Requirement	Issues to consider
PR6 (para 9). In accordance with GIP, the assessment will consider: (i) the Project's potential impacts on ecosystem services, including those that could be exacerbated by climate change; (ii) the use of, and dependence on, these ecosystem services by potentially affected communities and/or indigenous peoples; and (iii) the Project's dependence on these ecosystem services.	Has a baseline assessment been done to cover supply of ecosystem services and benefits derived in the "no Project" scenario? Have implications of climate change been considered (e.g. in relation to future access to fresh water). Has any consultation taken place and what were the main findings and action points? Was a need for further studies or engagement identified and did this take place? Are Project dependences on ecosystem services known and has an assessment been done to quantify trends over time with and without planned levels of use from the Project?
For Projects that could potentially have impacts on indigenous peoples and local communities, the Client will provide opportunities for fair and equitable sharing of the benefits derived from the utilisation of living natural resources in accordance with: (i) the requirements for addressing economic displacement impacts in PR5; (ii) the specific requirements relating to managing potential risks and impacts on indigenous peoples in PR7; and (iii) the stakeholder engagement requirements provided in PR10.	Shared meetings with social specialists and community/ indigenous peoples' representatives regarding Project impacts on ecosystem services can help clarify important livelihood, cultural and traditional dependences on ecosystem services and the implications of substituting them with alternative benefits. It is always helpful to see records of stakeholder discussions and see how key discussion points or actions have been carried forward. Have impacts on local communities and indigenous people been considered? Have key biodiversity/ES risks been identified? Are there any important, rights, values or dependences that have not been addressed through social interventions such as livelihood restoration plans?
Critical Habitat Assessment	
PR6 requires Clients to determine if their Project will affect <i>priority biodiversity features</i> (PR6 paragraph 12) or <i>critical habitat</i> (PR6 paragraph 14)	CHA should be done early, at the baseline stage, to allow for avoidance of impacts on priority and critical features and for more detailed studies to be conducted if necessary. A CHA should follow the process set out in GN6 Figure 1 and should have been done if there is any possibility that any of the biodiversity

PR6 Requirement	Issues to consider
The requirement for a Critical Habitat Assessment (CHA) will be identified during the Project's impact assessment scoping phase and, where relevant, be revised at the conclusion of the baseline assessment (PR6 para 17). Some criteria have no pre-determined conditions (i.e. PR6 paragraphs 12-iii "significant biodiversity features identified by a broad set of stakeholders or governments", 12-iv "ecological structure and functions needed to maintain the viability of priority biodiversity features described in this paragraph", and 14-v "areas associated with key evolutionary processes").	features identified in Table 1 of GN6 could occur or are suspected. The CHA should use the criteria and conditions described in GN6 (Table 1) and assess features against them using ecologically appropriate areas of analysis (EAAAs). The criteria and conditions are based on the EU Habitats and Birds Directives, the Bern Convention, and/or draw from IUCN's Key Biodiversity Area Standard. These can provide useful background information. Has a CHA been conducted, and a report provided? If not, is a CHA needed? Have EAAAs been appropriately designed for each feature? Have the appropriate criteria and thresholds been applied to determine whether priority biodiversity features or critical habitat could be affected by the Project? Do you agree with the findings? Are there any populations of threatened species that might have global threat status below the relevant threshold, but higher threat status at regional or national level? Have credible external experts with relevant ecological experience been used to assess presence of critical habitat and especially for criteria without numerical thresholds. Note that if field work reveals additional biodiversity features or ecosystem services in the area, additional or refined EAAAs may need to be developed, and additional field work should be organized to complete any further focused studies that are needed. Also note that EBRD does not use the concept of "natural habitat" in its PR and associated guidance, but relatively unmodified areas of habitat often support priority biodiversity.

PR6 Requirement	Issues to consider
<i>Impact Assessment</i>	
PR6 paras 7 and 8. The baseline and impact assessment will characterise direct, indirect and cumulative impacts and consider (at least) potential habitat loss, degradation and fragmentation, introduction or spread of invasive alien species, over-exploitation of natural resources, migratory corridors, hydrological changes, nutrient loading, and pollution, as well as impacts relevant to climate change and adaptation.	Does the ESIA reflect GIP with respect to assessment of impacts on biodiversity, for example as described in Good Practices for Biodiversity Inclusive Impact Assessment and Management Planning developed by the Multilateral Financial Institutions' Biodiversity Working Group. Have direct, indirect, and cumulative impacts on biodiversity features and ecosystem services been identified? Check that methods to evaluate impact significance are relevant to PR6 outcomes and don't obscure important information on losses and gains for priority biodiversity and critical habitat features. E.g. if impacts are scored and ranked, how does this relate to loss/gain calculations used for demonstrating achievement of no net loss or net gain?
The assessment process will include consideration of potential landscape level impacts, seasonal constraints and/or sensitivities, as well as impacts on the ecological integrity of these ecosystems, independent of their protection status and regardless of the degree of their disturbance or degradation (PR6 para 8).	This means the impact assessment should not focus only on protected sites and species. Have the full range of impacts been considered in terms of ecological functioning and implications for biodiversity as whole?
Where further investigations are needed to provide greater certainty of the significance of potential impacts, the Client will carry out additional studies and/or monitoring before undertaking Project-related activities that could cause irreversible impacts (PR6 para. 7).	Are there any gaps/omissions requiring further study or do the baseline reports recommend further investigations? If these have not yet been commissioned or carried out, is there sufficient time to conduct them before planned Project activities start? Are Project personnel aware of the requirement to undertake such studies in advance of undertaking Project activities?
If <i>priority biodiversity features</i> and <i>critical habitats</i> might be affected, focused assessments are required for these features.	Impacts should be characterised in terms of their magnitude and duration, and how this may affect the viability of those features in their respective EAAAs. Note, if there are potential impacts on

PR6 Requirement	Issues to consider
	Critical Habitat, independent experts must be retained to assess impacts.
<i>Mitigation and Management</i>	
PR6 specifies certain outcomes to be achieved from impact mitigation for priority biodiversity features (PR6 para. 13, footnote 77), and critical habitat (PR6 para. 15-16, and footnotes 79-82).	Are mitigation measures designed to achieve no net loss, and preferably a net gain, of priority biodiversity features over the long term and to achieve a net gain in critical habitat in accordance with these requirements? If the Project affects <i>priority biodiversity features</i> or <i>critical habitat</i>, has a loss-gain analysis been done to establish that <i>no net loss</i> or a <i>net gain</i> can or will be achieved? Have suitable loss/gain metrics been used as a basis for demonstrating that mitigation measures are commensurate with impacts? Is a baseline or counterfactual scenario(s) defined against which to measure losses and gains? Have biodiversity losses and gains been quantified or presented for the whole Project lifespan?
Requirements for Projects affecting priority biodiversity are set out in PR6 para 13, footnote 77. No Project related activities must take place unless it can be demonstrated: • there are no feasible alternatives; • stakeholders have been consulted under PR10; • the Project is legally permitted; and • appropriate mitigation measures are put in place, in accordance with the mitigation hierarchy, to ensure no net loss and preferably a net gain of priority biodiversity features, habitats and ecological functions,	Based on review of Project documentation and site visits: Is it evident that the Client has reviewed alternatives with respect to potential impacts on priority biodiversity and can make a strong case regarding lack of alternatives to avoid impacts on priority features? Have stakeholders been consulted? Have legal permits been provided, or an undertaken given that the Project is legally permitted? Is a mitigation strategy in place that can reasonably be expected to achieve NNL or a net gain in priority biodiversity features? Are the necessary measures clearly presented in a Biodiversity Action Plan (as per PR6 para. 16)?

PR6 Requirement	Issues to consider
supporting them long term to achieve conservation outcomes. PR6 para. 15: Critical habitat shall not be further fragmented, converted or degraded to the extent that its ecological integrity or biodiversity importance is compromised. No Project activities must take place in Critical Habitat unless the following conditions are met: • no other viable alternatives within the region; • stakeholders are consulted in accordance with PR10; • the Project is permitted under applicable environmental laws; • no measurable adverse impacts on those biodiversity features for which the critical habitat was designated; • the Project is designed to deliver net gains for critical habitat impacted by the Project; • no net reduction in the population of any endangered or critically endangered species, over a reasonable time period; and • a robust and appropriately designed, long-term biodiversity monitoring and evaluation program aimed at assessing the status of critical habitat is integrated into the Client's adaptive management program.	It must be demonstrated that the Project will not jeopardize the viability of the critical habitat or the features it supports within the EAAA, and that the national or global populations of Endangered or Critically Endangered species (depending on the relevant criterion for critical habitat designation) will not decline to a degree that affects the persistence of that species over many generations. Is the Client aware that no Project activities should take place unless and until it can be demonstrated that the conditions in para. 15 have been met? Has the Client demonstrated, on the basis of good evidence that: • there are no locational alternatives that would avoid impacts on Critical Habitat; • all reasonable efforts to avoid impacts through design adaptation have been made in accordance with the mitigation hierarchy and measures are clearly specified in a Biodiversity Action Plan; • legal permits have been obtained and are available for review; • measures to achieve net gains have been identified for all features with Critical Habitat potentially affected by the Project using a credible loss/gain accounting method. These measures are proven/ reasonably likely to be effective and are set out in a BAP (and biodiversity offset strategy if appropriate); and • a Biodiversity Monitoring and Evaluation Plan or equivalent has been developed which can be used to monitor impacts on Critical Habitat over time as a basis for corrective action if needed (see also under adaptive management).

PR6 Requirement	Issues to consider
(PR6 paragraph 5 and footnote 9). Mitigation efforts are expected to follow a mitigation hierarchy, starting with avoidance, minimisation, restoration and, finally, offsetting.	NOTE: <i>For more information on the mitigation hierarchy see A Cross-Sector Guide for Implementing the Mitigation Hierarchy, developed by the Cross-Sector Biodiversity Initiative².</i> Check that mitigation plans describe, prioritise and justify actions according to the mitigation hierarchy.
Offsets as part of the mitigation hierarchy	
Offsets should be used as a last resort and designed to achieve measurable, additional, and long-term conservation outcomes as required to conform with the PR. The design of a biodiversity offset will adhere to the “like-for-like or better” principle and be carried out in alignment with the Bank’s PRs and GIP (PR6 para 18). If offsets are proposed for residual impacts on priority biodiversity or critical habitat, a biodiversity offset strategy or biodiversity offset management plan must be provided. Independent experts with knowledge in biodiversity offset design and implementation must be retained (PR6, para 19). Appropriate staff resources must be dedicated to any offset (PR6 para 18).	Offset proposals must be possible to implement in practice, with adequate funding and using proven methods. Refer to GN6 for guidance on good practice in designing and implementing offsets and the principles that should apply. Have residual impacts on priority or critical habitat features been documented that require offsets? Has a high-level offset strategy been developed to address residual impacts? This should be in place well in advance of financial close/construction and should set out the loss/gain calculations (and assumptions) used to underpin commitments. The long-term technical and financial feasibility of undertaking the offset must be demonstrated. Have suitable experts been used? A detailed offset management plan will be needed at a later stage, giving detail on practical aspects of implementation such as responsibilities for actions, legal arrangements and resources needed. Are plans for monitoring outcomes established? Monitoring will be necessary to demonstrate success of the plan’s implementation or to support adaptive management.

² <http://www.csbi.org.uk/our-work/mitigation-hierarchy-guide>

PR6 Requirement	Issues to consider
If there is a risk of non-offsetable impacts, the Project must be redesigned to avoid them.	This is a strict requirement that needs to be considered in the context of alternatives assessment. Conventional ESIA approaches that score different selection criteria and aim for a compromise are not appropriate. The Project location, timing or design MUST be altered to avoid non-offsetable impacts on priority biodiversity/ critical habitat.
The Project's mitigation strategy will be described in a biodiversity management plan or biodiversity action plan (PR6 para. 16, 17).	Management Plans (BMPs) or Biodiversity Action Plans (BAPs) should be practical and auditable work plans that capture all actions necessary to achieve desired Project outcomes for biodiversity. BMPs typically include the full set of measures needed to safeguard biodiversity during construction, operation and decommissioning. BAPs typically build on the BMP with additional time-bound actions that are required of the Client to bring the Project into compliance with PR6. BMP/BAPs may be separate and stand-alone or integrated in the ESMS. Has a BMP/BAP been prepared? Does it capture tasks, expected timelines, responsible parties and measures for success? Are objectives realistic and based on measurable targets? Are actions outlined for each objective, including completion indicators or monitoring targets? Are responsible parties specified? Is a timeframe indicated? This should include interim milestones if the timeframe covers several years and especially if there is any uncertainty about effectiveness of mitigation or offsets. Have relevant stakeholders been consulted/ involved, including government, external experts, local/ international conservation organizations and Project-affected communities?

PR6 Requirement	Issues to consider
	Is there evidence that the BAP/BMP is fully integrated in Project systems and operations, with clarity on how this is achieved in practice? Check to see if personnel are aware of BAP/BMP requirements or receive regular training to raise awareness of key risks and issues.
PR6 (para 16) Measures needed to conform with the requirements of para 15 with respect to Projects in or affecting critical habitat will be set out in a biodiversity management or action plan	It is essential for the BMP/BAP to be in place before construction starts if there are likely impacts on critical habitat. Has a Biodiversity Action Plan been developed? Check that a Biodiversity Action Plan has been developed and that it takes a precautionary position in terms of mitigation and management measures if there is any uncertainty about potential impacts.
<i>Monitoring and Adaptive Management</i>	
The Client will adopt a precautionary approach and apply adaptive management practices in which the implementation of mitigation and management measures are responsive to changing conditions and the results of Project monitoring throughout the Project lifecycle.	A Biodiversity Monitoring and Evaluation Plan (BMEP) should be produced as a basis for adaptive management. The BMEP should provide a basis for confirming that impact assessments were accurate; and, ensuring that mitigation functions as planned. Has a BMEP been prepared? Does it include: a) baseline values for priority and critical biodiversity features; b) the current status of those features (as monitored periodically); c) the trend of that status (e.g., declining, stable, improving); c) performance thresholds for the current status that triggers a change in mitigation needed to ensure that PR6 requirements will be met; d) a description of alternative mitigation that will be implemented if thresholds are crossed (these options may change over time due to knowledge gained through experience or changing conditions)?
The Client's Environmental and Social Management System (ESMS) should prescribe how PR6 requirements will be fulfilled throughout the process of Project development and throughout the Project lifecycle. The Environmental and Social Management Plan (ESMP) should describe how	PR6 requirements should be integrated into Project management systems and plans. On reviewing ESMS, the ESMP and the full suite of biodiversity-related plans, is it evident that the requirements of PR6 have been appropriately incorporated across the Client's systems and operations? E.g. do construction and operation management plans and contractor scopes of work refer to the BMP/BAP?

PR6 Requirement	Issues to consider
requirements will be met, (including how the mitigation hierarchy will be implemented and respecting limits to the types of impacts that can be offset). The ESMP may reference additional plans such as the Biodiversity Action Plan, Species Action Plans, Biodiversity Monitoring and Evaluation Plan and a Biodiversity Offset Strategy and/or Management Plan.	Have the relevant biodiversity management and monitoring plans been developed or what stage of development are they at?
<i>Legally Protected and Internationally Recognised Areas of Biodiversity Value</i>	
PR6 paras 21 to 22. If the Project is located within or could affect an area that is legally protected, and/or internationally recognised as being of high biodiversity value, (such as a Key Biodiversity Area/KBA), or proposed for such status by national governments, the Client shall identify and assess potential Project-related impacts and apply the mitigation hierarchy so that impacts from the Project will not compromise the integrity, conservation objectives and/or biodiversity importance of such an area. PR6 para 22 if effects are unavoidable, legal, consultation has taken place in accordance with PR10 and programmes must be implemented to promote and enhance the conservation objectives of the area.	Projects with the potential to negatively affect a legally protected area must respect the conservation goals of the area and the features it seeks to protect. Projects that may impact a protected area either from within or outside of its boundaries and will degrade its ability to meet its management goals <i>will not comply</i> with PR6. In cases where there is potential for impacts to occur, Project design must include consultation with protected area authorities. Projects may not have any significant residual impacts on Natural World Heritage Sites (GN6 identifies these as <i>non-offsetable</i> impacts). There are specific provisions under the EU Habitats Directive for Projects within, or potentially affecting Natura 2000 Sites in Europe. Projects within or affecting Emerald Sites in other countries that have signed the Bern Convention will be expected to follow the same requirements to the extent possible. Article 6(3) of the Habitats Directive 92/43/EEC requires an Appropriate Assessment in accordance with European Commission guidance, to ensure that a Project will not have a significant impact on the integrity of the site. Has the mitigation hierarchy been followed? Have sufficient efforts been made to avoid impacts? Have all relevant stakeholders of the protected area been adequately consulted from an early stage in the Project's design?

PR6 Requirement	Issues to consider
	Has the Project explored opportunities to implement programmes that enhance the status of the protected area? Are plans for enhancement sufficiently well developed and are there reasonable expectations of success?
<i>Invasive Alien Species</i>	
The Client shall avoid and proactively prevent accidental or deliberate introduction (or spread) of alien species that could have significant adverse impacts on biodiversity (PR6 para 23).	The principle measures for controlling invasive alien species are: a) prevention of their intentional and unintentional introduction; b) early detection and eradication; and c) management to prevent their spread where they are already established. Has an explicit assessment been done to identify risks of accidental introduction or spread of alien species? This is particularly important in the marine environment and for any Project involving international shipping and ballast water control. For terrestrial Projects, linear infrastructure has high potential to spread invasive plant species. Are any species mentioned in baseline reports or impact assessments that already occur in the Project affected area and have invasive potential? Have suitable and sufficient measures been identified to limit any risks?
Species with potential for invasiveness will not be used for purposes of primary production Projects without adequate controls to prevent their release/spread outside of the production area. For fisheries, risk of escapes into the wild and spread of disease and parasites must be assessed and minimised.	Is the Project planning to use species that could become invasive? What controls are in place to prevent release/spread? Are planned controls adequate? Have contingency plans been identified in the event of unintended escapes/ releases?

PR6 Requirement	Issues to consider
<i>Ecosystem Services</i>	
(PR6 para 9) In accordance with GIP, the assessment will consider: (i) the Project's potential impacts on ecosystem services, including those that could be exacerbated by climate change; (ii) the use of, and dependence on, these ecosystem services by potentially affected communities and/or indigenous peoples; and (iii) the Project's dependence on these ecosystem services.	Has an assessment been done to identify ecosystem services (ES) that are strongly depended on by third parties or by the Project itself? Are the beneficiaries of ES known? Note that some beneficiaries could be located significant distances away or outside the defined Project Affected Area. (Some ES may be supplied within the PAA but used globally). Have levels of supply, use or benefit been quantified? Is there a clear understanding of whether supplies are sustainable, whether any beneficiaries or beneficiary groups will lose benefit as a result of changes in supply of ES or ability to access them? Have measures been identified to safeguard the supply of services, the ability of people to access them or the levels of benefit from ES that are needed to support livelihoods/ wellbeing of people? This is particularly important in cases where vulnerable groups or indigenous people depend strongly on ES
<i>Requirements for Projects involving primary production of living natural resources (crop or livestock production, forestry, aquaculture, fisheries, biomass)</i>	
Where appropriate, the Client will adopt globally, regionally or nationally recognised certification standards.	Have available certification standards been adopted?
In the absence of such standards, the Client will commit to applying appropriate industry-specific sustainable management practices in accordance with GIP (PR6 para 24).	Maintaining good animal welfare is both an ethical responsibility and a practical necessity due to the close links between animal welfare, animal health, and human health. Harmonised EU rules³ are in place covering a range of animal species and welfare-affecting issues. Have EU rules been followed?
Projects should use unforested land or land that has already been converted from its natural state to avoid/ minimise impacts	Does the Project involve modification of natural habitat? Is there alternative modified land available that

³ https://ec.europa.eu/food/animals/welfare/practice_en

PR6 Requirement	Issues to consider
on priority biodiversity or critical habitat.	could be used?
For farming, transport and slaughtering of animals for meat or by-products, the Client will adopt and implement national regulatory requirements, relevant EU animal welfare standards and GIP, whichever is most stringent. In EU member states, Genetically Modified Organisms (GMOs) may not be used or released to the environment without approval being given by the competent authorities. In other EBRD countries of operation, GMOs may not be used or released to the environment without a risk assessment, conducted in accordance with EU substantive environmental standards.	EU rules are in place covering a range of animal welfare-affecting issues. GN6 specifies key EU Directives and regulations. These apply to EBRD financed Projects within and outside of the EU. In addition, Clients are expected to implement relevant GIP for their specific sectors and activities. Have necessary standards been adopted and is there evidence that they are being adopted? How will adherence to these standards be monitored or enforced? Is use of GMOs proposed and if so has necessary consent and approval been sought/received? Is it within the power of the Client to give assurance that GIP will be followed?
<i>Supply Chains</i>	
As part of the supply chain assessment process outlined in PR1, the Client will identify and assess the risks and impacts to biodiversity caused by its primary suppliers. Requirements to manage biodiversity impacts associated with business supply chains are specified in PR6 paras 25 to 29. At a minimum, the Client will establish policies, procedures and verification practices which will: • identify the origin of the supply and habitat type of the source area; • avoid procurement from suppliers that are contributing to significant conversion or degradation of priority	Clients should give preference to purchasing living natural resources that are produced in accordance with internationally recognised principles and standards of sustainable management, where available for the product being purchased. Standards that conform to the ISEAL Code of Good Practice for Setting Social and Environmental Standards will likely be consistent PR6 GIP requirements, however, EBRD does not endorse any particular standard as meeting its requirements, since standards can change in both content and application on the ground over time. Does the Project have any core inputs whose production may pose a risk to biodiversity (GN6 gives examples)? Has the supply chain been evaluated for major risks, such as large-scale habitat loss or over-exploitation of fisheries? Has the Client taken appropriate steps to remedy impacts in accordance with GIP over a timeframe

PR6 Requirement	Issues to consider
biodiversity features, critical habitats and/or designated protected areas; and provide for an ongoing review of the Client's primary suppliers. Where the Client is purchasing natural resource commodities, e.g. food or timber known to originate from areas where there is a risk of significant conversion or degradation of priority biodiversity features and/or critical habitats, the Client's environmental and social assessment will include an assessment of the systems and verification practices used by the primary suppliers.	agreed with the EBRD? Has the Client given preference to purchasing living natural resources that are produced in accordance with internationally recognised principles and standards of sustainable management (where available for the product being purchased)? Does the Project depend on natural resources originating from areas with known risks of degradation of priority biodiversity or critical habitats? Does the ESIA include an assessment of the systems and verification practices used by primary suppliers?

A list of queries should be compiled following the review of all documentation received during Task 1, including any gaps in the material provided. Use the 'Task 1 Key Findings' format presented in Module 1 of this training programme.

Task 2 – Site visit and discussions

The site visit and discussion with Client representatives should be used as an opportunity to discuss the list of queries compiled during Task 1. During Task 2, you may need to meet with the following (these meetings should be organised in advance):

- **Project Director** – for a brief introduction associated with the purpose and scope of your visit, and to discuss the Client's approach to the management of key biodiversity risks. You can also use this session to request the availability of other Client representatives that you need to meet, and to thank them for their general support.
- **Environmental Manager or Biodiversity Manager** – to discuss the Client's overall approach to the management of biodiversity and ecosystem service-related risks and opportunities.

NOTE: The questions in this section may need to be modified to reflect the current status of the Project.

Interview with the Environmental Manager or Biodiversity Manager

The Environmental Manager or Biodiversity Manager should be interviewed to clarify the list of queries generated during Task 1 and agree any further information requirements. During this meeting, the following additional questions could be asked:

1. Is the proposed Project located in or in the vicinity of any national parks; protected areas, nature reserves; existing or designated Natura 2000; Emerald site, Ramsar sites, etc.? Request Project maps if available.
2. What biodiversity/ecological baseline surveys were conducted for the Project and what was the study area? Were such surveys based on review of available academic data only or were they also field-based?
3. Were the methodology and timing of the field surveys clearly documented? Are findings of the surveys clearly mapped? Request survey maps if available.
4. Do such surveys/study area require verifications against the location and scope of the proposed Project or any changes in the Project design?
5. How have biodiversity and ecosystem services been taken into consideration?
6. What Project alternatives have been considered?
7. During the consideration to alternatives, were risks to biodiversity and ecosystem services specifically taken into consideration?
8. What are the key risks and opportunities related to biodiversity and ecosystem services?
9. How are biodiversity and ecosystem services aspects included in the Project's environmental and social management system?
10. How has employees and contractors been informed about the Project's risks, mitigation and monitoring measures on biodiversity receptors?
11. What actions have been taken to protect biodiversity?
12. What resources are in place to implement mitigation measures, offsets and longer term monitoring?
13. Are additional resources required?
14. Have there been any grievances or general concerns raised on risks and impacts to biodiversity or ecosystem services?

Site visit

During the site visit an inspection of areas of land or nearshore and offshore areas that will be disturbed should be undertaken. Visits to other areas outside of the Project's physical footprint, may be needed to obtain an understanding of the broader biodiversity context, and to observe areas that may be exposed to indirect or induced Project impacts.

It is important to gain an insight into how the Project will alter, or contribute to existing threats and pressures affecting biodiversity and ecosystem services in the landscape/seascape. During the site visit, consider the following:

- Is the Project being developed in an area that is relatively undisturbed, with extensive natural habitat?
- Could Project impacts to ecosystems threaten their future viability due to cumulative effects in modified landscapes?
- Have landscape impacts been included in Project's assessments at a suitable geographic scale?

For very large Projects in remote areas, logistics can be challenging, and early planning is needed. During the visit, it will be useful to be accompanied by the Project's biodiversity specialist to discuss field survey methods, results and limitations

of the data that was collected.

NOTE: Before leaving complete the checklist overleaf to ensure that the EBRD's key requirements under PR6 have been covered.

Task 3 – Analysis and reporting using the EBRD format

The findings of Task 1 and 2 need to be analysed and presented using with EBRD's Reporting Framework presented in Module 3 of this training programme.

During the analysis of the data collected consider the following:

- Have sufficient and reliable baseline data been collected to identify and assess potential risks and impacts on biodiversity?
- Has sufficient emphasis been place on avoidance of impacts on biodiversity features and Critical Habitat?
- Has the Client made adequate efforts to identify risks to biodiversity and ecosystem services?
- Has the Client developed a robust mitigation strategy?
- Are Project personnel fully aware of the Project's biodiversity requirements, commitments and their respective responsibilities?
- Are contractors involved in the Project familiar with risks to biodiversity and the measures included in biodiversity management and monitoring plans?
- Is there sufficient capacity and resources to implement the management measures with reasonable chances of success?
- Has a transparent and participatory approach been taken to ensure that interested and affected parties are aware of the Project's likely implications for biodiversity?

Additional guidance, tools and reference documents

Additional EBRD guidance on the implementation of PR6 is provided here:

Performance Requirement 6 Guidance Note: <https://www.ebrd.com/environment/pdf-guidance-note-ebrd-performance-requirement-6.pdf>

Good Practices for the Collection of the Biodiversity Baseline data: <https://www.ebrd.com/cs/Satellite?c=Content&cid=1395245538876&d=&pagename=EBRD%2FContent%2FDownloadDocument>

Good Practices for Biodiversity Inclusive Impact Assessment and Management Planning:

<https://www.ebrd.com/cs/Satellite?c=Content&cid=1395245539075&d=&pagename=EBRD%2FContent%2FDownloadDocument>

EBRD COVID-19 Resilience Framework - Local Environmental and Social Due Diligence Skills Capacity Building

PR6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources – ESDD Checklist

Please confirm all of the actions have been completed		Yes / No
<i>Existing documentation relevant to biodiversity and ecosystem services</i>		
6.1	Copies of existing baseline and impact assessment reports (for biodiversity and Ecosystem Services); Biodiversity Management Plan/ Biodiversity Action Plan; Biodiversity Monitoring and Evaluation Plan; Biodiversity Offset Management Plan (if needed) and other relevant management plans and procedures (such as Invasive Species Management Plan, Bushmeat Management Plan) have been reviewed.	
<i>Avoiding and minimising impacts on biodiversity and ecosystem services</i>		
6.2	The efforts made by the Client to avoid and minimise impacts on biodiversity and ecosystem services have been discussed.	
<i>Assessment of impacts</i>		
6.3	The different sources of impacts on biodiversity and ecosystem services from the Project have been checked and discussed with the Client.	
6.4	Potential impacts on biodiversity and ecosystem services have been discussed with the Client.	
6.5	Alternatives have been assessed from the PR6 perspective and there is a defensible rationale for selecting the preferred alternative.	
<i>Mitigation hierarchy</i>		
6.6	The Project has a mitigation strategy which follows the mitigation hierarchy, presenting actions needed to avoid or minimise impacts and restore ecosystems or species populations to pre-impact conditions. This is considered to be fit for purpose.	
6.7	Mitigation plans have been discussed with the Client, including any avoidance requirements and the practical implementation of minimisation and restoration measures.	
6.8	A Biodiversity offset strategy is in place to deliver Net Gain in Critical Habitat or No Net Loss for priority biodiversity features. This presents actions to address residual impacts (those remaining despite efforts to avoid or minimise impacts or restore damaged biodiversity or ecosystems).	

6.9	A loss/gain assessment has been completed using credible metrics to establish required gains through offsets. Offsets align with good international principles and practice.	
<i>Managing and monitoring impacts</i>		
6.10	A Biodiversity Management/Action Plan is in place for Projects with significant potential impacts on biodiversity and also for ecosystem services. This includes explicit explanations of how PR6 requirements will be met.	
6.11	The way in which contractors have been trained to be aware of biodiversity-related risks and impacts, and mitigation measures, has been discussed with the Client.	
6.12	Biodiversity plans and procedures are in place to support an adaptive management approach including a Biodiversity Monitoring and Evaluation Plan. This includes indicators and thresholds that can be used to adapt management if new impacts occur due to changes in the Project, or if mitigation measures fail to be successful.	
<i>Invasive species</i>		
6.13	The risks of introducing or spreading of alien invasive species have been discussed with the Client.	
<i>Primary production</i>		
6.14	The Client is able to demonstrate that appropriate standards are being followed in line with EU Directives and international certification standards. Any additional requirements have been discussed with the Client and an action plan agreed.	
<i>Supply chain</i>		
6.15	The Client has considered implications for biodiversity and ecosystems throughout the supply chain and reviewed risks of significant impacts on biodiversity including risks of extensive habitat degradation. Auditable measures are in place to manage these risks.	