

EBRD: FINANCIAL INTERMEDIARIES

GUIDANCE NOTE FOR CATEGORY A PROJECTS

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Glossary

Category A Project	A 'greenfield' or major extension or transformation-conversion project which is likely to have significant environmental and/or social impacts and which requires a formalised process of assessment.
Client	Client receiving debt or equity finance from the Financial Intermediary. Same as Project Sponsor or borrower.
eManual	FI resource provided by EBRD to be found at http://www.ebrd.com/environment/e-manual/a0menu.html
ESAP	Environmental and Social Action Plan – the tabular summary of the corrective actions identified in an Environmental and Social Due Diligence (ESDD).
ESD	EBRD's Environment and Sustainability Department.
ESDD	Environmental and Social Due Diligence – the process of examining and appraising the risk to the Financial Intermediary related to environmental and social factors.
EIA	Environmental Impact Assessment - a formalised assessment of environmental risks and impacts for a specific project or activity; may be regulated by national legislation. EIA may or may not address social risks.
ESIA	Environmental and Social Impact Assessment - a formalised assessment of environmental and social risks and impacts for a specific project or activity; may be regulated by national legislation. ESIA also refers to the report resulting from the assessment process.
FI	Financial Intermediary.
Non-Technical Summary (NTS)	An important output of an EIA/ESIA. A summary of the project, giving information on the location, activities, processes and the environmental (and social) risks, and how those will be addressed. An NTS should be produced in a format and language accessible to a non-technical audience.
OVOS	A State Environmental Review (SER) in CIS countries – equivalent to an EIA/ESIA in other countries.
PR	"EBRD" Performance Requirement.
Project	The business activity for which EBRD-financing is being sought (through the FI), regardless of the type of financing product.
Stakeholder Engagement Plan (SEP)	A plan which sets out the requirements and steps needed to identify, consult and engage with stakeholders and disclose project information in a manner which meets the requirements of the EBRD Environmental and Social Policy.

1. INTRODUCTION

1.1 DEFINITION

Category 'A' Projects are defined by EBRD as projects which are likely to have significant environmental and/or social impacts and which require a more formalised process of assessment than other projects. The definition applies to:

- 'greenfield' projects, or major extension or transformation or conversion projects;
- projects in sensitive locations;
- projects with significant adverse impacts on local communities; and/or
- projects involving significant involuntary resettlement or economic displacement.

Appendix 1 of the Environmental and Social Policy (ESP) provides a full list of Category A Projects¹.

1.2 EBRD POLICY REQUIREMENTS

EBRD is committed to promoting environmentally-sound and sustainable development, and has developed an Environmental and Social Policy (ESP) to ensure that all EBRD-financed projects:

- are environmentally and socially sustainable;
- respect the rights of affected workers and communities; and
- are designed and operated in compliance with regulatory requirements and good international practice.

As part of the Policy, EBRD has adopted a set of Performance Requirements (PRs) which cover key areas of environmental and social risk. Performance Requirement 9 (PR9)² sets out the responsibilities of EBRD's Financial Intermediaries (FIs) and requires them to:

- manage environmental and social risks;
- promote good environmental and social business practices among their Clients; and
- adopt environmental and social due diligence and monitoring procedures appropriate to the level of risk related to their activities and investments.

Where FIs are lending to or investing in sub-projects which have been assessed as Category A, they must ensure that the sub-project complies with PRs 1-8 and PR10.

1.3 PURPOSE OF THE GUIDANCE NOTE

The purpose of this Guidance Note is to set out the procedures and tools required to conduct the environmental and social risk assessment of Category A Projects.

The Guidance Note applies to corporate lending and equity investments. For other types of transactions, such as trade finance, leasing, insurance, etc. FIs should consult the e-manual³.

In the majority of cases, sub-projects will be categorised as low, medium or high risk. Occasionally, however, FIs will be asked to review sub-projects with a greater than 'high' risk profile; these are termed 'Category A'. For Category A Projects, a more detailed and systematic risk assessment is required to ensure compliance with EBRD's policy and PRs.

¹ Note that Projects¹ which are planned to be carried out in sensitive locations or are likely to have a perceptible impact on such locations, even if the project category does not appear in this list, may still be Category A. Such sensitive locations include, *inter alia*, national parks and other protected areas identified by national or international law, and other sensitive locations of international, national or regional importance, such as wetlands, forests with high biodiversity value, areas of archaeological or cultural significance, and areas of importance for Indigenous Peoples or other vulnerable groups.

² Ref: PR9, para. 16.

³ <http://www.ebrd.com/environment/e-manual/a0menu.html>

1.4 COMMISSIONING THIRD PARTY SUPPORT

Once the sub-project has been identified as a Category A, and in order to undertake the ESDD, it is very likely that the FI will need to engage with external independent experts and to get advice from EBRD's Environment and Sustainability Department (ESD).

The FI may seek help from EBRD in the identification of suitable external consultants to perform the advisory work with experience in the sector or sub-sector. Further guidance on using environmental and social experts is provided in the e-manual. It is unlikely that the FI will have sufficient in-house expertise to perform the ESDD.

2. ENVIRONMENTAL & SOCIAL DUE DILIGENCE

Environmental and Social Due Diligence (ESDD) provides a systematic process through which the FI can assess the environmental and social risks of the proposed transactions. ESDD involves a number of stages and outputs as summarised in the section below and presented in *Figure 1*.

2.1 KEY STAGES IN THE ESDD PROCESS

Key stages in the ESDD are described below (this is indicative only and should form a routine part of ESDD as conducted by the independent consultant). *Annex 1* provides a typical ESDD scope.

2.1.1 Site Visit

A visit to the sub-project should be made to define the sub-project location, site characteristics and site setting including any associated facilities and/or off-site infrastructure.

2.1.2 EHS Management Review

The ability of the sub-project management team to assess and manage risk is a key part of the ESDD process; during the site visit, the ESDD consultant should:

- review existing policies, procedures and management systems in place for managing environmental and social risks;
- identify how the sub-project Sponsor complies with applicable national standards with regard to environment, health and safety practices; and
- identify management's awareness of, and capacity to address the risks in accordance with the EBRD ESP.

2.1.3 EHS Risk Review

The site visit will also be used to:

- identify potentially significant environmental and social risks and issues, and to benchmark the current and proposed operations and facilities against EU and international best practice (including EU Directives, ILO guidelines, etc.);
- review historic or future land acquisition and identify any physical or economic displacement impacts;
- identify the stakeholders and parties who may be affected by the project, and confirm the degree to which stakeholders have been identified, provided with information on the project, and how their views have been taken into account in the decision-making process.

2.1.4 Regulatory Review

A review should be made of the national and sub-national legal and regulatory frameworks with which the project must comply, including the necessary permits and approvals required. It should be verified that the sub-project meets any local and national requirements for environmental and social assessment, public information, consultation and disclosure that may apply.

2.1.5 EIA/ESIA Compliance

ESIA is required for all Category A Projects and must address all EBRD PRs (1-8 and 10), as well as meeting the requirements of the EU EIA Directive. The eManual provides guidance on the ESIA/EIA report format, and local disclosure of Environmental Impact Assessments.

In CEE countries, Environmental Impact Assessment (EIA) or Environmental and Social Impact Assessments (ESIA) are required. In CIS countries, State Environmental Reviews ("ekspertisa" or OVOS) are generally

required for investments involving a new 'greenfield' development or a significant expansion or modification of an existing facility.

The preparation and financing of the ESIA, including the public consultation aspects are the responsibility of the Project Sponsor (i.e. the FI's client).

What to do if there isn't an ESIA?

For Category A Projects the environmental and social risks must be scoped in a participatory process⁴. Stakeholders should be able to provide comments and recommendations on the project. Where an ESIA has not been undertaken, the recommended action from the ESDD will depend upon the stage of the project:

- *Project still to be developed:* in cases where there is not an ESIA and the Project is still to be developed, the ESDD should recommend an ESIA of the project in line with national requirements and EBRD Policy.
- *Project already developed and operating:* in cases where the Project is already developed and operating, the ESDD may recommend additional examination of the environmental and social risks of the project, against national requirements and the EBRD Policy and Performance Requirements. This requirement should be contained within the ESAP and any recommended measures arising from the examination should be incorporated into the project.

What is the typical ESIA format?

The ESIA should follow a report format consistent with the EU EIA Directive⁵, and should address the concerns of all EBRD's PRs, e.g. projects involving involuntary resettlement (PR5), risks to biodiversity (PR6), impacts on Indigenous Peoples (PR7) or cultural heritage (PR8) will require an assessment in accordance with the respective PR. *Annex 2* provides a simplified structure for an EISA Report.

What are the requirements for ESIA disclosure?

The ESIA/EIA Report must be disclosed publically in accordance with PR10 and any applicable national requirements. Disclosure should be in a local language and in a manner that is accessible and culturally appropriate, taking into account any vulnerable people affected. Disclosure should occur early in the appraisal process if the potential environmental and social impacts are significant⁶.

Where possible, FIs will provide on their website the link to any ESIA/EIA reports for Category A projects which they finance.

2.1.6 Gap Analysis

On the basis of the ESDD, the consultant should be able to identify any non-compliance of the sub-project with the EBRD PRs. This process is termed a 'Gap Analysis'. The Gap Analysis should be used to examine the applicability of each PR to the project and to identify where additional steps are likely to be required in order to comply with the Policy/PRs. The Gap Analysis should identify any additional investigations, studies, procedures and actions that will need to be undertaken so as to meet the EBRD requirements, these will be contained within the Environmental & Social Action Plan (ESAP) (*see below*).

What to do if significant gaps are found?

In cases where the FI's involvement in a project comes *after* the national environmental approvals have been completed, an EIA/ESIA/OVOS had been developed, and the project is already under implementation, a review of the EIA/ESIA/OVOS should be made as part of the ESDD, and a gap analysis made against the Policy requirements. The review may identify shortcomings between the EIA/ESIA/OVOS and the EBRD Policy. Common gaps include weak assessment of social impacts, failure to assess off-site impacts, insufficient consultation with affected parties and poor disclosure of information.

Where significant gaps are found, it not always possible or appropriate to re-open and/or upgrade the EIA/ESIA/OVOS. In these cases, the ESDD will take account of the stage of development of the project, and make recommendations as to how the EBRD Policy requirements should be met.

⁴ PR10, para. 10, p.69

⁵ EU EIA Directive 2011/92/EU

⁶ PR10, para. 14, p.70

3. REPORTING TO EBRD

3.1 ESDD REPORT

Using the information obtained from the tasks above, an ESDD Report should be prepared detailing whether the project design, preparation activities, ESIA/EIA and other relevant documentation meet EBRD requirements, as well as identifying additional information, investigations, procedures and actions required in order to achieve compliance.

3.2 ENVIRONMENTAL & SOCIAL ACTION PLAN (ESAP)

Based on the ESDD, an Environmental and Social Action Plan (ESAP) shall be prepared that summarises the actions to be taken by the FI's Client for the proposed sub-project to ensure that the sub-project meets all applicable requirements. The mitigation measures determined in the ESIA, along with specific actions identified during the ESDD, should be collated into the ESAP (the ESAP may also-cross refer to mitigation measures in the ESIA). The FI/Consultant should work with the potential Client to develop the ESAP and design any further data collection and analyses that may be required. The ESAP should include specific tasks, roles and responsibilities together with costs and timings for implementation. A standard template for an ESAP is provided in *Annex 3*.

Once the ESAP has been agreed, it should be disclosed to affected parties. The ESAP should be disclosed on the FI's and the sub-project Sponsors website.

3.3 STAKEHOLDER ENGAGEMENT PLAN (SEP)

A Stakeholder Engagement Plan (SEP) is a plan which sets out how the Project Sponsor will meet the requirements for consultation, stakeholder engagement and disclosure of information. The SEP needs to meet both EBRD Policy (PR1 and PR10) and national requirements for information disclosure and consultation. A project-specific Stakeholder Engagement Plan (SEP) should be developed for Category A projects (or if one exists, it should be reviewed and upgraded where necessary). Based on the ESDD the FI (as part of the ESDD process) should either prepare or ensure that the sub-project Sponsor develops an SEP.

A SEP generally includes the following:

- a brief description of the Company operations and potential associated EHSS impacts;
- a brief review of the local legal framework of consultation activities and Project disclosure requirements;
- identification and categorisation of potential stakeholders in the Project;
- record of any prior consultation activities undertaken;
- an action plan for further consultation during preparation, construction and operations phases of the sub-project,
- a disclosure plan, including the identification of any locations where relevant project documentation will be available locally and elsewhere as well as languages to be used; and
- a formalised grievance mechanism for use by external stakeholder groups.

The scope and level of detail of the SEP should be scaled to fit the potential impacts and needs of the sub-project. The SEP should be disclosed on the FI's and Project Sponsors website.

Annex 4 contains a template for a SEP.

3.4 NON-TECHNICAL SUMMARY (NTS)

A concise Non-Technical Summary should be prepared for the Project covering:

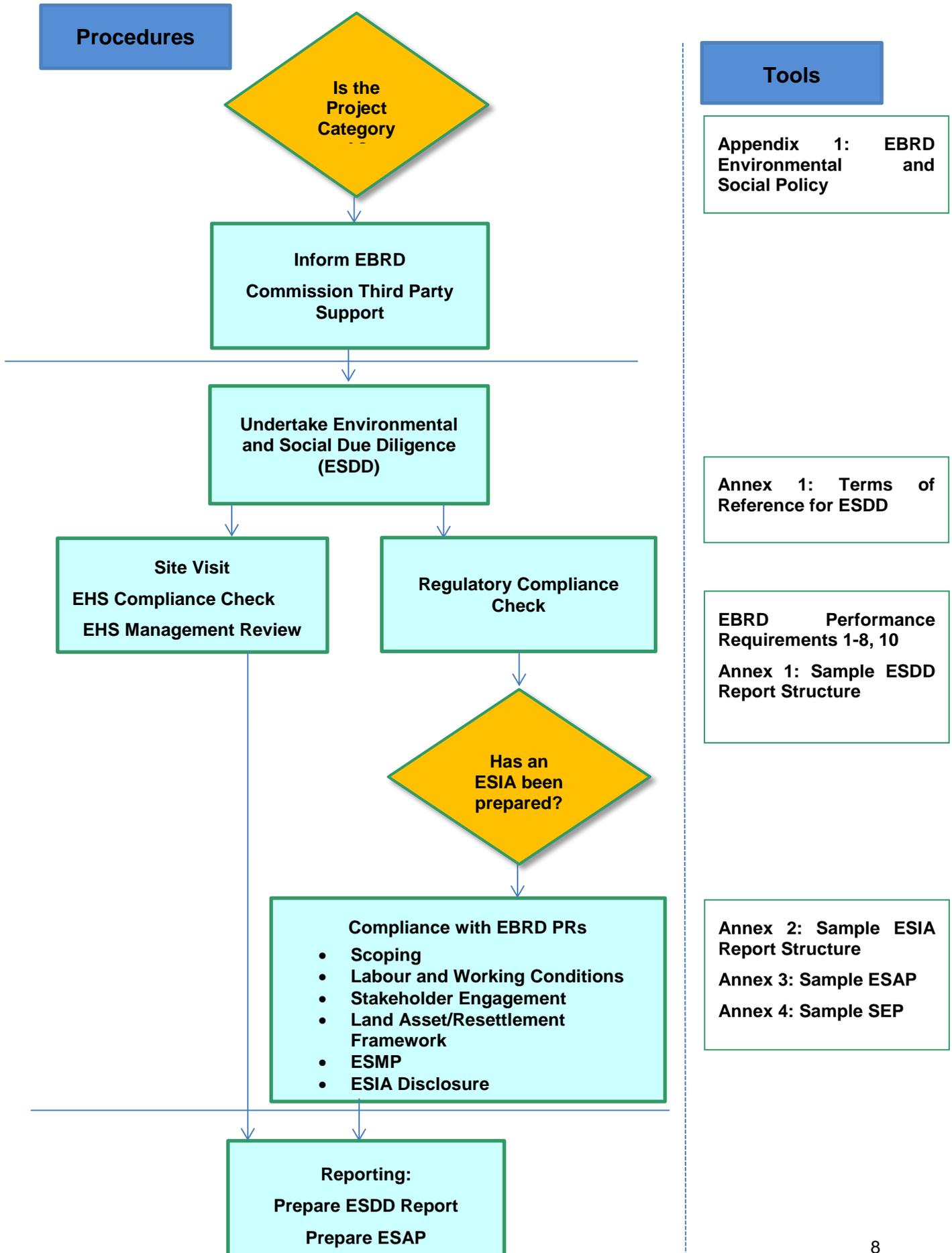
- sub-project description, including map/plan;
- background and rationale for project;
- project preparation process, including alternatives considered, ESIA/EIA process, public consultation and disclosure; and
- environmental & social benefits, impacts and mitigation measures.

The NTS should be prepared in English and relevant local languages and should be distributed to affected and interested parties. The NTS should be disclosed on the FI's and Project Sponsors website.

3.5 SUPPORTING DOCUMENTS: E.G. RESETTLEMENT ACTION PLAN (RAP)/LIVELIHOOD RESTORATION FRAMEWORK (LRF)

The ESDD process may identify the need for other documents to be prepared. For example, if there is physical or economic displacement, a Resettlement Action Plan (RAP) or Livelihood Restoration Framework (LRF) may need to be prepared.

Figure 1: Environmental and Social Risk Assessment for Category A Projects



This is taken from the eManual. Further information on the required contents of each section is found in the eManual.

Non-Technical Summary

Operational Framework (including Policy, Legal and Administrative Framework (national, IFI, international treaties, standards and guidelines, etc.))

Project Description

Description of the Existing Environment (physical and natural environment, social and socio-economic conditions, Occupational Health and Safety, and Labour and Working Conditions)

Potential Impacts (including local impacts, national impacts, transboundary and global impacts)

Analysis of Alternatives

Characterisation of Impacts and Issues (during pre-construction phase, construction, operation & maintenance, decommissioning or closure and reinstatement, and including related to third parties and supply chain issues, environmental Impacts and Issues, social Impacts and Issues, labour and working conditions, population movements, economic effects, community health, safety and security, education, social conflict, gender effects, effects on indigenous peoples).

Mitigation and Management of Impacts and Issues (during all project phases)

Residual Impacts and Risks

Environmental and Social Opportunities for Project Enhancement

Action Plans and Management Systems

Appendices

- Names of those responsible for preparing the EIA
- References and Sources of Information
- Records of public meetings and consultations held
- Supporting Technical Data
- Photo Log

Annex 2: ESDD Report Table of Contents

This is taken from the eManual, and is based on EBRD's sample Environmental and Social Audit Protocol. The full EBRD Audit Protocol can be obtained from EBRD's Environment and Sustainability Department.

Executive Summary

1. Nature of the Project to be Supported
 - 1.1 Description and Context of the Proposed Project
2. The Existing Company/Facility Conditions and Area of Influence
 - 2.1 Description of Processes, Facilities and Assets
 - 2.2 Facility and Site History
 - 2.3 Characteristics of Facility Location and Description of Natural Environment
3. The Company's Environmental Performance
 - 3.1 Corporate environmental policies and management
 - 3.2 Local and National Regulatory Requirements
 - 3.3 Applicable EU and Other International Requirements and Standards
 - 3.4 Inputs, Products and Releases (*subdivide into raw materials, water and energy sourcing and consumption, greenhouse gas emissions, wastewater effluent & quality, air emissions, solid waste*)
 - 3.5 Process Efficiency (cleaner production, waste minimisation)
 - 3.6 General Housekeeping Issues
 - 3.7 Product-related Issues
 - 3.8 Material Handling and Storage
 - 3.9 Management of Hazardous Materials
 - 3.10 Waste Management (including PCBs and Asbestos)
 - 3.11 GMO Issues
 - 3.12 Soil, Surface and Groundwater Contamination
 - 3.13 Current Environmental Expenditure
 - 3.14 Conclusions and Recommendations: Environment
4. Occupational Health & Safety Performance
 - 4.1 Local and National Regulatory Requirements
 - 4.2 Applicable EU and Other International Requirements and Standards
 - 4.3 Key Occupational Health and Safety Issues
 - 4.3.1 *Occupational Health and Safety Management*
 - 4.3.2 *Health Provisions and Procedures*
 - 4.3.3 *Safety Provisions and Procedures*
 - 4.3.4 *Safety Record*
 - 4.3.5 *Noise, Vibration, Lighting and Other Physical Factors*
 - 4.3.6 *Site Safety Provisions*
 - 4.3.7 *Fire Protection*
 - 4.3.8 *Hazardous Material/Waste Handling*
 - 4.3.9 *Temperature Exposure*
 - 4.3.10 *Radiation Exposure*
 - 4.3.11 *Work equipment*
 - 4.3.12 *Electrical Equipment*
 - 4.3.13 *Workplace Transport*
 - 4.3.14 *The Workplace Environment*
 - 4.3.15 *Manual Handling*
 - 4.3.16 *Display Screen Equipment*
 - 4.3.17 *Safety Signs*
 - 4.3.18 *Confined Spaces*
 - 4.3.19 *Pressure Systems*
 - 4.3.20 *Temporary/Contracted Workers*
 - 4.3.21 *Workplace Violence*
 - 4.3.22 *Bullying*
 - 4.3.23 *Stress*

- 4.3.24 *Non-Ionising radiation*
 - 4.3.25 *Emergency Response Capability*
 - 4.4 Control of Major Accidents and Accident Hazards
 - 4.5 Conclusions and Recommendations: Occupational Health and Safety
- 5. Labour Practices and Human Resources Management
 - 5.1 Local and National Regulatory Requirements and PR2
 - 5.2 Employment profile
 - 5.3 Corporate policies and management
 - 5.4 Working hours and overtime
 - 5.5 Wages
 - 5.6 Workers' organisations
 - 5.7 Grievance procedures
 - 5.8 Disputes, court cases and other complaints
 - 5.9 Child labour
 - 5.10 Forced labour
 - 5.11 Non-discrimination and equal opportunity
 - 5.12 Non-employee workers
 - 5.13 Retrenchment
 - 5.14 Conclusions and Recommendations: Labour and human resources management
- 6. Social Performance and Management (outside Company's premises)
 - 6.1 Local communities: impacts and benefits
 - 6.2 Community health, safety and security
 - 6.2.1 *Security*
 - 6.2.2 *Fire Safety*
 - 6.2.3 *Emergency Preparedness and Response*
 - 6.2.4 *Community exposure to disease*
 - 6.3 External Stakeholder Engagement
 - 6.4 Impacts on vulnerable groups
 - 6.5 Impact on cultural heritage
 - 6.6 Involuntary resettlement and economic displacement
 - 6.7 Conclusions and Recommendations: Social performance (external)
- 7. Conclusions and Recommendations
 - 7.1 Summary of Regulatory Compliance
 - 7.2 Summary of Key Impacts, Risks and Liabilities
 - 7.3 Process Efficiency and Environmental Opportunities
 - 7.4 Social opportunities
 - 7.5 Environmental and Social Action Plan
- 8. Appendices
 - Details of Persons Consulted
 - Photo/video/CD log
 - Copies of Permits and other documentation
 - Environmental and Social Performance Monitoring Protocol.

Annex 3: ESAP Template

No	EBRD Performance Requirement	Action	Environmental Risks Liability/ Benefits	Legislative requirement/ / Best practice	Investment Needs /Resources/ Responsibility	Timetable Action to be Completed by End of Year	Target and Evaluation Criteria For Successful Implementation
1	EHS Management and training						
1.1	PR1	Develop and implement an Environmental Management System (EMS).	Optimisation of environmental management through a formalised system. Provide resources for training and monitoring of emissions.	Voluntary and best practice	Own resources, external consultants. Cost Assign responsibilities	2010	Develop an EMS. Attain ISO 14001 or equivalent. Attain certification by xxx Annual EHS Report to the Bank

Annex 4: Stakeholder Engagement Plan Template

Introduction

[Insert introduction to the Project and the purpose of the SEP].

Project Description

[Description of location of Project & a figure showing location; Summary of the need for the Project; for linear Projects, summary description of Project and figure of Proposed Route; and Summary of the environmental setting through which the Project runs and land use and communities along the route/within vicinity of the site.]

Regulatory Context

National Stakeholder Engagement Requirements & Legislation

[Insert summary of stakeholder engagement/public participation requirements contained within Strategic planning process, EIA process and land acquisition/expropriation process. Sample table provided below]

Legal Framework in [Insert Country] Requiring Stakeholder Engagement

Legislative Area	Law	Summary of Stakeholder Engagement Requirements
Preparation of project documentation and related strategic studies (including Spatial Plans and Strategic Environmental Assessments)		
Land acquisition (expropriation)		
EIA and Environmental Permit Process		

EBRD Requirements

[Insert EBRD's stakeholder engagement requirements for a Category A Project under EBRD's Environmental & Social Policy 2008 & the EBRD Performance Requirements (PRs) contained within the policy (<http://www.ebrd.com/downloads/research/policies/2008policy.pdf>); specifically stakeholder engagement requirements contained with Performance Requirement 1 and 10].

Summary of Previous Stakeholder Engagement

[Insert summary of public participation/stakeholder engagement activities undertaken during the preparation of the Project]

Summary of Previous Stakeholder Engagement Activities

Document/Study/Stage:	Summary of Stakeholder Engagement Activities:

Identification of Project Stakeholders

[List the key stakeholder groups who will be informed and consulted about the Project; these need to include those people and groups who are affected by the Project (i.e. communities along the route); have interests in the Project; and have the potential to influence the Project. Example text inserted below. Likely communication method to engage with the stakeholder needs to be described.]

Summary of Affected Parties/Stakeholders

Affected Party	Likely communication methods

Summary of Interested Parties

Interested party	Likely communication methods
National authorities	
Local authorities/agencies	
[Insert other local authorities/agencies (e.g. Police.)]	Official correspondence / meetings
Non-Government Organisations (NGOs) and other organisations	

Stakeholder Engagement Programme & Action Plan

Stakeholder Engagement Programme

[Summarise proposed stakeholder engagement programme. State where the stakeholders can find project documentation and provide a brief description of what information will be disclosed, the methods and how views raised by all stakeholders will be taken into account – including the views of potential vulnerable groups (e.g. elderly, youth etc.).]

[Insert when and how announcements will be made via the media for public meetings, consultation on the ESIA/EIA and disclosure of project documentation, include which communication & media services will be used (i.e. website, leaflets, meetings, local press releases, newspaper, radio etc.). State if Information Board will be installed at the project borders by Project Sponsor for the Project.]

[Include that the public will also be able to use the grievance procedure described below and that information regarding the grievance procedure will also be widely disseminated to affected local communities; include date when the grievance procedure will be disseminated by.]

[Include that throughout the life of the Project, Project Sponsors and Contractor(s) engaged to undertake the Project will continue to engage with stakeholders and this Stakeholder Engagement Plan will be updated to reflect Project progress. Annual environment and safety reports will also be published on the [Project Sponsor] website.]

Stakeholder Engagement Action Plan

[Insert planned Stakeholder Engagement Actions]

ID	Purpose/Tasks [Examples]	Target Stakeholder Group:
1	Introduction to the Project and explanation of route.	Landowners / land users / residents of structures / business owners affected by land acquisition and in proximity to the project footprint/route. To include vulnerable people within the local communities affected. [Other Affected Parties/[Municipalities & Other Local Authorities/ Key National Authorities – including National Parks Authorities]
2	Consultation on Scoping of Environmental Impact Assessment (EIA)	Landowners / land users / residents of structures / business owners affected by land acquisition and in proximity to the project footprint/route. To include vulnerable people within the local communities affected. [Other Affected Parties/ Municipalities & Other Local Authorities/ Key National Authorities – including National Parks Authorities]
3	Land Acquisition Planning	Physically and Economically Displaced People (i.e. Landowners / land users / residents of structures / business owners affected by land acquisition) [Other stakeholders interested in land acquisition]
4	Consultation on ESIA/EIA	[Insert Affected Parties and Other Interested Stakeholders]

Grievance Procedure

[Describe the grievance process by which people affected by the Project can bring their grievances and raise concerns to Project Sponsor for consideration.]

Reporting

[Insert how and when results of stakeholder engagement will be reported back to affected parties & other stakeholders. Insert Contact Details. Example Text below for review/update.]

Contact Details for the Public

[Insert Project Sponsor address & contact details & website]