

ARCH EMERGING  
MARKETS PARTNERS LIMITED



**Environmental and Social Management  
System Manual**

for the ARCH Cold Chain Solutions East Africa Fund LP  
February 2022

## DOCUMENT CONTROL

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**LIST OF ACRONYMS**

AfDB	African Development Bank
ARCH	ARCH Emerging Markets Partners Limited
BAT	Best Available Techniques
CCRA	Climate Change Risk Assessment
CCSEAF	ARCH Cold Chain Solutions East Africa Fund LP
CITES	Convention on International Trade of Endangered Species
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
EHS	Environmental, Health and Safety
EPRP	Emergency Preparedness and Response Plan
ESG	Environmental, Social and Governance
ESMS	Environmental and Social Management System
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
FPIC	Free, Prior and Informed Consent
GBV	Gender-based violence
GCCA	Global Cold Chain Alliance
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
GM	Grievance Mechanism
H&S	Health and Safety
HR	Human Resources
IAC	Investment Advisory Committee

IBA	Important bird and biodiversity areas
IFC	International Finance Corporation
ILO	International Labour Organisation
ISS	Integrated Safeguards System
KBA	Key Biodiversity Areas
KPI	Key Performance Indicator
JSA	Job Safety Analysis
LP	Limited Partner
LPAC	Limited Partner Advisory Committee
LRP	Livelihood Restoration Plan
NGO	Non-governmental Organisation
OHS	Occupational Health and Safety
PCB	Polychlorinated biphenyl
POC	Portfolio Operating Company
PMC	Project Management Company
PS	Performance Standards
PTW	Permit to Work
RAP	Resettlement Action Plan
RCP	Representative Concentration Pathway
SDG	Sustainable Development Goal
SEA	Sexual exploitation and abuse
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference
WBG	World Bank Group

# 1 Objective and Scope

## 1.1 Overview

This document comprises the Environmental and Social Management System (ESMS) Manual of the ARCH Emerging Markets Partners Limited (“ARCH”) ARCH Cold Chain Solutions East Africa Fund LP (hereinafter referred to as “CCSEAF” or “the Fund”) and defines the Fund’s approach to assessing and managing Environment and Social (E&S) risks and opportunities associated with the Fund’s investments. The processes described in this ESMS Manual are intended to implement the commitments set out in the [Fund’s E&S Policy](#) (Appendix A).

The overall E&S objectives of the Fund are set out in the [E&S Policy](#), which reflects the level of commitment to managing E&S aspects across the investment lifecycle, throughout its portfolio of assets, and within the Fund’s own operations. The [E&S Policy](#) is included in Appendix A.

This ESMS Manual will be reviewed at regular intervals (not less than annually) and, where required, updated to ensure that it remains relevant and effective to CCSEAF’s investment practices and reflects Good International Industry Practice (GIIP).

## 1.2 CCSEAF Investment Approach

The Fund’s focus is on the development, financing, construction and operation of new temperature-controlled storage facilities and distribution operations (cold chain solutions), mainly covering the industries of agriculture; food processing; meat, poultry and seafood; supermarkets and QSR; and pharmaceuticals. The operations are focused on East Africa, including but not limited to Kenya, Tanzania, Ethiopia, Uganda and Rwanda. The Fund invests alongside one or more local

Operational Partners with the aim of a minimum 75% shareholding in each country and the overall portfolio of countries.

The Fund will invest in each country through a portfolio operating company (POC). The general partner of the Fund will be ARCH Cold Chain Solutions East Africa General Partner LP (acting through its general partner, ARCH Cold Chain Solutions East Africa GP Co Limited), and the Manager will be the investment manager of the Fund.

## 1.3 Applicable E&S Standards

As part of its commitment to sound E&S management, responsible operations and sustainable development, CCSEAF’s ESMS is operated to ensure investments comply with:

- Local laws and regulations applicable to E&S topics for the jurisdiction(s) that the assets are located within;
- [The International Finance Corporation’s \(IFC\) Performance Standards \(PS\) \(2012\) and supporting Guidance Notes](#);
- [African Development Bank’s \(AfDB\) Integrated Safeguards System – Operational Safeguards \(2013\)](#);
- [The World Bank Group \(WBG\) General and relevant sector-specific Environmental, Health and Safety \(EHS\) Guidelines](#);
- [The International Labour Organisation \(ILO\) Core Labour Conventions](#) as referenced in IFC PS2; and
- GIIP in the cold chain sector<sup>1</sup>, including membership conditions and [guidance issued by the Global Cold Chain Alliance \(GCCA\)](#) on energy efficiency, workplace health and safety, greenhouse gases, water conservation, ammonia spill and fire prevention and emergency response, driver safety, food safety.

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<sup>1</sup> Defined as the exercise of professional skill, diligence, prudence and foresight that would be reasonably expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally. The circumstances that skilled and experienced professionals may find when, for example, evaluating the range of pollution prevention and control techniques available to a project may include, but are not limited to, varying levels of

environmental degradation and environmental assimilative capacity as well as varying levels of financial and technical feasibility. Taken from IFC Performance Standards - [https://www.ifc.org/wps/wcm/connect/c02c2e86-e6cd-4b55-95a2-b3395d204279/IFC\\_Performance\\_Standards.pdf?MOD=AJPERES&CVID=kTjHBzk](https://www.ifc.org/wps/wcm/connect/c02c2e86-e6cd-4b55-95a2-b3395d204279/IFC_Performance_Standards.pdf?MOD=AJPERES&CVID=kTjHBzk)

## 1.4 Overview of the ESMS Manual Structure

The structure of this ESMS Manual follows the guidance of IFC PS 1 on the 'Assessment and Management of Environmental and Social Risks and Impacts' and the AfDB's *Integrated Safeguards System (ISS) (Operational Safeguard 1: Environmental and Social Assessment)* with key elements being:

- Section 1: Objectives and Scope – The context, purpose and structure of CCSEAF's ESMS, CCSEAF's commitments to E&S and the applicable E&S standards.

### Part A – Fund Level E&S Requirements

- [Section 2: E&S Roles and Responsibilities](#) – The duties & responsibilities of key internal and external stakeholders for implementation of this ESMS.
- [Section 3: E&S Integration into the CCSEAF investment process](#) – The systems, processes and supporting tools for incorporating E&S into each stage of the investment lifecycle.
- [Section 4: E&S Stewardship](#) – the mechanisms through which CCSEAF actively influences E&S performance of the POC and assets
- [Section 5: E&S Investment Monitoring and Reporting](#) at Fund Level to the Investment Advisory Committee (IAC) and Limited Partner Advisory Committee (LPAC)
- [Section 6: Exit Maturity](#) – How CCSEAF demonstrates the E&S value creation for sale of the investee, and conducts E&S diligence of potential vendors.

### Part B – POC E&S Requirements

- [Section 7: E&S Assessments, Systems and Processes](#) - Environmental and Social Management System; Construction Phase HSES Oversight Plan for PMC; Construction Phase HSES Management Plan for EPC Contractor; Stakeholder Engagement Plan; Grievance Redress Mechanism; Emergency Preparedness and Response; Resettlement Action Plan.
- [Section 8: E&S Consideration for Selection and Contracting of Third-Party Contractors](#) – Sets out mechanisms for considering E&S aspects in the

selection of third-party contractors, and including E&S provisions in contracts with the same.

- [Section 9: E&S Capacity and Competency](#) – The requirements on the POC to have sufficient E&S resources in place and for E&S training.
- [Section 10: E&S Monitoring and Reporting](#) commitments undertaken at the investee/project level and communicated up to CCSEAF.

**PART A – FUND-LEVEL E&S REQUIREMENTS**

## 2 E&S Roles and Responsibilities

### 2.1 CCSEAF E&S Organisational Structure

The roles and responsibilities in the delivery of the ESMS are presented in Figure 1 and Table 2-1 and detailed further in the ensuing sections.

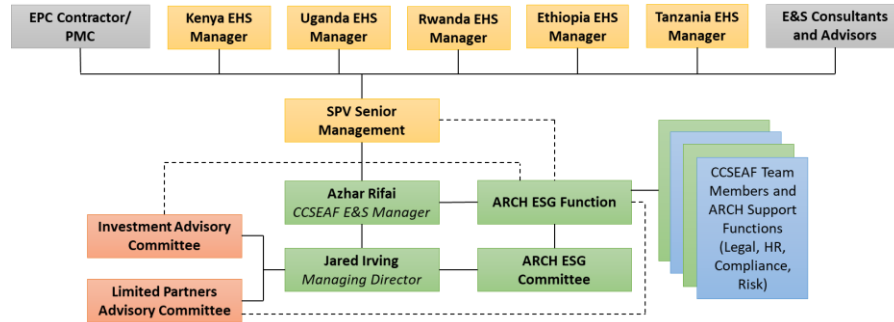


Figure 1: CCSEAF E&S Organisational Structure

Table 2-1: E&S Responsibilities of Key Staff and Committees

Person/ Committee	ESMS Requirement	Other E&S Responsibilities
Jared Irving, Managing Director	Knowledge and understanding	Ultimate responsibility for proposals to the IAC and for ensuring CCSEAF's team discharge their respective E&S duties.
Azhar Rifai, CCSEAF E&S Manager	In depth knowledge and implementation	Day-to-day implementation of the ESMS with oversight from the ARCH Environmental, Social and Governance (ESG) Function.
ARCH ESG Function	In depth knowledge and implementation	Oversight of the ESMS implementation on a day-to-day basis.
ARCH ESG Committee	Working knowledge	Implementation of ARCH ESG Policy across the funds under

Person/ Committee	ESMS Requirement	Other E&S Responsibilities
		management and forum to discuss investments
CCSEAF investment team	Working knowledge	Actively involved in E&S issues insofar as they interact with their responsibilities for investments
IAC Committee	Awareness of, in relation to IAC process	The IAC considers the E&S inputs at each IAC stage along with other investment criteria and provides the decision to move to the next stage of due diligence or investment approval. This includes approval for any budgets to complete.
Limited Partners	Review of ESMS as part of due diligence	Receive and review performance reports and updated via the LPAC
POC Facility EHS Managers	Understand the requirements of CCSEAF to reflect in the Special Purpose Vehicle (POC) ESMS	Develop the POC ESMS and associated management plans to reflect the ESMMP and the risks and impacts identified.
PMC EHS Managers	Awareness of, in relation to construction management requirements	Supervision of the EPC Contractor and reporting into the ESM if facility EHS Manager not appointed to carry out this role
EPC Contractor EHS Managers	Awareness of, in relation to construction management requirements	Management of HSES risks and reporting of performance to the Project Management Company (PMC)
E&S Consultants and Advisers	Understand the requirements of CCSEAF with expertise in sector related E&S considerations	Support CCSEAF to meet its E&S obligations for investments including due diligence, monitoring and ad-hoc support



## **2.2 Responsibilities for Key Personnel and Organisations**

### **2.2.1 Managing Director**

The Managing Director has ultimate responsibility for the implementation of the ESMS and the investments that are presented to the IAC for approval. They will work closely with the ARCH ESG Function to ensure that all E&S aspects are discharged in accordance with the procedures outlined in Section 3 and sit on the ARCH ESG Committee.

### **2.2.2 E&S Manager**

The E&S Manager will be responsible for the implementation of the ESMS into pre-investment screening and assessment, and post-investment stewardship, monitoring and management. The E&S Manager's specific responsibilities include the following:

- Overall management of the ESMS, ensuring that it is operated, maintained, updated and resourced as needed.
- Ensuring that the various procedures and documents associated with the ESMS are kept up to date.
- Conduct, or arrange others in the Fund to conduct, the pre-investment E&S screening process of all proposed investment opportunities. Facilitate the involvement of the ARCH ESG Function to support with this process as needed, and to review the drafted completed documentation.
- If the Fund is leading, in collaboration with the ARCH ESG Function, define the scope and arrange the commissioning of a consultant to conduct an Environmental and Social Impact Assessment (ESIA), Environmental and Social Monitoring and Management Plan (ESMMP) and other specific E&S studies as needed.
- Work with the ARCH ESG Function to prepare E&S input for investment proposals presented to the Investment Advisory Committee, identifying the key E&S risks and how these will be managed by the POC to comply with the E&S policy.
- Provide E&S stewardship at board level when interacting with the POC. Seek advice from the ARCH ESG Function to conduct such stewardship to achieve alignment with the CCSEAF E&S Policy.

- Ensure that E&S performance data is collated from the POC on a regular basis as prescribed, review this data, and collate it for reporting/presenting to the LPAC on a quarterly and annual basis.
- Ensure that notification of significant E&S incidents from an investee are shared with the LPAC promptly.
- When preparing for exit, provide guidance and arrange resources to articulate E&S value creation for potential buyers and conduct diligence on the E&S performance of potential buyers.

### **2.2.3 ARCH ESG Function**

The ARCH ESG Function provides oversight of all E&S aspects for CCSEAF including the implementation of the ESMS. Until the first two facilities are constructed and operational the ESG Director will carry out the ESM's responsibilities, after which a full time ESM will be appointed. Responsibilities include:

- Overall support to the E&S Manager for the implementation of the ESMS.
- Provide advice to and notify the E&S Manager and Managing Director on the effectiveness of the ESMS or when compliance with it is falling short. Assist with updates to the ESMS to ensure its effectiveness, alignment with best industry practice, and incorporating new Limited Partner (LP) requirements.
- Support the E&S Manager and Fund team overall in completion of the pre-investment E&S screening, especially identification of excluded activities/products, red flag issues, categorisation, identification of applicable IFC PS, and scoping and budgeting of the detailed E&S assessment studies.
- Interface with the Fund team to determine E&S opportunities for investments to achieve positive development outcomes.
- Support the Fund ESM or POC to define the scope and arrange the commissioning of a consultant to conduct an ESIA, Environmental and Social Monitoring and Management Plan (ESMMP) and other specific E&S studies as needed.
- Work with the POC to define E&S selection criteria and weighting for third-party contractor selection.

- Work with the POC and legal to ensure that appropriate E&S requirements are included in the relevant legal and contractual documentation with third-party contractors.
- Review and approve the PMC’s HSES Oversight Plan and the EPC contractor’s HSES Management Plan for construction phase.
- Review and approve the POC’s ESMS and other E&S documentation as needed.
- Preparation and presentation of relevant E&S materials deliverables for the IAC, identifying the key E&S risks of the investment and how these will be managed.
- Review E&S performance data received from the POC on a regular basis as prescribed and collate and report this to the LPAC on a quarterly and annual basis.
- Follow up with POCs when notified of significant E&S incidents from them to ensure (and/or get involved in) investigation to ensure appropriate action is taken to prevent reoccurrence, compensation is given, and disclosures are made as relevant.
- Support and advise the Fund’s investee board representative on E&S stewardship to achieve alignment with the CCSEAF E&S Policy.
- Regularly interact with and advise those within the POCs who are responsible for E&S to discuss and identify initiatives that could achieve E&S opportunities and positive development outcomes, and ensure overall alignment with the Applicable E&S Standards and Fund E&S Policy.
- Assist at meetings with CCSEAF investors and other external parties as required.
- Provide E&S capacity training to Fund investment team.

#### **2.2.4 ARCH ESG Committee**

ARCH is in the process of establishing an ESG Committee to ensure that ARCH’s Sustainability Policy is implemented effectively for all the funds under management. The ESG Committee will have senior representation from all the funds and ARCH acting as ‘champions’ across the organisation. The Committee will

be an opportunity to share information, carry out training and discuss any changes to policies and procedures. The Committee is planned to meet every two months.

#### **2.2.5 Facility EHS Manager**

The Facility EHS Manager will be responsible for implementing the facility ESMS, ensuring that it meets the Fund’s requirements and reporting regularly to the ESM. Responsibilities will include:

- Overall management of the facility ESMS ensuring that it is operated, maintained, updated and resourced as needed.
- Ensuring that the various procedures and documents associated with the ESMS are kept up to date, and to recommend any changes/updates as needed.
- Regular reporting to the ESM, including monthly updates and incident reporting.
- Daily inspections and reporting of issues to the Facility General Manager.
- If appointed prior to construction assuming the responsibilities of the OE EHS Manager

#### **2.2.6 EPC Contractor EHS Manager**

The EPC Contractor shall appoint a qualified EHS Manager throughout the construction phase. The EPC EHS Manager responsibilities will include:

- Daily inspections of the site;
- Site inductions for all employees, sub-contractors and other people/organisations entering the site;
- Developing and implementing the EPC Contractor’s construction HSES Management Plan;
- Conducting HSES risk assessments;
- Training of employees and sub-contractor employees on the HSES Management Plan;
- Daily toolbox talks covering the activities taking place on that particular day;
- Weekly meetings with the PMC EHS Manager; and

- Incident reporting and monthly reporting on performance against the HSES Management Plan requirements.

### **2.2.7 PMC EHS Manager**

For the construction phase of each asset, it is likely that the POC will require support to oversee the EPC Contractors activities. This will certainly be the case if the facility EHS Manager has not been appointed. The PMC EHS Manager will:

- Developing and implementing the PMC’s construction HSES Oversight Plan;
- Carry out daily inspections of the site and EPC Contractor activities;
- Report on all cases of non-conformity with the EPC Contractor’s HSES Management Plan;
- Attend weekly meetings with the EPC contractor’s EHS counterpart and the fund’s ESM;
- Submit regular monitoring reports (monthly) to the Fund’s ESM.

### **2.2.8 E&S Consultants & Advisers**

The Fund will make use of consultants and advisers for a variety of E&S workstreams where extra capacity or an independent assessment is required. The types of support required include:

- Carrying out E&S assessment studies;
- Completion of independent E&S scoring;
- Advisory services on Fund E&S documents and investments.

## **2.3 Training & Capacity Building for Fund Personnel**

The Fund implements an annual training program on relevant E&S topics as a mandatory requirement for all Fund staff. The training program covers:

- E&S induction training for all new joiners to the Fund investment team on the Fund’s E&S Policy, ARCH Sustainability Policy, and the Fund’s ESMS; and
- Annual E&S refresher training for all CCSEAF team members tailored to the core business activities and relating to the investments and country

specific risks. This may be delivered internally or externally. External courses/training could include:

- KfW’s [State of the Art E&S Risk Management for Financial Institutions](#) – 2.5 hours - free
- IFC’s [Sustainability Training and E-Learning Program \(STEP\)](#) (designed for managers and staff of financial institutions (FIs), aims to help better understanding of sustainable finance, E&S risk management and explore sustainability-related business opportunities) – 3 hours – free
- IFC’s [E-Learning Course on Managing Environmental and Social Performance](#) (learn how you can help your clients manage their environmental and social risks, thereby having a positive impact on their bottom line, reputation and development impact) – 1 hour – free
- European Investment Bank (EIB)’s [Master Class on EIB Environmental & Social Sustainability Management](#) - 3 months assuming 5-7 hours of self-study per week – Free
- Cambridge Institute for Sustainability Leadership (part of Cambridge University) [Sustainable Finance online short course](#) – Offered on a quarterly basis (online with tutor assistance - 8 weeks, 6–8 hours per week - £2,200 (CPD certified)
- Chartered Financial Analyst (CFA) UK’s [Level 4 Certificate in ESG Investing](#) - designed for practitioners working in investment roles who want to learn how to analyse and integrate material ESG factors into their day-to-day roles - £485, including access to online Official Training Manual and the first exam sitting (100 questions assessed by multiple choice questions and item set scenarios)

Additional training needs will be identified and delivered as appropriate.

### 3 E&S INTEGRATION INTO THE INVESTMENT DECISION MAKING PROCESS

The key steps involved in integrating E&S into CCSEAF’s investment processes are outlined in Figure 3, and described throughout this Section. This process adopts a risk-based approach, ensuring that the level of assessment undertaken is proportional to the level of potential E&S risk associated with each asset.

E&S risks and opportunities are identified during the assessment phase together with management actions to eliminate or reduce risks to acceptable levels and enhance opportunities for value creation. The objective is to demonstrate, through CCSEAF’s involvement, that there has been a meaningful demonstration of industry-benchmark or better E&S performance prior to the eventual fund exit.

The ESMS has been designed to integrate with the Fund’s overall investment and management governance arrangements and processes, as applicable throughout investment screening and assessment, as well monitoring and reporting through the ownership/operational period. Sections of the ESMS are supported by various detailed policies, templates and checklists including an [E&S Exclusion List](#), Categorisation Guidance, Checklists, etc. which are available in the Annexes. The table below provides an overview of the E&S tools:

**Table 3-1: List of Appendices**

Appendix	Description
A	<a href="#">CCSEAF E&amp;S Policy</a>
B	<a href="#">E&amp;S Exclusion List</a>
C	<a href="#">E&amp;S Screening Checklist</a>
D	<a href="#">Environmental and Social Impact Assessment Report Outline</a>
E	<a href="#">Environmental and Social Management Plan Template</a>
F	<a href="#">Stakeholder Engagement Plan Outline</a>

G	<a href="#">Resettlement Action Plan Outline</a>
H	<a href="#">Quarterly E&amp;S Reporting Template</a>
I	<a href="#">Incident Reporting Template</a>

#### 3.1 IAC Approval Process for E&S

The IAC is the committee made up of representatives from the Investment Advisor and Independent Experts. In line with a typical fund structure, an IAC pack is presented at each IAC including E&S deliverables which are reviewed and discussed at the meeting. The Fund cannot proceed to the next phase in the investment development until the IAC approves both the deliverables for this step and the budget to complete them. There are two key IAC meetings during the investment decision process which incorporate consideration of E&S matters.

**Table 3-2: E&S Actions and Deliverables in IAC Process**

IAC Meeting	Main Purpose	Deliverables to be reviewed and considered
<b>Initial IAC</b>	After the fund investment team has originated the investment and completed its screening, an Initial IAC is called to review the screening documents and approve the investment moving to ESIA stage, including the budget required.	<a href="#">E&amp;S Screening Checklist</a> , including identification of key E&S risks and opportunities, categorisation, and E&S standards identification Budget and Scope for ESIA, ESMMP and Climate Change Risk Assessment (CCRA)
<b>Primary IAC</b>	Upon completion of the ESIA, the IAC reviews the ESIA reports in tandem with other investment documents and approves the Fund team to negotiate the investment agreements.	ESIA Non-technical summary, ESMMP and CCRA

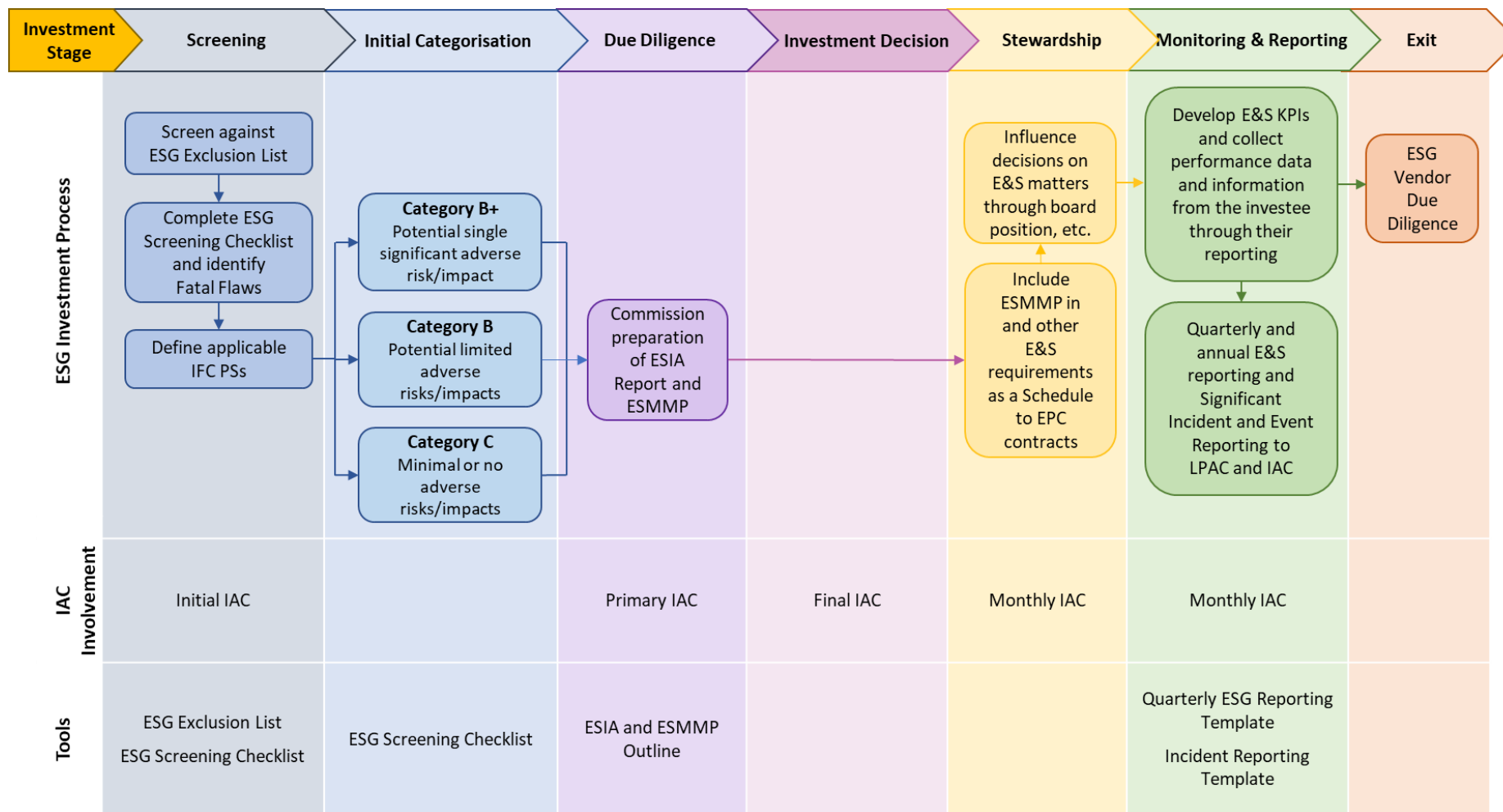


Figure 2: E&S in the Investment Cycle

## 3.2 Screening

### 3.2.1 E&S Exclusion List

This step applies to early review of a potential investment and approval to proceed with assessment in line with the investment process. It should be undertaken prior to and feed into the Initial Committee.

The Fund commits to not develop and operate assets using or involving any activity or product included on the [CCSEAF E&S Exclusion List](#) (Appendix B). The asset/corporate client should be periodically assessed against the [CCSEAF E&S Exclusion List](#) by the investment team during the due diligence phase. Where any information comes to light that suggest that there may be a potential issue against excluded activities/products then the ARCH ESG Function should be consulted for guidance.

### 3.2.2 E&S Screening

Where the asset has not been excluded based on the [CCSEAF E&S Exclusion List](#) or otherwise, CCSEAF's E&S Manager will arrange for an initial E&S screening to be conducted of the asset's potential E&S risks of most concern as well as potential positive development outcomes (either themselves, a member of the investment team, or the ARCH ESG Function if no-one else is available). This information shall be documented in the [E&S Screening Checklist](#) (Appendix C). Such issues could be related to resource use, physical and/or transition climate risk, pollution prevention and control, biodiversity, community health and safety, community engagement, resettlement, human (including labour) rights, indigenous peoples, cultural heritage, bribery and corruption, gender and diversity, etc. Some of the most challenging E&S risks may arise from the external operating environment, not the asset/company itself – such as systemic discrimination, conflict, or widespread disease. This shall be covered by this screening also.

The screening is not intended to be a detailed assessment. It will be based on a short site visit by the investment team to see the land parcel and surrounding area to identify E&S sensitivities.

For the acquisition of vehicles for distribution business, the Fund shall remain committed to adopting Best Available Techniques (BAT)<sup>2</sup> for our logistics fleet. No further diligence is required.

### 3.2.3 E&S Standards Identification

The ARCH ESG Function shall identify which IFC PSs could be applicable to an asset and therefore will need to apply to the scope of the ESIA. IFC PS1 is always applicable as it is an overarching standard covering and defining the approach to assessment and management of E&S impacts and risks. This will be indicated in the [E&S Screening Checklist by the ARCH ESG Function](#), the end of which includes a list of questions to assist with identifying IFC PS applicability. The completed checklist and categorisation shall be included in the Initial IAC pack, to be supplemented as needed.

### 3.2.4 Preliminary Project Categorisation

Based on the information in the completed [E&S Screening Checklist](#), as part of the technical review, the ARCH ESG Function will assign a preliminary E&S risk category to the asset. All assets are classified into one of the following three categories according to the relevance of their potentially adverse E&S impacts and risks: “B+” (substantial risk), “B” (moderate risk) or “C” (low risk). Definitions of each of the categories are provided in Table 3-3.

The determination of the risk categorisation will rely on the professional judgement of the ARCH ESG Function. Since the extent of E&S risks would not be fully clear at this stage, the precautionary principle will apply and the higher of the potential risk categories will be adopted (i.e. if unsure whether the project will be Category B or C, select B).

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<sup>2</sup> 'Best available techniques' (BAT) means the available techniques which are the best for preventing

or minimising emissions and impacts on the environment in a commercially viable way.

The categorisation and screening will determine the scale and complexity of ESIA required if the prospective opportunity is taken forward.

**Table 3-3: E&S Risk Categorisation Criteria**

Category	Risk Level	Definition and Guidance
B+	Substantial	Typically, the potential impacts and risks of category B+ projects are limited to a local area, are in most cases reversible and are easier to mitigate through appropriate measures. However, if it is expected that a Category B+ Project has a <b>single significant adverse environmental and social impact and risk that is irreversible or unprecedented in a single area</b> , this Project would be categorized as Category B+ (substantial risks).
B	Moderate	A project that has <b>potentially adverse E&amp;S risks and impacts</b> , although to a lesser extent than those of a category A/B+ project. Typically, the potential impacts and risks of category B project(s) are <b>site specific, are in most cases reversible and are easier to mitigate through appropriate measures</b> .
C	Low	A project that has <b>no or only minor adverse E&amp;S impacts or risks</b> , and if the construction and operation of the project does not require any particular protection, compensation or monitoring measures.

The preliminary categorisation shall be documented at the end of the [E&S Screening Checklist](#) together with the respective justification/rationale. The completed checklist and categorisation shall be included in the Initial IAC pack, to be supplemented as needed.

It is unlikely that the investments will fall into a Category C, meaning that investments taken forward will be Category B+ or B thereby necessitating an ESIA for asset.

The categorisation of the asset will be kept under review during the ESIA and amended as new information becomes available, as appropriate. Where the categorisation is revised, then the investment teams' plans for a more detailed ESIA, etc. should also be reviewed and revised, where appropriate.

### 3.3 E&S Assessment

If investment into an asset is approved to proceed with further consideration at the Initial IAC, the ESM, or the POC if it has been established at this milestone, will:

- Include E&S requirements into the investment permit register;
- Develop a terms of reference (ToRs) for an ESIA and Climate Change Risk Assessment (CCRA) (if using ammonia as the refrigerant) to be conducted and ESMMP to be prepared on the basis of the potential E&S risks and impacts identified during the E&S screening phase;
- Procure a consultant(s), registered with the in-country competent authority, to carry the ESIA and CCRA and prepare an ESMMP in accordance with the ToRs;
- Work with the ESIA and CCRA consultant(s) and provide the link between them and the design consultant to ensure the ESIA and CCRA reflects the final facility design and operations, and any recommendations from the same are included in the final facility design and operations;
- Attend key stakeholder engagement activities arranged by/with the ESIA consultant to represent the facility developer;
- Obtain the required E&S permits from the competent authority;
- Publicly disclose a non-technical summary of the draft ESIA and ESMMP.

The following sub-sections describe the requirements and contents of an ESIA, CCRA and ESMMP.

#### 3.3.1 ESIA

An ESIA documents the process of assessing potential E&S impacts of a proposed project, evaluating alternatives and designing appropriate mitigation, management and monitoring measures. An ESIA is usually prepared for greenfield developments, or significant expansions of existing assets, that are likely to generate significant E&S impacts.

The scope and depth of the ESIA depends on the nature, complexity and significance of the identified issues, as established through a scoping study which involves relevant stakeholders to confirm the risks identified, to set priorities for the ESIA and to determine the types of assessments required for the ESIA.

The 'Area of Influence' is defined for the assessments within the ESIA considering where, both on and off-site, a project could potentially have direct and/or indirect impacts on the physical, biological, social or cultural environment. An ESIA for a project to be invested in by CCSEAF is to be prepared in accordance with local regulatory requirements, where they are applicable, and IFC PS1. It should cover all potentially significant E&S issues covered by IFC PSs 2-8 as applicable. National ESIA laws may cover certain social aspects (in particular cultural and archaeological heritage) but typically do not require a full consideration of the full breadth of social impacts covered by the IFC PSs.

A [content outline of a typical ESIA](#) is provided in Appendix D.

### **3.3.2 Environmental and Social Management and Monitoring Plan (ESMMP)**

An ESMMP for the asset describes all measures that need to be taken to avoid, mitigate, offset and monitor any adverse E&S impacts and risks identified by the ESIA, and is typically the final chapter of an ESIA report (although not always if the project is a brownfield investment and an ESIA was not conducted or not conducted to IFC PS requirements).

The measures are usually split by project phase, i.e. i) preparation (conception, planning); ii) construction and commissioning; and iii) operations. It may comprise an overarching ESMMP document with supplementary documents, e.g. Resettlement Action Plan (RAP), Livelihood Restoration Plan (LRP), etc., where these are required. It will also assign responsibilities for implementing such measures.

A [template for and some example content of a typical ESMMP](#) is provided in Appendix E.

### **3.3.3 Climate Change Risk Assessment (CCRA)**

Climate change should be addressed through application of the Applicable E&S Standards (within the ESIA, ESMMP, ESMS, etc.) and a supplementary CCRA.

Climate change is addressed in the Applicable E&S Standards as follows:

- IFC PS3 Resource Efficiency and Pollution Prevention Clauses 6-8 (together with the World Bank Group General EHS Guidelines – Energy

Conservation, and any applicable the World Bank Group Industry Sector EHS Guidelines) – Require consideration of alternatives and implementation of technically and financially feasible options to reduce project-related Greenhouse Gas (GHG) emissions during the design and operation of the project.

- IFC PS3 Clause 9 also requires, where a project is a potentially significant consumer of water, that measures that avoid or reduce water usage are adopted so that the project's water consumption does not have significant adverse impacts on others. This should include consideration of how future climatic changes may impact the availability of water resources.
- IFC PS4 Community Health, Safety and Security – Requires assessment of how project activities may accelerate and/or intensification the impacts on communities, including water resource and ecosystem services, that local communities are reliant on.

A CCRA will be undertaken to understand how climate change and transition to a low carbon economy may create risks for the project through consideration of both:

- *Physical risk* – considering current frequency and severity together with future trends of climate hazards (e.g. storms, hurricane/typhoons, flooding, water availability, extreme heat/cold, wildfires, landslides, etc.) and how these may impact on the supply chain, on site activities and Associated Facilities (such as transmission lines) of the project during the construction and operational phases. Future trends such be considered with respect to relevant international and national level models/scenarios (e.g. the Intergovernmental Panel on Climate Change Representative Concentration Pathway (RCP) 8.5 scenario, which is approximately aligned to four degrees centigrade of average global warming). The assessment should include consideration of the integrity/operational efficiency of the assets, maintenance and repair requirements, and health and safety of workers.
- *Transition risk* - considering future scenarios of policy, regulatory, technology and market drivers associated with the transition to a low



carbon economy and how these may create additional costs or erode revenue associated with the project.

The scope of the CCRA should include all project sites and components, including Associated Facilities. The depth and nature of the CCRA will depend on the type of project as well as the nature of risks, including their materiality and severity. Identified impacts to the project associated with different forwarding looking scenarios analysed should be quantified as far as possible, including in financial/commercial terms, with adaptation and mitigations measures developed for those impacts assessed as having a potential significant impact.

### **3.4 Finalisation of Project Categorisation**

As part of the ESIA, the investment categorisation will be reviewed in accordance with the actual level of E&S risks identified following the ESIA and with reference to Table 3-3. Should the Category rise from a C to a B, or a B to a B+, the ARCH ESG Function will inform the investment team that the ESIA conducted to date will need to be supplemented. In order to not delay the transaction, any such Category change should be communicated as soon as possible (ideally at scoping stage) such that this additional ESIA work can be conducted.

### **3.5 Investment Decision Agreement**

For decision to proceed with investment consideration to be made at the primary IAC, the non-technical summary of the ESIA and ESMMP shall be submitted to the IAC for review.

If the ESIA and/or CCRA reveal that the asset is likely to have significant adverse E&S impacts or risks that cannot be mitigated or offset to an acceptable level as judged and directed by the Primary IAC, the investment team will not proceed further with the transaction. The investment decision will also be denied by the IAC if the asset does not or cannot comply with the relevant host country E&S laws and regulations. CCSEAF must also ensure that there is a viable and robust route to ensure that any weaknesses can be addressed appropriately.

The decision of the Final IAC will be based on whether the proposed solutions for appropriate E&S protection/risk management measures are commercially viable and socially acceptable.

## 4 E&S Stewardship

During the investment period, CCSEAF will seek to influence the E&S management and performance of the POC through various mechanisms discussed below in order to achieve compliance with the Applicable E&S Requirements and contribute to positive sustainability outcomes. The CCSEAF team will plan annual training sessions with senior POC employees and is planning to implement incentives around upholding the ARCH's ESG Principles as well as HSES aspects.

### 4.1 Board Influence

As CCSEAF will hold a board position in the POC, CCSEAF's representative(s) shall actively exercise influence over board decisions made regarding E&S. This will involve actively raising or engaging in discussion on E&S concerns and key decision points, and voting in line with [CCSEAF's E&S Policy](#) and the [Applicable E&S Standards](#).

### 4.2 Informal Engagement with ESG Functions and Senior Management

CCSEAF' investor representative shall introduce and facilitate ARCH ESG Function's engagement and regular dialogue with the POC senior management and/or ESG Functions on emerging E&S topics or particular areas of concern.

## 5 E&S Investment Monitoring and Reporting

### 5.1 E&S Monitoring Visits

ARCH will conduct regular site visits to understand the E&S performance of each asset with reference to the [Applicable E&S Standards](#) and to ground-truth the reported information received from the portfolio company throughout the investment period.

The frequency of site visits is dictated by the stage of development and E&S risk level (categorisation). If the asset is in construction/commissioning phase, site visits should be conducted on at least a six-monthly basis due to the more dynamic nature, and potentially higher risk, of such activities. Once it transitions to operations, site visit frequency can be reduced to at least annually.

Frequency can be increased at the discretion of the ARCH ESG Function as necessary mid-investment (but not less than the minimum frequency mentioned above). In such an event, the ARCH ESG Function shall inform the investment team during the annual budgeting process. For example, should a series of significant incidents occur (e.g. increasing number of fatalities, major accidents, pollution incidents, employee grievances, etc.), then the frequency may be increased. Should the ARCH ESG Function be satisfied that the asset has improved its E&S performance, then a lesser frequency can be applied. The frequency (and any changes to it) should be communicated by the Fund investment team to the POC.

The ESM or ARCH ESG Function shall conduct the site visits.

In order to facilitate the E&S site visits, the ESM or ARCH ESG Function shall refer to the most recently submitted E&S reports received to aid the focusing of monitoring efforts on the highest E&S risks.

The outcome of each E&S site visit event should be a brief report prepared by the person who conducted the site visit that:

- Identifies the status of implementation of the E&S commitments set out in local permits, the ESIA and ESMMP;
- Identifies any emerging/new significant E&S issues with reference to the Applicable E&S Standards; and

- Defines recommendations to address any new or outstanding E&S issues, or enhance E&S performance or positive sustainability outcomes with a view to achieving ESG value creation.

The E&S site visit findings should be communicated to and discussed with the EPC contractor and POC (for construction phase) or just the POC (for operation phase) to ensure their understanding and determine whether they need support/assistance to achieve the Applicable E&S Standards and/or implement the recommendations.

### 5.2 Setting ESG Metrics and Targets

In order to assist in driving the ESG agenda, obtain clear demonstration of ESG value creation, or identify concerning ESG trends/performance that requires correcting/managing, the ARCH ESG Function shall develop a set of material ESG metrics for the Fund portfolio companies. These shall be discussed with the portfolio company to ensure they are understood in terms of collection methodologies definitions and are reasonable to measure such that consistency across the fund is established. ARCH expects to receive this data on an annual basis from each portfolio companies.

Once the first year of data collection has been collated, the investment team together with the ARCH ESG Function shall work with the portfolio companies to establish bespoke achievable and time bound targets on an annual basis for improvement together with initiatives, plans and budgets to achieve those targets. The targets may also be informed by peer or sector benchmarking where such data is available.

This data may be used to report E&S performance to the Fund's LPs. See below.

### 5.3 Quarterly E&S Report for Investors

Input into the Fund's quarterly LPAC report will be provided covering E&S performance covering the active portfolio including key actions during the period and a summary of any incidents that have occurred. It is noted that quarterly reports are required by the LP side letters to be submitted within 45 calendar days after each quarter, provided that the report for the final quarter of each Accounting Period may be provided within 120 days of the end of such quarter.

## 5.4 Annual E&S Report for Investors

An annual fund level E&S report will be submitted to the LPAC no later than 30 May following the previous financial year and shared with other investors where appropriate. This will provide the following information for the reporting period:

- An attestation that the Fund and the General Partner are each in compliance with the E&S Compliance Framework;
- Status of compliance with [CCSEAF's E&S policy](#) and ESMS;
- Details of any changes to [CCSEAF's E&S policy](#) and ESMS;
- Details and status of any changes to the Fund's E&S resourcing and competency (incl. details of any training);
- E&S assessment studies activities conducted over the period;
- High-level summary of the E&S Risk Profile of the portfolio;
- Consolidated E&S performance across the portfolio;
- Summary of key E&S information for each investment such as E&S initiatives and improvements implemented, E&S key performance indicator (KPI) data and trends, and details of any significant incidents; and
- Details of any material E&S issues or incidents that are relevant at a Fund-level.

The exact contents and format of the report should be agreed in dialogue with the LPAC.

ARCH shall discuss the annual E&S Report at the next LPAC meeting, held after the report has been provided to Investors.

## 5.5 Significant Incident and Event Reporting to Investors

ARCH, through the fund manager, will notify its investors promptly of:

- Any significant event, incident or accident in relation to its investments, or trend in incidents, that are considered to create reputational risk at

the fund level and therefore may create potential reputational risk issues for investors<sup>3</sup>; and

- Any activity by an investee/project that does not comply with the E&S Compliance Framework.

Initial notification to LPs should be made as promptly as possible, and in any event no more than two days, after ARCH becomes aware of the occurrence and as soon as reasonably practicable thereafter a more detailed report outlining: the nature of the incident, accident or circumstance and the impact arising therefrom; the measures being taken, or plans to be taken, to address them and prevent any future similar event. ARCH, through the fund manager, shall keep the LPs informed of the on-going implementation of those measures.

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<sup>3</sup> A serious incident is one that is material social, labour, health and safety, security or environmental incident including any environmental and social claim, serious accident, loss of life, material breach of law, material effect on the environment or circumstance with respect to any portfolio company or in

relation to any portfolio company operations having, or which could reasonably be expected to have, any material adverse effect or a material adverse impact on the implementation or operation of the portfolio company operations in compliance with the Environmental and Social Requirements

## 6 Exit/Maturity

### 6.1 Maximising E&S Value Creation

In order to maximise the value of the investee from an E&S perspective for sale (either an acquisition or an initial public offering (IPO)), ARCH shall prepare a review of the POC on E&S to:

- Facilitate potential investor's ease of access to the E&S performance of the investee/project;
- Showcase the E&S value creation through risk management and achievement of positive sustainability outcomes;
- Demonstrate compliance, and active management to achieve compliance, with the [Applicable E&S Standards](#).

E&S value creation will be sought to be demonstrated in financial terms as far as possible likely around the following elements:

- **Top line growth** - Attract B2B and B2C customers and able to access certain markets and sectors with more sustainable products, thus gaining more and higher value market share. Achieve better access to resources and no delays to achieving operations through stronger community and government relations.
- **Cost reductions** - Lower energy, water and raw material consumption. Reduced waste generation and associated disposal costs. Reduced insurance premiums, worker claims, etc. due to good OHS and HR management.
- **Regulatory and legal interventions** – Avoid restrictions on advertising and point of sale, and fines, penalties, and enforcement actions.
- **Productivity uplift** – Good employee retention and engagement due to motivation and purpose. Attract talent through greater social credibility.
- **Investment and asset optimization** - Better allocation of capital for the long term (e.g. more sustainable plant and equipment). Avoid investments that may not pay off because of longer-term environmental issues, thus avoiding stranded assets.

The above will be conducted at a reasonable time prior to planned exit and in line with other fund workstreams.

### 6.2 Validating Vendor E&S Capabilities

At a reasonable time prior to planned exit and in line with other Fund workstreams, the ESM will prepare an E&S Exit Plan. The E&S Exit Plan will include the following considerations:

- Initial E&S screening of potential investors;
- KYC, including anti-bribery and money laundering checks in compliance with ARCH Policy;
- Examination of the preferred investors track record on E&S issues and management; and
- Interview with the preferred purchases management in terms of their intentions going forward for E&S management of the asset in question.

The ESM will compile an E&S screening report of the potential investors and a more detailed ESDD of the preferred investor to the IAC.

**Part B – POC E&S Requirements**

## 7 E&S Assessments, Systems and Processes

Depending on the categorisation of the asset and its stage of development, certain E&S assessments and systems are expected to be conducted and established as set out in Table 7.1.

**Table 7.1 – Required E&S Assessments, Systems and Processes**

E&S Studies/Systems	Category		
	B+	B	C
<a href="#">Environmental and Social Management System (ESMS)</a> - [Section 7.1]	✓	✓ Limited complexity, scaled to the risk	✗ <sup>a</sup>
<a href="#">Construction Phase HSES Oversight Plan for PMC</a> – [Section 7.2]	✓	✓	
<a href="#">Construction Phase HSES Management Plan for EPC Contractor</a> – [Section 7.3]	✓	✓	
<a href="#">Emergency Preparedness and Response Plan (EPRP)</a> – [Section 7.2]	✓	✓	
<a href="#">Stakeholder Engagement Plan (SEP)</a> - [Section 7.5]	✓ During ESIA process and throughout project lifecycle	✓	✓
<a href="#">Grievance Mechanism (GM)</a> - [Section 7.6]	✓	✓	✓
<a href="#">Resettlement Action Plan (RAP) and LRP</a> - [Section 7.7]	✓ If there is going to be involuntary physical and/or economic displacement	NA	NA

The POC shall be responsible for leading the development and implementation of the E&S studies/systems; it is not envisaged that the Fund will be involved in the development or implementation of these. The POC may liaise with contractors and/or consultants, as needed, to ensure all requirements are addressed.

The below subsections set out broadly the purpose, key elements and requirements of these E&S studies and systems as guidance for their development and/or evaluation of their alignment with the [Applicable E&S Standards](#) by the POC or its consultant. In each case, the level of complexity and detail in the requirements should be proportionate to the E&S risk level of the asset.

### 7.1 Environmental and Social Management System (ESMS)

An ESMS is a set of documented policies, governance arrangements, roles and responsibilities, procedures, tools and internal capacity that together form a risk control framework to ensure the E&S impacts/risks of an assets construction and operation are identified, appropriately assessed and managed. An ESMS for an asset should be aligned with the requirements of IFC PS1, the AfDB’s ISS Operational Safeguard 1, ISO14001 and ISO45001/OHSAS18001 and should comprise the elements set out below.

- *E&S policy* - setting out the E&S objectives and principles that guide an POC to achieve sound E&S performance in compliance with the [Applicable E&S Standards](#) defined in Section 1.3. The policy will also indicate who within the POC ensures conformance to the policy and is responsible for oversight of its implementation.
- *E&S assessment procedures* - establish and maintain a process for identifying the E&S risks and impacts of an asset.
- *Roles and responsibilities* – ensure there are clearly defined roles and responsibilities to implement the ESMS, including personnel with the necessary skills and expertise, clear lines of responsibility and designated authority.
- *E&S management programs* - describe mitigation and performance improvement measures and actions that address the E&S risks and impacts of the asset (building upon the ESMMP described in Section 3.3.2 above in the case of an asset). This may include a combination of

operational procedures, practices, plans and legal agreements. The mitigation hierarchy to address risks and impacts will favour the avoidance of impacts over minimization, and, where residual impacts remain, compensation/ offset, where technically and financially feasible. A requirement for other E&S management plans would be determined based on the prevailing/predicted E&S impacts/risks.

- *Adequate E&S organisational capacity and competency* - establish, maintain and strengthen as necessary an organizational structure that defines roles, responsibilities and authority to implement the ESMS. Considering how to most effectively ensure governance and good E&S performance is joined up between different parties involved (e.g. agents, contractors, sub-contractors, etc.).
- *E&S training measures* – provide training to all relevant employed and contracted workers involved in the development or operation of an asset so they may have sufficient understanding and skills to implement the requirements of the E&S management programs. Training should consider the context of the workforce and the cultural norms which may be prevalent within a country, e.g. associated with health and safety in the workplace, but which are not aligned to good international practice. Training programmes should proactively seek to identify and address this.
- *Emergency Preparedness and Response Plan (EPRP)* – identifies potential emergency situations for an asset, and ensures appropriate plans and resources are in place and properly trained to respond to such events. Further details of what is required in an EPRP is provided in Section 7.2 below.
- *Monitoring and reporting procedures* - monitor and measure the effectiveness of the management system, as well as compliance with legal, regulatory and applied international E&S requirements/standards. This may include environmental, health and safety (H&S) and social monitoring, inspections, audits, investigation and corrective action planning, developing and reporting on key E&S KPIs, and management review.

The IFC's [Environmental and Social Management System \(ESMS\) Implementation Handbook](#) may be referred to for developing such a system.

## 7.2 Construction Phase HSES Oversight Plan for PMC

In the role of providing oversight of the EPC contractor and its subcontractors during the construction phase of the asset, the PMC is also required to oversee the HSES performance. In preparing to do so, the PMC shall be required through the contracting process to develop and implement an HSES Oversight Plan that includes the following:

- Definition of the Applicable HSES Standards, including local and international;
- Outline of the HSES Management Plan that the EPC contractor should develop and implement (see Section 7.3);
- The Minimum HSES Requirements, including reference to the ESIA and ESMMP, but covering the full range of environmental, workplace health and safety, community, and labour rights topics;
- An HSES organisational structure and roles and responsibilities for the PMC; and
- HSES performance oversight mechanisms including involvement in risk assessment, inspections, audits, involvement in incident investigations, internal and external reporting, and HSES meetings.

The ARCH ESG Function shall review and approve this document prior to commencing work.

## 7.3 Construction Phase HSES Management Plan for EPC Contractor

The EPC contractor shall be required as part of its contract to prepare an HSES management plan for the construction phase of the asset that includes the following:

- HSES policy and commitments;
- Applicable HSES laws, standards and site rules;
- The project organizational chart identifying roles and responsibilities for HSES management;



- HSES training plan, including a training matrix, training programmes, schedule, competency assessment arrangements, training recording arrangements;
- Procedure for identification and assessment of HSES risks, including a Job Safety Analysis (JSA) system (or similar), a Permit to Work (PTW) system, toolbox talks, etc.;
- Management plans for HSES risks;
- Subcontractor selection and management;
- Emergency preparedness and response plan, including first aid, medical, fire prevention and fighting, oil spill control and clean up resources and facilities;
- Human Resources Policies and Procedures;
- Procedures for monitoring HSES performance, including walkthroughs, inspections, audits, development and monitoring specific HSES KPIs;
- Procedure for incident investigation;
- Procedure for internal and external (including to the PMC and regulatory authorities) reporting of HSES performance and incidents; and
- Procedure for management review and governance structures.

Reference should be made in developing this Management Plan to the PMC's HSES Oversight Plan and the ESIA's ESMMP.

The PMC's EHS responsible person shall review and approve this document prior to commencing work.

#### **7.4 Emergency Preparedness and Response Plan (EPRP)**

An EPRP is needed if the project/business operations involve specifically identified physical elements, aspects and facilities that could result in an emergency situation. This could be an occupational or community H&S accident/fatality, fire, explosion, collapse of a facility, release of toxic gases or liquids, security incident, strikes, protests, etc. They form part of an ESMS.

The purpose of an EPRP is to prevent and respond, rapidly and efficiently, to emergencies in a manner appropriate to prevent and mitigate any harm to people and/ or the environment. It should be designed in line with legal requirements, IFC PS1 and any other applicable IFC PSs such as IFC PS2: Labor and Working

Conditions, IFC PS3: Resource Efficiency and Pollution Prevention, and IFC PS4: Community Health, Safety and Security.

Key principles of an EPRP are as follows:

- It should cover all reasonably foreseeable emergencies relevant to the stage of asset development, i.e. construction, commissioning, operation, such as:
  - *Natural emergencies* – e.g. floods, hurricanes, earthquakes;
  - *Work-related emergencies* – fires, explosions, fatality or severe accident or other medical emergency, significant pollution incident such as oil/chemical spill, uncontrolled wastewater discharge, pandemic amongst the workforce; and
  - *Civil emergencies* - violent social/community unrest, workplace violence or harassment, kidnapping; detainment; hijacking; bombs/ explosive remnants of war, pandemic amongst the community.
- The measures set out in the EPRP should be appropriate to the respective risk level of a given emergency, and should complement other provisions in place for, for example, occupational health and safety, pollution prevention and control, stakeholder engagement, security, etc.
- The emergencies covered by the EPRP can take place on-site as well as off-site, e.g. traffic accident on public roads.
- Impacted people to be considered by the EPRP could include, as relevant, direct workers, supplier/contractor workers and visitors on-site, and/or surrounding community.
- Where the consequences of emergency events are likely to extend beyond the asset property boundary or originate outside of the asset property boundary, risks and potential impacts to communities should be considered. Such potential emergencies should be informed to affected communities in a culturally appropriate manner, the EPRP should be designed and practiced in collaboration with them, and measures in the EPRP should include communication with and response by affected communities.

- The EPRP should be a ‘live’ document, being amended and updated periodically in light of operational changes and learnings experienced during its implementation.
- Key elements of an EPRP include:
- Identification of the emergency scenarios.
- Assigning of roles and responsibilities for communicating about and responding to emergency situations.
- Specific response procedures based on the emergency level classification (emergency tiers) of each emergency scenario.
- Training and practice requirements, including drills and their periodicity based on assigned emergency levels or tiers.
- Emergency contacts and communication systems/protocols (including communication with affected communities when necessary).
- Procedures for interaction with government authorities (e.g. emergency, health, environmental).
- Equipment requirements for employees who are responsible for rescue operations, medical duties, threat and incident responses (e.g., hazardous material spill response), fire fighting and other responses. As a minimum, the construction sites must have first aid kits available and provide information on nearest medical facilities including emergency contact and mean of transportation.
- Permanently stationed emergency equipment and facilities requirements (e.g. first aid stations, firefighting equipment, spill response equipment, personal protection equipment for the emergency response teams).
- Identification of evacuation routes and muster points.
- Decontamination procedures and means to proceed with urgent remedial measures to contain, limit and reduce pollution within the

physical boundaries of the project property and assets to the extent possible.

## 7.5 Stakeholder Engagement Plan (SEP)

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in an asset and/or the ability to influence its outcome, either positively or negatively. They can include affected communities located near an asset, particularly those subject to actual or potential project-related risk and/or adverse impacts on their physical environment, health or livelihoods. How those stakeholders are engaged can determine the successfulness of an asset implementation, as it forms the basis for managing an asset’s E&S impacts.

A SEP is required to be developed, communicated and implemented for all assets in line with: IFC PS1, and if applicable IFC PS5 (if there is involuntary physical and/or economic resettlement) and PS7 (if there is potential impact on Indigenous Peoples), and are to apply to Affected Communities<sup>4</sup>, Workers<sup>5</sup> and, where relevant, Other Stakeholders<sup>6</sup>. The SEP will identify relevant stakeholders, particularly Affected Communities, and describe in detail a plan to engage and consult with each of those stakeholders in a culturally appropriate, inclusive and accessible manner, including differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Engagement can include a combination of information disclosure and consultation, and should describe and apply with any local legal or international requirements that apply. This will typically include:

- Providing key asset information to stakeholders through means that are accessible at all levels, from neighbouring communities to the international level;
- Regular meetings with stakeholders, conducting all discussions in good faith and in a two-way manner;

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<sup>4</sup> Any people or communities located in the project's near geographical proximity, particularly those contiguous to the existing or proposed project facilities who are subject to actual or potential direct project-related risks and/or adverse impacts on their physical environment, health or livelihoods.

<sup>5</sup> All workers engaged directly or indirectly by the asset managers to work at the project site,

including full-time and part-time workers, contractors, sub-contractors and temporary workers.

<sup>6</sup> Those not directly affected by the project but have an interest in it. They could include national and local authorities, neighbouring projects, and/or nongovernmental organisations.

- Providing mechanisms for stakeholders to raise issues and grievances (see Section 7.6) and for feedback to be provided in a thorough and timely manner.

In terms of information disclosure, the management team shall publicly disclose the following documents as a minimum:

- ESIA in conformance with in-country requirements, electronically on the POC's website, hard copies in accessible public area locally to the asset (and advertised), and public hearings where pertinent.
- POC's E&S/Sustainability Policy on their website permanently.

Where stakeholder engagement is the responsibility of the host government, the POC will collaborate with the responsible government agency to the extent permitted to achieve outcomes that are consistent with the IFC PSs. If the government's process does not meet the IFC PSs, the POC will conduct a complementary process to supplement it.

Further to a standalone SEP document, an ESIA is required to include a chapter on stakeholder engagement that describes the SEP and Grievance Mechanism (GM) that have been or will be developed for the project. This chapter should also describe what engagement has taken place during the ESIA process (e.g. scoping, ESIA disclosure) and the outcomes of this engagement (summary of concerns raised and how they have been addressed in the ESIA). Finally, this chapter should also describe any future engagement that is planned.

The IFC's [Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets](#) and [Meaningful Stakeholder Engagement: A Joint Publication of the Multilateral Financial Institutions Group on Environmental and Social Standards](#) may be referred to for developing such a plan.

A [content outline of a typical SEP](#) is provided in Appendix F.

## 7.6 Grievance Mechanism (GM)

A grievance is considered to be any complaint, comment, question, concern or suggestion about the way an asset is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by an asset, concerns

about access to the asset stakeholder engagement process or about how comments and concerns about asset activities during construction or operation, or perceived incidents or impacts have been addressed.

A GM is a formal process for receiving, responding to and remedying complaints from stakeholders that are being negatively impacted by an asset, directly or indirectly.

A GM has the following objectives:

- to build and maintain trust with all stakeholders;
- to prevent adverse consequences of failure to adequately address grievances; and
- to identify and manage stakeholder concerns and thus support effective risk management.

A GM can enable problems to be addressed early before they escalate as well as helping to identify patterns of impacts over time, thus feeding directly into reviews of mitigation measures set out in ESMMPs, E&S management programs, etc. It also provides a mechanism for stakeholders to continue to engage with the POC and is an important risk management system in turn.

A GM is required to be developed, communicated and implemented for all assets in line with IFC PS1, and if applicable IFC PS5 (if there is involuntary physical and/or economic resettlement), and are to apply to Affected Communities, Workers and, where relevant, Other Stakeholders. The design of the GM should be informed by the wider stakeholder engagement process so that it is appropriate for, and accessible to the relevant stakeholders, including vulnerable groups. The POC should consider linking to existing grievance processes used by its stakeholders; this could include liaison with, for example, representatives from local authorities, traditional leaders, or other community representatives during the establishment of the GM.

Information about the GM, who to contact and how, should be readily accessible, in a format and language that is appropriate for the asset's stakeholders. The GM shall be advertised locally and on the POC's website. During the first physical meeting with local stakeholders/project affected persons, the GM should be

explained and discussed to ensure that the stakeholders agree that the selected methods are the most appropriate. The details of this discussion should be recorded and included in the stakeholder meeting summary.

The grievance procedure should be free, open and accessible to all, and comments and grievances should be addressed in a fair and transparent manner. A “grievance/continuous input book” should be physically available in an appropriate location (e.g. asset boundary, town/village community centre, place of worship). In addition to the book, at least one additional method should be in place for receiving grievances and should be appropriate for the context. Other methods could include, for example:

- Telephone access
- Internet access
- Nominated independent mediator
- Community leader

Where literacy levels are low in the region, grievances shall be able to be made verbally and recorded by the community liaison officer or similar role. The grievance process should allow for anonymous complaints, and contain a clear commitment to non-retribution against complainants, and should not impede access to other forms of remedy (e.g. judicial or non-judicial processes).

Where it is not possible to resolve the grievance between the grievant and the POC, the grievance will involve two external representatives related to the grievant to mediate. The aim is that a resolution can be put forward by the committee that is acceptable to both parties. Where it is still not possible to resolve the grievance through the committee the complainant can resort to justice through the in-country legal mechanisms.

Management at the asset should establish clear responsibilities for managing the grievance process, being cognisant of where conflicts of interest may exist.

The mechanism should enable grievances received to be logged, screened, assessed, responded to and tracked. The GM should outline how grievances will be managed, with clear timelines and responsibility assigned for acknowledging, investigating and resolving grievances.

Management at the asset should establish a process to periodically monitor the effectiveness of the GM and make improvements as necessary. Also, the GM should be a source of continuous learning about the E&S performance of an asset, and as such analysis of grievance trends should be reported to senior management on a regular basis for consideration as to where adjustments to E&S risk management approaches can be made.

The IFC’s [Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets](#) and the European Bank for Reconstruction and Development (EBRD)’s [Employee grievance mechanism Guidance note](#) may be referred to for developing such a mechanism.

A content outline of a typical GM is provided within the [SEP outline](#) in Appendix F.

## **7.7 Resettlement Action Plan (RAP)**

According to the IFC, resettlement is involuntary when it occurs without the informed consent of the displaced persons or, if they give their consent, without having the power to refuse resettlement. People occupying or otherwise dependent on that land for their livelihoods may be offered fair compensation for their losses. However, they have little recourse to oppose the expropriation.

Displacement may be either physical or economic. Physical displacement is the actual physical relocation of people resulting in a loss of shelter, productive assets or access to productive assets (such as land, water, and forests). Economic displacement results from an action that interrupts or eliminates people’s access to productive assets without physically relocating the people themselves.

If individuals affected by an asset are willing to sell their property and assets on a voluntary basis to the developer, a RAP is not required to be developed and implemented provided the developer can demonstrate that: 1) land markets or other opportunities for the productive investment of the sales income exist; 2) the transaction took place with the seller’s informed consent; and 3) the seller was provided with fair compensation based on prevailing market values.

For all assets that involve involuntary resettlement, regardless of the number of people affected or the significance/severity of anticipated impact, a RAP is required. Its purpose is to identify to all interested parties, including affected

people, who will be affected by land acquisition, how acquisition will be implemented and by whom, as well as the time frame and resources. It outlines eligibility criteria for Affected People, establishes rates of compensation for lost assets, and describes levels of assistance for relocation and reconstruction of affected households. The RAP's planning protects the POC against unanticipated or exaggerated claims from individuals who have spurious eligibility for resettlement benefits.

As a minimum requirement, a RAP must ensure that the livelihoods of people affected by the asset are restored to levels prevailing before inception of the asset. However, simple restoration of livelihood may be insufficient to protect affected populations from adverse asset impacts, especially induced effects such as competition for resources and employment, inflation, and the breakdown of social support networks. For this reason, resettlement activities should result in measurable improvements in the economic conditions and social well-being of the Affected People.

A RAP should include the following components:

- Rationale for resettlement, actions taken to avoid and minimise the need for resettlement;
- Identification of asset impacts and affected populations (based on a census), including those with formal or customary land rights, and establishment of cut-off date;
- A legal framework for land acquisition and compensation, including all relevant host country policies, laws, regulations and international standards (including IFC PS5), including legal mandates and authorities;
- A compensation framework;
- A description of resettlement assistance and restoration of livelihood activities;
- A detailed budget;
- An implementation schedule;
- A description of organizational responsibilities;
- A framework for public consultation, participation, and development planning;
- A description of provisions for redress of grievances; and

- A framework for monitoring, evaluation, and reporting.
- Resettlement and development planning require specialised expertise, and therefore it should be conducted by qualified and experienced personnel.

Under certain circumstances, a POC may be provided with an unoccupied site clear of any current claims by a government agency or other party, but which previously had occupants that were involuntarily displaced in anticipation of the project, the management manager should undertake an assessment to determine whether those resettled were compensated in a manner consistent with host country laws and IFC PS5.

The IFC's [Handbook for Preparing a Resettlement Action Plan](#) and the EBRD's [Resettlement Guidance and Good Practice](#) may be referred to for developing such a plan.

A [content outline of a typical RAP](#) is provided in Appendix G.

## 8 E&S Considerations for Selection and Contracting of Third-Party Contractors

### 8.1 E&S Considerations in Contractor Selection

E&S aspects should be considered early on in relation to third party contractors in order to ensure that all companies considered are able to comply with the Applicable E&S Standards and CCSEAF's E&S Policy.

The first step in the contractor procurement process is the preparation of a RfP. The POC shall include in the RfP the ESMMP which sets out the various E&S considerations, controls, and commitments related to the main activities that the EPC contractor will be required to implement as part of its scope of work, including clear definitions of responsibilities, training needs, performance measurement tools, and reporting requirements. This shall also include requirements to:

- Have in place an E&S/HSES and human resources (HR) policies;
- Have in place an E&S/HSES and HR management systems and codes of conduct;
- Have in place standard HSE procedures and controls that meet local and international standards;
- Have in place grievance mechanism controls, including means to address harassment and other forms of gender-based violence (GBV) plus prior reported incidents of sexual exploitation and abuse (SEA) and GBV;
- Be able provide qualified and experienced HSE and HR professionals throughout construction;
- Have a track record in good HSE and labour rights performance, demonstrated through statistics; and
- Have management measures to manage E&S risks in the supply chain.

This will improve the understanding by the contractor of the E&S requirements, and provides an overall framework of the POC's expectations on E&S matters. With a better understanding of these, the contractor can determine the resources required for executing the work with due consideration of the E&S requirements.

As a result, the bidding process, the selection of the contractor, the contract, and the execution of the work itself includes the E&S considerations from the outset.

E&S evaluation criteria and weightings shall be established alongside the bid packages and included with the bid package so that prospective bidders can see early on the relative weightings of the environmental, social, and health and safety aspects of their proposal. The contractor's existing systems, its capacity to implement E&S requirements, and the contractor-supplied information on past E&S performance shall be among the key criteria used to evaluate contractors. A lack of capacity to establish an ESMS (if one does not exist), implement E&S requirements, and meet applicable standards shall disqualify a contractor from further consideration. The following shall also be considered grounds for disqualification:

- Failure to provide information on past E&S performance, including health and safety records;
- Reports of past performance deemed unacceptable for the current project;
- Notices of material labour issues between workers and management;
- Fines and sanctions imposed by E&S and labour regulators and authorities;
- Poor security management records from previous projects; and
- Material community grievances and high profile adverse press reports on E&S matters.

Referees may be asked to validate claims regarding E&S performance.

The team evaluating proposals shall include at least one qualified and experienced E&S professional who has been involved in the development of solicitations and the establishment of the criteria that should be used to evaluate bidders' E&S qualifications. This shall include attending interviews.

### 8.2 E&S Considerations in Contracting Third-Parties

E&S requirements shall be incorporated into the tendering process for an EPC contractor and PMC for construction of the asset. This shall include as a minimum requirements to:

- Implement the ESMMP of the ESIA (included as an Annex to the contract);
- Comply with the Applicable E&S Standards;
- Develop and implement a construction phase HSES Management Plan (see Section 7.3) and HR Policy and Procedure, which includes procedures to implement the requirements of the above two points;
- In the case of the PMC, develop an HSES Oversight Plan (see Section 7.2) to oversee the HSES performance of the EPC contractor and subcontractors;
- Provide designated and full-time HSES and HR organisational capacity with appropriate level of experience and qualifications – inclusions of an organization chart illustrating reporting lines on E&S to the POC, PMC and subcontractors to be included in the documentation.
- Induction and training programs for E&S and other personnel, including training on applicable HR policy provisions, grievance mechanisms, health and safety, code of conduct including training on the provisions intended to combat GBV and SEA, materials management, and environmental protection.
- Any monitoring of environmental parameters (such as noise, air emissions and air quality, water flows and quality, waste generation and management) that contractors may be required to carry out.
- Implementation of a grievance mechanism for workers (including subcontract workers) either through a grievance mechanism implemented and managed by the contractors or through extending the grievance mechanism of the POC to the workforce of the contractor. In both cases, clear reporting on grievances and how they are addressed between contractor and client is required. The grievance mechanism should ensure proper handling of GBV-related grievances, including but not limited to sexual harassment.
- Creation and maintenance of records on E&S performance.
- The environmental conditions under which the contractor will be allowed to demobilize and leave the site, including conditions of site restoration and requirements for handling personnel retrenchment, particularly those involving local workers.
- Penalties and/or incentives for E&S performance of contractors and subcontractors.
- Report HSES and HR performance on a monthly basis to the Fund; and
- Report any significant event, incident or accident<sup>7</sup>.
- Clear contract statement that the contractor is responsible for the E&S performance of subcontractors and suppliers.
- Contract statement that on the contractor's failure to meet the E&S requirements in such a way as to prevent significant impacts to workers, local communities and/or individuals, and/or environmental resources, and on the contractor's failure to correct such deficiencies upon receiving proper notice, the POC has the right to appoint and pay another party to repair damages or otherwise remedy the impacts and reduce payment to the contractor in the amount paid to the third party.
- The bill of quantities shall include adequate costs and timelines for expenditure to effectively implement the commitments related to E&S performance. The bill of quantities should define milestone and final payments for completion or partial completion of work, to include satisfactory performance of related E&S requirements. If a contract includes incentives for timely completion of work, it should also include corresponding penalties for failure to implement required mitigation measures.

Regardless of whether a contract is based on an international model, the ARCH ESG Function or other qualified person shall review the contract to assess any general E&S requirements present and determine how such requirements need to be modified to fit the POC's needs.

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<sup>7</sup> A serious incident is one that is material social, labour, health and safety, security or environmental incident including any environmental and social claim, serious accident, loss of life, material breach of

law, material effect on the environment or circumstance.

## 9 E&S Capacity and Competency

Each POC should have in place E&S functions, which will likely be split over several different departments (e.g. human resources, EHS, community relations), with senior/board level accountability to provide direction. Whether each E&S function should have full-time positions and/or standalone departments or whether some could be incorporated into other roles and functions (e.g. community relations into external relations or marketing, EHS into engineering/technical) should be based on the E&S risk level of the asset. For assets that have higher E&S risk (Category B+) as a general rule should have full-time E&S positions and even standalone departments, while those of lower risk (Category B or C) may not require such dedicated attention and capacity. The decision on how the E&S functions should be structured should be based on the ESMMP, with them being tailored proportionally to the scale and complexity of the asset and its prevailing E&S risk profile.

If not already familiar with the [Applicable E&S Standards](#), the E&S functions shall undergo training by an external provider to familiarise themselves with the expectations.

During operations, workers will be trained as applicable on procedures developed to manage potential E&S risks.

The ARCH ESG Function is able to provide guidance to the POC with completion of E&S studies and as set out in Section 7 to achieve alignment with the [Applicable E&S Standards](#).



## 10 E&S Monitoring and Reporting

Each POC is required to have an ESMS that is scaled to the nature of the E&S risks of the asset(s) and impacts they manage and resourced appropriately per Section 7.1. A key component of this is their monitoring and reporting requirements in line with CCSEAF's E&S Compliance Framework. As such, monitoring and reporting of E&S performance entails:

- During construction phase of projects when most E&S issues related to such investments are likely to be most significant, attend weekly E&S meetings and review monthly progress reports from the PMC/EPC contractor on E&S performance and related compliance.
  - Quarterly updates on the status of ESG commitment implementation, noting any particular concerns or actual issues.
  - Annual reporting of consolidated E&S metrics data on an agreed set of metrics to enable ongoing monitoring of E&S performance. The POC should also interpret the data and provide commentary on trends observed/conclusions drawn by the POC, the measures identified/implemented to address any (emerging) issues, and communicate these to CCSEAF. For annual reporting, details on the development and implementation of any E&S initiatives covering risk management as well positive sustainability outcomes is required.
  - In the event of any serious E&S incident, the POC is required to notify CCSEAF of the details of the incident and details of any investigation conducted already within 24 hours of its happening in writing, the final incident report will be submitted no later than 72 hours. The POC shall specify the nature of the incident, accident, or circumstance and the impact or effect arising or likely to arise therefrom, and the measures being taken, or plans to be taken, to address them and prevent any future similar event; and keep the Fund informed of the on-going implementation of those measures. A [template for reporting an incident](#) is provided in Appendix H.
- A fatality (of a direct or indirect worker, visitor or someone in the community but as a result of project activities) (including a worker dying as a result of occupational exposure to COVID-19);
  - A lost time injury;
  - Accidents to members of the public or others who are not at work if they result in an injury and the person is taken directly from the scene of the accident to hospital for treatment to that injury;
  - Diagnoses of occupational diseases, where these are likely to have been caused or made worse by their work;
  - Diagnoses of having COVID-19 attributed to an occupational exposure to coronavirus;
  - A significant pollution incident, i.e. an accidental and uncontrolled release of a pollutant (e.g. air emission, chemical or other hazardous substance/waste spill, wastewater discharge, etc.) into the environment that could cause significant damage or irreversible harm or damage to an ecologically or socially sensitive resource (could occur or be released on-site or off-site, but as a direct result of project activities);
  - Worker strikes (direct or indirect/contractor workers);
  - Community or Non-governmental Organisation (NGO) protests;
  - Cases of harassment and discrimination;
  - Local authority enforcement and/or material fines being imposed; or
  - Negative media attention related to E&S aspects that could cause serious reputational damage to either the POC, asset or CCSEAF.

A serious E&S incident includes, but is not limited to:

## **Appendix A – CCSEAF E&S Policy**

## CCSEAF E&S Policy

### Overview

There is a severe shortage of cold chain storage solutions across East Africa resulting in large post-harvest food losses and seasonally affected supply chains causing volatility in market pricing. The cold storage facilities and logistics operations developed by CCSEAF will result in positive development outcomes both directly, by reducing food losses and flattening market pricing, and also indirectly through businesses that will develop within the value chain. The benefits of reducing food losses are twofold:

- 1) Contributing to achieving Sustainable Development Goals (SDGs) 1 and 2 by contributing to ending poverty and zero hunger in East Africa.
- 2) Food loss is a significant contributor of greenhouse gases (methane) in Africa as the products decay, therefore a reduction in food losses will also contribute to the Paris Agreement's ambition to limit global warming to well-below 2°C as far as possible.

These facilities can and will also be used to store essential pharmaceutical products for the region, including vaccines and medicines, and therefore can positively contribute to SDG 3 – Good Health & Well-being.

CCSEAF however recognises that, while providing food security and medical supplies, there can be environmental and social (E&S) risks associated with developing and operating such assets, particularly if there are local E&S sensitivities. As such, CCSEAF commits to acting in an environmentally sustainable, socially responsible, and ethical manner in developing and operating cold storage and logistics operations. We will actively manage our impacts and risks in relation to the environment, neighbouring communities, employee health and safety, and contractors and sub-contractors, and will engage ethically and transparently with all our stakeholders.

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<sup>8</sup> Defined as the exercise of professional skill, diligence, prudence and foresight that would be reasonably expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally. The circumstances that skilled and

CCSEAF is committed to managing E&S risks and opportunities effectively across the investment lifecycle, throughout its portfolio of investments, and within its own operations, recognising that such risks and opportunities link to its fiduciary duty to its limited partners. CCSEAF believes that a robust, integrated approach to sustainable investing is essential in preserving and enhancing the value of its investments throughout its investment lifecycle.

### Scope of this Policy

This Policy applies to all CCSEAF employees, investment activities, investees and contractors. Where there is no conflict with this Policy, CCSEAF may adopt additional policies in order to meet local regulatory, lender or co-investor, customer or other stakeholder requirements.

### E&S Standards

CCSEAF is committed to conducting its investments in line with generally accepted, good, international sustainability management practices. Accordingly, it aligns its E&S management practices to the International Finance Corporation's (IFC) E&S Performance Standards 1 and 2. Further, it applies the following E&S standards to its investments, and requires a commitment from its construction contractors and operating companies to do the same:

- IFC E&S Performance Standards (2012) and associated Guidance Notes;
- African Development Bank's (AfDB) Integrated Safeguards System – Operational Safeguards (2013);
- The World Bank Group (WBG) General and relevant sector-specific Environmental, Health and Safety (EHS) Guidelines
- International Bill of Human Rights
- The International Labour Organisation (ILO)'s Core Labour Conventions; and
- GIIP in the cold chain sector<sup>8</sup>, including membership conditions and guidance issued by the Global Cold Chain Alliance (GCCA) on energy

experienced professionals may find when, for example, evaluating the range of pollution prevention

efficiency, workplace health and safety, greenhouse gases, water conservation, ammonia spill and fire prevention and emergency response, driver safety, food safety.

- All national laws and regulations pertaining to E&S relevant to each investment.

CCSEAF also commits to developing and implementing internal approaches to:

- Implement the recommendations of the Financial Stability Board (FSB) Task Force on Climate-related Financial Disclosures (TCFD); and
- Manage human rights risks based on the UNGPs, including identifying human rights risks, implementing means to avoid infringing on the human rights of others, to address these impacts where they occur, and provide access to remedy to those that are impacted.

CCSEAF delivers on these commitments through developing and implementing an E&S Management System (ESMS).

### Specific E&S Commitments

CCSEAF will require of asset and operating company to operate in line with the following specific commitments beyond those required by the Applicable E&S Standards defined above:

#### General

- Achieve Leadership in Energy and Environmental Design (LEED) certification for the building design and construction of the new facilities.
- Do not invest in any E&S Category A developments or companies, meaning *“business activities with potential significant adverse*

*environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented”* (IFC, 2012)<sup>9</sup>.

#### Climate Change

- Use on-site renewable energy to power the facilities to the extent feasible.
- Quantify the amount of GHG emissions displaced through the operation of the assets.
- Monitor and report Scope 1 and 2 (and where appropriate Scope 3) GHG emissions on an annual basis.

#### Environment

- Do not use hydrofluorocarbons or other ozone depleting substances listed under the Montreal Protocol and its Amendments in the facilities refrigeration technology.
- Remain committed to utilising Best Available Technique (BAT)<sup>10</sup> for our logistics fleet.

#### Community

- Avoid physical and economic displacement, and where this is not possible identify land that is the least impacting and within a Category B profile.
- Avoid all impacts to critical cultural heritage as defined by IFC PS8<sup>11</sup>.
- Avoid projects that directly impact Indigenous Peoples, triggering obtaining their Free, Prior and Informed Consent.

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and control techniques available to a project may include, but are not limited to, varying levels of environmental degradation and environmental assimilative capacity as well as varying levels of financial and technical feasibility. Taken from IFC Performance Standards -

[https://www.ifc.org/wps/wcm/connect/c02c2e86-e6cd-4b55-95a2-b3395d204279/IFC\\_Performance\\_Standards.pdf?MOD=AJPERES&CVID=kTjHBzk](https://www.ifc.org/wps/wcm/connect/c02c2e86-e6cd-4b55-95a2-b3395d204279/IFC_Performance_Standards.pdf?MOD=AJPERES&CVID=kTjHBzk)

<sup>9</sup>[https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/es-categorization](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/es-categorization)

<sup>10</sup> ‘Best Available Techniques’ means the economically and technically viable techniques which are

the best for preventing or minimising emissions and impacts on the environment as a whole. BAT is a moving target on practices, since developing societal values and advancing techniques may change what is currently regarded as "reasonably achievable", "best practicable" and "best available".

<sup>11</sup> Internationally recognised heritage of communities who use, or have used within living memory the cultural heritage for long standing cultural purposes; and legally protected cultural heritage areas, including those proposed by host governments for such designation.

- Prioritise affected communities in the distribution of project benefits, e.g. *employment*, procurement of goods and services and community investment.

#### *Biodiversity*

- Avoid investing in projects with significant impacts to Legally Protected and Internationally Recognized Areas and Critical Habitat as defined by IFC PS6.

#### *Food Safety*

- Achieve local and international food safety certifications (those necessary for customer's clients) for CCSEAF's facilities.

#### *Governance and Business Integrity*

- Conduct all business dealings with honesty, integrity, fairness, diligence and respect.
- Zero tolerance for bribery, corruption, fraud and unethical behaviour, whether under UK law or the law of the jurisdiction in which the portfolio company's asset(s) is located.
- Properly record, report and review financial and tax information.

### **Managing Sustainability Across the Investment Lifecycle**

CCSEAF is responsible for implementing its ESMS requirements for managing E&S risks and opportunities across each stage of the investment lifecycle, including:

- E&S screening against an exclusion/prohibited activities list (as a minimum based on the IFC Exclusion List (2007), but tailored to LP requirements) and identification of potential E&S red flags and opportunities;
- E&S impact assessment (ESIA) and other E&S studies scoped and scaled to the E&S risk level of the facilities;
- Review and consideration of E&S risks/impacts and opportunities identified by the ESIA by the Investment Advisory Committee;
- Incorporation of E&S terms including definition of standards and E&S Management and Monitoring Plan (ESMMP) devolved from the ESIA, and

requirements for development of HSES management plans in line with these, into contractor and operating company legal agreements and contracts;

- Active stewardship and monitoring of E&S issues and opportunities, achieving alignment with the Applicable E&S Standards, and guiding positive E&S and climate outcomes where possible during ownership; and
- Articulation of E&S value creation during ownership at exit.

### **E&S Communication and Reporting**

CCSEAF monitors and reviews E&S performance on a portfolio-wide and asset-level basis. Given the homogeneous nature of the assets, material E&S key performance indicators are assigned to the whole portfolio to assist in ongoing risk management and value creation. Assets of higher E&S risk (Category B+ and B) are also subject to regular (at least annual) site visits to check the status of compliance with the Applicable E&S Standards. CCSEAF reports on key aspects of E&S progress, performance and material issues across its portfolio internally to its investment advisory committee and ARCH's ESG Function, and externally to its LPs on a quarterly and annual basis.

During project planning, CCSEAF shall ensure it is conducted in consultation with affected communities to identify and manage local and cultural community sensitivities. A stakeholder engagement plan scaled to the prevailing social sensitivities shall be developed and implemented for the whole lifecycle of each project. This shall be conducted in accordance with relevant IFC PSs, ensuring that interactions with stakeholders are inclusive, transparent and are relationship building.

CCSEAF requires each of its operating companies to develop and implement an external grievance mechanism in line with IFC PS1 and PS2, through their own ESMSs, that enables third parties (communities in which they operate, direct and indirect workers of the portfolio companies, and any other external stakeholders) to raise and resolve concerns about their E&S impacts.

**Policy Oversight and Implementation**

This Policy has been approved and adopted by CCSEAF's Managing Director. Ultimate accountability and responsibility for implementation of this Policy and CCSEAF's ESMS sits with the Managing Director of CCSEAF, Jared Irving. All CCSEAF staff shall play a role in contributing to the Policy's success. In particular, responsibility for day-to-day implementation of the ESMS rests with CCSEAF's E&S Manager, Azhar Rifai, supported by ARCH's Head of ESG.

**Review of this Policy**

CCSEAF is committed to an ongoing and long-term process of improving its approach to integrating E&S considerations into the investment process. Consequently, this Policy and CCSEAF's approach will evolve over time, through a process of regular (at least annual) review, to reflect changes in best practices and structures, technologies and law.

## **Appendix B – E&S Exclusion List**

## E&S Exclusion List

The Fund will not invest in the following business or activities:

1. Category A investments, as defined by the IFC<sup>12</sup>
2. Production or activities involving harmful or exploitative forms of forced labour<sup>13</sup>/ harmful child labour<sup>14</sup>.
3. Production or trade in any product or activity deemed illegal under host country laws/regulations or international conventions and agreements, or subject to international phase-outs or bans, such as pesticides/herbicides, ozone depleting substances, Polychlorinated biphenyls (PCBs), wildlife or wildlife products regulated under the Convention on International Trade of Endangered Species (CITES).
4. Any business relating to pornography or prostitution.
5. Production or use of or trade in hazardous materials such as radioactive materials<sup>15</sup>, nuclear reactors and components thereof, unbounded asbestos fibres.
6. Cross-border trade in waste and waste products unless compliant with the Basel Convention and the underlying national and EU regulations but for the avoidance of doubt, use of waste as a fuel in district heating is not excluded.
7. Unsustainable fishing methods (i.e. drift net fishing in the marine environment using nets in excess of 2.5 km in length and blast fishing)
8. Destruction of Critical Habitats<sup>16</sup>.

<sup>12</sup>

[https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/es-categorization](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/es-categorization)

<sup>13</sup> Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty

<sup>14</sup> Harmful child labour means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, moral or social development. In addition, any labour that is performed by a person which has not yet reached the age of 15 is considered to be harmful, unless the local legislation specifies compulsory school attendance or the minimum age for working to be higher; in such cases, the higher age will be applied for defining harmful child labour.

<sup>15</sup> Exception: Medical equipment, quality control (measurement) equipment and any other equipment

9. Production and distribution of racist, anti-democratic and/or neo-Nazi media.
10. Tobacco (including its production), if it forms a substantial part of a Project's primary financed business activities.
11. Production of alcoholic beverages and luxury consumer goods.
12. Live animals for scientific and experimental purposes, including the breeding of these animals.
13. Ammunition and weapons, military/police equipment, infrastructure or correctional facilities, prisons, and other goods used for military or paramilitary purposes.
14. Projects which have the effect of limiting people's individual rights and freedoms or violating their human rights.
15. Gambling, casinos and equivalent enterprises or hotels hosting such facilities.
16. Commercial concessions over, and logging of tropical natural forest; conversion of natural forest into a plantation.
17. Purchase of logging equipment for use in tropical natural forests or high nature value forest in all regions; and activities that lead to clear cutting and/or degradation of tropical natural forests or high nature value forest.
18. New palm oil plantations.
19. Any business with a political or religious content.
20. Production, trade in, or use of:

where EFP considers the radioactive source to be trivial and/or adequately shielded.

<sup>16</sup> Critical habitats are a subset of both natural and modified habitat that deserves particular attention. Critical habitat includes areas with high biodiversity value that meet the criteria of the World Conservation Union ('IUCN') classification, including habitat required for the survival of critically endangered or endangered species as defined by the IUCN Red List of Threatened Species or as defined in any national legislation; areas having special significance for endemic or restricted-range species; sites that are critical for the survival of migratory species; areas supporting globally significant concentrations or numbers of individuals of congregatory species; areas with unique assemblages of species or which are associated with key evolutionary processes or provide key ecosystem services; and areas having biodiversity of significant social, economic or cultural importance to local communities. Primary Forest or forests of High Conservation Value shall be considered Critical Habitats.



- nuclear reactors and related products, radioactive materials (except in the case of medical materials and quality-control equipment where the radioactive source is in small quantities and is adequately shielded), combustible elements not exposed to irradiation (cartridges for reactors);
  - unbonded asbestos fibres or other products with bonded asbestos as a dominant material; or
  - harmful substances that are subject to international phase-outs or bans (including pharmaceuticals and pesticides classified as Class Ia (extremely hazardous); Class Ib (highly hazardous); Class II (moderately hazardous); and ozone-depleting substances.
21. Speculative trade or investment in platinum, pearls, precious stones, gold and related products.

## **Appendix C – E&S Screening Checklist**

# E&S Screening Checklist – Greenfield Assets

<b>Project name:</b>			
<b>Project location, including description of closest community/communities:</b>			
<b>Short Project description:</b>			
<b>Check the box with the correct and appropriate answer. Provide details where available below each question.</b>		<b>Yes</b>	<b>No</b>
<b>Environmental and Social Setting</b>			
1.	<p>Is the site within, near to or is (likely to) impact internationally / nationally ecologically or culturally important features such as any of the following? Tick as applicable:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Primary forests</li> <li><input type="checkbox"/> Coral reefs</li> <li><input type="checkbox"/> Wetlands</li> <li><input type="checkbox"/> Mangroves</li> <li><input type="checkbox"/> Estuaries</li> <li><input type="checkbox"/> Locally or international recognized cultural heritage sites</li> <li><input type="checkbox"/> Ramsar sites</li> <li><input type="checkbox"/> National Parks</li> <li><input type="checkbox"/> Nature Reserves</li> <li><input type="checkbox"/> Important bird and biodiversity areas (IBA)</li> <li><input type="checkbox"/> Key Biodiversity Areas (KBA)</li> <li><input type="checkbox"/> Other</li> </ul> <p>Provide any details here.</p>		
2.	<p>Will the project cause involuntary resettlement, loss of livelihood (loss of businesses or enterprises, agricultural, crops, trees, other productive assets, and/or other income sources and means of livelihoods), and/or loss of access to natural resources, communal facilities and services? If so, provide any details here.</p>		
3.	<p>Are there distinct socio-cultural groups present in or use the project area who may be considered as "tribes" (hill tribes, schedules tribes, tribal peoples), "minorities" (ethnic or national minorities), or "indigenous communities" in the investment area? Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories? Will the investment directly or indirectly affect their traditional socio-cultural and belief practices (e.g. child-rearing, health, education, arts, and governance) and/or their livelihood systems? If so, provide any details here.</p>		
4.	<p>Will the project disproportionately impact the poor, women and children, Indigenous Peoples, or other vulnerable groups? If so, provide any details here.</p>		

5.	Will the project affect tangible or intangible cultural heritage or cultural values? If so, provide any details here.		
6.	Are there nearby communities that could be impacted by the project from a health and safety perspective, e.g. noise and vibration, harmful air, water and waste emissions, exposure to hazardous substances, failure of major infrastructure such as dam, destruction of ecosystem services that provide H&S benefits, increase in transmission of vector borne or communicable diseases, increased traffic, etc.? If so, provide any details here.		
7.	Will the project affect (quality and/or quantity) sources of water for human or ecological use? If so, provide any details here.		
8.	Will the project impact access to or availability of ecosystem services for local communities that rely on these? If so, provide any details here.		
9.	Other important environmental and social setting information can be summarised here.		
<b>Labour Matters</b>			
10.	Is there likely to be a large-scale workforce involved in the construction and/or operation of the project? Provide any details here.		
11.	Is there likely to be migrant and/or low skilled workforce involved in the project, including by a third party for construction and/or maintenance? If so, provide any details here.		
12.	If yes to 13, is the influx of people likely to cause social conflict and/or excessive burden on social infrastructure and services? If so, provide any details here.		
13.	Other important labour-related information can be summarized here.		
<b>Initial Project/Platform Categorisation (tick one):</b>			
<input type="checkbox"/> A <input type="checkbox"/> B+ <input type="checkbox"/> B <input type="checkbox"/> C			
<b>Provide rationale for categorisation</b>			
<b>Which IFC Performance Standards are triggered for environmental and social impact assessment? (tick all that are applicable) – see overleaf to assist with applicability</b>			
<input type="checkbox"/> IFC Performance Standard 2: Labour and Working Conditions <input type="checkbox"/> IFC Performance Standard 3: Resource Efficiency and Pollution Prevention <input type="checkbox"/> IFC Performance Standard 4: Community Health, Safety, and Security <input type="checkbox"/> IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement <input type="checkbox"/> IFC Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources <input type="checkbox"/> IFC Performance Standard 7: Indigenous Peoples			

<input type="checkbox"/> IFC Performance Standard 8: Cultural Heritage		
<b>Recommendations for the detailed ESDD?</b>		
<input type="checkbox"/> Internal?	Scope:	Budget:
<input type="checkbox"/> External?		
<b>Completed by:</b>		
<b>Reviewed and Approved by:</b>		
<b>Further comments provided by the Reviewer/Approver:</b>		

The IFC PS would be applicable if 'yes' is the answer to the following questions:

*IFC PS2: Labour and Working Conditions*

- Are people or will any people be employed directly or indirectly (by contractors or in the supply chain) by the project?
- Will the project involve any retrenchment, i.e. elimination of a significant number of jobs or a layoff of a significant number of employees?
- Is the project or will the project be located in a combination of country and sector where child or forced labour might be present?
- Is the project or will the project be located in a combination of country and sector where issues of worker discrimination and the right to organise might be an issue?

*IFC PS3: Resource Efficiency and Pollution Prevention –*

- Does or likely will the project:
  - use significant quantities of energy or other resources?
  - generate significant quantities of GHGs (>25,000 tonnes CO<sub>2e</sub>) during operations?
  - discharge pollutants into air, water, land (including routine, non-routine or accidental release) at the local, regional or transboundary level?
  - generate significant quantities of waste?
  - require significant pesticide use?

*IFC PS4: Community Health, Safety and Security*

- Are there any communities who might live close to, or have access to, the project's structural elements during the life of the project, e.g. structural infrastructure, dams, tailings, ash ponds, relevant equipment, decommissioned facilities, etc.?
- Are there any communities whose health and safety could be put at risk from the project due to exposure to hazardous materials, or from the transportation of raw materials, the disposal of wastes, the operation of equipment on public roads or the use of pesticides?
- Is the project located in a region that is prone to natural hazards, such as landslides or floods?
- Will the project result in the influx of workers or speculative migrants to the project area during project construction, operational or decommissioning activities?
- Will the project retain security personnel or involve government security personnel on a routine or emergency basis?

*IFC PS5: Land Acquisition and Involuntary Resettlement*

- Does the project require the acquisition of land or acquisition of temporary or permanent access rights to land that might result in relocation, the loss of shelter, the loss of assets or access to assets, or the loss of income or livelihoods?
- Will the government acquire land for use by the project that might result in relocation, the loss of shelter or the loss of assets or access to assets, or the loss of income or livelihoods?
- Can the acquisition of land or access rights to land be imposed on the affected parties if a negotiated settlement is not agreed, i.e. the parties have no right to refuse land acquisition?

*IFC PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources*

- Is it located in, or does it adversely affect an area legally protected under national or international law (or proposed for protection) for the purposes of, or a habitat valued for its contribution to biodiversity conservation?
- Does it involve the use of renewable natural resources, such as natural forest harvesting, plantation development or the production or harvesting of aquatic species?
- Will it intentionally or accidentally introduce alien species, or non-native species of flora and fauna?

#### IFC PS7: Indigenous Peoples

- Are there communities living on or near the project site who meet the definition for Indigenous Peoples<sup>17</sup>?
- Is the project proposing to use the cultural resources, knowledge, innovations or practices of Indigenous Peoples for commercial purposes?

#### IFC PS8: Cultural Heritage

- Has the developer investigated for the presence of the following forms of irreplaceable cultural heritage, including critical cultural heritage<sup>18</sup> that might be adversely affected by the project:
  - tangible cultural heritage, including: property or sites having archaeological, paleontological, historic, cultural, artistic or religious values, or unique natural environmental features that embody cultural values, e.g. sacred groves?
  - intangible cultural heritage, including: cultural knowledge, innovations, and practices of communities employing traditional lifestyles?
- Will the project use cultural heritage for commercial purposes?
- Is the project located in an area where is it possible that during construction work (or operations that involve earth moving) cultural heritage might be expected to be found 'by chance'?

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<sup>17</sup> A distinct social and cultural group possessing the following characteristics in varying degrees: Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; Customary cultural, economic, social, or political institutions that are separate from those of the dominant society or culture; An indigenous language, often different from the official language of the country or region.

<sup>18</sup> Internationally recognised (e.g. The United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage) and currently used (or have used within the living memory) for long-standing cultural purposes, or legally protected.

## **Appendix D – ESIA Typical Content Outline**



## **ESIA Outline**

### **Purpose**

This ESIA content outline provides guidance on the elements to be included in further documentation required for projects classified as Category A, B+ and potentially B by the CCSEAF.

The following sections include instructions and information on the content and input that needs to be provided/obtained by the party completing the further studies/documentation. This content aligns with good international practice for ESIA development.

The structure and content can be modified as necessary by the party completing the ESIA to address the identified risks as deemed suitable by best professional judgement and therefore should not be seen as fixed. The EISA needs only to contain those sections that are applicable to the project and to a level of detail that is appropriate for assessing the relevant E&S topics.

Reference should be made to the following publications for further detailed guidance on how to prepare an ESIA:

- IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts (2012)
- IFC Guidance Note 1 Assessment and Management of Environmental and Social Risks and Impacts
- IFC Good Practice Handbook on Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets

## PROJECT INFORMATION

Provide a short description of the project including, but not limited to:

- Project name
- Implementation partner
- By whom was the ESIA prepared
- Rationale for the Project
- Project location (ideally with a map)
- Description of main project components, processes, pollution control technologies included in the design, construction approach
- Description of Associated Facilities, including details of owner/operator if different to that of the project, main components, processes, pollution control technologies included in the design and standards being achieved
- Delineation of the Project within its geographical, environmental and socio-economic context and the spatial area that it may impact, including definition of Area of Influence

## DEFINITION OF PROJECT STANDARDS

Describe the policy, legal and administrative framework within which the project takes place, and identify any laws, regulations and international standards that pertain to environmental and social matters relevant to the project including the IFC Performance Standards. This includes regulations about environmental and/or social impact assessments to which the project must adhere as well as laws implementing host country obligations under international law. Flag any areas where the project might fall short on compliance.

## METHODOLOGY

The methodology should be described comprising the following topics.

### E&S Assessment Justification

The ESIA should focus on the issues that are most important for design, decision-making and stakeholder interests. E&S risks and impacts that need to be further assessed in this report have been identified during the

screening and categorization exercise. The issues that require the preparation of an ESIA are:

Insert here criteria for Categorization of the Project as per the E&S Screening Report: e.g. construction inside protected area, impacts on the biological, socio-economic or cultural environment, land use change, resettlement (e.g. livelihoods impacts), health & safety issues (occupational or community), impacts on Indigenous Peoples or vulnerable groups, etc.

## National Permitting

List all permits that are required by the host country to carry out the project. Provide status of the permit or document and information of steps to be taken to acquire the permits to implement the project – if any.

Permit / Document	Status	Actions

## BASELINE CONDITIONS

The baseline conditions provide the context within which the impacts of the project can be assessed, a description of physical, biological, human / socio-economic and cultural conditions (as applicable for this assessment) within the project area. The baseline should include information on all E&S issues that were identified the “E&S Assessment Justification” section.

While some broad contextual information is necessary, the analysis should focus on the immediate context of the project site and aspects that relate to the identified impacts in order to be relevant to decisions about project design, operation, or mitigation measures.

## Sources of information

Possible information sources for the ESIA could be (please cite sources in the applicable chapters):

- Site visit (with date, scope, persons met);
- Technical /engineering documents;
- Publicly available source of information;
- Consultation with key informants/ specialists (e.g. NGOs, experts, authorities, universities, consultants etc.);
- Sample analysis (what, how, by whom, when, where);
- Professional judgement;
- etc.

For general context data, consult– to the extent possible - secondary data and existing analyses. To understand the context at the project site, it is usually necessary to collect primary data at the site.

### **Physical Environment**

Provide details on the physical environment specific to the project area and, as detailed as possible, ideally with quantitative information and specific to the project area, for example on:

- Key landscape features: mangroves, rainforest etc., this could also include habitat maps
- Geomorphology and geology
- Ecosystem types
- Climate and meteorology (temperatures, storms, rains etc. that are important to consider).
- Vulnerability to climate change, including potential water stress
- Water resources – surface and groundwater
- Air quality and existing emissions load
- Noise and vibration
- Natural resources with economical interest (forests, tourism areas, on/offshore wind, on/offshore oil/gas etc.).

### **Biological Environment**

Provide details on the biological environment specific to the project area and as detailed as possible, ideally with quantitative information and specific for example on:

- Biodiversity: flora /fauna species found in the area with their respective protection status as per national and international (IUCN Red List or similar) standards.
- Any habitat fragile or needing specific consideration in the area.
- Location of the next protected areas or buffer zones per national or international status.

### **Human, Socio-Economic and Cultural Environment**

Provide details on the human, socio-economic and cultural environment specific to the project area and as detailed as possible, ideally with quantitative information and specific, for example:

- Demographic data: population, religion, age, education, population health profile
- Social composition (ethnicity, clan/tribal structure, minority groups, including the presence of any indigenous peoples)
- Villages, dwellings, social infrastructure in the area
- Utilities (power, roads/tracks, health/education/administration infrastructure, water and sanitation etc.
- Main economic activities in the areas / livelihoods patterns (formal and informal sector)
- Livelihood associated natural resources (fishing, seaweed collection, forests, hunting) with economic interest to be considered (ecosystem services).
- Places of spiritual, social, cultural, religious or historical/archaeological interest to be considered in the area.
- Human challenges to be considered (conflicts, threats).
- Landscape and visual issues
- Gender issues
- Vulnerable groups
- Any other projects that could either influence this project, be influenced by this project or lead to similar impacts on the receptors.

## Land Issues

Document and record all the information concerning the acquisition of land, including at least the following:

- Previous site use (e.g. greenfield or brownfield);
- Land use and conversion (residential, industrial, agricultural area etc.);
- Land status (e.g. protected area, high ecological value area);
- Land ownership (private, community, public, non-formal ownership etc.);
- Total land used.

The land agreements (private landowners, land donation, informal ownership rights) should also be documented and in case of public land acquired the compensation issues should be recorded and the need of further documentation should be identified, as mentioned in the Screening Checklist.

In case there is no land acquisition related to the Project, please confirm briefly.

## IMPACT ASSESSMENT

Apply the following methodology for the impact assessment for the identified relevant topics during the baseline description:

- **Impact assessment:** to determine if the project and the associated activities could potentially impact the resources/receptors, to evaluate the significance of the predicted impacts by considering their magnitude and likelihood of occurrence, the sensitivity, value and/or importance of the affected resource/receptor. Transboundary and cumulative impacts should be identified during this stage (if any).
- **Mitigation and enhancement:** to identify appropriate and justified measures to mitigate negative impacts and enhance positive impacts.

- **Residual impact evaluation:** to evaluate the significance of impacts assuming effective implementation of mitigation and enhancement measures.

## Impact Identification

This step is the heart of the ESIA; it itemizes and describes the identified impacts, makes predictions in terms of their probability and assesses their significance. Relevant impacts could include:

- Local impacts
- National impacts
- Transboundary and global impacts
- Indirect and cumulative impacts

Impacts which are unlikely to arise or be insignificant should be discounted through a process of reasoned argument.

## Prediction and Assessment of Impacts

Based on the baseline, describe here for each identified environmental and social impact:

- How the project is likely to adversely affect the different components of the environment and socio-economic conditions and which benefits could potentially be raised by the project?
- How the environment and socio-economic conditions may be affected by the project?
- How the project is likely to contribute to cumulative impacts (cumulated effects originating from different activities that would have similar impacts on same receptors)?

Evaluate the significance of the predicted impacts by considering their magnitude, likelihood of occurrence, duration, reversibility/potential for mitigation, and the sensitivity, value and/or importance of the affected resource/receptor.

Project impacts can be analysed using a range of methods from simple qualitative analysis to detailed quantitative surveys or modelling, with reference to achieving both local and international standards (the most

stringent of standards will be applied, but where there is a conflict, local compliance will take precedence). The data collection methods and analytical tools used and the depth of analysis should be commensurate with the type and significance of the impacts, it should allow rigorous assessment of the significant impacts using qualitative and, to the extent possible, also quantitative methods. The report should describe the methods chosen for data collection and analysis and the rationale for the choice of method; it should further describe the quality of available data and, where applicable, explain key data gaps and uncertainties associated with predictions.

Environmental and social impacts should be explicitly linked to relevant stages of the project cycle, such as:

- Pre-construction phase
- Construction
- Operation & Maintenance
- Decommissioning or Closure and Reinstatement

Where third parties such as contractors are involved, their roles and capacities, and the degree of control the project can exert over them, should be considered.

Supply chain issues that are central to the project's core functions should be considered where the resource utilised by the project is ecologically sensitive or where low labour cost is a material factor of the project's competitiveness.

### **Recommended Mitigation Measures**

Identify and outline feasible and cost-effective measures to prevent or minimise negative impacts to acceptable levels and enhance positive impacts, guided by the mitigation hierarchy. The mitigation hierarchy implies that all reasonable attempts must first be made to avoid negative social or environmental impacts. If avoidance is not possible without challenging the conservation objective of the project, measures should be taken to minimise the impacts to acceptable levels and address remaining residual impacts with adequate and fair compensation measures.

Determine the relevant mitigation measures for a project-specific ESMMP. This could be done in text form, bullet lists or table format or a combination of these.

### **Residual impact assessment conclusions**

Insert a discussion of the outcome of the assessment once mitigation measures have been applied and if specific impacts cannot be mitigated or outstanding impacts remain despite the measures applied. The discussion should be clear about which aspects of the impact have been affected by the implementation of the specific mitigation measure.

Environmental risks such as the potential for accidents and incidents (e.g. oil spills, explosions, contaminant release, dam failure, etc.) should be described, including financial provisions to respond to them (e.g. escrow accounts and insurance cover to provide for abandonment and decommissioning, site remediation and oil spills and other emergencies). The section should also describe proposed contingency planning and measures and evaluate their adequacy

### **ANALYSIS OF ALTERNATIVES**

A systematic comparison of feasible alternative locations, technologies, designs, GHG emissions, operations and sites, including the "no project" option, to the project in terms of:

- their effectiveness of achieving the project objectives as well as potential trade-offs;
- their potential environmental and social impacts;
- the feasibility of mitigating these impacts;
- operational requirements and their suitability under local conditions;
- their institutional, training, and monitoring requirements;
- their estimated cost-effectiveness; and
- their conformity to existing policies, plans, laws and regulations.

Where appropriate, a least-cost analysis of alternative forms of production should be conducted.

The analysis should recommend the preferred alternative and state why it was chosen.

## **STAKEHOLDER ENGAGEMENT**

The stakeholder engagement section of an ESIA should describe the SEP and grievance mechanism that have been or will be developed for the project. The section should describe what engagement has taken place during the ESIA process (e.g. scoping, ESIA disclosure) and the outcomes of this engagement (summary of concerns raised and how they have been addressed in the ESIA). The ESIA should also describe any future engagement that is planned.

## **ESMMP**

This section deals with the set of mitigation and management measures to be taken during investment implementation to avoid, reduce, mitigate, or compensate for adverse environmental impacts (in that order of priority). It may include multiple management plans and actions together with an overall Environmental and Social Action Plan. It includes the following key components (with the level of detail commensurate with the investment's impacts and risks):

### ***Mitigation:***

- identifies and summarizes anticipated significant adverse environmental impacts and risks;
- describes each mitigation measure with technical details, including the type of impact to which it relates and the conditions under which it is required (for instance, continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; and
- provides links to any other mitigation plans (for example, for involuntary resettlement, Indigenous Peoples, or emergency response) required for the investment.

### ***Monitoring:***

- describes monitoring measures with technical details, including parameters to be measured, methods to be used, sampling

locations, frequency of measurements, detection limits, and definition of thresholds that will signal the need for corrective actions; and

- describes monitoring and reporting procedures to ensure early detection of conditions that necessitate particular mitigation measures and document the progress and results of mitigation.

### ***Implementation arrangements:***

- specifies the implementation schedule showing phasing and coordination with overall investment implementation;
- describes institutional or organizational arrangements, namely, who is responsible for carrying out the mitigation and monitoring measures, which may include one or more of the following additional topics to strengthen environmental management capability: technical assistance programs, training programs, procurement of equipment and supplies related to environmental management and monitoring, and organizational changes; and
- estimates capital and recurrent costs and describes sources of funds for implementing the environmental management plan.
- Performance indicators: describes the desired outcomes as measurable events to the extent possible, such as performance indicators, targets, or acceptance criteria that can be tracked over defined time periods.

## **Appendix E – ESMMP Template**

# ESMMP Template

## Purpose

This document serves as ESMMP template, translating the mitigation measures from the ESIA into practical management actions, with institutional mechanisms for monitoring and reporting their implementation with well-defined roles, responsibilities and timeframes.

The ESMMP should include sub-sections on the following:

- Overview of roles and responsibilities;
- Overview of capacity building / training arrangements; and
- Overview of monitoring, inspection and audit arrangements.
- Overview of reporting and review arrangements
- Definition of detailed E&S management plans/procedures that should be developed

The main component of an ESMMP is a table that sets out the mitigation measures, monitoring requirements, etc., typically divided into three phases of project development as follows:

- preparation (conception, planning)
- implementation / construction and commissioning
- operations

Each phase is further divided into E&S aspects, and associated mitigation measures, each allocated responsibilities and monitoring requirements. A completed table, as an example, is provided overleaf, which can be used as a template.

The ESMMP is typically referred to by the asset manager and construction contractor, if applicable, to build on these into the E&S management plans/programs and operational procedures of their ESMS.



Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
Preparation (conception, planning)	E&S Risk Management & Project siting	<ul style="list-style-type: none"> <li>Define and assign Environmental &amp; Social (E&amp;S) requirements and responsibilities for the construction project <ul style="list-style-type: none"> <li>Make sure that the Contractor has experience in dealing with E&amp;S management. Give authority for stop of works if non-conformities are identified</li> </ul> </li> <li>Build as far as practical and relevant from neighbours' residences and sensible receptors (schools, hospitals).</li> <li>Plan the project to avoid <ul style="list-style-type: none"> <li>Environmentally sensible areas, such as wetlands, and places near protected areas (buffer zones) or underrated forests</li> <li>Areas prone to natural disasters or places of cultural and social interest</li> <li>Cultivated lands and grazing areas</li> <li>Crossing of critical habitat</li> <li>Known areas of historical/cultural/archaeological interest</li> <li>Rivers and streams as well as flooded areas (consider seasonal variations)</li> <li>Long downhill stretches and slopes above 10%. When possible, roads should follow hill contours</li> <li>Land acquisition or impact on livelihoods</li> </ul> </li> <li>Consider all associated facilities throughout the E&amp;S risk management activities, such as: <ul style="list-style-type: none"> <li>Transmission lines</li> <li>Substations</li> <li>All sources of materials, such as quarries for backfill material, sand, gravel etc.</li> <li>All temporary facilities used for construction, such as material storage areas, vehicle parking etc.</li> </ul> </li> </ul>	<p>Project application / Project concept</p> <p>Contractor's resume and past ESHS experience in similar projects</p>	Investee	<p>Construction reports</p> <p>Review once prior to selection of Site Manager</p>
	Project siting	<ul style="list-style-type: none"> <li>Identify risks linked to the previous use of the site, such as soil contaminations, and have the source of contamination removed before construction can start.</li> <li>Minimise impacts on flora/fauna by a suitable selection of the exact project site</li> <li>Schedule activities to avoid breeding and nesting seasons for any identified critically endangered or endangered wildlife species.</li> </ul>	<p>Project application</p> <p>Site Observations</p>	<p>Investee</p> <p>Contractor</p>	<p>Construction reports</p> <p>Site inspections</p>
	Project design	<ul style="list-style-type: none"> <li>Identify and comply all applicable laws, permitting requirements and regulations against national legislation and World Bank's Environmental, Health &amp; Safety standards</li> <li>Adjust this ESMMP to the specific project, define the frequency of the monitoring procedure and identify if further Management Plans have to be prepared</li> <li>Apply low-maintenance solutions in the design of buildings, e.g. based on other buildings of the same type in the region.</li> <li>Include provisions for maintenance of roads and drainage system. The maintenance requirements should be doable in the local context (either by authorities or by communities).</li> </ul>	Project application / Project concept	Investee	Construction reports

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
		<ul style="list-style-type: none"> <li>○ Finalize maintenance agreements with local communities before beginning construction</li> <li>● Ensure that key/ routine maintenance and operations can be implemented by the community/beneficiaries.</li> <li>● Account for proper ventilation and adequate resistance to severe weather or natural disasters.</li> <li>● Consider as relevant the emergency preparedness in the planning of buildings, such as provision for fire emergency evacuation.</li> </ul>			
	Project design	<ul style="list-style-type: none"> <li>● Ensure local communities are preferred for the supply of goods and services to the Project and Project personnel, where appropriate. <ul style="list-style-type: none"> <li>○ If materials and competences are available locally, they should be sourced locally provided it does not disturb local economy.</li> </ul> </li> </ul>	Site observations	Investee	Random site inspection
	Project design	<ul style="list-style-type: none"> <li>● Engage with communities and authorities at the earliest stage to understand the land ownership and land use situation.</li> <li>● Engage with the local community and potential affected households to understand their needs and identify the risk of damage to their livelihood basis through the Project</li> </ul>	Minutes of Meetings	Investee	Project planning documents
	Indigenous People & Stakeholder Engagement	<ul style="list-style-type: none"> <li>● Engage/ communicate with communities and plan sufficient time for participation.</li> <li>● Ensure regular consultations with the local authorities and communities regarding the management of construction.</li> <li>● On-going consultation processes should identify marginalized groups, including Indigenous People as per IFC definition</li> </ul>	Project Documentation Stakeholder Engagement Minutes	Investee	Document review Grievance records
	Grievance Mechanism	<ul style="list-style-type: none"> <li>● Document all grievances from workers, communities and other stakeholders formulated on a register along with the responses given. <ul style="list-style-type: none"> <li>○ Anonymity, if required, shall be guaranteed.</li> </ul> </li> </ul>	Grievance Mechanism	Investee	Review of grievance register
	Occupational Health & Safety	<ul style="list-style-type: none"> <li>● Ensure that all workers, suppliers and possible subcontractors are familiar and comply with the requirements and specifications of this ESMMP</li> <li>● Sensitize Implementing Partners on Occupational Health &amp; Safety.</li> <li>● Provide H&amp;S Induction and Training and awareness to the workforce regarding H&amp;S risks and mitigation measures (including indirect workers) tailored to project scope</li> <li>● Ensure reporting of incidents and accidents</li> </ul>	Training record Incident documentation. Project reporting Grievance Mechanism in place and grievances recorded	Investee Contractor	Check Training records Check incidents reports Review of Contracts to ensure that project requirements are included

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
Implementation / Construction	Grievance Mechanism	<ul style="list-style-type: none"> <li>Ensure that all direct and indirect workers have access to and are aware about the Grievance Mechanism where they can raise workplace relevant complaints anonymously</li> <li>Document all grievances from workers, communities and other stakeholders formulated on a register along with the responses given.</li> </ul>	Grievance Mechanism	Investee Contractor	Review of grievance register
	Labour Conditions	<ul style="list-style-type: none"> <li>Ensure minimum legal labour standards as per ILO regulations (child/forced labour, sexual assault, no discrimination, equal opportunities, working hours, minimum wages) are met.</li> <li>Contribution from community in the form labour is allowed, if contribution is voluntary and does not negatively affect livelihoods.</li> </ul>	Grievance Mechanism	Contractor	Inspection reports (also from labour authorities)  Review of grievance register and training records
	Labour Conditions	<ul style="list-style-type: none"> <li>Ensure the workforce has access to primary healthcare on site, providing prescriptions.               <ul style="list-style-type: none"> <li>As a minimum, first aid kits need to be available on every construction site.</li> </ul> </li> <li>Emergency services (next hospital, health centre or doctor) needs to be identified and made available to workers in case of need.</li> <li>Ensure provision of Health and Safety and hygienic and sanitary facilities at the site, including shaded welfare areas, bathrooms, changing rooms and potable water.               <ul style="list-style-type: none"> <li>Ensure toilets and changing rooms are separated between male and female employees.</li> </ul> </li> </ul>	Observations  Grievance Mechanism	Contractor	Random site inspection
	Occupational Health & Safety	<ul style="list-style-type: none"> <li>Provide H&amp;S training to contractors and workers on the main risks on workers' health and safety related to work place, the safe work practices, the emergency procedures and the requirement of incident reporting.</li> <li>Ensure the use of Personal Protective Equipment (PPE) tailored to the conditions workers are exposed to.               <ul style="list-style-type: none"> <li>As a minimum foot plus head, hand, ear, eyes protection, depending on working position.</li> </ul> </li> </ul>	Minutes of Meetings  Observations  Appropriate H&S and sanitary facilities provided at site	Contractor Investee	Check Training records  Check incidents reports  Regular inspection  Review of grievance records
	Occupational Health & Safety	<ul style="list-style-type: none"> <li>Record accidents and near misses continuously.</li> <li>Implement incentive programme for incident recording.</li> </ul>	Training record  Incident documentation  Project reporting.	Contractor Investee	Check Training records  Check incidents reports

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
	Biodiversity and Natural Habitats	<ul style="list-style-type: none"> <li>Limit vegetation clearing to areas within the site boundary where it is absolutely necessary to reduce habitat disturbance</li> <li>Ensure revegetation of cleared areas (with recovered plants and other appropriate local flora) where possible after construction using native species</li> <li>Ensure that the construction stays out of surrounding wetland areas</li> </ul>	<p>Vegetation clearing minimal</p> <p>Check pre-construction survey to make sure that site is not in wetland areas</p>	Contractor	Random site inspection
	Emissions (dust, noise, gases)	<ul style="list-style-type: none"> <li>Reduce source of dust emissions at construction sites by watering of transportation roads during dry and windy conditions. <ul style="list-style-type: none"> <li>Generally keep roads in good condition.</li> <li>Cover truck loads with canvas to avoid dust blow.</li> </ul> </li> <li>Using equipment and vehicles in appropriate technical conditions.</li> <li>Ensure vehicles and equipment are switched off when not in use.</li> </ul>	Observations	Contractor	Random site inspection, inspection of roads
	Noise and vibration impacts	<ul style="list-style-type: none"> <li>Reduce noise and vibration impacts during construction.</li> <li>Limit the hours of operation for specific pieces of equipment or operations, especially mobile sources operating through community areas or close to residential houses. <ul style="list-style-type: none"> <li>Avoid vehicle movements at night.</li> </ul> </li> <li>Use of modern, state-of-the-art technology and limit the number of machines operated simultaneously.</li> </ul>	<p>No work conducted at night (between 10pm and 7am)</p> <p>Grievance Mechanism</p>	Contractor	Random site inspection, Review of filed grievances, review of timesheets of workers
	Soil and groundwater contamination	<ul style="list-style-type: none"> <li>Maintain high standards in general housekeeping on site.</li> <li>Identify and store appropriately all material or hazardous substances like fuel or chemicals and provide solutions to remediate unforeseen leakage and spills.</li> <li>Enforce appropriate waste management practices <ul style="list-style-type: none"> <li>Give priority to reuse of waste material upon disposal.</li> <li>Collect and segregate wastes and ensure safe storage and in line with legal requirements.</li> </ul> </li> </ul>	<p>Dedicated storage areas in place</p> <p>Waste Manifests</p>	Contractor	Random site inspection, Review of waste inventories
	Soil Management	<ul style="list-style-type: none"> <li>Implement best practices for soil management <ul style="list-style-type: none"> <li>Ensure appropriate storing of topsoil removed. After construction, topsoil will be used as backfill for restoration of the area.</li> <li>Limit stockpile height to 2 m maximum to avoid soil compensation.</li> <li>If construction takes place on inclined surfaces/slopes, ensure preventive erosion control measures are applied (e.g. plan to retain trees and other vegetation)</li> </ul> </li> <li>Reinstate the construction working area to the best possible after construction activities are completed</li> </ul>	Topsoil stored and re-used	Contractor	Random site inspection

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
	Water Resources Protection	<ul style="list-style-type: none"> <li>Implement best practices for water management               <ul style="list-style-type: none"> <li>Prioritise the use of rainwater/storm water over surface water/groundwater abstraction by using harvesting equipment and systems on site.</li> <li>Reuse wastewater wherever feasible.</li> <li>Restrict excavation activities during periods of intense rainfall.</li> </ul> </li> </ul>	<p>Water harvesting conducted</p> <p>No excavation during intense rainfall</p> <p>Project application / Project concept</p>	Contractor	<p>Random site inspection</p> <p>Project planning documents</p>
	Community Health & Safety	<ul style="list-style-type: none"> <li>Implement good practices for traffic safety               <ul style="list-style-type: none"> <li>Schedule traffic activities to avoid peak hours on local roads if feasible.</li> <li>Ensure safe driving by Project personnel, e.g. through training/induction/incentives (best driver awards).</li> </ul> </li> <li>Ensure all H&amp;S related incidents (e.g. observations, accidents) on site are recorded and followed up properly.</li> </ul>	<p>Observations</p> <p>Training attendance lists</p> <p>Grievance Mechanism</p> <p>Incident recording process in place</p>	Contractor	<p>Random site inspection</p> <p>Check incident/accident records</p>
	Community Health & Safety	<ul style="list-style-type: none"> <li>Restrict access to construction sites to non-authorized persons               <ul style="list-style-type: none"> <li>Prevent physical access to the site fencing and/or guarding</li> <li>Use appropriate signage</li> </ul> </li> </ul>	Access controlled	Investee	Random site inspection
	Cultural Heritage	<ul style="list-style-type: none"> <li>Ensure all chance finds of cultural heritage (e.g. graves, old ceramic, old building fragments) are reported immediately to the relevant authority.</li> <li>If possible, avoid excavation in the ultimate neighbourhood of a chance find, fence the chance find and await instructions from the competent authority</li> </ul>	<p>Contractual documentation</p> <p>Chance finds records</p>	<p>Contractor</p> <p>Investee</p>	Random site inspection

Phase	Topic	Measure	Means of Verification	Responsibility	Monitoring Procedure
Operation	Community Health & Safety	<ul style="list-style-type: none"> <li>Ensure that a Grievance Mechanism is in place where the workforce or the community can raise relevant complaints anonymously</li> <li>Target signage and outreach activities to improve public awareness of traffic changes and potential hazards for high-risk sections of public roads, including near the site and laydown areas.</li> <li>Ensure safe driving by Project personnel (e.g. through training/induction).</li> </ul>	<p>Grievance Mechanism</p> <p>Warning signs</p> <p>Minutes of Meetings</p> <p>Driver Training Records as part of Induction training</p>	Investee Contractor	<p>Review of grievance register</p> <p>Inspection of traffic routes</p> <p>Review of training records</p>
	Waste Management	<ul style="list-style-type: none"> <li>Implement relevant waste management procedures</li> </ul>	Waste management procedure in place	Contractor or recipient of buildings	<p>Review of procedure</p> <p>Random site inspection</p>

## **Appendix F – SEP Typical Content Outline**

## SEP Outline

### PROJECT DESCRIPTION

*Insert brief project description, including project components, location, area/layout, ideally include map(s)*

*Insert information about the project's social context, e.g.*

- *directly affected communities, villages, districts etc. or close to the project affected area,*
- *any ethnic communities and/or indigenous peoples,*
- *if available, include a summary of any social or household surveys, e.g. current land use, source of income, literacy rate etc.*

### REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

[Name of Project] is committed to full compliance with national and international stakeholder engagement and disclosure requirements.

#### Project's Host Country Requirements

*Describe the national and international requirements for the project regarding stakeholder engagement and disclosure, e.g. check and describe if an environmental study (e.g. EIA, ESIA, IEE) is required and what the requirements are regarding public meetings, disclosure (what, when, where)*

#### International Requirements

CCSEAF requires all of its projects to be compliant with the IFC PS, including PS1 (Stakeholder Engagement and Information Disclosure), PS5 (Involuntary Resettlement) and PS7 (Indigenous Peoples).

- CCSEAF is committed to community engagement that ensures the free, prior, and informed consultation of affected communities. Stakeholder Engagement shall be conducted on the basis of timely, relevant, understandable and accessible information, provided in a culturally appropriate format. In summary CCSEAF requires:

- Identification of key stakeholders, including people or communities that could be affected by the Project, as well as other interested parties;
- Meaningful consultation with project-affected or other interested parties on environmental and social issues that could potentially affect them;
- Disclosure of appropriate information and appropriate notification about this disclosure at a time when stakeholder views can still influence the development of the project;
- Stakeholder consultation during the whole lifecycle of the project, and starting as early as possible;
- Operation of a procedure by which people can submit comments and complaints (Grievance Mechanism);
- Maintenance of a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation; and
- Special provisions shall apply to consultations which involve Indigenous Peoples as well as individuals belonging to vulnerable groups, and
- In particular, Free, Prior and Informed Consent (FPIC) is applied when operations encounter, affect or threaten the customary rights and interests of Indigenous Peoples, and it refers to the process whereby the affected community of Indigenous Peoples arrives at a decision in accordance with their legal provisions, cultural traditions and practices. [The UN Declaration on the Rights of Indigenous Peoples](#) will serve as guidance when implementing the FPIC process.

### IDENTIFICATION OF STAKEHOLDERS

The objective of stakeholder identification is to establish which organizations and individuals may be directly or indirectly affected (positively and negatively), or have an interest in the Project. This shall be conducted by the asset manager (with support from external consultant, if needed) and is an ongoing process, requiring regular review and updating as the project proceeds.

An example for stakeholders groups is given in Table I1. The list should be adapted to fit the specific project and updated and modified over the course of the project.



**Table 11 – Identified Groups of Stakeholders related to the Project**

Group of Stakeholders	Stakeholders
<b>1. Landowner and users</b>	1.1 Individuals, legal entities, local administration holding land title documents 1.2 Tenants or occupiers without formal rights 1.3 Land users (grazing, farming or other activities);
<b>2. Local population</b>	2.1 Inhabitants of the project affected villages 2.2 Residents located near the Project location 2.3 Residents of settlements located near roads used for transporting materials during construction 2.4 Indigenous Groups
<b>3. Administrative Bodies and Authorities</b>	3.1. National authorities (concerned ministries) 3.2. Regional authorities (district level government authorities) 3.3. Local authorities
<b>4. General public, Non-Governmental Organizations (NGOs) and independent experts</b>	4.1. General public 4.2 Specialized environmental, social and research organizations, NGOs 4.3 Experts on a national and international level
<b>5. Media</b>	5.1. Print media 5.2 Radio, TV 5.3. Internet sources
<b>6. Organizations involved in Project implementation</b>	6.1 Construction and design companies involved in implementation of the Project 6.2 Contractors and contractor’s staff
<b>7. Specific vulnerable groups who may be impacted by the Project.</b>	7.1 People with difficulty in engaging with the stakeholder consultation process 7.2 People with special vulnerability due to physical disability, social, political or economic standing, legal status, limited education, lack of employment or housing

<b>8. Project workers including those of contractors</b>	8.1 People employed directly or indirectly by the POC 8.2 People employed by contractors and subcontractors for construction, installation, maintenance activities, etc.
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Contact addresses of selected for the identified stakeholders are provided in the Annex I to this SEP.

## INFORMED CONSULTATION AND PARTICIPATION

For projects with potentially significant adverse impacts on affected communities (Category A and B+), the process of Informed Consultation and Participation (ICP) needs to be applied. ICP involves an in-depth exchange of views and information, and an organized and iterative consultation, leading to the incorporating of the views of the affected communities into the decision-making process on matters that affect them directly, like mitigation measures, sharing of development benefits and opportunities, and implementation issues.

The consultation process should:

- capture both men’s and women’s views, if necessary through separate forums or engagements, and
- reflect men’s and women’s different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate. The client will document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the Affected Communities, and will inform those affected about how their concerns have been considered.

## VULNERABLE GROUPS AND INDIGENOUS PEOPLES

### Vulnerable Groups

Vulnerable groups are population groups that suffer from discrimination, unequal access to rights, unequal access to and control over resources or unequal access to development opportunities. As a result, they may be poorly integrated into the formal economy, may suffer from inadequate access to basic public goods and services, and may be excluded from political decision-making. As a result, they risk

being disproportionately affected by project-related risks and adverse impacts. Such groups may include ethnic, religious, cultural, linguistic minorities, indigenous groups, female-headed households, children and youngsters, the elderly, persons with disabilities, and the poor.

In the case of vulnerable groups, the project/platform has to ensure that vulnerable individuals and groups are duly and timely consulted, making sure that their concerns are heard, taking into account individuals' and communities' specificities, and delivered in an appropriate form, manner and language. This may be done in the form of focus group discussions. In some cases, special efforts must be made to ensure that vulnerable members have access to consultation events or discussion forums.

*Insert description on vulnerable groups affected by the project.*

## Indigenous Peoples

*Insert description on Indigenous Peoples affected by the project, if applicable. Include information on if IPs are recognized in the host country or not. Clearly state if indigenous peoples are affected by the project or not and amend following text accordingly or delete, if not applicable.*

For projects with adverse impacts to Indigenous Peoples (IP), the project/platform is required to engage them in a process of ICP. In addition, it is expected that in most cases the process of FPIC has to be applied. This is the case if IP are physically displaced, including through economic displacement, or if the Project is associated with any of the below listed potentially adverse impacts identified below:

- Impacts on lands and natural resources subject to traditional ownership or under customary use;
- Relocation of Indigenous Peoples from lands and natural resources subject to traditional ownership or under customary use;
- Significant impacts on critical cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual aspects of Indigenous Peoples lives, including natural areas with cultural and/or spiritual value such as sacred groves, sacred bodies of water and waterways, sacred trees, and sacred rocks; or

- Use of cultural heritage, including knowledge, innovations or practices of Indigenous Peoples for commercial purposes.

FPIC is a specific right for indigenous peoples as recognised in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169/1989.

### Free, Prior and Informed Consent (FPIC)

**Free:** A process that is self-directed by the community, free of coercion, expectations, intimidation, incentives or manipulation.

**Prior:** Prior means that consent has been sought sufficiently in advance of any authorization or commencement of activities and that respect is shown for time requirements of indigenous consultation/consensus processes.

**Informed:** The type of information that is provided should:

- be accurate,
- be in an appropriate language,
- include information, when available, on social, economic, environmental and cultural impacts and reasons for proposed activities, duration, affected locality, proposed benefits sharing and legal arrangements and people likely to be involved,
- be in a form that is understandable and that takes into account traditions of the community.

**Consent:** Consent must be sought and granted or withheld according to the unique formal or informal dynamic of each community.

A process for obtaining FPIC is outlined in Appendix II of this section.

### STAKEHOLDER ENGAGEMENT PROGRAM

The disclosure of project information should be done well in advance of the start of the project. Ongoing stakeholder engagement activities ensure that stakeholders are kept informed and have an opportunity to continue a constructive dialogue about the Project and provide feedback.

Updated versions of the SEP, which are under responsibility of the project implementing party, should be consulted with affected communities to achieve feedback on perception of engagement during the entire life of the project. Additionally, the implementation of the SEP will be subject to regular monitoring.

Table L2 and Table I3 below give a brief description of actions that have already taken place as well as actions to be taken to implement this SEP.

*Table L2: Insert stakeholder activities that have already been undertaken, e.g. formal newspaper notices, other public notices, focus groups discussions, collection of views/opinions/suggestions, receiving approval letters, disclosure of documents etc. Describe activities in as much detail as possible (e.g. where did meetings take place and when, what documents were disclosed etc.) and always with dates or time frames.*

**Table L2 – Stakeholder activities that have already been undertaken**

Activity/Element	Target Stakeholders	Description	Timing
1. Community meetings	Community XYZ	Introduction of project to community	Day/month/year
2.			
3.			

*Table I3: Insert planned stakeholder activities, e.g. collection of views/opinions/suggestions, receiving approval letters, disclosure of documents etc. Describe activities in as much detail as possible (e.g. Where are meetings planned, when and with whom? What documents are to be disclosed and where/when? Are the documents only disclosed as hard copies (where?) or available digitally online (include link)? What are the target groups (e.g. all stakeholders, vulnerable groups, indigenous groups, women)?*

**Table I3 – Planned Future Stakeholder Engagement and Disclosure**

Activity/Element	Target Stakeholders	Description	Timing
1. Focus group discussion	Women in affected community	Discussion of mitigation measures with women	Month/year or during a certain project phase
2.			
3.			

## GRIEVANCE PROCEDURE

### Overview

Each CCSEAF project requires the set-up of a grievance mechanism by the Implementation Partner. A grievance is considered to be any complaint, comment, question, concern, suggestion about the way a project is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments and concerns about Project activities during construction or operation, or perceived incidents or impacts have been addressed.

A Grievance Procedure specific to the Project will be developed with the following aims:

- to build and maintain trust with all stakeholders;
- to prevent adverse consequences of failure to adequately address grievances; and
- to identify and manage stakeholder concerns and thus support effective risk management.

### Grievance Procedure

The Grievance Procedure should be free, open and accessible to all and comments and grievances should be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available on the Project website, in other materials and during stakeholder consultation.

In case of construction activities, the Implementation Partner will require its construction contractor(s) to establish a grievance mechanism for all workers. This will be included in the contracts. All workers will be informed of the grievance process and new workers will be informed when they join the Project. If existent, information on contact points will be posted on staff information boards and on site information boards. Alternatively, the Grievance Mechanism of the Implementing Partner can be made available to the workers of the contractor.

The grievance procedure comprises the following steps:

Identification of grievance: Stakeholders shall be able to use the following methods to submit a grievance:

1. *Insert applicable methods to submit a grievance, whatever is appropriate, some examples are provided below.*
  - *Orally (in person or via telephone) via project information hotline or Complaints Manager/Community Liaison Manager;*
  - *SMS/text messages;*
  - *Social media;*
  - *Filling out the Grievance Form online (provide link to website); and*
  - *In writing via the Grievance Boxes (include the locations).*

The grievance is recorded and classified in a 'Grievance Log' (written and electronic) by the responsible staff of the project.

Grievance is formally acknowledged through a personal meeting, phone call, email or letter as appropriate, within 10 working days of submission. If the grievance is not well understood or if additional information is required, clarification should be sought from the complainant during this step.

The Complaints Manager will estimate the subject matter of this grievance and identify the risk category.

A response is developed by the responsible staff with input from others, as necessary. The Project might consider the establishment of a conflict resolution "committee" for the management of complex grievance issues. The set-up of this committee should be agreed upon with the project implementing party representatives, local authorities and traditional leaders / community representatives during the establishment of the grievance mechanism.

Required actions are implemented to deal with the issue, and completion of these is recorded in the grievance log.

The response is signed-off by the responsible staff. The sign-off may be a signature on the grievance log or in correspondence that should be filed with the grievance to indicate agreement.

The response is communicated to the affected party; the response should be carefully coordinated. The responsible staff ensures that a suitable approach to communicating the response to the affected party is agreed and implemented. The response to a grievance will be provided 20 working days after receipt of the grievance.

The response of the complainant is recorded to help assess whether the grievance is closed or whether further action is needed. The responsible staff should use appropriate communication channels to confirm whether the complainant has understood and is satisfied with the response. The complainants' response should be recorded in the grievance log. Ideally, both parties should sign off the grievance to confirm closure. Or, alternatively, a written confirmation that the grievance has been closed satisfactorily should be obtained.

The grievance is closed with sign-off from the responsible staff, who determines whether the grievance can be closed or whether further attention and action is required. If further attention is required the responsible staff should return to Step 2 to re-assess the grievance and then take appropriate action. Once the responsible staff has assessed whether the grievance can be closed, he/she will sign off to approve closure of the grievance on the grievance log or by written communication.

A template for the Grievance Form is presented in Appendix 3.

If actions taken on a grievance are not resolved to the satisfaction of the complainant, a stakeholder may turn to the CCSEAF directly to log a grievance. Ultimately, stakeholders may turn to court in accordance with the existing legislation of the host country.

## **STAKEHOLDER REGISTER**

It is important that issues raised during the consultation process are recorded in a logical and systematic way. The Stakeholder Register is essentially a database (for example, this could be set up in an Excel file). The register should record at least the following, but can be extended to document additional information, if necessary:

- Stakeholder;

- Contact details (unless requesting anonymity);
- Date of contact(s);
- Issue(s) raised (comment, suggestion, question, complaint, etc.);
- Proposed response and actions to be taken; and
- Status (recorded, active, closed).

Where many stakeholders raise similar issues these can be grouped as "issues" and responses to them will be tracked together in a separate section of the register. An appropriate cross-reference will be made in the response column in the main register.

Annex IV provides a template for a Stakeholder Register.

## **RECORDING AND MONITORING**

This section presents an overview of the reports that will be used to report on and monitor stakeholder engagement activities. Monitoring will be performed on a regular basis.

Documents used for monitoring will be:

- Meeting Minutes;
- Lists of participants of stakeholder meetings;
- Grievance Log.

## **REPORTING**

The Implementation Partner will update the SEP through the lifetime of the project, in particular whenever there have been changes to the project or additional stakeholder activities or when particular milestones (agreements with communities) have been reached.

Monitoring reports, in line with the overall CCSEAF reporting, should be made available to affected communities concerning ongoing risks, impacts and mitigation measures.

The SEP will be part of the external overall ESMS assessment (mid term and final). This evaluation will examine the extent to which activities were implemented in

accordance with the SEP, including FPIC (if applicable), and the extent to which they achieved the aims defined here.

The results and any lessons learned should then be incorporated into further updates of the SEP as the project evolves.

## SEP OUTLINE - APPENDIX 1: TEMPLATE FOR STAKEHOLDER LIST

*Insert stakeholders their contact information*

No	Stakeholder	Contact details
<b>Project Developer</b>		
1.	NGO/Company Contact Person	Address Phone No.: E-mail:
<b>National Supervisory Authorities</b>		
1.	Ministry Contact Person	Address Phone No.: E-mail:
2.	Department Contact Person	Address Phone No.: E-mail:
<b>District Level Government Authorities</b>		
1.	District Coordination Committee Contact Person	Address Phone No.: E-mail:
<b>Local Level Government Authorities</b>		
1.	City/Municipality Contact Person	Address Phone No.: E-mail:
<b>Non-government organizations</b>		
1.	Non-Governmental Organization	Address Phone No.: E-mail:

**Note:** *The Stakeholder List should be amended during each phase of the Project.*

## SEP Outline - Appendix 2: FPIC Process

The measures outlined below describe a process to reach FPIC.

### During Project Design:

- Indigenous Peoples should participate either directly or through their own freely chosen representatives and/or customary or other institutions specify which of these is entitled to express consent (or lack of) on their behalf. The objective should be to reach a collective decision (involving indigenous peoples' representative bodies and organizations e.g., councils of elders or village councils), as well as members of the affected communities of indigenous peoples; and any other local civil society organizations identified by the affected indigenous peoples' communities).
- Organize meetings where the Project and its proposed activities and the impacts and mitigation measures are explained (i.e. discussing the results of the environmental and social studies, providing translated copies of the Non-Technical Summary).
  - The meetings should be conducted in a form and language that takes the traditions of the community into account.
  - Allow time for discussion without any project staff in attendance, when the IPs can discuss whether they are prepared to provide their consent, or return at an agreed later date for this purpose.
  - The inclusion of a gender perspective and the participation of women are essential, as well as the involvement of community

Table I4 below.

*Insert past and future activities. Describe activities in as much detail as possible (e.g. where did meetings take place and when, what documents were disclosed etc.) and always with dates or time frames. The descriptions in the table below are just an example and should be adapted to make it specific to the project and the actually undertaken and planned activities.*

members of different ages as appropriate (e.g. focus group discussions).

- Recording of the consultations.
- Recording the consent or non-consent.
  - Consent will be expressed in a collective manner through community representatives. The IPs will convey their decision either in writing using a template prepared by the project implementing party or, if preferred, orally. If a document is prepared, it will be signed by the village head and will indicate that the decision was reached by consensus. The names, sex, ages, ethnic group, and occupation of each participant in the village meeting will be recorded in an annex to the document.

### During Project Development and Implementation:

- Regular stakeholder meetings to determine whether the Project responded to local communities' needs and aspirations.

### During Monitoring and Evaluation:

- Monitoring and evaluation will take into account IPs' issues and will evaluate whether the Project has been implemented in line with FPIC, e.g. any issues raised by IPs and agreed on with NEA should be monitored and followed up during the Project implementation.

All actions outlined in Table 3 in the main text also apply to Indigenous Peoples. The FPIC process (reaching consent with Indigenous Peoples) is specific to Indigenous communities though. The key aspects and milestones for this process are outlined in



**Table 14 – Plan for FPIC Process**

Activity/Element	Target Stakeholders	Description	Timing
1. Preliminary meeting (“kick-off meeting”)	Indigenous groups	Meet with Indigenous groups and agree on culturally appropriate ways to engage with them (e.g. the language the meetings will be conducted in) and a strategy to reach consent. The IPs will choose representatives (e.g. council of elders, village council, which are entitled to express the community’s consent (or lack of) on their behalf.	<i>Insert time frame</i>
2. Stakeholder Meetings	Indigenous groups	Organize meetings with the IPs where the Project, its proposed activities, the impacts and mitigation measures are explained. Provide translated copies of the Non-Technical Summary. Allow time for discussion without any project staff in attendance, or return at an agreed later date for this purpose. Conduct focus group discussion in order to include the perspectives of both genders and different age groups.	<i>Insert time frame</i>
3. Recording of Consultation	Indigenous groups	Record the process, attendees, opinions, issues, agreements and other important aspects of the meetings.	<i>Insert time frame</i>
4. Monitoring and Evaluation	Indigenous groups	Monitor and evaluate that the IPs’ issues are taken into account and evaluate whether the Project has been implemented in line with FPIC. Any issues raised by IPs and agreed on with the project implementing party shall be monitored and followed up on.	<i>Insert time frame</i>

## SEP OUTLINE - APPENDIX 3: TEMPLATE FOR PUBLIC GRIEVANCE FORM

*Adapt, if necessary. Grievance Form needs to be translated into the local language(s)*

<b>Public Grievance Form</b>	
<b>Reference No. (assigned by Implementation Partner):</b>	
Please enter your contact information and grievance. This information will be dealt with confidentially. Please note: If you wish to remain anonymous, please enter your comment/grievance in the box below without indicating any contact information – your comments will still be considered by	
<b>Full Name</b>	
<b>Anonymous submission</b>	<input type="checkbox"/> I want to remain anonymous
<b>Please mark how you wish to be contacted (mail, telephone, e-mail).</b>	<input type="checkbox"/> <b>By mail (please provide mailing address):</b> _____ <input type="checkbox"/> <b>By telephone (please provide telephone number):</b> _____ <input type="checkbox"/> <b>By e-mail (please provide e-mail address):</b> _____
<b>Preferred language for communication</b>	<input type="checkbox"/> <i>[insert other applicable language(s)]</i> <input type="checkbox"/> English <input type="checkbox"/> Other, please specify: _____
<b>Description of incident or grievance:</b>	
<b>Description of incident or grievance:</b>	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
<b>Date of incident/grievance:</b> _____	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
<b>What would you like to see happen to resolve the problem?</b>	

Please return grievance form to:

*Provide contact person and address*



## **Appendix G – Outline of Resettlement Action Plan**

## Resettlement Action Plan Outline

A RAP is required for all investments with involuntary resettlement impacts. Its level of detail and comprehensiveness is commensurate with the significance of potential involuntary resettlement impacts and risks. The substantive aspects of the outline will guide the preparation of the resettlement plans, although not necessarily in the order shown.

### A. Executive Summary

This section provides a concise statement of investment scope, key survey findings, entitlements and recommended actions.

### B. Investment Description

This section provides a general description of the investment, discusses investment components that result in land acquisition, involuntary resettlement, or both, and identifies the investment area. It also describes the alternatives considered to avoid or minimize resettlement. It includes a table with quantified data and provides a rationale for the final decision.

### C. Scope of Land Acquisition and Resettlement

- discusses the investment's potential impacts, and includes maps of the areas or zone of impact of investment components or activities;
- describes the scope of land acquisition (provide maps) and explains why it is necessary for the main investment;
- summarizes the key effects in terms of assets acquired and displaced persons; and
- provides details of any common property resources that will be acquired.

### D. Socioeconomic Information and Profile

This section outlines the results of the social impact assessment, the census survey, and other studies, with information and/or data disaggregated by gender, vulnerability, and other social groupings, including:

- definition, identification, and enumeration of the people and communities to be affected;

- description of the likely impacts of land and asset acquisition on the people and communities affected taking social, cultural, and economic parameters into account;
- discussion of the investment's impacts on the poor, indigenous and/or ethnic minorities, and other vulnerable groups; and
- identification of gender and resettlement impacts, and the socioeconomic situation, impacts, needs, and priorities of women.

### E. Information Disclosure, Consultation, and Participation

- identifies investment stakeholders, especially primary stakeholders;
- describes the consultation and participation mechanisms to be used during the different stages of the investment cycle;
- describes the activities undertaken to disseminate investment and resettlement information during investment design and preparation for engaging stakeholders;
- summarizes the results of consultations with affected persons (including host communities), and discusses how concerns raised and recommendations made were addressed in the resettlement plan;
- confirms disclosure of the draft resettlement plan to affected persons and includes arrangements to disclose any subsequent plans; and
- describes the planned information disclosure measures (including the type of information to be disseminated and the method of dissemination) and the process for consultation with affected persons during investment implementation.

### F. Grievance Redress Mechanisms

This section describes mechanisms to receive and facilitate the resolution of affected persons' concerns and grievances. It explains how the procedures are accessible to affected persons and gender sensitive.

### G. Legal Framework

- describes national and local laws and regulations that apply to the investment and identifies gaps between local laws and these policy requirements; and discusses how any gaps will be addressed.
- describes the legal and policy commitments from the executing agency for all types of displaced persons;

- outlines the principles and methodologies used for determining valuations and compensation rates at replacement cost for assets, incomes, and livelihoods; and sets out the compensation and assistance eligibility criteria and how and when compensation and assistance will be provided.
- describes the land acquisition process and prepares a schedule for meeting key procedural requirements.

#### **H. Entitlements, Assistance and Benefits**

- defines displaced persons' entitlements and eligibility, and describes all resettlement assistance measures (includes an entitlement matrix);
- specifies all assistance to vulnerable groups, including women, and other special groups; and.
- outlines opportunities for affected persons to derive appropriate development benefits from the investment.

#### **I. Relocation of Housing and Settlements**

- describes options for relocating housing and other structures, including replacement housing, replacement cash compensation, and/or self-selection (ensure that gender concerns and support to vulnerable groups are identified);
- describes alternative relocation sites considered; community consultations conducted; and justification for selected sites, including details about location, environmental assessment of sites, and development needs;
- provides timetables for site preparation and transfer;
- describes the legal arrangements to regularize tenure and transfer titles to resettled persons;
- outlines measures to assist displaced persons with their transfer and establishment at new sites;
- describes plans to provide civic infrastructure; and
- explains how integration with host populations will be carried out.

#### **J. Income Restoration and Rehabilitation**

- identifies livelihood risks and prepares disaggregated tables based on demographic data and livelihood sources;

- describes income restoration programs, including multiple options for restoring all types of livelihoods (examples include benefit sharing, revenue sharing arrangements, joint stock for equity contributions such as land, discuss sustainability and safety nets);
- outlines measures to provide social safety net through social insurance and/or special funds within the investment;
- describes special measures to support vulnerable groups;
- explains gender considerations; and
- describes training programs.

#### **K. Resettlement Budget and Financing Plan**

- provides an itemized budget for all resettlement activities, including for the resettlement unit, staff training, monitoring and evaluation, and preparation of resettlement plans during loan implementation;
- describes the flow of funds (the annual resettlement budget should show the budget-scheduled expenditure for key items);
- includes a justification for all assumptions made in calculating compensation rates and other cost estimates (taking into account both physical and cost contingencies), plus replacement costs; and
- includes information about the source of funding for the resettlement plan budget.

#### **L. Institutional Arrangements**

- describes institutional arrangement responsibilities and mechanisms for carrying out the measures of the resettlement plan;
- includes institutional capacity building program, including technical assistance, if required;
- describes role of NGOs, if involved, and organizations of affected persons in resettlement planning and management; and
- describes how women's groups will be involved in resettlement planning and management.

#### **M. Implementation Schedule**

This section includes a detailed, time bound implementation schedule for all key resettlement and rehabilitation activities. The implementation schedule should cover all aspects of resettlement activities synchronized with the investment

schedule of civil works construction, and provide land acquisition process and timeline.

**N. Monitoring and Reporting**

This section describes the mechanisms and benchmarks appropriate to the investment for monitoring and evaluating the implementation of the resettlement plan. It specifies arrangements for participation of affected persons in the monitoring process. This section will also describe reporting procedures.

## **Appendix H – Incident Reporting Template**



## Incident Reporting Template

1. Incident Details						
Company Name:			Date and time of incident:			
Location of incident:	Type:	Environmental		<input type="checkbox"/>		
		Major Injury/Fatality		Workers	<input type="checkbox"/>	
				Public/Community	<input type="checkbox"/>	
		Social incident (e.g. labour unrest)		<input type="checkbox"/>		
Fire		<input type="checkbox"/>				
2. What Happened?						
Describe:						
3. Injuries to Workers/Contractor Employees						
Worker	Sex	Age	Job Title	Time with company	Cause of Injury	Type
4. Injuries to the Public						
Name	Sex	Age	Community	Place of Residence	Cause	Type
5. Environmental Incident						
incident Type: (Spill/Release/Fire/Other)		Quantity: (L/kg)		Cause		Damage
6. Witnesses						
Name		Place of Residence			Contact Details	
7. Other Relevant Information						
Have the authorities been informed?				Yes <input type="checkbox"/>		No <input type="checkbox"/>
Please provide details						
Has there been any media coverage?				Yes <input type="checkbox"/>		No <input type="checkbox"/>
Please provide details						
Were there any impacts outside the project site boundaries?				Yes <input type="checkbox"/>		No <input type="checkbox"/>
Please provide details						

<b>Were any photographs taken?</b> (If so, please provide copies)		<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>Date:</b>			
<b>List below the corrective actions taken after the accident:</b>			
<b>Person completing form:</b>			
<b>Name/Position:</b>			
<b>Telephone No:</b>		<b>Email address:</b>	

**\*\* End of Document\*\***