Environmental and Social Management System Toolkit

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Acknowledgements

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Citation

Camco and REPP 2 TAF, 2024. Environmental and Social Management System Toolkit.

Purpose of this Document

Like any greenfield infrastructure project, renewable energy projects run the risk of causing negative impacts. To help ensure that the environmental and social performance of all Camco-supported projects is sustainable, Camco has developed this toolkit to help project developers to mitigate and manage risk and develop projects in line with Camco's Environmental and Social Safeguarding Policy.

All projects supported by Camco-managed platforms and funds must follow this policy, which is based on adherence to host country legislation, IFC Performance Standards on Environmental and Social Sustainability, the Sustainability Principles advocated by the UN Global Compact, UN Guiding Principles on Business and Human Rights, and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

In order to fulfil the requirements, each developer must establish and maintain an environmental and social management system (ESMS) for their project(s). This includes the identification and assessment of its environmental and social risks and impacts, and the development of a set of appropriate responses and procedures for dealing with those risks and impacts that are commensurate with the nature and scale of the project and the level of those risks and impacts.

In addition, an environmental and social impact assessment (ESIA) must also be carried out by a third party at project level.

The purpose of this document is to guide investees of Camco-managed platforms and funds in the development of an ESMS. The toolkit describes the objectives, standards applied, and requirements dictated by the Camco Environmental and Social Policy and Procedures.

How to use this Toolkit

This toolkit serves as a guide for establishing and implementing a full ESMS. It has been created in such a way as to provide the structure and required sections for an ESMS in accordance with the IFC Performance Standards on Environmental and Social Sustainability, the GCF Revised Environmental and Social Policy and, where relevant, the GCF Indigenous Peoples Policy, the ILO Declaration on Fundamental Principles and Rights at Work, the ILO Basic Terms and Conditions of Employment, the International Bill of Human Rights, the UN Declaration on Rights of Indigenous Peoples and the Sustainable Finance Directive Regulation (EU) (2019/2088).

Each section starts with a description of the relevant standard and is followed by tailored guidance for meeting that standard.

Used in conjunction with the separate ESMS Workbook, project developers can produce a full ESMS that addresses each of the above-mentioned standards. The workbook is suitable for low and low-to-medium risk projects; for medium-to-high and high-risk projects, an ESMS should be established in consultation with subject matter experts.

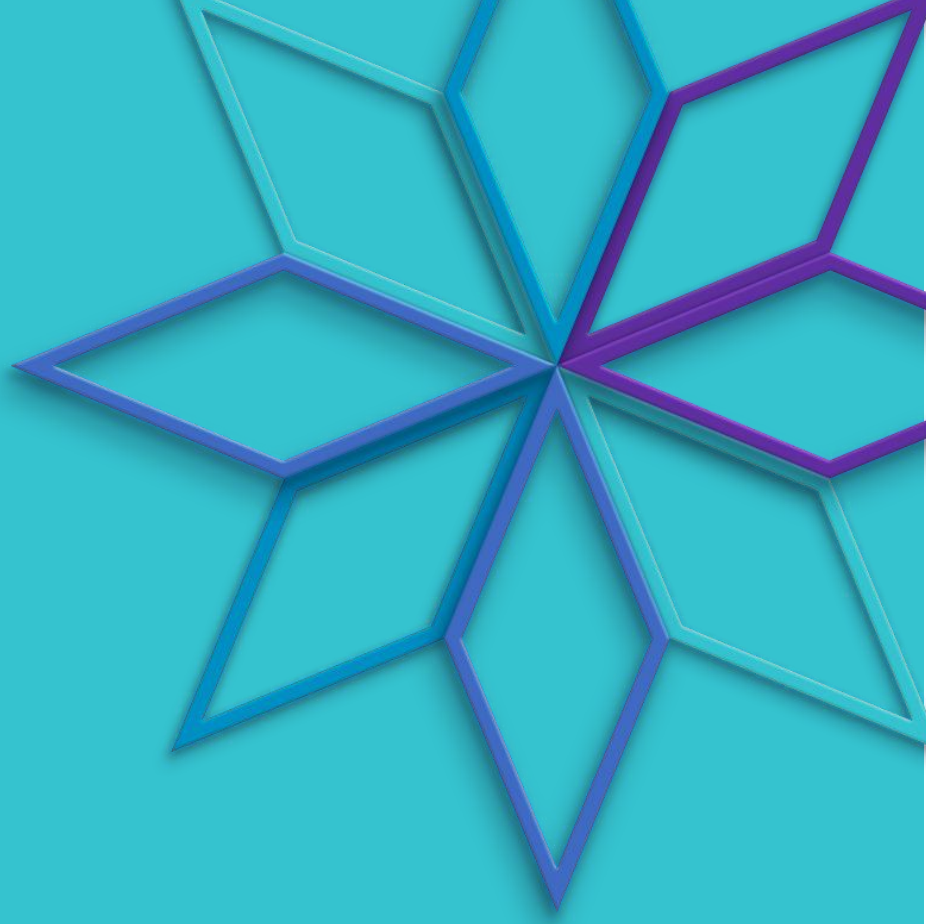
It is important to keep a record of any amendments to the ESMS over time. Please make sure all changes are logged and approved in the version control form provided in the ESMS Workbook.

As a general note, in situations where individual project sites have not been identified yet, the ESMS should serve as a framework for managing environmental and social impacts and risk. The ESMS should be updated to reflect site-specific risks and impacts as soon as the project site is confirmed and the ESIA has been carried out by an independent third party.

If you require any support using this toolkit, email info@camco.fm

A guide to symbols used in this toolkit

	Descriptive overview
	Indicates guidance specific to solar home systems and solar mini-grids projects
	Good practice considerations
	Indicates where the user's input is required on the separate ESMS Workbook
	Suggested further reading
	Good practice checklist
	Tip



1. IFC Performance Standard 1

Assessment and Management of Environmental and Social Risks and Impacts

1.1. Environmental and Social Assessment and Management System

As the project developer, you need to establish and maintain an environmental and social management system (ESMS) at the organisational level and the project level that is appropriate to the nature and scale of the project and commensurate with the level of its environmental and social (E&S) risks and impacts. The organisational level policies should adhere to key standards and principles outlined throughout. The project level management plans specifically address key requirements, concerns and considerations in operational implementation.

An ESMS is a set of policies, procedures, tools and internal capacity to identify, manage and mitigate a project's E&S risks and impacts. As a minimum, it should include a gender sensitive third-party assessment of your project's impacts, your company's E&S policy/ies, and plans for stakeholder engagement, emergency response, occupational health and safety (OHS), waste management, diversity action and monitoring.

In Figure 1 below, the dark gray components of the ESMS are necessary policies and plans, while the lighter gray components should only be included if required based on the project context.

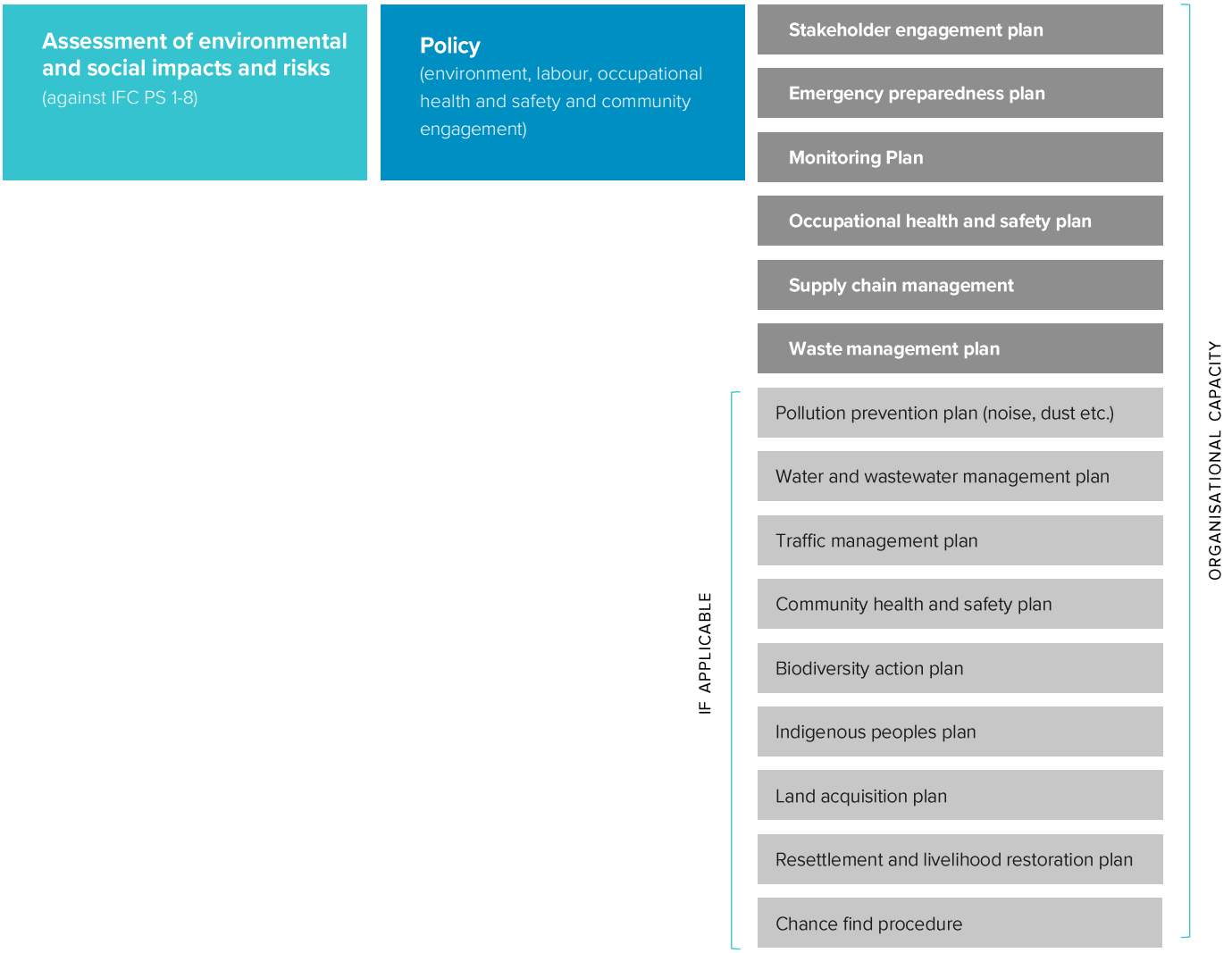


Figure 1: Elements of an ESMS

For a solar mini-grid or solar home system (SHS), standard operating procedures and monitoring and management plans should be used as a basis for the ESMS. These should be particularly focused on OHS when installing and operating the units, including the safe handling of toxic chemicals contained within the solar panels, portable batteries (if applicable) and accompanying appliances. This is to extend to all levels of staff, contractors, sub-contractors, suppliers and community members.

Please fill in Section 1.1 of the ESMS Workbook based on the guidance provided above.

1.2. ESMS – Policy

> Policies should be the foundation of your ESMS. They provide the rules you expect your employees to follow and are a public statement about what your company believes in and how it conducts business.

Developers should:

- Establish an overarching policy defining the E&S objectives and principles that guide the project(s), including an organisational structure/role of responsibilities for its execution at the organisation level. Having an E&S Manager and a Community Liaison Officer is mandatory.
- Adopt and effectively implement human rights commitments in company operations in line with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the International Bill of Human Rights and the ILO Basic Terms and Conditions of Employment.
- Declare that the project(s) will comply with applicable local laws and regulations, the IFC Performance Standards (IFC PS) and the GCF Environmental and Social Policy. State the relevant laws as applicable.
- Ensure clear communication of policies throughout the company. Consider how will you ensure all new employees are aware of policies and know where to find them. When dealing with suppliers and business partners, make it clear that they are expected to either adopt or comply with your polices in contracts and agreements.

Good practice considerations:

The following commitments relate to your project's potential impact in different areas and how you draft your E&S policy to address those impacts. Please see the ESMS Workbook for a template of an E&S policy.

Environment

- Abide by environmental laws and regulations. These include host country and international standards, particularly IFC PS, GCF Environmental and Social Policy, UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, International Bill of Human Rights and ILO Basic Terms and Conditions of Employment.
- Ensure resource utilisation efficiency (e.g., energy, water, important input materials, etc.).
- Ensure no activities financed by Camco-managed funds and platforms cause harm to any of the following objectives: climate change mitigation, climate change adaptation, sustainable use and protection of water

and marine resources, and transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems.

- Adopt a no net loss approach to measure and quantify biodiversity impacts.
- Mitigate and manage the release of pollutants into air, water and land (from use of diesel fuels, geothermal, etc.).
- Ensure the safe and secure handling, storage, and disposal of hazardous chemicals.
- Ensure the safe and secure handling of hazardous and non-hazardous waste generated.
- Ensure the recovery, reuse, treatment and proper disposal of waste.
- Employ non-chemical means to control economically significant pests and vectors.
- Conserve, preserve and restore natural forest lands, or reduce, minimise or avoid impact on wetlands, critical habitats or endangered species.

Gender equality and ethnic inclusion

- Ensure strong leadership, commitment and support for women's empowerment and the inclusion of ethnic minorities.
- Respect the rights of women and girls and ethnic minorities in local communities.
- Ensure equal opportunity procurement to expand relationships with female-owned businesses in your value chain.
- Adopt strategies to ensure gender balance and ethnic inclusion in management positions and across the company.
- Adopt an approach to ensure equal pay for equal work.
- Establish maternity and paternity leave policy.

Labour and working conditions

- Apply labour policies and procedures to all levels of staff, contractors, sub-contractors, third-party service providers and suppliers.
- Promote, protect and fulfil universal human rights.
- Respect Indigenous people and the surrounding community's rights to land and free, prior and informed consent, as per the GCF Indigenous Peoples Policy.
- Respect collective bargaining agreements, if applicable.
- Ensure reasonable working conditions and terms of employment (e.g., working hours, compensation and benefits).
- Provide compensation or remuneration that complies with the international poverty line as the global absolute minimum wage.
- Ensure protection for migrant, contract and/or temporary workers.
- Respect workers' rights to form and to join workers' organisations.
- Ensure non-discrimination in hiring, promotion, management and compensation practices.
- Provide training, tools and opportunities for advancement.
- Ensure freedom from harassment by management or other workers.
- Establish a transparent process (Grievance Redress Mechanism) for receiving and resolving worker complaints.
- Ensure no retaliation following discrimination complaints.
- Uphold minimum age employment laws and conditions for engaging young workers. This will be 14 years or the legal national minimum age, whichever is higher, in line with the ILO Convention 138 on child labour.[1]

[1] In accordance with ILO Convention concerning Minimum Age for Admission to Employment and ILO Recommendations on Child Labour, the minimum age for work should not be below the age for finishing compulsory schooling and in any case not less than 14. Children aged 13 and 14 may do light work, as long as it does not threaten their health and safety or hinder their education or vocational orientation and training. Any hazardous work which is likely to jeopardise children's physical, mental or moral health and safety should not be done by anyone under the age of 18.

- Ensure freedom of movement and freedom to resign, and forbid any form of forced labour.
- Forbid the retention of identification papers or money to detain workers.
- Ensure awareness, training and consistency of drills in emergency prevention and response procedures.
- Ensure the extension of policies and monitoring to the supply chain in cases of high risk and fragile conflict areas.

Community health and safety

- Ensure consumer product safety (SHS and mini-grid projects).
- Ensure the health and safety of the public in relation to company activities.
- Ensure the health and safety of the public in relation to the construction, operation and decommissioning of equipment and project infrastructure.
- Avoid potential community exposure to hazardous materials and substances.
- Ensure the safe transportation and disposal of hazardous wastes.
- Avoid impact on ecosystem services on which communities rely.
- Avoid impact on land ownership through acquisition and resettlement.
- Avoid community exposure to communicable diseases, such as COVID-19, tuberculosis, Ebola, HIV/AIDS, which company activities may aggravate. Includes communicable diseases associated with the influx of temporary or permanent project labour.
- Ensure awareness of emergency situations and hazardous sites caused by company activities, equipment and infrastructure.
- Avoid excessive or unregulated vehicle traffic near the facility and through communities.
- Ensure appropriate screening, training, equipping and monitoring of direct or contracted workers providing security services/personnel.
- Establish a Grievance Redress Mechanism for workers and the community to express concerns about the security system and personnel.
- Investigate any allegations of past abuse.

GOGLA: Consumer Protection Code[2]

- Commit to and embody the Consumer Protection Principles:

    1. Responsible sales and pricing: Empower customers to take control of their finances and better understand their obligations, reducing the risk of financial stress.
    2. Transparency: Empower customers to make informed decisions by providing them with transparent, simple and clear information.
    3. Good product quality: Demonstrate a commitment to ensuring your products meet the Verasol Quality Standards or higher, meaning they are of high quality, long-lasting and safe.
    4. Good consumer service: Provide a high-value service, which requires consideration of, and discussion with, other family members.
    5. Personal data privacy: Commit to the responsible use of collected data that is necessary for providing a good consumer service and the legitimate interests of the business.
    6. Fair and respectful treatment: Build a trusted brand and business practice with the community that encourages consumers' confidence in the business when making purchasing decisions.

[2] Introductory Guide to the Consumer Protection Code (2023)

Suggested further reading

Business and Human Rights Resource Centre's Renewable Energy & Human Rights Benchmark. Key Findings from the Wind & Solar Sectors (2020)

1.3. ESMS – Identification of Risks and Impacts

> Developers should establish and maintain a process for identifying the E&S risks and impacts of the project, which needs to be carried out by a third-party service provider. The process may comprise of a full-scale environmental and social impact assessment (ESIA) or, in the case of SHS-type projects, a limited or focused E&S assessment that is relevant to the project size, type and location.
>
> Always seek to avoid any potential negative impacts of the risks. If that is not possible, take steps to minimise the impact of the risks. If negative impacts have occurred, offset or compensate for them.

Consider this list of the types of country-specific regulations your project may be expected to abide by:

- ESIA and environmental permit considerations
- Environmental conservation and management
- Forest and wildlife conservation and resource management restrictions
- Biodiversity conservation
- Water abstraction limits, natural resource conservation and community consumption
- Land acquisition, inheritance and granted ownership, land evaluation and resettlement
- Construction safety and permits
- Labour regulations (relating to employees, sub-contractors, suppliers, service providers), workmen's insurance and working conditions
- Occupational health and safety (relating to employees, sub-contractors, suppliers, service providers)
- Energy or electricity acts, and
- International agreements or conventions signed by the host country that pertain to the conservation of the project site.

Provide a summary of key impacts based on the third-party ESIA in accordance with IFC PS 2-PS 8, GCF Environmental and Social Policy, GCF Indigenous Peoples Policy, ILO Declaration on Fundamental Principles and Rights at Work, ILO Basic Terms and Conditions of Employment, International Bill of Human Rights, UN Declaration on the Rights of Indigenous Peoples, and Sustainable Finance Directive Regulation (EU) (2019/2088).

Describe the ESIA process that has or will take place, including consultant name, date, timeline, project site description, methodology of desktop and on-site analysis and results.

Specify the status of any ongoing permit applications and any conditions that they may include, such as placement of the plant, height of weir, water abstraction volume, environmental flow, replanting of vegetation, working hours during construction, etc. Table 1 below provides a suggested format for listing permits and their conditions.

Table 1: Example of a status of permits record sheet

PERMIT NAME	ISSUING DATE	ISSUING AUTHORITY	CONDITION	PHASE	EXPIRY DATE	ACTION
E.g. Environmental licence NAME	dd/mm/yyyy	Ministry of Environment	Construction work to take place between 7.30 – 16.30	Construction	n/a	Site Manager to enforce

1.3.1. Contents of an ESIA Report

The ESIA report should include:

- A summary of the report.
- A description and analysis of the initial state of the site and its physical, biological, ecological, socio-economic and human environment, inclusive of triggering of critical, natural and/or modified habitat criteria.
- A description and analysis of all natural resources, climate change effects (e.g., flooding, droughts, natural disasters, famine, etc.), and socio-cultural elements that may be affected by the project and project area.
- A description and analysis of cumulative impacts on valued E&S components, considering the current situational landscape and planned project developments based on stakeholder discussions.
- A description of the project and the reasons for this choice of location among the alternatives.
- A review of the applicable environmental, legal and institutional frameworks, with recommendations for compliance for the ESIA. This review should cover:
    - Identification and evaluation of possible effects of the implementation of the project on the natural and human environment
    - Identification of possible effects on valued E&S components, plus a recommendation as to whether a cumulative impact assessment is required
    - With respect to hydropower projects, identification of optimal eco-flow requirements to sustain and maintain primary ecosystem function
    - Indication of the measures necessary to avoid, reduce or eliminate harmful effects on the environment and surrounding community
    - Identification of the necessary management plans to be developed in response to the E&S risks, and
    - Classification of the project in accordance with the IFC Risk Categorization: Environmental and Social Categorization.
- Stakeholder engagement and consultation in accordance with local legislation and IFC PS.

Table 2 provides a summary of typical adverse impacts from renewable energy projects.

Table 2: Summary of crosscutting adverse impacts anticipated for Camco-funded projects

TOPIC	IFC PS	POTENTIAL IMPACT	APPLICABILITY	MITIGATION MEASURE	LIKELIHOOD
Land use	5	Loss of land used for agriculture, livestock or other productive uses.	On-grid (construction and operation phases) Isolated grids (construction and operation phases)	Assessment of the initial value of the land and compensation and support for resettlement. Mitigation of any negative impact by site selection.	High

			Off-grid (construction phase)	Establishment of a **Land Use and Compensation Plan**. A specialist will need to be contracted to ensure the evaluation meets with legal (national and international) regulations and social acceptance. Development of a **Resettlement Action Plan**, which aligns with host country land use and approval structures, regulations or laws (integrating legacy land use entitlement factors, current traditional social structures and newer legal entitlements). The plan should also align with land ownership regulations or laws (integrating legacy land ownership in the event of an expropriation and entitlement factors, current traditional social structures and newer legal entitlements) and a transparent compensation process and approved and applied compensation evaluation methodologies. Development of a **conflict-sensitivity assessment**, which evaluates the need for the implementation of gender, social classes, sexuality, age, disability, religious background, urban/rural setting and ethnic-sensitive mechanisms.	
Soil run-off, flooding, sediment-ation	1 and 6	Interruption of drainage patterns and lack of water table replenishment because of ground clearance and earthworks. Downstream sedimentation and siltation during construction. This can affect both the quality of water for aquatic life and that fetched for domestic purposes.	On-grid (construction phase) Isolated grids (construction phase) Off-grid (construction phase) On grid (construction phase): run-of-river hydro (both construction and operational phases)	Minimisation of cleared areas and soil disturbance, with revegetation with native species as soon as feasible. Covering of cleared areas with geotextiles or mulching until areas are revegetated or covered by the facility. Early installation and regular maintenance of drainage and diversion structures, including drainage outlets to discharge into vegetated areas, if possible. Vegetation along watercourses and drainage lines to be retained, if possible. Avoidance of areas liable to flooding, slope instability and water crossings where possible. Retention of topsoil for restoration (including tilling and revegetation) as soon as practicable. Establishment of a **Biodiversity Management Plan and a Drainage Plan**. Avoidance of construction during heavy rain. Installation and regular emptying of sediment traps in surface drains, along roads and in construction areas. Plantation of riparian plant species along the banks of the river or waterway to create a riparian zone (3-10m).	Medium Medium

				Removed topsoil should be disposed of away from rivers and downstream watercourses.	
Pollution of soil and water	3	Release of hazardous substances during construction or operation (e.g., oil spills) leading to soil, surface or groundwater contamination. Pollution of watercourses through discharge of construction site/camp sewage effluent.	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	Establishment of a **Pollution Prevention Plan**, including: • materials handling, storage and control procedures • control of construction vehicle movements through the development of a **Traffic Management Plan** and prohibition of vehicle washing in watercourses and similar practices • creation of emergency response plans and respective training protocols in preventative • safe removal of liquid effluent and/or development of a sanitation or wash station system on site, included in the **Water Management Plan**.	Medium
Air quality	1 and 3	Negative impact on human health and/or wildlife as a result of dust and other emissions caused during construction and/or operation. Potential GHG emissions from construction site and running of camp diesel gensets.	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	Establishment of a **Pollution Prevention Plan**, including: • sensitive siting of construction facilities • dust control and suppression measures, including creation of **Dust Management Plan** • undertaking of necessary combustion (from generators, fires, etc.) in a wide-open space, protected from the community. Personal protective equipment (PPE) must always be worn while operating generators or stoking fires • establishment of an **Occupational Health and Safety Plan**, an **Emergency Preparedness Plan** and a **Response Plan**, and • carrying out of hygiene surveys, stack emission monitoring and stack emission testing.	Low Low
Noise and vibration	1 and 3	Disturbance to humans and wildlife caused by noise and vibration from equipment, traffic and other activities during construction at sites and associated facilities.	On-grid (construction and operation phases) Isolated grids (construction and operation phases)	Establishment of a **Pollution Prevention Plan**, including: • sensitive siting of construction facilities • use of modern equipment fitted with abatement devices (e.g., ear mufflers, noise enclosures) and implementation of a good maintenance regime, as per the **Occupational Health and Safety Plan** • strict control of timing of activities (e.g., high noise activities are prohibited at night) • establishment of a **Stakeholder Engagement Plan** and **Grievance Redress Mechanism** to discuss noise impacts with the community and agree on a time schedule • observance of seasonal sensitivities (e.g., breeding seasons) • speed controls and other traffic management measures to prevent excessive speed around settlements to ensure safety.	Low

Water resources	1 and 3	Impact on surface and groundwater supplies of communities and ecosystems as a result of water demands during construction and operation. (Water requirements may be high for large solar power plants.)	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	Establishment of a **Water Management Plan** in water-sensitive areas, including: • water study to demonstrate where substantial need is required, inclusive of engagement with the community and prior to any abstraction. The study must take into consideration domestic use, subsistence farming, fishing and local business needs, as well as seasonal and climate change-related periods of drought and catering for community, project and project staff needs, • no allocated abstraction without prior approval of relevant authorities, and • promotion of water efficiency (including leak detection and preventative maintenance of equipment) and water recycling. In the case of rivers, consider the impact for downstream water users in a **cumulative impact assessment**.	Medium
Pollution prevention (hazardous waste, e-waste and pesticides)	3	Excess materials consumption and generation of waste emissions due to inefficient waste management during construction and maintenance. Generation of electrical and electronic waste (e-waste) and hazardous waste through the projects, especially when batteries and solar panels are not disposed of correctly when they reach their end of life, leading to contamination Pesticides from farm activities powered by mini-grids.	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	Establishment of a **Waste Management Plan**, including: • waste hierarchy of prevent, reduce, reuse, recycle and recover • identification of key waste streams generated during construction, operation and decommissioning phases (e.g., general, domestic, hazardous, recyclable, etc.) • development of a hazardous waste collection and storage strategy, where waste is stored in a safe and secure manner and only disposed of at licensed and fit-for-purpose facilities, and • staff training, including on the use of pesticides, provision of Safety Data Sheets (SDS), and • testing of effluent discharge from the farms and establishment of an Effluent Discharge Plan.	High High
Loss and degradation of habitat (animal migration routes and pathways)	6	Land clearance for the power plant may cause loss or fragmentation of protected areas and other areas of conservation interest. Severance of terrestrial routes and watercourses used for migration or for access to feeding and breeding areas.	On-grid (construction phase) Isolated grids (construction phase), Off-grid (construction phase) On-grid, including wind and run-of-river hydro (construction and operation phases)	Establishment of a **Biodiversity Action Plan** and **critical habitat assessment**, including: • careful site selection • wherever possible, the avoidance and/or minimisation of activity near or around ecologically sensitive areas • if unavoidable, the establishment of buffer zones around conservation areas, watercourses and other locations identified as ecologically sensitive. • minimisation of construction or operational activity by reducing the duration, intensity and extent of activity during phases	Medium Low

				• rehabilitation of cleared areas with native species • establishment of nursery for local culturally significant species • creation of wildlife crossings for aquatic and terrestrial animals, and design of culverts/crossing structures to avoid impacts on aquatic animal movement, and • integration of a fish pass into the plant design of hydro projects. Should the impact require consistent management, a biodiversity specialist should be contracted to ensure alignment with the Biodiversity Action Plan and development of mitigative measures, should the action plan require revision and adaptation.	
Direct impacts on fauna and flora	6	Clearance of vegetation may lead to loss of plant species and habitat of conservation interest. Poaching of critically endangered/ vulnerable species (hunted for bushmeat and other valuable parts).	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	Establishment of a **Biodiversity Action Plan**, and **critical habitat assessment**, including: • careful site selection with advice from and collaboration with biodiversity authorities/associations/wildlife specialists • establishment of security precautions and having security personnel on site to ensure community and employee safety. • collaboration of on-site security personnel with police and other enforcement authorities to ensure safety precautions are met • careful planning of construction activities • demarcation and avoidance of areas of conservation interest (e.g., high-value species, feeding or breeding sites, migration routes, etc.), and • transplantation of endemic or critically endangered species to ensure continued survival. Should the impact require consistent management, a biodiversity specialist should be contracted to ensure alignment with the Biodiversity Action Plan and development of mitigative measures, should the action plan require revision and adaptation.	Medium
Invasive species	6	Movement of plants to new areas which adversely impact fauna, flora, ecosystems and crops.	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	No introduction of new invasive species. If the area cleared has invasive species, establish an **Invasive Species Management Plan** to identify actions or activities in preventing and managing the spread of the invasive species.	Low
Physical and economic displacement of people,	2	Disruption of economic activities, livelihoods or use of natural resources,	On-grid (construction phase	Initial site selection considering original land use, preferentially selecting land of minimal value, and comparison of alternative locations.	Low (the probability of physical displacement will be low as significant

property, assets and resources		particularly those dependent on the land to be acquired for the project. Physical displacement of people or loss of assets due to new infrastructure build.	Isolated grids (construction phase) Off-grid (construction phase)	Establishment of a **Resettlement Action Plan** and **compensation structure** to be built into land lease agreements. Compensation structure to include both socio-economic evaluation and market-related evaluation. A specialist will need to be contracted to ensure the evaluation meets with legal (national and international) regulations and social acceptance.	displacement will not qualify for funding)
Cultural heritage	8	Displacement or damage to cultural heritage sites that may have archaeological, paleontological, historical, cultural, artistic and/or religious value by construction activities, causing harm to the setting and affecting the amenity value.	On-grid (construction and operation phases) Isolated grids (construction and operation phases)	Careful site selection. The undertaking of community consultation to ensure cultural heritage sites are avoided. If appropriate, specialist surveys should be contracted. Implementation of a **Chance Finds Procedure** and **Stakeholder Engagement Plan**.	Low
Indigenous peoples	7	Displacement, discrimination or exclusion of Indigenous people in land ownership or use discussions or other project benefits.	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	Establishment of an **Indigenous Peoples Policy**. Ensuring acknowledgement and full respect of Indigenous peoples' human rights, dignity, aspirations, culture and natural resource-based livelihoods. Acknowledging the different challenges faced by women, girls and other vulnerable groups within Indigenous communities and promote the participation and leadership of women in investment activities given their role as traditional custodians of cultural and spiritual heritage and values. Establishing and maintaining an ongoing relationship, based on informed consultation and participation, with the Indigenous peoples affected by an investment throughout its lifecycle. This includes recognising the principle of free, prior and informed consent (FPIC) when there are any potential impacts on cultural and/or natural resources, or land owned by or under customary use of Indigenous peoples. A specialist should be contracted to identify specific measures to comprehensively and inclusively engage with Indigenous peoples.	High
Community health, safety and security	1, 2 and 4	Poor construction management practices may lead to adverse effects on safety, human health and wellbeing. Real or perceived disruption to normal	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	Good construction site management, labour practices and site working conditions management procedures, including the creation of a **Labour Policy** and **Occupational Health and Safety Plan**; standard operating procedures; signage and restriction of site access.	Medium Medium

		community life, through the physical presence of a construction workforce. Potential health risks associated with water-borne diseases and water-related diseases (e.g., schistosomiasis, onchocerciasis, malaria). Interaction between migrant construction workers and local communities and/or sales agents with local community households may increase occurrence of communicable diseases, including HIV/AIDS and sexually transmitted diseases. Increased incidences of conflict resulting in, for example, sexual exploitation; human rights violations of any person within the project-affected area, resulting from disputes over political or social differences; gun violence; placement of landmines; acts of terrorism; incidences of riots and protests; and social intimidation.		Disease control measures (e.g., no pools of standing water). Emergency response planning to consider impacts on local communities. Adoption of a **Stakeholder Engagement Plan** for early and ongoing community consultations. Implementation of a **Grievance Redress Mechanism**. Establishment of a **Code of Conduct and safeguarding approach**. These should include conflict resolution training applied to all workers (extended to suppliers, service providers and sub-contractors) across all phases of the project cycle (construction, operation and decommissioning), and training in acceptable behaviour with respect to the community. Awareness training for the workforce and their dependents on HIV/AIDS and other STDs, as well as health awareness raising campaigns for communities on the same topics. Conduction of a **conflict-sensitivity assessment**, which evaluates the need for implementation of gender-sensitive mechanisms. Conduction of a **security risk assessment**, which should include an assessment and evaluation of possible security threats or risks to community well-being and sexual harassment, as well as the probability of security or conflict risks occurring as a result of current or upcoming political and social events. Should the project site be in an area exposed during the project's lifecycle to civil unrest and terrorist activity, a specialist in development of a viable and effective security risk assessment should be contracted to ensure the safety and security of the workforce and community, to the extent possible. Mitigation measures should be integrated in an **Emergency Preparedness and Response Plan, Labour Policy, Occupational Health and Safety Plan, Stakeholder Engagement Plan** and a **Grievance Redress Mechanism**.	Medium Medium Medium
Socio-economic impacts		Stimulation of local economy through temporary direct employment as well as demand for goods and services which will enhance livelihoods in the project community.	On-grid (construction and operation phases) Isolated grids (construction and operation phases)	Adoption of a **Stakeholder Engagement Plan** for early and ongoing community consultations. Conduction of a **conflict-sensitivity assessment**, which evaluates the need for the implementation of gender-sensitive mechanisms.	Low

		Mainly positive but can have negative impact in community relationships, if not well managed.		Implementation of a **Grievance Redress Mechanism**.	
Topographical changes and landscape scarring impact	1	Project construction works are likely to result to landscape scarring and topographical changes, such as clearance of vegetation and earth movement for road construction, excavation of the headrace and penstock alignments (for hydro), and installation of transmission lines and visual impact of to power plant.	On-grid (construction phase) Isolated grids (construction phase) Off-grid (construction phase)	Establishment of an **ESIA** and **Environmental and Social Management Plan.** Careful site selection. Working closely with the local communities. Strict limitation of construction activities within footprint of development. Plant debris should be piled along the edge of rights of way pending transfer to a suitable disposal site. All new access roads to be constructed should be built subject to consultation with the local authority.	High
Employm-ent and occupati-onal health and safety (OSH)	1 and 2	Issues arising from the direct employment of the local population in the construction workforce. Poor construction management and OSH practices may lead to accidents, injuries and illnesses. Poor accommodation for construction labour may create mental health issues. Discrimination and harassment based on differences in ethnicity, religion, language, gender. High risk of child labour and/or forced labour currently exists in the supply chain of silicon-based solar panels solar and lithium-ion-batteries.	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases) Supply chains: specifically, solar PV panel and battery supply chains (construction and operation phases)	Development of an **Employment Plan, Employee Handbook** and a **Human Resource Policy**, with clear employment requirements (including minimum salary and working hours, zero-tolerance for SEAH) in accordance with host country labour rights. A gender specialist should be contracted to ensure gender sensitivity, consistent training and awareness raising around the community and workforce, as well as establish partnerships with NGOs, organisations and/or associations for GBVH support and assistance. Fair and transparent hiring and staff management procedures. Establishment of standard operating procedures. Establishment of safe and secure working conditions. Adoption of **Stakeholder Engagement Plan** and an employee **Grievance Redress Mechanism** to ensure employees, sub-contractors, service providers, contractors and suppliers are engaged with in an appropriate and timely way with regards to E&S issues through a sustained and continuous stakeholder engagement process. Establishment of an **Occupational Health and Safety Plan** outlining specific PPE requirements for each construction or operational project activity. Establishment of an employee **Grievance Redress Mechanism** to build mutual trust and a mutual understanding of differing perspectives when working together.	High High High High

				Establishment of **supplier code of conduct** principles covering compliance with labour and human rights laws, including the prohibition of forced and child labour and health and safety. Increase levels of traceability across supply chain, identifying commitments across the supply chain to prohibit child and forced labour. Development of **supply chain procedures** and a **due diligence screening mechanism** against risks of forced and child labour, to be implemented at the investee level.	
Sexual exploitation abuse and harassment (SEAH)	1 and 2	Increased levels of SEAH by investee staff, contractors, subcontractors, or other associates of the investee to the surrounding community. Increased spread of sexually transmitted diseases.	On-grid (construction and operation phases) Isolated grids (construction and operation phases) Off-grid (construction and operation phases)	Conduction of a **SEAH risk assessment** to determine the risk rating and identify the gaps. A gender specialist should be contracted to ensure gender sensitivity, consistent training and awareness raising around the community and workforce, as well as established partnerships with NGOs, organisations and/or associations for GBVH support and assistance. The specialist should be aware and familiar with the project site community traditions and cultural norms. Development of a **Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy**, which should include the organisation's commitment to PSEAH and measures that will be undertaken to realise the commitment. Conduction of a **conflict-sensitivity assessment**, which evaluates the need for implementation of gender-sensitive mechanisms. Staff training on PSEAH. Establishment of a **Code of Conduct** for all staff that defines appropriate behaviour and identifies consequences for breaches. The Code of Conduct should be included in induction programmes. Obligations on all investment workers (including sub-contractors) that are suitable to address applicable health and safety requirements, use of illegal substances, non-discrimination, interactions with community members, sexual harassment, violence or exploitation, protection of children, sanitation requirements, avoidance of conflicts of interest, respecting reasonable work instructions, protection and proper use of property, duty to report violations of the Code, and no retaliation against workers who report violations of the Code.	Medium Medium
Climate change	1	Intensification of chronic and acute climate-related events, such as increased temperature,	On-grid (construction and operation phases) Isolated grids (construction and operation phases)	Include assessment on aggravation of adverse impacts due to chronic and acute climate-related events in the ESIA to the extent relevant for the technology and location.	Medium

		precipitation, drought, flooding, cyclones (Madagascar), fires and sea level rise.	Off-grid (construction and operation phases)		

Good practice considerations:[3]

- Use external consultants and experts in setting up the ESMS for complex projects and to train in-house personnel to undertake monitoring and reporting.
- Cover baseline environmental impacts (incl. flora, fauna and ecosystems) determined in literature review against field surveys. Please note: for hydro projects, a dry season and wet season baseline study will need to be conducted to understand the fluctuation of biodiversity within the proposed project site, as well as a critical habitat assessment to conclusively identify the habitat.
- Cover OHS, labour, community and gender risks.
- Increased traffic due to construction may pose risks and should be assessed and, if relevant, managed in a Traffic Management Plan.
- Cover sources of livelihoods, levels of education, cultural beliefs, values and active participation of women and men within the community and active women's associations.
- Review risks and impacts any time there are significant changes to operations.
- Consult risks and impacts any time there are external changes, such as new laws or regulations.
- Include input from affected communities and other external stakeholders.
- In post-conflict areas, consider the project's potential for refuelling a conflict, as well as the potential threat of unexploded land mines.
- Consider waste management and health and safety risks in your supply chain, as well as in your own company.
- Link your monitoring plans to your prioritised risks.
- Scale the ESMS as appropriate to the size and complexity of your business/project.

What are the health and safety issues arising from providing SHS, portable batteries and appliances to communities and what steps are taken for maintenance of the project equipment?

- How will working conditions affect the health and safety of workers? (see Section 2)
- How could the operation of equipment affect the health and safety of the community? (see Section 4)
- How will waste and hazardous materials generated by the project, such as batteries, e-waste, chemicals and oils be dealt with safely?
- Have you considered the safe disposal of broken panels and batteries? What plans are in place for end-of-life waste management and recycling and storage of spent batteries and panels (see Section 3).

Use Table 3 below to summarise key impacts and how they are being addressed to satisfy the requirements of specific standards.

[3] IFC's ESMS Implementation Handbook (2015)

Table 3: Satisfaction of IFC Performance Standards

STANDARD	PS NAME	SATISFACTION OF THE PS		
		Summary of main impacts/concerns raised	How the impacts/concerns are addressed and monitored	Reference to the relevant section of the ESIA and/or relevant management plan(s)
IFC PS 1	Assessment and management of E&S risks and impacts Stakeholder engagement			
IFC PS 2	Labour and working conditions			
IFC PS 3	Resource efficiency and pollution prevention			
IFC PS 4	Community health safety and security			
IFC PS 5	Land acquisition and involuntary resettlement			
IFC PS 6	Biodiversity conservation and sustainable management of living natural resources Standards on Biodiversity and Ecosystems			
IFC PS 7	Indigenous peoples			
IFC PS 8	Cultural heritage			

Determine the IFC risk category of the project (see Table 4 below) as defined by the third-party ESIA assessment. A project is classified by the magnitude of risks and impacts incurred. The resultant categorisation specifies the degree of institutional requirements required for disclosure. The following guiding questions should be considered when determining the significance of risk:

- Intensity: How big will the impact be?
- Manageability: Can the risk be managed?
- Duration: How long will the risk be present?
- Reversibility: Can the situation be restored if/when negative impacts occur?

Table 4: Risk Categorisation

PROJECT RISK CATEGORY[4]	DEFINITION	GUIDANCE AND EXAMPLES	SUPPORTED BY CAMCO	REQUIRED ELEMENTS OF ESMS	CAMCO IMPACT TEAM
Category A (high risk) OR Category I1	Activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible or unprecedented. Activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible or unprecedented. OR When an intermediary's existing or proposed portfolio includes, or is expected to include, financial exposure to activities with potential significant adverse E&S risks and impacts that, individually or cumulatively, are diverse, irreversible or unprecedented.	• Including projects that: • have large geographic scale • involve large-scale infrastructure • are located in valuable ecosystems, natural and/or critical habitats defined in IFC PS 6 (paragraphs 13-19) • entail adverse impacts to the rights, resources and lands of Indigenous peoples and trigger FPIC requirements defined in IFC PS 7 (paragraphs 13-17);	No	ESIA and PPP carried out by independent expert (IFC PS 1-8). Proof of organisational capacity and competency, including Senior Management. Policy in line with IFC PS 1-8. Full ESMS covering all relevant management plans (incl. monitoring).	Project ineligible, therefore terminated.
Category B+ (medium risk)	Activities with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures.	Risks and impacts are considered limited, and the magnitude is expected to be low to moderate. The risks and impacts are few in number, contained within the footprint of the activities, largely reversible, and readily mitigated through generally accepted relevant mitigation measures and good international industry practices. Typically, for example, small and medium-scale low emission power.	Yes	ESIA or PPP done by independent expert (IFC PS 1-8). Proof of organisational capacity and competency, including Senior Management. Policy in line with IFC PS 1-8. Full ESMS covering all relevant management plans (including monitoring).	Third-party ES due diligence (DD) required with site visit at DD stage. Camco impact staff or external consultant to undertake site visit during construction. Continual support to be provided throughout approval process, after agreement has been signed, and throughout funding agreement
Category B (medium low risk)	Activities with potential limited adverse E&S risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed	Risks and impacts are considered limited, and the magnitude is expected to be low to moderate. The risks and impacts are few in number, contained within	Yes	ESIA done by an independent expert (IFC PS 1-8).	Third-party ES DD required with site visit at DD stage. Continual support to be provided

OR Category I2	through mitigation measures. OR When an intermediary's existing or proposed portfolio includes, or is expected to include, substantial financial exposure to activities with with potential limited adverse E&S risks and impacts that are few, generally site-specific, largely reversible, and readily addressed through mitigation measures. Also includes no activities with potential significant adverse E&S risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented.	the footprint of the activities, largely reversible, and readily mitigated through generally accepted relevant mitigation measures and good international industry practices. Typically, for example, small and medium-scale low and activities to improve energy efficiency of industry.		Proof of organisational capacity and competency including Senior Management, E&S Manager and Community Liaison Officer (CLO). Policy in line with IFC PS 1-8. Full ESMS covering all relevant management plans (incl. monitoring).	throughout approval process, after agreement has been signed, and throughout funding agreement.
Category C (low risk) OR Category I3	Activities with minimal or no adverse environmental or social risks and/or impacts. OR When an intermediary's existing or proposed portfolio includes financial exposure to activities that predominantly have minimal or negligible adverse E&S impacts.	Small-scale projects undertaken within an already built environment with minimal additional footprint (<50m2) and negative screening for PS 5 -8.	Yes	Simplified assessment of impacts (screening). Staff members qualified to categorise activities by risks. Appointment of E&S Manager. ESMS simplified but should consider waste management (IFC PS 3) and OHS (IFC PS 2).	Impact staff to inform key risks to be identified during site visit at DD stage. Continual support to be provided throughout approval process, after agreement has been signed, and throughout funding agreement.

Please fill in Section 1.3 of the ESMS Workbook based on the guidance provided above. Refer to Section 1.3.1. for an ESIA terms of reference template.

[4] Guidance modified from Green Climate Fund: Guidance on risk categorisation (2019)

1.4. ESMS – Organisational Capacity and Competency

Developers should establish and maintain an organisational structure with a responsibility matrix that defines roles, responsibilities and authority to implement the ESMS and designates specific personnel with sufficient skills, knowledge and resources.

An ESMS is, of course, not just about documented policies and procedures. It is about the effective implementation and updating of the ESMS to reflect the true operation of the business and/or project. This does not mean that ESMS implementation should become a full-time job for Category C projects; rather, the newly identified responsibilities should be incorporated into relevant job descriptions with proven competency and capacity and E&S performance should be evaluated based on the consistent implementation of assigned duties as defined in procedures. However, for Category B projects, an E&S Manager (contracted to the investee company), Health, Safety and Environment (HSE) Manager (contracted to either the investee or EPC company) and Community Liaison Officer (contracted to the investee company), are necessary to ensure implementation of the ESMS is consistent and fully complies with the final ESMS approved by Camco.

The developer must designate a position within the company that will oversee the management and mitigation of each E&S risk. For all projects above 1MW it is requested that an Environmental, Health and Safety Manager is on site during construction and early operation.

For mini-grids and SHS projects with a total capacity of below 1MW and occupying <50m^2 within an already built environment, we suggest that the developer appoints a Health and Safety (HS) Manager, whose responsibilities are to implement the ESMS and to ensure that the company enforces its E&S policies. The HS Manager is required to receive training on IFC PS and E&S impacts. The ESMS should align fully with the ESMS toolkit in addressing adherence to the international best practice standards applied.

Use organisational diagrams to better understand the reporting lines and designation of responsibilities in each role or design a responsibility matrix to define roles. Think about these questions to help you:

- Who does what and when, and how will it be recorded?
- What are the different levels of engagement with the ESMS (e.g., senior management, ESMS team, HR, workers and managers, procurement, etc.) and their relative training needs?
- Have you ensured that the roles and responsibilities are clear for monitoring and reporting of key performance indicators and core E&S parameters.?
- Consider also whether it is necessary to establish a Health and Safety Committee during stakeholder engagement, which includes workers representatives, as well as a Community Committee to discuss urgent matters that arise during the construction and operational phases of the project with members of the public?

Use the responsibility matrix below to identify roles and responsibilities suitable for your organisation.

Table 5: Example of a responsibility matrix

PERSON RESPONSIBLE	E&S POLICY	RISK MANAGEMENT	TRAINING & AWARENESS	OPERATIONAL CONTROL	EMERGENCY PLANNING	MONITOR-ING, REPORTING	INCIDENT MANAGE-MENT	STAKE-HOLDER ENGAGE-MENT & COMMUNI-CATION
[title/position]	[specify role]	[specify role]	[specify role]	[specify role]	[specify role]	[specify role]	[specify role]	[specify role]
e.g., EHS Manager	e.g., Person Responsi-ble	e.g., Person Responsible, together with PM	e.g., Person Responsible, together with PM	e.g., Support COO & PM	e.g., Person Responsible	e.g., Person Responsible	e.g., Support COO & PM	e.g., Support CLO & monitor
e.g., COO	e.g., Support EHS	e.g., Support EHS	e.g., Support EHS	e.g., Person Responsible	e.g., Person Responsible	n/a	e.g., Person Responsibl e	e.g., Support CLO & QA
e.g., Project Manager (PM)		e.g., Person Responsible, together with EHS	e.g., Person Responsible, together with EHS	e.g., Person Responsible	e.g., Person Responsible	e.g., Support EHS	e.g., Person Responsibl e	e.g., Support & inform CLO
e.g., Community Liaison Officer (CLO)	e.g., Support EHS	e.g., Support EHS	e.g., Support EHS	n/a	e.g., Support EHS	e.g., Support EHS	n/a	e.g., Person Responsible
[title/position]	[specify role]	[specify role]	[specify role]	[specify role]	[specify role]	[specify role]	[specify role]	[specify role]

Ensure relevant training to raise awareness, gain commitment and teach people the knowledge and skills they need to implement and deliver the ESMS. Communication is key for successful implementation!

Please fill in Section 1.4 of the ESMS Workbook based on the guidance provided above.

1.5. ESMS – Management Programmes

> Developers should establish E&S action plans and standard operating procedures, defining the desired outcomes and mitigative actions to address the identified risks. The plans and procedures should include elements such as performance indicators, targets or acceptance criteria that can be tracked, as well as estimates of necessary resources and responsibilities for implementation.
>
> As part of the ESMS, the developer should establish and implement a management programme based on E&S management and monitoring plans, which will assist you in addressing the risks identified above in Section 1.3.

Key questions to think about, when establishing action plans/management programmes:[5]

- What are the E&S risks you want to address?

[5] IFC's ESMS Implementation Handbook (2015)

- How are related actions and procedures to be implemented to address the risk?
- Why have the actions and procedures been specified (objectives), and what are the expected results (targets)?
- When will the programme be implemented and what are the deadlines for each action? Take into consideration external regulatory bodies for permits or authorisation and timelines.
- What is the monitoring frequency of each action to ensure complete implementation?
- Who are the responsible people?

Ensure relevant training needs are covered for each Management Plan. Training logs should entail:

- Subject/scope
- Roles and responsibilities
- Who is to be trained (e.g., existing employees, new employees (temporary, part-time, probationary, interns, contracted, etc.), sub-contractors, suppliers, service providers, etc.)
- Record keeping methods and archiving.

Please fill in Section 1.5 of the ESMS Workbook based on the guidance provided above.

1.6. ESMS – Emergency Preparedness and Response

> Developers should establish and maintain an Emergency Preparedness and Response Plan, including identification of areas where accidents and emergency situations could occur and the communities and individuals that may be impacted. The plan should cover response measures, provision of equipment and resources, training, reviews, drills etc. in a manner appropriate to prevent and mitigate any harm to people and/or the planet.
>
> The Emergency Preparedness and Response Plan should be specifically relevant to your responses to labour and working conditions (see Section 2) and community health, safety and security (see Section 4).

An Emergency Preparedness and Response Plan should include:[6]

- Identification of potential emergencies based on hazard assessments. Examples of potential emergencies include:
    - Fires
    - Electrocution
    - Traffic incidents
    - Landslides/mudslides
    - Hazardous spills
    - Medical emergencies
    - Events leading to fatalities or severe medical conditions.
- Emergency response procedures to respond to the identified emergency situations with staff and community. Each emergency to be categorised by threat level per site area.
- Procedures to shut down high-powered equipment.

[6] IFC's ESMS Implementation Handbook (2015)

- Locations of alarms and fire extinguishers, as well list schedules of maintenance, inspection and testing of emergency and first aid equipment.
- A list of emergency contacts and location of emergency response equipment (firefighting, electrocution, spill response, first aid kits, personal protection equipment for emergency response teams, ambulance services, nearest medical clinic, police and other armed forces for support, etc.). The list of emergency contacts to be reviewed periodically and posted in a conspicuous area.
- Protocols for the use of the emergency equipment and facilities.
- Clear identification, markings, signage and procedures for each section of the site of evacuation routes and meeting points need to be marked throughout the site.
- Schedule of trainings, including with local emergency response services (fire fighters).
- Procedures and refresher courses of emergency drills for staff to be trained on consistently throughout the year.
- Procedures to be provided at induction of a visitor or new personnel as soon as they are introduced to the site.
- Procedures for periodic review and update of emergency response plans.
- Training requirements for all levels of staff in the following needs to be maintained throughout the year:
    - Individual roles and responsibilities
    - Threats, hazards and protective actions
    - Notification, warning and communication procedures
    - Means for locating colleagues in an emergency
    - Emergency response procedures
    - Evacuation, shelter and accountability procedures
    - Location and use of common emergency equipment, and
    - Emergency shutdown procedures.

Depending on the location of your project, it might also be necessary to consider appropriate response plans for the following:

- Severe weather, such as storms and flooding
- Local and regional fires
- Earthquakes and associated tsunamis
- Volcanic eruptions, and
- Political escalations that could lead to civil unrest or terrorism.

Mini-grid and SHS developers need to consider the necessary steps for ensuring the safe use of SHS and other electric equipment by both staff and customers and reducing operational hazards. This includes developing procedures and training materials that respond to identified emergency situations, such as fires, electric shock, exposure to chemicals released by batteries (if applicable) and other situations that require first aid to staff and/or customers.

Please fill in Section 1.6 of the ESMS Workbook based on the guidance provided above. Please note that templates for the training attendance registers and records for incidents/near misses/accidents and fatalities can be found in the ESMS Workbook. Implementation and training on how these are completed will be required by the investee during the monitoring and review stage of the investment.

Suggested further reading

Sample Fire Response Procedure in IFC's ESMS Toolkit (p38)
World Bank Group's Environmental, Health and Safety Guidelines for further guidance on hazard identification

1.7. ESMS – Stakeholder Engagement Plan (SEP)

Stakeholder engagement is a valuable tool for mitigating risks, managing expectations, andestablishing broad community support. It should be appropriate to the nature and scale of the project, as well as being tailored to it and executed in a systematic manner throughout the project lifecycle. Specific focus should be given to facilitate and encourage the participation of women, ethnic minorities, and other vulnerable groups.

As an investee of a Camco-managed platform or fund, you must establish and implement a SEP (including Grievance Redress Mechanisms), based on a standard process at the corporate level that is applied to every site, and which considers each site's characteristics. Stakeholder engagement should include activities that have already been carried out by the developer in initial project development prior to establishing a SEP, ideally based on documented evidence of such engagement.

Stakeholder engagement sessions are a platform to identify additional E&S impacts or risks during the ESIA stage, conduct awareness raising on the project's identified risks and impacts during construction and operation and outline the corrective actions and measures taken to address these risks. The SEP should identify the relevant personnel to whom issues should be raised to.

Ongoing stakeholder engagement processes should:

- Identify stakeholders, including people and communities that are, or are likely to be, affected by or have an interest in the project.
- Engage with stakeholders in an appropriate and timely manner that suits each stakeholder group (e.g., elders engaged in a public forum, women and girls engaged in a focused group discussion, landowners/users engaged through an established community committee, consumers engaged through surveys, etc.)
- Implement and maintain a procedure for external communications that includes methods to:
    - Receive and register communications (to be established in both English and the local language) from the public and offtakers
    - Communicate with all levels of stakeholders (to be established in both English and the local language) from consumers to community members to governmental regulatory bodies
    - Screen and assess the issues raised and determine how to address them
    - Provide, track, and document responses, if any, and
    - Adjust the management programme to reflect changes in the management of communication.
- Provide periodic reports to the affected communities that describe progress or updates with the implementation of the project action plans.

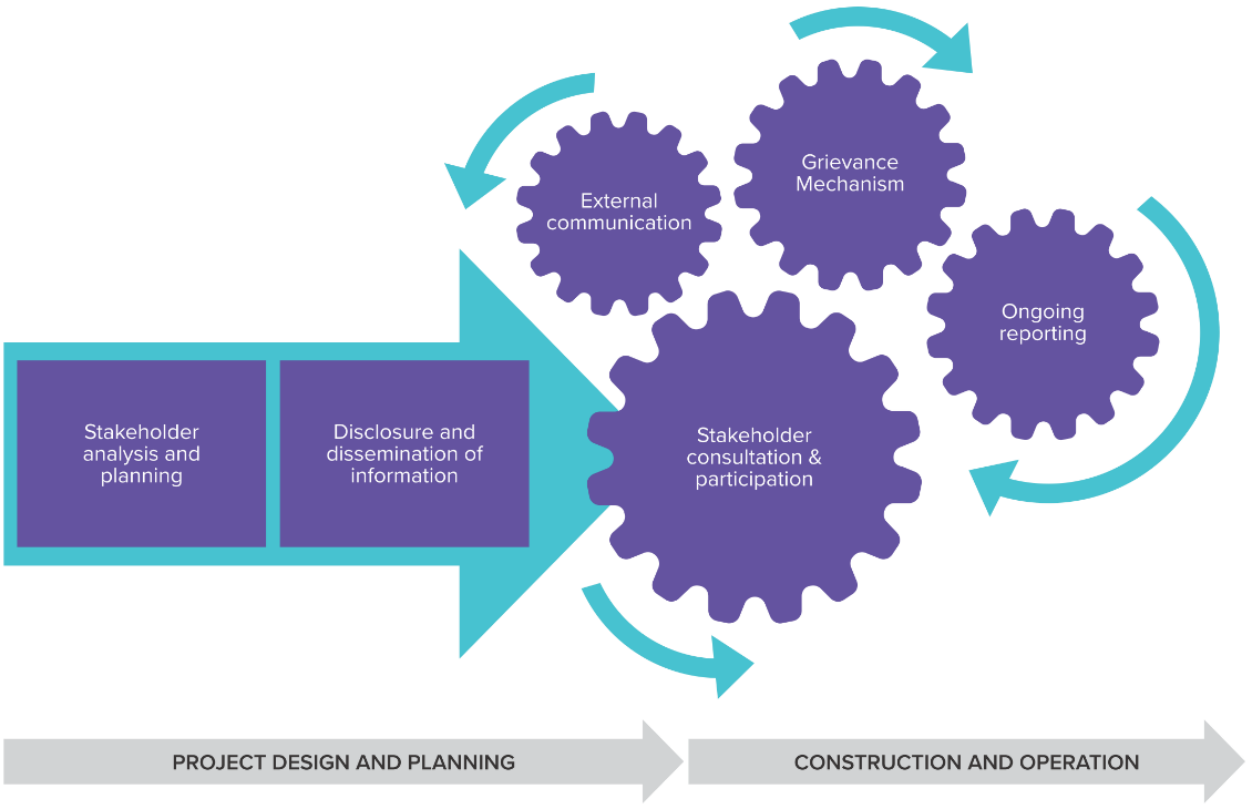


Figure 2: Elements of stakeholder consultation (adapted from IFC PS 1)

Good practice considerations:[7]

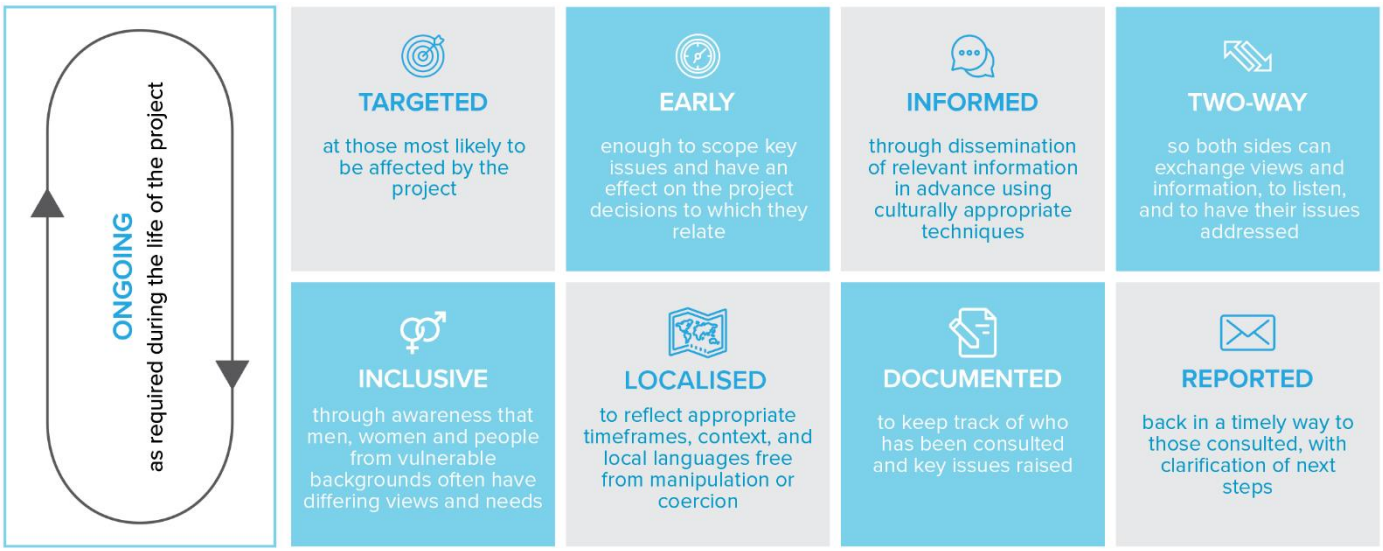


Figure 3: Basic principles of good practice for stakeholder consultation (adapted from: IFC 2007)

Be careful to manage expectations by clearly outlining potential opportunities for the community, if there are any, and/or restrictions to opportunities presented during stakeholder engagement. For example, job opportunities are often identified as a benefit to the community, in which case the project developer should clarify the exact number and type of local jobs and not raise expectations beyond what is likely to be available. Another example is the high

[7] IFC's Stakeholder Engagement: A Good Patrice Handbook for Companies Doing Business in Emergent Markets (2007)

likelihood of connection to electricity as a benefit to the community, in which case there is usually a high connection fee attached, which reduces the likelihood of households connecting to the project.

For customer-facing projects, such as mini-grids and SHS, stakeholder engagement is typically done on a smaller scale (e.g., door-to-door communication and engagement). However, to engage with the larger community in raising awareness, developers should pay specific attention to the considerations outlined below.

- Before a customer's house is connected:
    - Have customers been told about how to use electricity/the product in a safe manner in the household, the additional appliances required, and costs associated?
- Once the house is connected:
    - Has the customer been trained on the safe use of the SHS product or how to safely use electricity within the household?
    - Is the customer aware of the safety procedures and what they can touch, and which parts should not be interfered with?
    - Is the customer aware that adding any additional connections to the unit is potentially unsafe and could cause electrocution and/or fire?
    - Is the Grievance Redress Mechanism explained to the customer so that they know how to ask a question or complain if the system is defective or not performing to their expectations?

1.7.1. Stakeholder Identification and Analysis

Stakeholder engagement should be planned for and carried out in line with the principles of free, prior and informed engagement and participation (FPIC), which defines a practice of public consultation and participation that is:[8]

- Free from external manipulation, interference, or coercion, and intimidation
- Based on prior disclosure and dissemination of information
- Undertaken on an informed basis with information that is relevant, transparent, objective, meaningful and easily accessible in culturally appropriate local language(s), and using a format that is understandable to the affected individuals and communities
- Is responsive to the needs, rights and interests of both women and men. It may be necessary to establish separate forums and engagement processes to ensure this, and
- Includes targeted capacity building and/or other assistance as necessary to empower impacted individuals and communities to fully and effectively participate in engagement and consultation processes. This is particularly relevant to vulnerable and marginalised people.

Note: FPIC is a specific right for Indigenous peoples that is triggered by particular circumstance and defined project impacts. (see Section 7 for more)

[8] EIB's Environmental and Social Handbook. Standard No. 10 (2008)

Due consideration must be given to vulnerable populations, groups and individuals, described as those who are at a higher risk of being unable to anticipate, cope with, resist and/or recover from project-related risks and/or adverse impacts.

As per UN guidance, the following people are considered vulnerable: 1) women; 2) children; 3) refugees; 4) internally displaced persons; 5) stateless persons; 6) national minorities; 7) Indigenous peoples; 8) migrant workers; 9) disabled persons; 10) elderly persons; 11) HIV-positive persons, AIDS victims and victims of other contractable threatening diseases; 12) Roma/Sinti; and 13) any individual based on ethnicity, beliefs, identify, gender or sexual orientation.

Vulnerable groups will be identified in the ESIA, whereby a socio-economic baseline is established, taking into consideration the project context and its impact on their specific circumstances.

Table 6: Stakeholder categories

CATEGORY	EXAMPLE BODIES / GROUPS
Directly affected by the project	• Community members whose quality of life is affected (e.g., lose full or partial access to their immovable assets, cultivated lands, culturally significant areas, etc.) • Residents with land titles who have elected to relocate and not use the land for their own purpose • Community members who have lost access to pathways or routes to their property or culturally significant areas
Indirectly affected by the project	• Community members exposed to changes in the socio-economic environment • Surrounding or nearby communities and villages • Local traders, businesses and service providers • Neighbouring projects
Local stakeholders	• District regulatory bodies • Prefectures • Community or village heads • Nearby commercial enterprises, associations or regulatory entities (e.g., national parks, NGOs, mines, industrial areas, etc.)
National stakeholders	• National NGOs • Environmental regulatory bodies • Energy regulatory bodies • Health and safety regulatory bodies • Labour regulatory bodies
International stakeholders	• Donors • Investors

Good practice considerations:[9]

- Who will be adversely affected by potential E&S impacts in the project's area of influence?
- Who are the most vulnerable among the potentially impacted, and are special engagement efforts necessary?
- At which stage of project development will stakeholders be most affected (e.g., procurement, construction, operations, decommissioning)?
- What are the various interests of project stakeholders and what influence might this have on the project?
- How are women's perspectives integrated into decision-making?
- Which governmental and authority organisations would provide important considerations, including women's rights and perspectives, to the effects of the project?

[9] IFC's Stakeholder Engagement: A Good Patrice Handbook for Companies Doing Business in Emergent Markets (2007)

- Which stakeholders can best assist with the early scoping of issues and impacts?
- Who strongly supports or opposes the changes that the project will bring and why?
- Whose opposition could be detrimental to the success of the project?
- Who is it critical to engage with first, and why?

Please fill in Section 1.7.1 of the ESMS Workbook based on the guidance provided above.

1.7.2. Stakeholder Engagement Framework

A stakeholder engagement framework is intended as a blueprint that outlines a project's stakeholder engagement strategy and guides its roll-out.[10]

In cases where the exact location of the project is not known, but it is reasonably expected to have significant impacts on local communities, the project developer should prepare a Stakeholder Engagement Framework. This forms part of the company's management programme and outlines general principles and a strategy to identify affected communities and other relevant stakeholders, as well as plan for an engagement process compatible with this IFC PS that will be implemented once the physical location of the project is known.[11]

Good practice considerations:

- Describe the regulatory and/or promoter's requirements for consultation and disclosure; identifies and prioritises key stakeholder groups.
- Provide a strategy and suggested frequency of engagement for sharing information and consulting with each of the stakeholder groups identified.
- Describe personnel resources and responsibilities for implementing stakeholder engagement activities.
- Describe what information will be disclosed, in what formats, in what language (local and English) and the various methods by which information will be communicated to each stakeholder engagement group to ensure they are reached. Include safeguarded focused discussion group engagement, in which vulnerable people can voice their opinions without intimidation or hesitation.
- Differentiated measures of engagement will be used for effective participation with identified vulnerable or disadvantaged stakeholders. Describe measures to collaborate with NGOs and specialist associations and organisations to ensure support is available in providing medical, psychological, emotional and legal support to vulnerable and disadvantaged peoples.
- Describe cultivated methods for continual and effective FPIC and stakeholder engagement for all identified Indigenous peoples, which would form part of the Indigenous Peoples Plan.
- Identified gender-related risks within the community or socio-economic landscape that could potentially escalate will require a gender specialist to engage with the community and staff (i.e. to develop awareness raising initiatives, training materials and deliver capacity building on gender-sensitivity and a gender-responsive approach to stakeholder engagement) to comply and integrate with the mandatory Gender Action Plan established for each investee.
- Describe how stakeholder engagement activities will be incorporated into the project's ESMS.

[10] EIB's Environmental and Social Handbook. Standard No. 10 (2018)
[11] IFC's Performance Standards on Environmental and Social Sustainability. PS 1 (2012)

- Establish firm references and links to all methods of the operation's Grievance Redress Mechanism, emphasising confidentiality.

Keep details of the supporting documentation or records of all stakeholder engagements (e.g., meeting minutes, photos, attendance registers, signed agreements on major decisions from the community, records of concerns raised from community members).

Please fill in Section 1.7.2 of the ESMS Workbook based on the guidance provided above.

1.7.3. Information Disclosure and Dissemination

Project developers should through information disclosure and dissemination ensure that stakeholders have access to information early on in the E&S impact assessment process, and that they will continue to do so as it unfolds.[12]

Good practice for information disclosure and dissemination involves taking steps to increase transparency and accountability as a means of understanding your project and establishing public trust. Remember that a lack of information can lead to the spread of misinformation about a project that can be both damaging to a company's reputation and undermine efforts to engage in an informed dialogue with stakeholders. This is an area where perception matters. If companies are viewed as closed or secretive, consumer confidence and public trust can be affected.[13]

Good practice considerations:[14]

- Disclose information early.
- Disclose objective information on the project, its timelines and positive and negative impacts.
- Design disclosure to support the consultation process. Leave sufficient time between the provision of information about the realistic benefits and disadvantages of the project (or changes to project operations and their implications) and the start of consultations.
- Provide meaningful information in local language(s).
- Ensure easy accessibility of information.

Please fill in Section 1.7.3 of the ESMS Workbook based on the guidance provided above.

1.7.4. Stakeholder Consultation

Stakeholder consultation involves a constructive, two-way consultation relationship over the project timeframe with the key stakeholders.

[12] EIB's Environmental and Social Handbook. Standard No. 10. (2018)
[13] IFC's Stakeholder Engagement: A Good Patrice Handbook for Companies Doing Business in Emergent Markets (2007)
[14] IFC's Stakeholder Engagement: A Good Patrice Handbook for Companies Doing Business in Emergent Markets (2007)

Good practice considerations:

Note: Basic good practice principles for stakeholder consultation are illustrated in Figure 3 above.

Gender-inclusive consultation is needed to provide the full picture of stakeholder perspectives. Experience shows that men and women often have different priorities, different perspectives on key issues and may be differentially impacted by a project or programme – with women bearing disproportionate negative impacts. Good practice encourages seeking out the views of women to provide companies with a more complete picture of potential risks, impacts and opportunities relating to their project.[15]

See Camco's Diversity Toolkit for more information.

Documenting consultation activities and their outcomes is critical for the effective management of stakeholder engagement, and should cover the following issues:

- For projects with potentially significant adverse impacts on affected communities, the project company should conduct an in-depth informed consultation and participation (ICP) process. The ICP involves an exchange of views and information, and an organised and iterative consultation. The idea is that this then leads to the project company incorporating into their decision-making processes the views of the affected communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The ICP process should:
    - Capture both men's and women's views, if necessary through separate forums or engagements.
    - Reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms and benefits, where appropriate.
    - Record when and where the meetings took place.
    - Record who attended the meetings.
    - Record what topics and themes were discussed.
    - Provide details of the results of the consultations, including whether any commitments were made to stakeholders made during or as a result of them.
    - Keep minutes of all stakeholder meetings and distribute them to participants afterwards. In the case of formal meetings, the minutes should be signed by the relevant actor(s).
- For projects that involve physical and/or economic displacement, IFC PS 5 applies. Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood as a result of project-related land acquisition and/or restrictions on land use.

Questions and topics to discuss with the community

- What are people's feelings about the project?
- Clarify how many jobs will be created through the project (construction and implementation).
- Will the local community receive electricity? If so, to what extent will the project subsidise the electricity and at what price will any further connections be expected?
- What are the plans expected from the project in terms of contributing towards economic development and community development planning?
- Are there any sites that are used as part of or for cultural rituals within the project boundary and how is access to these ensured?
- Are some of the species of wildlife in the area considered rare, endangered or culturally or medically significant to the community?

[15] IFC's Stakeholder Engagement: A Good Patrice Handbook for Companies Doing Business in Emergent Markets (2007)

- Are there any people in the community that are considered/consider themselves as Indigenous peoples? Is project information or disclosures available in their local language? Is stakeholder engagement conducted in a culturally appropriate manner? Are there socio-economic divisions between the community and Indigenous peoples and or intergenerational issues to consider during engagement? Consider ways in which inclusivity can be strengthened between the community and Indigenous peoples, as well as ways in which inclusivity can be strengthened in provision of services to Indigenous peoples from regional and national governmental institutions. Also consider ways in which meaningful inclusivity and participation can be fostered amongst women and other marginalised groups.
- If the project is in a post-conflict area, ask if the community is aware of any landmine contamination, terrorist activity or civil unrest in the area.
- Does the community know who they need to speak to when a grievance occurs?

External communications

- Project developers should implement and maintain a procedure for external communications that includes methods to:
    - Receive and register external communications from the public (to allow the community an opportunity to interrogate any information released from the company or project)
    - Distribute project communications to the public (including dates and locations of any organised stakeholder meetings and or activities)
    - Screen and assess the issues raised and come to an agreed approach in how to address them
    - Provide draft corrective measures to the community/community committees to offer them the opportunity to challenge the suggested measures and propose more realistic, effective and appropriate measures
    - Provide a Monitoring Plan, monitor progress, and document responses and actions undertaken, if any, and
    - Adjust the management programme to reflect any revision of procedures, as appropriate.
- In addition, project companies are encouraged to make public periodic reports on their E&S sustainability and health and safety achievements.

Please fill in Section 1.7.4 of the ESMS Workbook based on the guidance provided above. The ESMS Workbook provides an example template for stakeholder engagement meeting minutes.

1.7.5. Project-specific Grievance Redress Mechanism for Affected Communities

A Grievance Redress Mechanism (GRM) is a formal complaint process that can be used by individuals and communities to raise any concerns about the project.

THE GRIEVANCE REDRESS MECHANISM SHOULD BE DESIGNED SO THAT IT IS:[16]
LEGITIMATE and trusted, and encourages dialogue and shared responsibility for outcomes
SCALED to the risks and potential adverse impacts of the project

[16] EIB's Environmental and Social Handbook. Standard No. 10 (2018)

PUBLICISED and ACCESSIBLE, appropriately tailored to all potentially affected persons and communities and other interested parties, irrespective of their literacy and administrative capacity
FREE of cost for the stakeholders
includes an ANONYMITY option, where feasible, and guarantees confidential handling of requests, if so requested by the complainant. Examples of this can be in the form of a box by the project office or community centre, or a dedicated call line
fair, TRANSPARENT and inclusive about the process and outcomes
RIGHTS-COMPATIBLE, meaning outcomes align with internationally recognised human rights practices
ADAPTIVE to the stakeholder's preferred communications channel and to accommodate improvements in the mechanism to suit the needs of stakeholders
guided and supported by engagement and DIALOGUE
a PREDICTABLE, defined process that includes assignment of responsibility, time limits and monitoring of outcomes, and
TIMELY, resolving concerns promptly. An example of this is having an easy-access online portal, complaint box or call centre whereby employees and community members can speak with the project's liaison officer or communications officer to lodge an anonymous concern or complaint. The method of how to lodge a complaint or concern should be publicised during the stakeholder engagement process. The Grievance Redress Mechanism must provide a step-by-step process on how each grievance is addressed in a transparent and impartial way.

In developing the project-level GRM, the following steps and considerations must be taken:

Step 1: The GRM must **describe** the process in how to:

- Receive and register external communications from the public
- Screen and assess issues raised and determine effective solutions
- Promptly respond to the grievance to confirm it has been received, and
- Conduct a trend analysis on grievances received to identify potential systemic issues in how the company and/or project operates that could potentially affect community approval.

Step 2: The GRM needs to be publicised at each stakeholder engagement event to ensure all stakeholders are aware of the mechanism and understand how to lodge a grievance, and to introduce key members of the project team and/or designated trusted member of the community who will be receiving and communicating updates on the grievance. Methods of communication of the GRM need to be consistent, in the local language and publicised in media releases, publications, posters and at every stakeholder engagement meeting.

Step 3: A variety of confidential and normal methods for lodging a grievance should be available and publicised to the community, project staff, affected groups, suppliers and service providers. Examples of different grievance submission methods include submission boxes at the project office, in-person discussions with the Community Liaison Officer (CLO)/HSE Manager (provided the designated individual has been sufficiently trained), electronic submissions and via a toll-free number or customer call centre. Confidential methods for submitting a grievance can be in-person meetings with the CLO/HSE Manager, or to the community village head or via a confidential online form.

Step 4: Each grievance should be thoroughly vetted for validation by the designated project grievance manager and /or an Indigenous peoples' specialist (should this be required). Once validated, the grievance can be investigated by the investee management team to determine the corrective measures and plan for implementation. The corrective actions and plan are then presented to the complainant to be agreed upon. No action can take place without agreement with the complainant. A stakeholder engagement meeting should be arranged to address

a corrective action that needs to address groups of stakeholders to ensure transparency and consistency of information provided to the community concerned.

Step 5: Progress on the complaint and implementation of the corrective action must be monitored by the grievance officer (investee management, CLO or HSE Manager) to ensure the grievance has indeed been resolved and no additional resentment is evident. It is usually helpful to provide a roadmap of the process demonstrating the levels of investigation and confidentiality that occurs behind each communication to the aggrieved on the grievance submitted. The effectiveness of the GRM should also be evaluated by the investee management team to correct or improve upon any gaps or issues in the system.

Step 6: Specific attention will need to be given to gender-based violence and harassment (GBVH) cases to ensure specific, targeted support is provided. The approach taken to GBVH cases needs to reflect and be respectful of cultural and traditional ways of the local community. The GRM should be integrated with the Gender Action Plan in planning and structuring GBVH prevention methods and support of victims. The structure should include identifying specific avenues of support in medical, psychological, emotional and mental support from local partner associations, organisations, NGOs and other GBVH aides. The GRM will provide the first step in providing a safe, confidential and child-friendly mechanism that can be relied upon to ensure safeguards are in place to protect witnesses and other members involved. It is imperative that GBVH training, in line with international best practice, is received by the person designated to receive or address the GBVH grievance.

The key point is for the integrity of the GRM to remain strong and just but be adaptable and flexible to accommodate cultural customs to effectively build a sense of safety for all aggrieved.

Please note that all incidents, accidents and fatalities must be reported within three (3) days of the occurrence.

Please fill in Section 1.7.5 of the ESMS Workbook based on the guidance provided above.

Suggested further reading

IFC's Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007)
IFC's ESMS Toolkit – General Version 1.2 (2015) - see Section 7 for an example of a grievance log

1.7.6. Violence and Harassment Management

The GRM must also accommodate grievances of violence and harassment within the workplace, defined as physical assault, emotional or verbal abuse, threatening behaviour, vandalism, sabotage, theft, arson, threat of murder or intimidation. Work-related abusive behaviour can also occur away from the workplace but result from a work-related matter.

The GRM should be structured to assure all levels of staff that reporting of such acts are confidential, support measures are in place and training to prevent such behaviour is available and accessible. It should also be emphasised across all company policy that there is zero tolerance for any exhibition of such behaviour.

The GRM should make clear that management will be proactive in managing this type of incident and in resolving any misunderstandings between team members. Management will also ensure all matters of conflict are followed up, personal boundaries are honoured and that the work relationship is monitored consistently throughout the year.

1.7.7. Gender-Based Violence and Harassment (GBVH) Integration

GBVH is an umbrella term for any harmful act that is perpetrated against a person's will. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion and other deprivations of liberty.

In operationalising GBHV prevention measures, a relationship between the investee company and its employees, part-time workers, probationary employees, service providers, suppliers, sub-contractors, contractor is cultivated to:

- Understand the company's GBHV risks (local and country context) and how the company integrates these into its risk management system. Senior management and executives should consider undertaking a gender risk assessment that identifies the legal implications and necessary administrative actions (e.g., providing accessible information by producing leaflets and websites and working on social media campaigns targeting youth and schools etc.) in addressing and operationalising prevention and response measures within the company. The GBHV risk prevention measures should also be integrated into the employee training and administrative system.
- Ensure senior management buy-in to address GBHV prevention across the company and develop a supportive organisational culture, which can be integrated by:
    - Identifying and rewarding workforce members that try to address GBHV and influence good practices amongst other members of the team, such as company reward schemes or company-wide recognition
    - Including gender-based violence awareness-raising into the role and responsibility of a key member within senior management
    - Tracking progress and improvement by including explicit communication and reporting on GBHV efforts completed within the company culture as part of annual reporting commitments, as well as establishing a board-level committee to provide oversight on GBHV, and
    - Emphasising the company's support for seeking justice in crimes of GBHV acts.
- Communicate consistently with members of staff and service providers and/or suppliers about GBHV prevention measures. This should be achieved using communication methods that are sensitive to cultural traditions and which define the behaviour expected of workers, subcontractors and suppliers. As such, different methods of communication should be considered when addressing the training needs of the workforce in alignment with company culture (e.g., during staff meetings, service provider/supplier meetings, stakeholder engagement meetings etc., or through newsletters, emails, posters, leaflets, company reward schemes, etc.).
- Identify and establish mutually beneficial partnerships with stakeholders that can provide GBHV support. Align and partner with organisations that have local and national knowledge/context on cultural traditions and which are best placed to provide expertise on key GBHV risks and guide risk management processes. Review and, where appropriate, revise company GBHV preventative measures regularly.
- Take steps to develop a positive and inclusive organisational structure by including more diverse leadership in teams. Such measures include:
    - Establishing mentorship training programmes to empower promising women into managerial/leadership positions within the organisation/company that could champion GBHV prevention measures.

- Establishing recruitment procedures (e.g., advertised job description, shortlisted candidate selection, candidate interview process, the process for selection of the eventual candidate) that are gender neutral, non-discriminatory and ensure equal opportunities throughout.
- Establishing a Diversity Action Plan and Policy that considers feedback from a diverse workforce and creating a dedicated diversity taskforce with team members for candidate recruitment and training. The development of a diversity taskforce creates transparency - as well as ownership and buy-in from the whole team - and can assist with ongoing efforts to strengthen workplace culture and employee engagement

- Allocate sufficient budget for prevention measures to encourage reporting and response measures. Key GBHV mitigation measures requiring investment for implementation include:

  - Independent/third-party review of company policies with a gender perspective
  - Innovative and aggressive communication of the GRM to marginalised groups, specifically vulnerable peoples (e.g., women, girls, Indigenous peoples, elderly, disabled, ethnic minorities, etc.)
  - Training sessions directed at men on how sexual abuse and harassment affects the community and company
  - Hiring a social and gender specialist at key stages in project development to advise on and implement a Gender Action Plan
  - Providing information on already available resources for GBHV support structures or organisations in the community, and
  - Hiring local expert organisations or consultants to design training that is bespoke to local cultural challenges.

A trusting relationship between the investee, staff members and the community in which they operate is imperative for operationalising the Grievance Redress Mechanism. As such, the GRM must be robust enough to ensure that:

- Any grievance submitted is treated with due importance and respect to ensure that targets of GBVH feel secure enough to reach out
- Personnel handling or receiving the grievance are trained in GBVH and SEAH mitigation measures, conflict resolution, location-specific cultural customs and how to effectively build a sense of safety with the aggrieved
- The aggrieved can reach out to designated members of the community or staff through various avenues, recognising that any individual can be a perpetrator of GBVH and any individual can be a target
- Referral systems with specialist associations, organisations and NGOs are established to ensure that external services for counselling, legal, medical, psychological, mental health and/or social support is accessible
- The mechanism is flexible to accommodate the wishes of the aggrieved assessing the grievance in either an informal or formal confidential manner. This includes investee companies understanding that the grievance may be withdrawn without explanation
- A timely outcome and resolution is sought and enacted to reduce further risk to the survivor or victim, as well as to build trust and confidence in the GRM system among community members and staff. Confidential record keeping and monitoring of timelines is imperative
- Regular and consistent communication on the status of the investigation must be provided to those involved, without breaching confidentiality. Communication should be limited to the process of the investigation, timelines and steps taken thus far
- The aggrieved are able to reserve the right to withdraw their complaint, particularly during a formal process. The investee company should continue to provide support to the aggrieved, allowing for them to return with any grievances, as well as ensuring they feel safe enough to return to a respectful working environment, and
- In the event that a grievance is upheld, that the agreed level of sanction and/or disciplinary measure is proportionate to the violation. This will help promote the message within the workforce that any GBHV

violation will not be tolerated and give members of the community and staff the confidence to raise a grievance.

Confidence in the GRM can be measured by:

- Regularly reporting on resolved grievances (without identifying individuals)
- Consistent communication of the mechanism and how to fully engage with and access it, and collecting feedback from those involved in operationalising the mechanism.

Training

Investees must ensure that the persons in charge of the Grievance Redress Mechanism have undergone adequate training on how to handle community health, safety and security issues, including conflict management and emergency responses. Investees should also ensure community members are aware of the methods used to submit a grievance through the Grievance Redress Mechanism.

Investee staff should undertake safeguarding induction training once onboarded and refresher training to continually raise awareness on safeguarding measures. The following subject areas should be allocated training for all personnel involved in receiving, investigating, deliberating on and reporting of a grievance:

- Gender equality, gender sensitivity and gender-responsive approach
- Safeguarding measures and conflict resolution
- Awareness of respectful methods of understanding cultural customs and traditions
- Impartial investigation skills. and
- SEAH risks and awareness, exploring the following avenues:
    - Sexual exploitation or abuse
    - Physical, emotional or psychological abuse
    - Exchanging money, employment, goods or services for sexual activity
    - Engaging in any sexual relationships with beneficiaries of assistance, and engaging with sex workers.

1.8. ESMS – Monitoring and Review

> Project developers need to establish procedures to monitor and measure the effectiveness of their management programme as well as compliance with any related legal and/or contractual obligations and regulatory requirements. This involves using dynamic mechanisms to compare performance against desired outcomes or benchmarks, and performance reviews to adjust operations to improve the effectiveness of the ESMS over time. You should document monitoring results and identify and reflect on the necessary corrective and preventive actions in the amended management programme and plans.

Good practice considerations:[17]

- Disclose information early.
- What E&S parameters will you monitor to determine your success? (This can be derived from the impacts, indicators and mitigative measures specified in the ESIA.)
- How frequently will you collect samples?

[17] IFC's ESMS Toolkit General (2015)

- What methods, tools, and equipment will you use to collect and analyse samples?
- What standards or benchmarks will you use to establish acceptable values?
- Who will be responsible for collecting, analysing and acting upon the data?
- What records will you maintain and review?

Means of monitoring:[18]

- Visual observation - i.e. physical walk-throughs of the facility and surrounding land.
- Interviews - i.e. consultations with workers, managers, community members and external stakeholders.
- Measuring and testing using equipment that is properly calibrated (e.g., energy consumption, emissions to air, effluents, noise decibel levels, dust levels, ambient temperature, light levels).
- Document review - i.e. looking through documents and records. Examples include water and energy bills, waste disposal records, chemical use and discharge records, complaints logs, training records.

Requirements of Camco-managed platforms and funds

The Monitoring Plan is typically provided in Excel form and should contain the following:

- Potential direct impact (against IFC Performance Standards)
- Proposed mitigation measures
- Parameters to be monitored (i.e. how mitigation measures are to be monitored)
- Measurement unit
- Measurement range/target level
- Source of data
- Timings (construction/operation)
- Frequency of monitoring (continuous/daily/weekly/monthly)
- Frequency of reporting (weekly/monthly/annually)
- Location where recorded (document name and location)
- Corrective action, where parameter over/under indicated range
- Quality assurance and/or supporting document
- Name of responsible person, and
- Approximate cost.

In addition to the parameters defined based on the results of the ESIA, the following parameters should also be included in the Monitoring Plan:

- Installed capacity of the plant
- Operational capacity of the plant
- Amount of electricity generated
- Amount of electricity sold
- Number of sales/customers
- Number of people (active connections) with improved access to clean energy (disaggregated by gender) and location
- Number of connections
- Number of jobs generated disaggregated by gender, locality, stage (construction/operation) and level (low skilled/high skilled)
- Fossil fuel consumption (on-site generation, plus transport for biomass projects)
- (Staff and community) grievances raised and addressed
- Emergency drills conducted

[18] EIB's Environmental and Social Handbook. Standard No. 10 (2018)

- Occupational health and safety incidents
- Number of employees trained
- Training events run
- Number of fatalities, and
- Number of stakeholder engagement meetings.

If the project improves energy access for a school, clinic/hospital and/or waterworks/water-pumping station then this should be separately accommodated in the Monitoring Plan to assess positive impact.

TIP: A Monitoring Plan template is provided in the ESMS Workbook.

Please fill in Section 1.8 of the ESMS Workbook based on the guidance provided above.

2. IFC Performance Standard 2

Labour and Working Conditions, and the Occupational Health and Safety Plan

2.1. Working Conditions and Management of Worker Relationships

Developers should adopt and implement human resourcing policies and procedures to ensure reasonable working conditions in alignment with national laws and regulations and laws governing the corporate level. You should also make employment decisions, provide for professional development and implement any retrenchment plans based on non-discrimination and equal opportunities. Gender and ethnic inclusion balance should be promoted at management level and across the company.

This performance standard applies in conjunction with the Emergency Preparedness and Response Plan (see Section 1.6) and the Grievance Redress Mechanism (see Sections 1.7.5, 1.7.6 and 1.7.7)

Principles, policy and general guidance of the Occupational Health and Safety Plan can be established at the corporate level. However, each project will have its unique impacts that should be considered at the project level.

Project developers should have in place and enforce a corporate-wide staff policy, stating:

- Fair treatment, gender-equality, non-discrimination and equal opportunity, which is to be applied across recruitment, hiring, compensation, working conditions and terms of employment, access to training, job assignment, allocation of accommodation, promotion, termination, retirement and disciplinary principles
- Zero tolerance for acts of violence, discriminatory, abusive, threatening and sexual abuse and harassment (SEAH) behaviour
- Good worker–management relationships
- Compliance with national employment and labour laws and international best practice
- Protection for workers, in particular those in vulnerable categories
- The promotion of safety, health and hygiene needs of women at work
- The company's commitment to closing the gender gap
- The company's commitment to a living wage, defined as remuneration that meets basic needs and provides some discretionary income. The company will adhere to ILO Declaration on Fundamental Principles and Rights at Work, ILO Basic Terms and Conditions of Employment and International Bill of Human Rights in upholding the international poverty line and maintaining a living wage across all staff (inclusive of subcontractors, service providers and contractors). In some countries, minimum wage is exceptionally low and revised rarely. In the absence of strong national labour policy, companies should ensure workers are paid a proper living wage. For further guidance visit Global Living Wage Coalition's website.
- The Grievance Redress Mechanism for all levels of employees, subcontractors, suppliers, service providers and contractors
- The company's commitment to fair retrenchment practices to complement the transparent Grievance Redress Mechanism
- The company's commitment to access to the Camco Whistleblowing Policy, allowing for anonymous reporting of human rights violations and without reproachment, and
- The company's commitment to avoiding the use of forced labour and child labour. For definitions of forced and child labour, see Section 2.3 below.

Please fill in Section 2.1 of the ESMS Workbook based on the guidance provided above.

2.2. Occupational Health and Safety

> Your company should have in place appropriate labour and health and safety policies and processes, as well as the resources for their enforcement to protect the health and safety of workers. Establish an Occupational Health and Safety Plan, which supports the provision of a safe and healthy working environment. This includes identifying potential hazards and providing preventative and protective measures, training, and the documentation and reporting of occupational accidents, diseases and incidents, as well as arrangements for emergency prevention, preparedness and response.

For PPE below: please check Personal Protection Equipment Poster & Website.

Good practice considerations:[19,20]

- Identify hazards to workers and the community's health and safety, such as:
    - Heavy, moving and rotating equipment or vehicles
    - Electrical equipment usage
    - Traffic movements and obstructed pathways or unmarked areas
    - Falling objects
    - Loud noise
    - Exposed or faulty electrical devices
    - Welding/hot work
    - Eye hazards
    - Working at height
    - Working in remote locations
    - Corrosive, oxidising, hazardous and reactive chemicalsexposure to fire
- Define preventive and protective measures, including modification, substitution or elimination of hazardous conditions or substances, in standard operating procedures. This covers:
    - Eliminating the hazard by removing the activity from the work process
    - Controlling the hazard at its source, if possible
    - Minimising the hazard through the design of safe work systems and administrative or institutional control measures, such as job rotation, training in safe work procedures, limiting exposure or work duration, etc. In addition, be sure to install warning signs on all hazardous electrical equipment or hazardous sites, fences, power poles, etc., and ensure lightning protection and earthing is installed on all required electrical equipment
    - Providing appropriate personal protective equipment (PPE) in conjunction with training, us, and maintenance of the PPE
    - Ensuring maintenance and service for vehicle fleets, equipment, lifting operations and heavy machinery, and
    - Providing appropriate equipment to assist with manual work (i.e. heavy lifting).
- Provide training for workers, including security personnel, in the following topics:
    - Emergency preparedness procedures
    - First aid

[19] IFC's Performance Standards on Environmental and Social Sustainability. PS 2. (2012) and World Bank Group's Environmental, Health and Safety Guidelines (2007)
[20] World Bank Group's Environmental, Health and Safety Guidelines. Occupational Health and Safety Guidance (2007)

- Fire fighting
- Fall prevention and protection methods
- Use of equipment for intended use (controls for electrical installations, driving permits, licenses to operate, load restrictions, etc.)
- Toolbox training
- Hygiene measures
- Handling and storage of hazardous substances, and
- HIV/AIDS and other STI awareness.

- Ensure documentation and reporting of all occupational accidents, diseases and incidents, as well as training events. An example format is provided in the ESMS Workbook.
- Establish a health and safety committee with representatives from the labour force to engage and monitor OHS issues.
- Put in place emergency prevention, preparedness and response arrangements, as well as a Communication Plan to ensure all emergency procedures are well known throughout the site.
- Describe the site's facilities, workers welfare (including availability of drinking water) and sanitation provisions.
- Describe appropriate PPE at site and for different tasks (e.g., requirements for eye protection when welding, ear mufflers when drilling, helmets around the construction site, masks when sanding, gloves when handling equipment or lifting, etc.).
- Promote HIV/AIDS and sexual assault awareness to help protect employees as well as people in the community where the project takes place. Projects with migrant construction labour and construction camps should provide training, potentially in partnership with local NGOs or health care organisations. Smaller projects, such as mini-grids, might address the issues using informative poster directed to both employees and community.

Please fill in Section 2.2 of the ESMS Workbook based on the guidance provided above.

TIP: An incident/accident report and a training record form are provided in the ESMS Workbook.

Suggested further reading

Global Living Wage Coalition's What is a living wage?
World Bank Group's environmental, health, and safety guidelines for:
Occupational health and safety
Geothermal power generation
Wind energy
World Bank Group's Good Practice Note: Environmental, Health, and Safety Approaches for Hydropower Projects
ILO's Using the ILO Code of Practice on HIV/AIDS and the world of work

2.3. Protecting the Occupational Health and Safety of Workers Engaged by Third Parties and in the Supply Chain

Project developers should take reasonable efforts to ascertain that third parties who engage their workers are reputable and legitimate enterprises with an appropriate ESMS. Establish policies and procedures for managing and monitoring the performance of such third-party employers, including EPC contractors.

Where there is a high risk of child/forced labour in the primary supply chain, identify those risks, take appropriate steps to remedy them in developing a supply chain assessment, and monitor on an ongoing basis. Mined minerals known to have a high risk of child labour are cobalt and lithium, both present in batteries.

Certain minerals, such as cobalt, wolframite, nickel, bauxite and lithium, are considered "conflict minerals", if mined from conflict-affected and high-risk areas. According to OECD, special due diligence should be given to minerals mined from Angola, Burundi, Central African Republic, Democratic Republic of the Congo (DRC), Malawi, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

Conflict-affected and high-risk areas include places that are in a state of armed conflict, a state of fragile post-conflict, or are witnessing weak or non-existent governance and security, such as failed states. It is common in these areas for there to be widespread and systematic violations of international law, including human rights.[21]

Child Labour:

In accordance with ILO's convention concerning minimum age for admission to employment and its recommendations to ensure the avoidance of child labour, the minimum age for work should not be below the age for finishing compulsory schooling and in any case not less than 14. Children between the ages of 13 and 14 years old may do light work, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training. Any hazardous work which is likely to jeopardise children's physical, mental or moral health and safety should not be done by anyone under the age of 18.

Forced Labour:

Defined by ILO's Forced Labour Convention as "all work or services which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily". Project developers should never employ forced labour.

Suggested further reading

ILO's Combating Forced Labour: A handbook for Employers and Business
ILO's Indicators of Forced Labour

[21] Regulation (EU) 2017/821 of the European Parliament and of the Council on non-binding guidelines for the identification of conflict-affected and high-risk areas and other supply chain risks

2.3.1. Labour Policy

Labour rights apply to all levels of staff members (inclusive of interns, part-time employees, probationary employees, sub-contractors, service providers and suppliers). Investees must acknowledge the national guidelines for labour rights as well as the guidance provided in this toolkit and set out a **Human Resources Policy, Employment Plan, Employee Handbook** and/or **Labour Policy**. Investees must ensure that these policies address the following:

- Minimum age of employment and that all employees are employed voluntarily.
- Rights applicable to collective agreements.
- Rights related to working hours, wages overtime, compensation and benefits, prevention of harassment, intimidation and/or exploitation.
- Allocation of accommodation to employees, where relevant, based on non-discriminatory and equal opportunity principles.
- Equal opportunity and fair treatment with regards to employment relationships within the company. This approach is to be applied across recruitment, hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination, retirement and disciplinary practices.
- Retrenchment practices to transparently follow grievance records and disciplinary actions taken. A Grievance Redress Mechanism must be in place to ensure all employees (inclusive of interns, part-time employees, local employees, sub-contractors, service providers and suppliers) are able to raise a workplace concern in a transparent or confidential manner, with timely feedback from management.

Camco has a whistleblowing policy in place to provide employees of investees with an avenue to report a human rights violation anonymously and without fear of reproachment.

2.3.2. Sexual Exploitation, Abuse and Harassment (SEAH)

SEAH refers to sexual exploitation, abuse and sexual harassment that occurs within a working environment, including a programme setting or during work travel. SEAH within the workplace is a key issue that needs to be addressed in a sensitive and effective manner.

A SEAH risk assessment should be undertaken by all investees as part of the ESIA process, taking into account the host country's and project area's cultural, traditional and regulatory controls in place. It should be reviewed regularly to ensure situational circumstances are integrated into the assessment and updated.

Investees should compile a SEAH risk assessment at the beginning of the project to better understand the wider context in which SEAH risks might arise, as well as ensure the findings can be used to inform the project design, implementation, monitoring and evaluation.

Investees must ensure continuous awareness raising and capacity building on SEAH risks and how to address them is conducted with the staff (inclusive of interns, part-time employees, probationary employees, sub-contractors, service providers and suppliers). Investees should advertise the methods by which a grievance can be submitted, especially how to submit a grievance confidentially.

The assessment should:

- Include the perspectives of communities and a wide range of stakeholders affected by the project without putting them at risk
- Include perspectives from local project implementers, beneficiaries and/or civil societies
- Be carried out as part of a broader project design needs assessment, where appropriate

- Be structured to evaluate the sources and dynamics of exploitation or violence in a given context, taking into account different experiences of girls, women, boys, men and non-binary people
- Evaluate how different forms of diversity intersect with gender (e.g., ethnicity, religion, disability, age, etc.)
- Analyse the gender dimensions of key thematic issue areas needed to achieve sustainable conflict resolution, and
- Formulate strategic actionable recommendations to support women's participation, protection and rights (refer to prevention strategies below).

The assessment should also answer the following questions:

- What is the context and history of SEAH risks in the country/region?
- What political, economic, social, cultural and environmental actors, institutions and structures have shaped the SEAH risks?
- How are women, men, girls, boys, non-binary people and the most marginalised and vulnerable impacted differently by this context?
- Are there harmful gender norms that fuel conflict, exclusion and violence?
- How has the SEAH risks influenced gender norms?

All staff and representatives are responsible for preventing and responding to SEAH, and awareness of SEAH as a risk should be built into the organisational culture. Provisions to prevent SEAH must be Included in the Code of Conduct for project staff and for contracted workers in line with relevant international standards and national legislation. SEAH measures that focus on organisation-wide prevention and response include:

- Developing and maintaining relevant policies and procedures
- SEAH risk assessment and management
- Safe recruitment and regular staff training
- Awareness building within the organisation on understanding the challenges of SEAH, and
- Building an organisational culture that understands and challenges gender inequality, race inequality and other diversity and inequality issues.

All investees should develop a Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy and a Code of Conduct that is guided by the Camco Safeguarding Policy in projects that demonstrate a high probability of SEAH risks occurring within the community and district.

2.3.3. Code of Conduct

Investees must create a Code of Conduct that contains obligations placed on all project workers (including sub-contractors) suitable for addressing the issues laid out below, as a minimum. Additional obligations may be added to respond to particular concerns based on the project location and/or sector or to specific project requirements.

The Code of Conduct must comply with all applicable laws, rules and regulations of the jurisdiction. It must also comply with applicable health and safety requirements, including wearing prescribed personal protective equipment (PPE), preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment.

Issues and themes to be addressed in the Code of Conduct:

- The use of illegal substances.
- Conducting business activities and themselves with integrity, and not engaging in any or all forms of corruption in accordance with ethical standards.

- Non-discrimination (e.g., on the basis of family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability or political conviction).
- Interactions with community members (e.g., to convey an attitude of respect and non-discrimination).
- Sexual harassment (e.g., to prohibit use of language or behaviour, particularly towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning and/or culturally inappropriate) Violence or exploitation (e.g., the prohibition of the exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour).
- Protection of children (including prohibitions against abuse, defilement or otherwise unacceptable behaviour towards children, limiting interactions with children and ensuring their safety in project areas).
- Sanitation requirements (e.g., to ensure workers use specified sanitary facilities provided by their employer and not open areas).
- Avoidance of conflicts of interest (e.g., where benefits, contracts, employment or any sort of preferential treatment or favours are provided to a person with whom there is a financial, family or personal connection).
- Respecting reasonable work instructions (including regarding E&S norms).
- Protection and proper use of property (e.g., to prohibit theft, carelessness or waste).
- Workers are prohibited under any circumstances from engaging in any disturbance of wildlife or bushmeat hunting during the entire duration of their employment/engagement with the project.
- Duty to report violations of the Code.
- No retaliation against workers who report violations of the Code, if that report is made in good faith.

The Code of Conduct must be written in plain language and signed by each worker to indicate that they have:

- Received a copy of the code
- Had the code explained to them
- Acknowledged that adherence to the code is a condition of their employment, and
- Understood that violations of the code can result in serious consequences, up to and including dismissal and/or referral to legal authorities.

Investees must conduct awareness-raising and training activities to ensure that workers abide by the Code of Conduct (e.g., through toolbox talks). The investee will also ensure that local project-affected local communities are aware of the Code of Conduct and enable them to report any concerns or non-compliance.

2.3.4. Retrenchment Management

According to IFC, retrenchment refers to the elimination of a number of work positions or the dismissal or layoff of a number of workers by an employer, generally by due to plant closure or for cost savings. It is often a consequence of adverse economic circumstances or because of a re-organisation or restructuring.

To the best of its ability, the investee should look for and implement support measures to help dismissed workers find new options for employment. As appropriate, the support measures could include assisting the workers to find information about alternative jobs and opportunities, counselling, and/or providing training in financial matters or small business development.

Best practices relating to retrenchment include:

- Prior to implementing any collective dismissals, the investee carries out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives, a Retrenchment Plan is developed and implemented to reduce the adverse impacts of retrenchment on workers. The Retrenchment Plan should be based on the principle of non-discrimination and reflect the investee's consultation with workers, their organisations and, where appropriate, the government, and comply with collective bargaining agreements if

they exist. The investee complies with all legal and contractual requirements related to the notification of public authorities and the provision of information to, and consultation with, workers and their organisations.

- The investee should ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay and social security benefits and pension contributions and benefits will be paid:
    - On or before termination of the working relationship with the workers
    - Where appropriate, for the benefit of the workers, or
    - In accordance with a timeline agreed through a collective agreement. Where payments are made for the benefit of workers, workers will be provided with evidence of such payments.

Key steps in managing retrenchment:

- Ensure retrenchment is necessary (i.e., there are no alternatives to job losses).
- Look for alternatives to job losses. Alternatives could include a freeze to new hiring, enforcement of retirement ages, reduction in hours worked by existing staff, internal transfer and redeployment, reduction in salaries, transfer of employees to third-party organisations etc.
- Gather preliminary information (i.e., worker rights and obligations, gender and ethnic background of workers to be retrenched vs. those to be retained).
- Commence consultation with key stakeholders; engage with workers and their unions or other representatives. Could also include local, regional or national agencies (labour ministry).
- Decide on the nature of retrenchment and establish a procedure; form a committee or group within the organisation to manage the process of retrenchment.
- Implement Retrenchment Plan - i.e., prepare tools and procedures to affect the retrenchment, announce the number of dismissals, carry out interviews, make severance payments, carry out assistance programmes (e.g., training, outplacement, job assistance and economic development opportunities). In some cases, these programmes may be extended to employees' families and local community).

2.3.5. Supply Chain Procurement Plan (SCCP)

It is the investee's responsibility to establish an SCCP and to ensure compliance with its legal obligations. The SCPP applies to all subsidiaries of a company and their respective supply chains, and this must be clearly stated within the plan. The plan needs to identify the individuals with responsibility for supply chain risk management and ensure the responsibility and accountability for supply chain risk is clearly defined in their role (including for senior management and the Board). The SCCP should also state applicable regulations, standards and guidelines, including:

- UN Guiding Principles on Business and Human Rights
- ILO's Declaration on Fundamental Principles and Rights at Work
- the sustainability principles advocated by UN Global Compact

The following guidelines are also recommended:

- ILO's Combating forced labour: A handbook for employers and business / International (2015)
- Solar Equipment Buyers' Guide for Supply Chain Traceability (2021)
- European Bank for Reconstruction and Development (EBRD) Sector supply-chain guidance – batteries (2024)
- EBRD Sector supply chain guidance – wind energy (2024)
- World Bank Group Supply Chain Management: An introduction and practical toolset for procurement practitioners (2023)

Approach:

Step 1: Establish a policy with a clear commitment to:

- Not use or benefit from any forms of involuntary labour or debt bondage, including withholding passports or other documents of employees
- Not allow any physical, psychological, verbal or sexual harassment or abuse towards any employee
- Conduct all business activities and conduct themselves with integrity, and not engage in any or all forms of corruption in accordance with ethical standards
- Not employ any workers below 14 years of age or the legal national minimum age, whichever is higher (in line with the ILO Convention 138 on child labour)
- Ensure that employing young people above the minimum age but under 18 years does not jeopardise their education, health or safety or expose them to immoral behaviour;
- Fully recognise employees' rights to organise, form and join a union, and to bargain collectively
- Pay employees a living wage, which should at least be at the level of the national minimum wage. A living wage is defined as the minimum income necessary for a worker to meet their basic needs (refer to ILO Minimum Wage Policy Guide for more information) and
- Allow employees to freely enter and leave their workplace and any housing provided.

Step 2: Map out the supply chain and encourage tier one suppliers to engage with those further down the chain. Investees must apply optimum effort to comply with any internationally recognised traceability protocol that reflects best international industry practice.

The following key questions should also be considered by investees during this step:

- What percentage of your supply chain operates in high-risk countries for each tier?
- What is the length of the direct supplier's contract with your company?
- Have contractual audit or cancellation rights been included in the supplier's contract?
- Are you able to switch suppliers?
- How do you rectify issues if minor breaches are identified?
- What is the amount (in USD) of goods or services procured from the supplier?
- Has the supplier adopted a public-facing policy including 1) an ethical sourcing code of conduct, 2) specific references to the Bill of Rights and ILO prohibiting forced and child labour, and 3) an OSH policy?
- Does the supplier have certifications in place for 1) ISO 45000 on OSH, 2) ISO 26000 on social responsibility, 3) ISO 20400 on sustainable procurement, and 4) SA 8000 on social performance?
- Does the supplier subscribe to the Responsible Minerals Initiative or conduct OECD-guided due diligence on its supply chains?
- Does the supplier have safeguarding policies and measures to protect employees?
- Do the supplier's commitments apply to underlying subcontractors, suppliers and other business partners throughout the supply value chain?
- How do you audit your supply chain (e.g., desk-based review, phone interviews, in-person interviews, on-site audits etc.)?
- What percentage of your direct suppliers have you audited and how do you determine which suppliers to audit?
- Do you make use of publicly available databases such as the Business and Human Rights' database, Human Rights Defenders and Civic Freedoms Programme, and/or Responsible Minerals Initiative to map compliance?

Step 3: Include legal provisions in contracts with contractors, subcontractors, suppliers and manufacturers in order to prevent forced and child labour. This applies to any staff or any other person employed or engaged by them, as well as to all contracts that they execute with their own suppliers or manufacturers.

These legal provisions should be enforced by:

- Investees actively monitoring contractors and suppliers' compliance with them
- The contractor, subcontractor, supplier or manufacturer committing to promptly inform the investee and fund if it receives information that the representation is false and of any new risks or incidents of forced and child labour in the supply chain that has been identified – and take appropriate steps to remedy the situation, and
- In the case of previously identified labour issues with a contractor or supplier, requesting that contractors and suppliers provide evidence of improved capacity and their commitment to comply with the prohibition of forced and child labour and warrant that they are not using forced or child labour.

Step 4: Establish a confidential Grievance Redress Mechanism so that contractors, subcontractors, suppliers and manufacturers can voice any suspected breaches anonymously or in a formal manner.

Good practice considerations:

- Ensure through your actions, for example having a relevant clause in the service agreement, that contractors comply with your company's ESMS and that its workers health and safety is covered in your own OHS Plan. Also make sure contracted workers have access to a Grievance Redress Mechanism by contracted workers. It is the investee's responsibility to ensure compliance.
- To better understand the health and safety and employment practices within your supply chain, request proof of the following from your suppliers:
    - Certificates of accredited OHS and ESMS, including ISO 45001 and ISO14000.
    - Labour policy - to ensure that the supplier is committed to the avoidance of forced and child labour, including in their own supply chain.
    - E&S policy - to ensure the supplier's commitment to maintaining a minimal impact on the E&S aspects in which they operate.
    - OHS policy - to ensure commitment to providing said product and/or service in a health-conscious, safe and secure manner, including in their supply chain.
    - Origin of raw materials (country and mine). As the developer, you should undertake a supply chain impact assessment if the country of origin is a fragile or unstable state. Visit the Fragile States Index website for more information.

Facts about slavery

49.6
million people live in modern slavery today

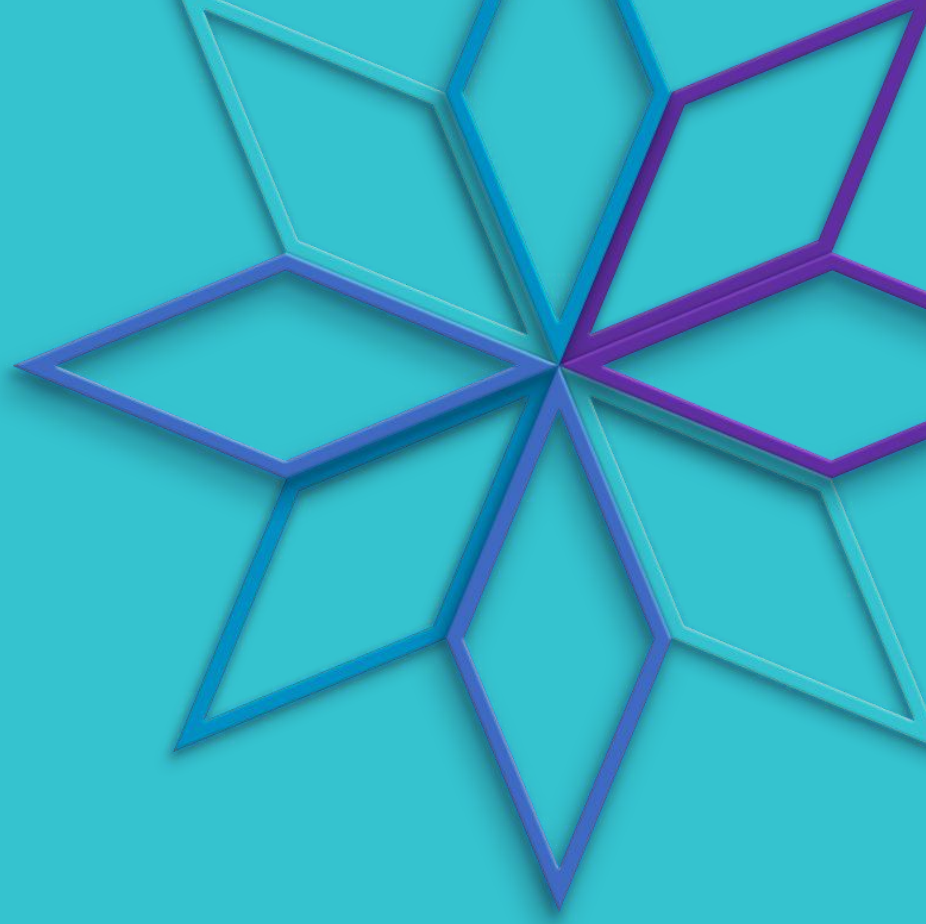
27.6
million people live in forced labour

54%
of those living in modern slavery are women

Source: Global Slavery Index 2021

Suggested further reading

IISD's Green Conflict Minerals: the fuels of conflict in the transition to a low-carbon economy
OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas



3. IFC Performance Standard 3

Resource Efficiency and Pollution Prevention

3.1. Resource Efficiency: Greenhouse Gases and Water Consumption

> Developers should identify and implement measures for improving efficiency in their project's consumption of energy, water and other resources and material inputs. You must also prevent, minimise and control pollution generating from project activities in line with internationally disseminated technologies and practices.
>
> The principles and techniques applied for pollution prevention and control during the project life cycle will be tailored to the impacts identified in your project-specific ESIA.

To address potential adverse project impacts on existing ambient conditions, the project developer should consider relevant factors, including:[22,23]

- Existing ambient conditions
- The finite assimilative capacity of the environment
- Existing and future land use
- The project's proximity to areas of importance to biodiversity and communities
- The potential for cumulative impacts with uncertain and/or irreversible consequences
- Landscape, seascape and visual impacts
- Air emissions and ambient air quality (Generally, these are minimal in most renewable energy projects, except for particle matter (dust) from clearing and construction)
- Energy conservation during the construction phase
- Water, wastewater and ambient water quality and availability (Consider the availability of water for construction and operation, including drinking water. Estimate the required quantity and how this might impact the surrounding community. Drinking water sources, whether public or private, should always be protected so that they meet or exceed applicable national acceptability standards or in their absence the current edition of the who's guidelines for drinking-water quality.)
- Water conservation and wastewater management (Consider dry toilets where applicable)
- Greenhouse gas emissions from fossil fuels in case of back-up generation
- Hazardous materials management
- Waste management, particularly during the construction phase (Investigate diversion from landfill waste management strategies)
- Noise, and
- Contaminated land (Ensure proper handling and storage of any hazardous materials, including batteries, oils and chemicals).

Please fill in Section 3.1 of the ESMS Workbook based on the guidance provided above.

[22] IFC's Performance Standards on Environmental and Social Sustainability. PS 3 (2012)
[23] World Bank Group's Environmental, Health and Safety Guidelines (2007)

3.2. Pollution Prevention: Waste, Hazardous Materials and Pesticide Use and Management Plan

Developers should establish and implement a Waste Management Plan for their projects. The plan should include actions for the appropriate handling, storing, transporting and recycling or safe disposal of any hazardous waste and materials (such as end-of-life PV panels and batteries, fuels, oils and chemicals,) and the minimisation and appropriate management of construction-stage waste.

You should identify waste streams and waste types, highlight specific hazardous and flammable substances, design a divert-from-landfill waste management strategy for each waste type and include them all in your E&S Monitoring Plan. Avoid or minimise the release of pollutants and/or control the intensity and mass flow of their release. Where waste and other pollutants cannot be recovered or reused, they should be destroyed or disposed of in an environmentally sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material.

Good practice checklist:

- Ensure fuel and other hazardous materials are securely stored above the flood level and at least 20m from any waterbody, watercourse, canal or storage pond. If this is not possible, ensure secure measures are in place and storage facilities are lined to prevents potential leakages.
- Ensure strict operational controls for segregation of waste streams to prevent contamination.
- Describe your company's storage procedures, record keeping and signage in relation to waste and hazardous materials.
- Where contamination has occurred, monitor the contaminated material/area frequently to ensure no run-off into nearby water sources or waterbodies.
- Ensure construction waste is disposed of in a manner that minimises pollution.
- Ensure a clear process, signage and containers for different waste streams.
- Consider Extended Producer Responsibility (EPR) in your company's recycling and reuse strategy especially for PV panels, turbine components, batteries and SHS components.
- When hazardous waste disposal is conducted by third parties, use contractors that are reputable and legitimate enterprises licensed by the relevant government regulatory agencies (i.e. they have a hazardous waste treatment license) and obtain chain of custody documentation to the final destination and certification of safe waste disposal. Certification of hazardous waste disposal is necessary for monitoring requirements. All waste containers designated for off-site transportation must be secured and labelled with the contents and associated hazards.
- Maintain a waste disposal management record (see Table 7).
- Roles, responsibilities and training should be considered in line with Section 1.4.

Table 7: Template for waste disposal management

ACTIVITY	WASTE TYPE	WASTE CLASSIFICATION	DISPOSAL METHOD	RECOVERY PLUS REUSE, RECYCLING OR RESPONSIBLE DISPOSAL TARGET	RESPONSIBILITY
e.g., Site clearance	Vegetation	Organic waste	Used by community	100%	A.N. Other
e.g., Earthworks	Soil, rock	Excavated natural material	Re-use on site	100%	A.N. Other
e.g., Construction finishing	Leftover paints and solvents	Liquid hazardous waste	Dispose of off-site at a licensed facility	100%	A.N. Other
e.g., Sanitation	Human waste	Sewage	Septic tank or fecal matter from dry toilets may undergo composting in accordance with country regulation	100%	A.N. Other
e.g., Site clearance	Vegetation	Organic waste	Used by community	100%	A.N. Other
e.g., Earthworks	Soil, rock	Excavated natural material	Re-use on site	100%	A.N. Other

- Consider the full retrieval of hazardous waste materials and e-waste through an incentive mechanism to ensure that waste is disposed of in safe and environmentally secure manner, aligned with the company's waste objectives and values. See Table 8 below which provides guidance on end-of-life waste management in the off-grid solar sector. Consider using third-party service providers for the disposal of waste lead-acid batteries. Also consider a strategy whereby e-waste is collated from nearby projects and stored in effective storage conditions to reach economies of scale for safe disposal of hazardous waste out of the country.
- When storing waste batteries, consider the following good practice:[24]
    - Manually discharge the batteries with a battery discharger.
    - Do not attempt to dismantle battery packs or damaged cells.
    - Cover the poles of the batteries with insulated tape.
    - Battery storage areas should be sheltered from direct sun, heat and rain, and secured to prevent unauthorised entry. Store lithium-ion batteries in drums/buckets with sand to insulate the battery should "thermal runaway" occur. Lithium-ion batteries should also be stored in a separate area to mitigate the risk of fire spreading in the event of an incident. The temperature in the storage drums.
    - should be consistently monitored for a rise in temperature which could cause a fire.

[24] GOGLA's E-waste Toolkit Module 1 Briefing Note (2019)

- Lead-acid batteries should be stored and transported on pallets, with similar-sized batteries placed next to one another. Place similar-sized batteries next to each other. Place thick layer of cardboard in between lead-acid batteries to absorb any leakage of battery acid. The batteries should not be stacked further than three layers high. Once stacked, the pallets should be wrapped and sealed with plastic wrap according to shipping requirements. Wet batteries that require an addition of distilled water should be drained, and the acid stored in secure bins.

Table 8: End-of-life waste management in the off-grid solar sector (adapted from End-of-life Management of Batteries in the off-grid solar sector, GIZ, 2018)

COMPONENT GROUP	EXPECTED LIFETIMES	PRESENCE OF TOXIC/HAZARDOUS COMPONENTS	RECYCLABLE COMPONENTS
PV panels	>10 years	Cadmium, tellurium (used in thin-film solar cells) and lead (contact layers, solder paste)	Silicon wafers and back foils
Control devices	5 – 15 years	Potentially: lead, cadmium and hexavalent chromium	Printed circuit boards, electronic components
Cables	>10 years	Copper, plastic insulation, chromium, brominated	Copper or other metal cores
Electrical and electronic equipment	2 – 10 years	Varies based on devises, but may include lead, cadmium, chromium, brominated flame retardants or polychlorinated biphenyls, mercury (used in CFLs)	Electronic components, aluminum and copper
Batteries	2 - 6 years	Lead, lead-oxide, cadmium (Despite the absence of heavy metals in Lithium-ion batteries, there are various constituent parts with potentially negative effects on human health and ecosystem)	Require recycling in facilities specialised on hazardous waste

Please fill in Section 3.2 of the ESMS Workbook based on the guidance provided above.

3.3. Water Management Plan

> Investees must establish a Water Management Plan that will provide guidance for any impacts to surface water and groundwater quality and supply during the project lifecycle.

The plan must outline measures to manage the different water sources (surface water runoff, groundwater, freshwater supply and grey water) in ensuring:

- Existing ambient conditions
- Water quality is unaffected by project activities

- Additional water pools or water sources are not created during project activities that might encourage the proliferation of water-borne parasites and increase the probability of associated diseases
- Water volumes used for project activities (e.g., drinking water, sanitation and construction) are monitored and do not impede community consumption and purpose-use levels
- Potable water sources are protected and meet with or exceed applicable national acceptability standards (or in their absence meet the WHO's current guidelines for drinking water quality
- Water abstraction volumes are aligned with permitting approved by the host country
- The improvement of water quality and water supply as a result of climate change impacts and to maintain or improve ecosystem services
- The possible need for drainage systems
- Liquid effluents, which are the sole responsibility of the developer, are disposed of in a safe and secure manner and removed from any water sources, and
- Training is provided in the handling of liquid effluent in a safe and secure manner, with guidance on sanitary measures.

Please fill in Section 3.3 of the ESMS Workbook based on the guidance provided above.

3.4. Traffic Management Plan

> Investees must establish a Traffic Management Plan that provides guidance on the flow of vehicles and people within the project site and nearby roads to protect the safety of all community and project site members.

The plan should outline:

- The procedures for how materials will be delivered on site (over land) and show the specific entrance points and storage points for heavy and abnormally large equipment, as well as road access points and indications of which roads have been reinforced to handle high tonnages
- The process for monitoring and the reporting of non-compliance, incidents and accidents, equipment quantities and the permitted tonnages for transport along project site roads without impediment and impact on road infrastructure
- Designated pedestrian pathways and routes throughout the project site and leading into the project site
- Security measures for visitor and project personnel entry into the project site
- Security and speed reduction measures on transport routes within the project site
- Driver rules and regulations whilst on site, as well as while transporting equipment off site
- Project site vehicle maintenance and licensing requirements
- The processes for managing dust, pollution and debris
- Training in driving manoeuvres, vehicle inspections checks, PPE necessary for driving, site traffic rules and regulations, and emergency vehicle procedures and drills for the project site and all personnel directing traffic on the project site, and
- Training of the Traffic Management Plan and awareness raising for the surrounding community to ensure traffic safety rules are well-acknowledged and adhered to.

Please fill in Section 3.4 of the ESMS Workbook based on the guidance provided above.

3.5. Dust and Noise Management Plan

> Investees must establish a Dust and Noise Management Plan outlining procedures to reduce and manage dust emissions and noise.

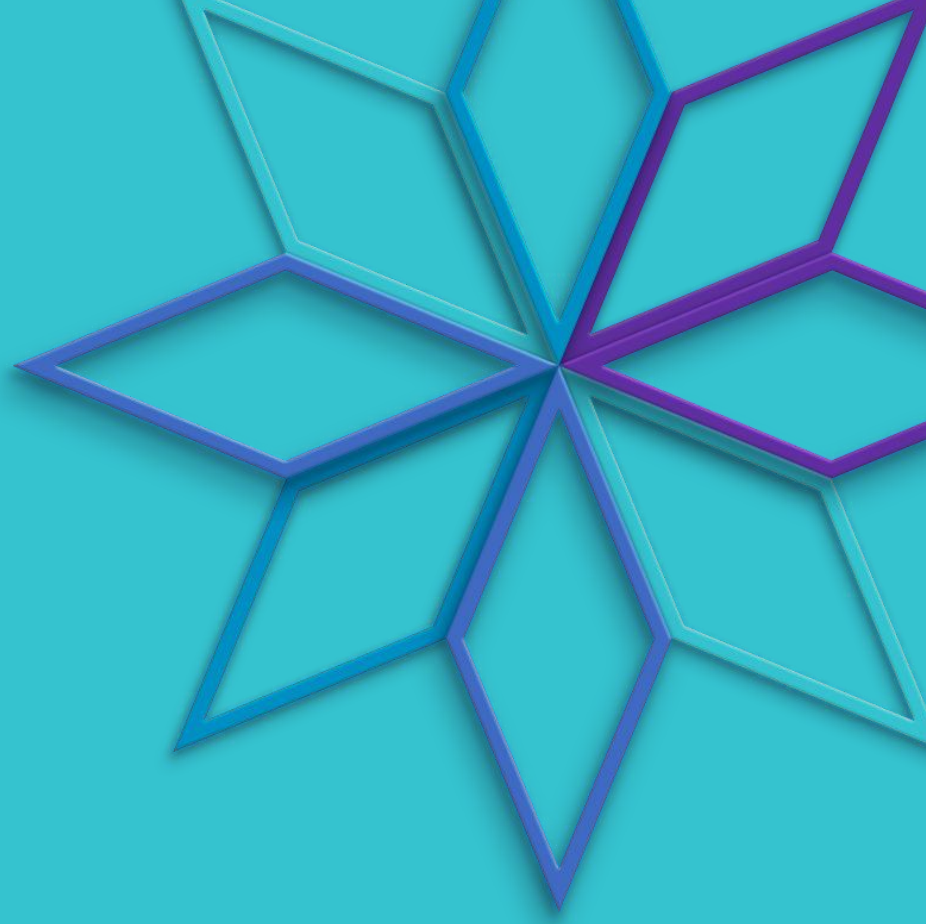
The plan should:

- Encourage the use of electrical construction equipment over motorised alternatives wherever possible
- Provide details of approved hours of construction activity, which have been agreed with the local community and other persons affected by the project
- Include procedures for equipment shut down and operational periods
- Include procedures and monitoring protocols that ensure use of equipment complies with dust and noise limits as per local legislation
- Establish equipment maintenance schedules to ensure optimum operation
- Ensure all visitors and project site vehicles adhere to traffic speed limits
- Make use of dust suppression methods and technologies
- Ensure allotted water levels are used for wetting down of gravel and informal project site roads, where necessary
- Ensure no waste is burned on site, and
- Ensure stockpiles of raw materials are covered when not in use to ensure dust emissions are minimised.

Please fill in Section 3.5 of the ESMS Workbook based on the guidance provided above.

Suggested further reading

World Bank Group's Environmental, Health and Safety Guidelines (2007)
World Bank Group's's Good Practice Note: Environmental, Health, and Safety Approaches for Hydropower Projects (2018)
GOGLA's E-waste Toolkit
Management of Batteries in the Off-Grid Solar Sector (2018)



4. IFC Performance Standard 4

Community Health, Safety and Security

4.1. Community Health and Safety

It is the project developer's responsibility to avoid or minimise the risks and impacts to community health, safety and security that may arise from project-related activities, with particular attention to vulnerable groups.

In conflict and post-conflict areas, the level of risks and impacts may be greater. The risk that a project could exacerbate an already sensitive local situation and put further strain on scarce resources must not be overlooked as it may lead to further conflict.

Ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimises risks to affected communities.

This IFC PS should be used in conjunction with the Emergency Preparedness and Response Plan (see Section 1.6) and the Grievance Redress Mechanism (Section 1.7.5) as well as the IFC PS relating to Indigenous people (see Section 7, below)

Good practice considerations:[25]

- Infrastructure and equipment design and safety: Design, construct, operate and decommission the structural elements or components of the project in accordance with good international industry practice and provide safe signage across the project site. Signage regarding site speed limits, dangerous areas, steep slopes, deep excavation, animal crossings, pedestrian areas, should be clearly demarcated and communicated during induction sessions for all site visits.
- Traffic safety: Estimate the quantity of vehicles and traffic and its impact on the community, including blocked-off restricted areas, vehicle movements in public areas, public access road conditions, community safety, noise, dust and pollution. Ensure children's safety at all times and establish a Traffic Management Plan and Dust Management Plan, where relevant. These points are particularly relevant during construction.
- Hazardous materials management and safety: Prevent or minimise the potential for community exposure to hazardous materials that may be released by the project. All hazardous waste should be secured from public access and access only given to designated personnel aware of how to handle hazardous materials/waste.
- Environmental and natural resource issues: Avoid impact of project on natural resources. Consider how your project's direct impacts on priority ecosystem services (including reduced biodiversity, soil erosion, floods and availability of water supply, if relevant) may
- result in adverse health and safety risks and impacts to affected communities. Ensure the relevant permits and licenses (water abstraction license) are valid and integrated into the Monitoring Plan.
- Community exposure to disease: Evaluate the risks and impacts to the health and safety of affected communities during the project life cycle (including water-borne diseases and transmission of communicable diseases that may be associated with the influx of temporary or permanent project labour). Consider implementing an Infectious Disease Outbreak Management Programme, which includes vaccinating workers to reduce potential outbreaks or containment of diseases to reduce the spread to the community.
- Conflict management: Ensure awareness is raised on potential conflicts that can arise between the community and investee staff due to cultural differences, miscommunications, misunderstandings, perceptions of bias, etc. Emphasis should be placed on continuous stakeholder engagement and access to the Grievance Redress Mechanism.

[25] IFC's Performance Standards on Environmental and Social Sustainability. PS 4 (2012) and World Bank Group's Environmental, Health, and Safety Guidelines (2007)

- Security risk: risks posed to the community through the development of the project should be identified, such as civil unrest, terrorism, threats of violence to the staff and community, theft, etc.).
- Emergency preparedness and response: Assess the potential risks and impacts from project activities and inform affected communities of significant potential hazards in a culturally appropriate manner. Refer to Emergency Preparedness and Response Plan.

During construction:

- Is public health information provided to the construction workforce prior to the commencement of on-site work, primarily covering the prevention of HIV/AIDS and COVID-19? This is especially relevant to projects that involve migrant labour and required construction camps.
- Will construction activities be restricted to daylight hours, with local communities informed of the schedule?
- Are construction camps required? If yes, remember to include in stakeholder engagement. Consider also effluent from the camps.

During operation:

- Have warning signs been installed on all hazardous aspects of the site, such as electrical equipment, fences, power poles, dam walls etc.?
- Have precautions been made to prevent exposure to hydrogen sulphide gas (geothermal projects)?
- Has lightning protection and earthing been installed on all required electrical equipment?

Please fill in Section 4.1 of the ESMS Workbook based on the guidance provided above.

4.1.1. Conflict Management

A conflict-sensitivity assessment is critical in fragile and conflict-affected areas. This type of assessment requires that the following considerations are made:

- Understanding the socio-economic context in which the investee will operate to understand the peace and conflict dynamics, and the interests and incentives of key actors within the community. This requires identifying the main drivers of conflict, the gender and conflict dynamics, key peace and conflict actors and the most likely future scenario/s and opportunities to promote peace and inclusion.
- Assessing what type of intervention and how this intervention might impact conflict and gender dynamics, and unpack risks and opportunities associated. This can be determined by asking the following key questions:
    - How will the project contribute to addressing any conflict drivers? Will the intervention exacerbate existing tensions between groups? Will the intervention result in perceptions of bias and jeopardise the safety of staff and sub-contractors? Will any project activities lead to acts of corruption to secure the assistance of armed non-state/state actors (police, security personnel, army personnel, etc.)? Will the intervention or project activities favour one group (e.g., women) over others and put members of that group at risk of violence?
    - How will the project strengthen peace and inclusion in the project site?
    - What or whom does the project target and how will beneficiaries be selected? Is the selection of beneficiaries inclusive of all ethnic/social groups?
    - What unintended impacts could the project have on the conflict dynamics in the project site as well as within the wider context, and what mitigation measures will be put in place?

- Continually adapting the intervention to minimise harm and maximise opportunities to build peace and stability, as well as adapting it in response to evolving conflict dynamics. The conflict analysis should be reviewed periodically in relation to all stakeholders to assess whether changes to project activities and implementation approaches are needed or require adjustment.

Awareness raising on the Grievance Redress Mechanism and Camco Whistleblowing Policy should be in place to provide the community for an avenue to report a human rights violations or safety issues anonymously and without fear of reproachment.

4.1.2. Security Risk Management Plan

An assessment of the potential security risks should be reflective of the socio-economic landscape of the project site, to ensure that sufficient security measures and resources are in place to mitigate and manage the risks. The Security Risk Management Plan should consider likely threats that will require a response by security personnel, both public and private, such as:

- The level of effort in assessing and managing security risks should be commensurate with the level of security risk associated with the project and its operating context. The type, number, responsibilities and arming of private/public security forces should flow from an assessment of the security risks and appropriate responses.
- Evaluate and analyse potential risks that impact the security and safety of critical infrastructure and people associated with the project site. Identify existing protective measures (e.g., walls, cameras, fencing, etc.) and vulnerabilities at project facilities and infrastructure and identifying ways to reduce vulnerabilities and enhance safety. This includes assessing physical security needs, cybersecurity, security management and staffing. Consider threats such as nonviolent and violent criminal threats (theft, threats of violence towards staff, active shooter incidents or terrorist threats, civil unrest, cybersecurity).
- Evacuation procedures for all staff and community members outlining key protection measures for all individuals. Evacuation routes and pathways to evacuate the premises.

4.1.3. Security Personnel

Developers should identify and assess risks posed by direct or contracted workers to provide security arrangements to those within and outside the project site.

Any concerns raised by affected communities about the security arrangements and acts of security personnel should be included in the Grievance Redress Mechanism.

Project developers also typically need to protect the project against theft with fences etc., although good community relations can help to reduce theft and vandalism, and the extent of security arrangements required. Project developers also need to ensure security personnel are involved in employee trainings, are afforded labour rights, access to basic services, and have access to the Grievance Redress Mechanism.

4.1.4. Vulnerable Communities

Particular attention should always be given to vulnerable groups when assessing community health, safety and security risks. Investees must ensure that safeguarding measures are applied to these groups and their property in accordance with relevant human rights principles and are aligned with the principles set out in the Camco

Safeguarding Policy. Investees are also expected to conduct focus group discussions in which all relevant information about the health and safety risks of the project are openly discussed. Sexual exploitation, abuse and harassment (SEAH) against vulnerable groups should be addressed as a risk in the Community Health, Safety and Security Plan (CHSSP), with all cases of SEAH reported and investigated under the Grievance Redress Mechanism.

Good practice checklist:

- Is the project site fully enclosed?
- Are local support structures (e.g., police, fire department, emergency security services, etc.) aware of the support required by the project? Is there consistent contact with local support services to ensure all security risks have been identified and the Security Risk Management Plan is updated?
- Is appropriate signage in place to warn trespassers of potential dangers?
- Do any of the security features/infrastructure pose a risk to the community's safety?
- Have all security personnel undertaken OHS trainings, outlined in Section 2.2 above, especially in emergency response procedures?
- Have awareness-raising sessions been scheduled with the community to discuss potential conflicts or security concerns? Is the community aware of the Grievance Redress Mechanism and the Camco Whistleblowing Policy?
- Are security personnel provided with access to sanitary facilities?
- Is appropriate cover or shade provided for security personnel? Are basic services, such as access to water supply, provided to security personnel?

Please fill in Section 4.2 of the ESMS Workbook based on the guidance provided above.

4.2. Training

> Investees must ensure that the persons in charge of community health, safety and security have undergone adequate training on how to handle community health, safety and security issues, including conflict management and emergency responses. Investees should also ensure community members are aware of the methods used to submit a grievance through their company's Grievance Redress Mechanism.

All staff should undertake safeguarding induction training once onboarded and refresher training to continually raise awareness on safeguarding measures (e.g., the Grievance Redress Mechanism) and inappropriate conduct. Such conduct includes:

- Sexual exploitation or abuse
- Physical, emotional or psychological abuse
- Exchanging money, employment, goods or services for sexual activity
- Engaging in any sexual relationships with beneficiaries of assistance, and
- Engaging with sex workers.

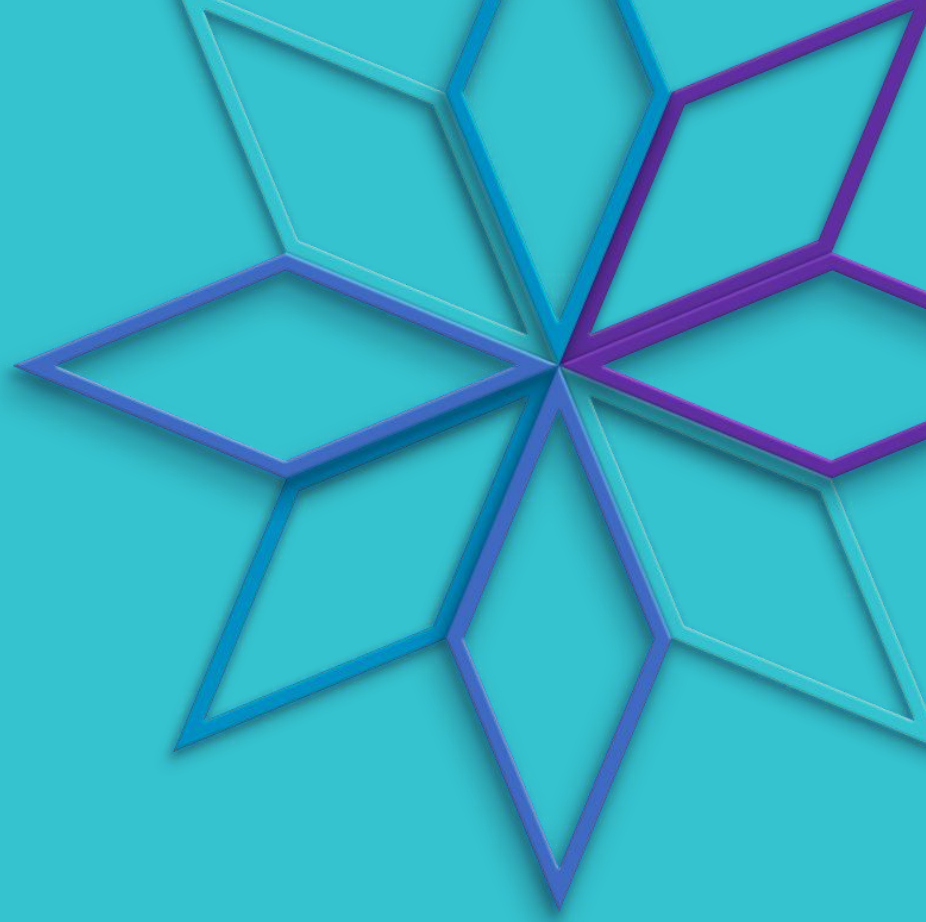
Please fill in Section 4.3 of the ESMS Workbook based on the guidance provided above.

4.3. Monitoring and Reviewing

It is the investee's responsibility to monitor the effectiveness of its Community Health, Safety and Security Plan's (CHSSP) mitigation measures by monitoring the following records:

- Updated security risk register
- Grievance records. These records should outline:
    - The circumstances of the grievance
    - The corrective actions taken following the grievance
    - Management's decision on the grievance, and
    - Progress of circumstances since corrective actions implemented.
- Stakeholder engagement meeting minutes, which should outline key concerns.
- Training records, which should provide details on date, time, training material and attendance.

Please fill in Section 4.3 of the ESMS Workbook based on the guidance provided above.



5. IFC Performance Standard 5

Land Acquisition and Involuntary Resettlement

5.1. Land Acquisition and Involuntary Resettlement

> Land acquisition and resettlement is one of the more complex challenges in project development. It involves balancing the timing of events relating to site selection, developing livelihood restoration programmes, preparing replacement land, consultation processes, consensus building and community mobilisation. It is ultimately for the developer to portray a sense of support in maintaining or improving the community's quality of living, livelihood, and ambitions for development within their community as well as individual families. If the developer is unable to achieve this, the associated risks are high. Impacts across financial projections, environmental concerns, legal status, etc. continue throughout the project life cycle.
>
> Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement. This occurs in cases of (i) lawful expropriation or temporary or permanent restrictions on land use and (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail.[26]

The following will be applied where land acquisition and resettlement is the responsibility of the host-country government:

- The investee will explore opportunities to collaborate with the responsible government agency, and if permitted by the agency, play an active role in resettlement planning, implementation and monitoring.
- In relation to previously planned or constructed projects, the investee will undertake a mapping of (i) legacy land ownership, (ii) the resettlement process undertaken and (iii) compensation structures applied in the past, dependent on community engagement and documentation where available, to ensure the process complies with the then-existing national land ownership laws and IFC PS 5.
- The investee must prepare a Supplemental Resettlement Plan covering (i) the identification of affected people and impacts, (ii) a description of regulated activities, including entitlements of displaced persons provided under applicable national laws and regulations, (iii) the supplemental measures to achieve requirements set under IFC PS 5 permitted by the responsible agency, and (iv) the financial and implementation responsibilities of the investee in the execution of the Supplemental Resettlement Plan.
- In the event of an entitled seller refusing the sale of land despite being presented with compensation structures or benefits, the investee must identify alternative land use options.

If a project results to involuntary resettlement, its risks are immediately higher. If resettlement considers more than 10 people, the project risk category increases to category A automatically and can no longer be supported by a Camco-managed platform or fund.

The IFC's Performance Standard 5 does not apply to resettlement resulting from voluntary land transactions (i.e., market transactions in which the seller is not obliged to sell). However, such settlements should be prescribed, recorded and archived as part of ESMS (impact assessment and stakeholder engagement). In the case of multiple sites and several landowners, the development of a land acquisition procedure is advisable, to ensure all crucial elements of land negotiations are addressed consistently across each site and discussions are recorded in a consistent manner.

The applicability of this performance standard should be confirmed at the project level. The compensation and resettlement will be tailored to the impacts identified in the project-specific ESIA. Please note that the performance standard also applies to customary or traditional rights on land. The use of negotiated settlements meeting the requirements of this performance standard are encouraged, even if the project has the legal means to acquire land without the seller's consent. Community acceptance and support is key for successful project development.

[26] IFC's Performance Standards on Environmental and Social Sustainability. PS 5 (2012)

In the ESIA report, the E&S consultant should either confirm that the project avoids displacement and economic resettlement, or in cases where this performance standard applies, establish a Resettlement Plan. Refer to country-specific land acquisition acts or regulatory compensation frameworks for sufficient compensation structures.

Good practice checklist:[27,28]

- Project design and planning: Avoid, and when avoidance is not possible, minimise displacement by exploring alternative project designs. Undertake legal and qualitative research of related laws and customs that affect women's property rights to understand how land acquisition will affect women in the project community.
- Engage a resettlement expert to lead the process and collaborate with the traditional entities, village heads and a social expert, ensuring that both market and social value is included in the evaluation. Identify eligible land parcels (via census surveys, socio-economic studies, meetings, site selection studies, etc.), landowners, land users, economic activity undertaken on the land, access to natural resources or ecosystem services for livelihood cultivation by the community and standards of living.
- Define a methodology for compensation that caters to both present market value and future market value and social value associated with the land parcel. Compensation should be defined dependent on whether it will be allocated to the landowner or land user. Discuss the social and economic value of assets held collectively by the community (such as common area resources, cultural structures, access to cultural heritage sites, etc.) with the community and ensure compensation is evenly distributed or designated to a village committee for management.
- Allow sufficient time, typically several years, for the resettlement process to be completed.
- Undertake extensive stakeholder consultations in accordance with the guidance provided under Section 1.7. This includes allowing for separate, female-oriented stakeholder engagement and consultation sessions to create a conducive and unbiased environment. Consider also the need for separate consultations for ethnic and other minorities. Consider who has what rights in the bundle of rights associated with land during "community training". When scheduling meetings and other consultation activities, give careful consideration to people's work and domestic duties to maximise potential attendance. Conduct a census, inventory and valuation, while considering the following:
    - Land use and its capability i.e. potential land use
    - Customary or traditional rights to land
    - Productive capacity should be assessed through independent survey
    - Houses and associated structures, and commemorative allocated land (e.g., family graves)
    - Vulnerable people (Facilitate meaningful participation in consultation and compensation discussions and develop/establish a non-discriminatory assistance programme for vulnerable peoples affected by resettlement)
    - Other private physical assets
    - Private enterprises
    - Natural resources of which people have traditionally made use
    - Employment and income-generating resources, such as fishing, small-scale farming
    - Assets held collectively, such as infrastructure, access to water resources, cultural property, should be recorded and assessed separately.
- Anticipate and avoid, or where avoidance is not possible, minimise adverse social and economic impacts from land acquisition or restrictions on land use by:

[27] IFC's Draft Good Practice Handbook: Land Acquisition and Resettlement (2019)
[28] IFC's Performance Standards on Environmental and Social Sustainability. PS 5 (2012)

    - Providing compensation or benefits for loss of assets at replacement cost reflective of project life-cycle duration, and
    - Ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.

- While some people may not have rights over the land they occupy, the performance standard requires that compensation on non-land assets be retained, replaced, or compensated for; any relocation to take place with security of tenure; and loss of livelihoods to be restored based on current and projected market value.
- Resettlement and livelihood restoration planning and implementation should look to improve, or restore, the livelihoods and standards of living of displaced persons.
- Developers should provide physically displaced persons with housing at resettlement sites that offers the same standard of living that they had previously or better and has security of tenure. Displaced persons may be classified as persons:

    - Who have formal legal rights to the land or assets they occupy or use
    - Who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognisable under national law, or
    - Who have no recognisable legal right or claim to the land or assets they occupy or use (i.e. even illegal settlements needs to be compensated accordingly). The census will establish the status of the displaced persons.

- Where physical displacement is unavoidable consider livelihood restoration and enhancement as a key driver for the resettlement.
- Community training content should be completed at project level and should entail:

    - Legal rights of women on land, including inheritance and divorce
    - Special problems encountered by women (for example, documentation or access to credit)
    - The involvement of women and men in the adjudication process and in registration of rights, and
    - Benefits of participation.

- Document, monitor and report the process including but not limited to:

    - Number of public meetings held
    - Attendance registers
    - Grievances raised
    - Compensation payments made
    - Housing lots allocated, housing and related infrastructure completed
    - Relocation of people completed, and
    - Livelihood programmes initiated and implemented.

- A plan for the resettlement (for physical displacement) and livelihood restoration (for economic displacement) should be established at the project level and cover the following:

    - Community engagement, inclusive of an agreed methodology of how to compensate each site and to be applied throughout sites.
    - Grievance mechanism to extend to all members of the community, including nomadic and vulnerable groups. Involvement of social and resettlement experts, facilitators or mediator are necessary to ensure non-intimidation techniques are used.
    - Continuous engagement with the community throughout the resettlement process to be cognisant of newer additions to the community.
    - Plan of implementation for resettlement and livelihood restoration.
    - Land ownership to be evidenced by documentation as well as all agreements made with the community during stakeholder engagement before undertaking negotiations. The documentation should include descriptions of the:

- Compensation provided
- Livelihood restorative benefits provided to displaced individuals (replaced accommodation, relocation assistance agreed and provided, nearby available infrastructure and social services etc.)
- Original accommodation and nearby infrastructure which can be compared to for evaluation purposes to demonstrate improved living conditions, and
- Evidence of the agreement from affected community members on the selected site.

- Infrastructural or economic improvements to be agreed with the community and documented before land negotiations begin.

Please fill in Section 5 of the ESMS Workbook based on the guidance provided above.

Suggested further reading

FAO's The Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (2012)
IFC's Guidance Note 5: Land Acquisition and Involuntary Resettlement (2012)
IFC's Good Practice Handbook: Land Acquisition and Resettlement (2019)
Interlaken Group's Respecting Land and Forest Rights: A Guide for Companies (2019)

6. IFC Performance Standard 6 & EIB's Standard 10

Biodiversity Conservation and Sustainable Management of Living Natural Resources

6.1. Biodiversity

> Biodiversity is the variability among living organisms from all sources including inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part. This includes diversity within species, between species, and of ecosystems.[29]
>
> It is important that we stress the development of a comprehensive biodiversity baseline during the ESIA study, as this provides granular insight of the project site. What this entails is an in-depth analysis of the different species that inhabit the area, including vegetation, insects, birds, smaller animals, etc. This must also be cross referenced against the International Union for Conservation of Nature (IUCN) Red List of endangered species to ensure all species impacted by the project are protected.

Ecosystem services are the benefits that people, including businesses, derive from ecosystems, and are organised into four types:

- Provisioning services, which are the products people obtain from ecosystems
- Regulating services, which are the benefits people obtain from the regulation of ecosystem processes
- Cultural services, which are the nonmaterial benefits people obtain from ecosystems, and
- Supporting services, which are the natural processes that maintain the other services.

Developers should categorise their projects based on three considerations:[30]

1. The legal conservation regime of the area, if any.
2. The type of habitat (natural, semi-natural – or socio-ecosystems, urban).
3. The biodiversity value of the habitat (criticality), also known as areas that provide ecosystem services such as the provision of food and fibre, air quality, soil formation, regulation of water supply, climate regulation, etc.

The project-level ESIA should consider direct and indirect project-related impacts on biodiversity and ecosystem services and identify any significant residual impacts. This process will consider relevant threats to biodiversity and ecosystem services, especially focusing on habitat loss, degradation and fragmentation, invasive alien species,[31,32] overexploitation, hydrological changes, nutrient loading and pollution.[33]

Any impact on biodiversity and ecosystems needs to be either avoided or minimised through mitigation.[34]

The following categorisation applies:[35]

- Modified habitats are areas that may contain a large proportion of plant and/or animal species of non- native origin, and/or where human activity has substantially modified an area's primary ecological functions and species composition. IFC PC 6 applies to those areas of modified habitat that include significant biodiversity value.
- Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition.

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[29] IFC's Performance Standards on Environmental and Social Sustainability. PS 6 (2012)
[30] EIB's Environmental and Social Handbook. Standard No. 3 (2018)
[31] In accordance with Convention on Biological Diversity, invasive alien species are species whose introduction and/or spread threaten biological diversity. (CBD, Guiding Principles COP 6 Decision VI/23, Annex, footnote i. to the Introduction. 2002)
[32] In accordance with Convention on Biological Diversity alien species is a subspecies or lower taxon, introduced outside its natural past or present distribution; includes any part, gametes, seeds, eggs, or propagules of such species that might survive and subsequently reproduce. (CBD, Guiding Principles COP 6 Decision VI/23, Annex, footnote i. to the Introduction. 2002)
[33] IFC's Performance Standards on Environmental and Social Sustainability. PS 6 (2012)
[34] EIB's Environmental and Social Handbook. Standard No. 3 (2018). For more information, see https://www.forest-trends.org/publications/standard-on-biodiversity-offsets/
[35] IFC's Performance Standards on Environmental and Social Sustainability. PS 6 (2012)

Critical habitats are areas with high biodiversity value, including:[36]

- Presence of critically endangered, endangered or vulnerable species, as defined by the IUCN
- Red List of threatened species and in relevant national legislation
- Importance to the survival of endemic or restricted-range species, or unique assemblages of species
- Required for the survival of migratory species or congregatory species
- Required for the maintenance of biological diversity with significant social, economic or cultural Importance to local communities
- Required for the maintenance of ecosystem functioning and the provision of key ecosystem
- Goods and services, and
- Key scientific value.

Project development in natural habitats should only be considered if no other viable alternatives within the region exist and the stakeholder consultation has established the views of stakeholders' including affected communities, with respect to the extent of conversion and degradation. Any conversion or degradation should be mitigated according to the mitigation hierarchy. Furthermore, the project shall not lead to measurable adverse impacts on those biodiversity values for which the critical habitat was designated, and on the ecological processes supporting those biodiversity values. A robust, appropriately designed, and long-term biodiversity monitoring and evaluation programme needs to be established for critical habitats.[37] Camco will not approve any project with a critical habitat status for funding.

The project shall not intentionally introduce any new alien species (not currently established in the country or region of the project) unless this is carried out in accordance with the existing regulatory framework for such introduction. As practicable, the project developer should take measures to eradicate such species from the natural habitats over which they have management control.[38]

The views and perspectives of local stakeholders should be considered when defining the values attached to particular biodiversity and ecosystem.

The biodiversity assessment should follow the process of scoping, impact assessment and management as described below.

In the project-specific ESIA report, the E&S consultant should confirm whether and how the project does affect biodiversity. The project-specific ESIA should take place in three clear stages.[39] No assessment will be valid unless these stages have been completed in the right order:

1. Establishment of an adequate baseline of the original state of the project site and its area of influence with regards to all biodiversity aspects, proportionate with the project impacts and risks.
2. The assessment impacts of the various alternatives – both during the construction and operation phase – against the benchmark of the without-project scenario.
3. The consideration of a range of alternative project designs, including a without-project scenario.

The resultant Biodiversity Management Plan should be revisited and revised every five years to ensure identified risks and mitigative measures are still relevant and applicable.

[36] EIB's Environmental and Social Handbook. Standard No. 3 (2018)
[37] IFC's Performance Standards on Environmental and Social Sustainability. PS 6 (2012)
[38] IFC's Performance Standards on Environmental and Social Sustainability. PS 6 (2012)
[39] EIB's Environmental and Social Handbook. Standard No. 3 (2018)

Good practice considerations:

- Check whether the project site is part of any protected area.
- If the proposed project site is within a wildlife reserve or buffer zone and the clearance of forest or acquisition of land is proposed, obtain written approval from the relevant authorities for the proposed activities.
- Make sure you record the biodiversity value of the site on the project-specific ESIA.
- Estimate whether any vulnerable or endangered species exist as part of the project-specific ESIA.
- Include biodiversity value determination and definition of ecosystem services as part of stakeholder engagement.
- Complete a Biodiversity Adaptive Management Plan (see example template in Table 9).

BIODIVERSITY SCOPING		What is the type of habitat of the area? Is it natural, semi-natural, or urban? What is the legal protection regime? Are there any protected species or critical habitats in the area? Is it indigenous land? Is it a no-go area?
		What is the biodiversity value of the area? Is it a priority area for conservation? Are there any protected species and / or critical habitats? Does the area support important ecological processes? Are the ecosystem services it supports critical to the livelihoods of the indigenous and forest communities?
		What are the potential throats to biodiversity (direct, indirect, induced and cumulative? Is the integrity of the site threatened thereby requiring a more strategic approached?
BIODIVERSITY IMPACT ASSESSMENT		What is the baseline ecological characteristics at the site and landscape levels?
		What are the different alternatives for the project design and the resulting scenarios for biodiversity on the site?
		What are potential impacts (direct, indirect and induced) of the project? What are the impacts resulting from both construction and operation and decommissioning phases? What are the options for biodiversity conservation and enhancement?
	MTIGATION HIERARCHY	Is it possible to improve the project's design to avoid the project's impact?
		Is it possible to improve the project design to minimise impacts that cannot be avoided?
		It there any residual biodiversity loss, and can it be compensated?
BIODIVERSITY MONITORING & ADAPTIVE MGME.		Were the mitigation and compensation measures detailed in the biodiversity management plan effective? How has the biodiversity value of the site actually changed throughout the life of the project? Are additional measures required maintain the biodiversity values?

Figure 4: The biodiversity assessment thought process (adapted from EEB 2013)

6.1.1. Biodiversity Management Approach

Investees must identify specific threats to biodiversity and ecosystems, and the associated risks of the project throughout its lifecycle, by conducting an IFC-compliant environmental and social impact assessment (ESIA). The ESIA needs to establish a baseline of identified flora and fauna species within the project area of influence that is cross-referenced with the IUCN Red List of Threatened Species. It should also identify whether the project area

encompasses modified, natural and/or critical habitats, legally protected and internationally recognised areas and/or invasive alien species. Furthermore, the ESIA should identify areas specific to animal migratory routes and pathways and apply the following considerations:

- Site selection is imperative to ensure land and habitat loss and degradation does not encroach onto migration routes and pathways and breeding sites. Wherever possible, investees should take measures to avoid and/or minimise impacts by selecting an alternative site. If unavoidable, they should ensure that the project design is adapted to encourage migratory and breeding habits of species as far as possible.
- Investees must ensure their operations are not located in or peripherally affect any "critical habitats".
- Should a vulnerable, endangered and/or critically endangered species be identified, a risk-averse approach should be taken whereby emphasis should first be placed on avoidance actions ensuring the project does not impact these species, ensuring protection and conservation of the species. If conservation is not possible, then corrective actions, such as habitat restoration, is necessary. Collaboration with biodiversity associations, wildlife specialists and relevant authorities will be necessary to preserve the species, while continuing to investigate the full extent of the risk.
- In effectively assessing the critical habitat risk, a stand-alone critical habitat assessment (CHA) is required, in which delineation of the natural, modified and critical habitats and the overlaying project infrastructure allows for identification of potential habitat losses. The CHA will delineate an Ecologically Appropriate Area of Analysis (EAAA) to inform potential direct and indirect impacts by human activity. The EAAA should not be limited to the project footprint, but rather a definable ecological boundary within which the biological communities have more in common with each other than they do outside of the boundary.
- The CHA will consider the distribution of species or ecosystems (within and sometimes extending beyond the project's area of influence) and the ecological patterns, processes, features and functions that are necessary for maintaining them (e.g., feeding area, breeding sites, migration, dispersal corridors).
- The CHA will need to incorporate a baseline identification against either a "modified" habitat or "natural habitat". A modified habitat will showcase a large proportion of plant and/or animal species of non-native origin, and/or where human activity has substantially modified an area's primary ecological functions and species composition. A natural habitat will showcase a large proportion of plant and/or animal species of non-native origin, and/or where human activity has NOT substantially modified an area's primary ecological functions and species composition
- Measures taken to avoid, prevent, reduce and – if necessary – offset significant adverse effects on the environment should result in no net loss and net gain of biodiversity. To achieve no net loss, the following mitigative measures should be considered:
    - Avoiding impacts on biodiversity through the identification and protection of set-asides, which are areas excluded from development and are targeted for the implementation of conservation enhancement measures. Set-asides will contain significant biodiversity value and/or provide ecosystem services of significance at the local, national and/or regional level and can be defined using internationally recognised approaches, such as high conservation value and systematic conservation planning
    - Implementing measures to minimise habitat fragmentation, such as biological corridors
    - Restoring habitats during operations and/or after operations, and
    - Implementing biodiversity offsets
- No Indigenous or culturally significant flora or fauna may be removed, disturbed or harmed as far as it is reasonably practical. Where applicable and agreed by the community, translocation or the establishment of a conservatory or nursery as a mitigation measure to ensure these species are protected as far as possible must be implemented.
- Consideration of potential armed forces amongst the community or outside individuals, should the project site be near a key conservation area in which valuable fauna is found. The risk of poaching increases and health and safety is at risk for the community and on-site personnel, which should be included in the security risk management for the site.

- Investees should ensure measures are in place to avoid the introduction or cultivation of invasive species. If the project area has invasive species and they are to be cleared, the investee is required to establish an Invasive Species Management Plan (See Section 6.3) to regulate replanting of any cleared vegetation.
- If there is a need to translocate species, conserve species and/or establish a nursery, then investees must ensure that any biodiversity risk is relayed to all employees by a biodiversity specialist. Training should include capacity building on identifying the "at risk" species, as well as the methods for handling the species while translocating.
- Investees must identify potential erosion risks that could affect available ecosystem services and, where required, implement, maintain and monitor any necessary control methods.
- For a hydropower plant specifically, an EFlow assessment is critical in identifying the quantity, frequency, timing and quality of water and sediment flows necessary to sustain freshwater and estuarine ecosystems and the human livelihoods that depend on these ecosystems. An EFlow assessment should be agreed upon at concept and prefeasibility stages of project development, and coordinate with the ESIA in establishing the baseline for seasonally representative information on hydrologic regimes, aquatic or terrestrial ecology.

    - The study should be commensurate with the risks of a run-of-river hydropower project, dependent on the scale of the power plant and consider the sensitivity of biodiversity impacts (low-, medium- or high-resolution method applied, dependent on the expanse and type of biodiversity present within the project area). In the event the hydro project is in a natural habitat, the EFlow assessment will need to implement a "net gain" or "no net loss" strategy, in which the developer will need to consider restorative measures (restoration offsets, avoided loss offsets or positive conservation actions) or offsets in addition to setting EFlows.
    - The EFlow assessment should provide an Environmental Flows Management Plan (EFMP), informed by stakeholder engagement on ecosystem uses, livelihood dependence, conservation priorities, possible water resource development and other aspects of concern, which focuses on the EFlow mitigative measures, in describing the activities needed to implement, monitor and review the EFlows. A detailed list of a project's planned activities should evaluate existing flow regimes and upstream and downstream water uses in consultation with potentially affected communities. Flow regimes maintained over seasonal or even smaller periods (e.g., monthly) should be evaluated.
    - In hydropower projects involving migratory fish populations, the following recommended measures should be considered to help mitigate the obstruction to fish movements and potential consequent destruction of natural fish stocks:

        - Identify migratory fish species requiring passage past the dam or diversion structure to fulfil their life-cycle requirements, which may depend on upstream or downstream passage. Consider both locally important fish stocks and IUCN red-listed fish species.
        - Ensure appropriate mechanisms for upstream fish passages are provided for within the design of the hydropower plant, such as fish ladders and hydraulic fish lifts, and trap and transport programmes.
        - Ensure appropriate mechanisms for downstream fish passage, such as increased spill (provided that dissolved gas concentrations do not become excessive), bypass channel and trap and transport programmes.
        - Consider using appropriate fish exclusion or guidance devices for both upstream and downstream passage that will prevent the entry of fish into dangerous areas and guide them into bypass facilities. These can be physical meshes or a behavioural screen that uses a deterrent stimulus (such as electrical barriers, strobe lights, bubble curtains or acoustics).
        - Consider the use of "fish-friendly" turbine technology or construction of bypass structures to reduce fish mortality and injury from passage through turbines or over spillways, especially where large-scale downstream fish migrations occur. Typically, Kaplan turbines are more fish-friendly than Francis turbines.

- Identify species, life stage and loss rates of fish, and replace losses either directly (such as hatcheries or spawning channels) or indirectly (such as fertilisation or stream enhancement).
- Assess critical depths and velocity needed for upstream and downstream movements of indicator species based on fish swimming abilities to assure availability of such characteristics at key stages of the migration cycles.

- For wind power investments and investments including T-line assessments specifically, include a specialist biodiversity report to determine the impact of the investment on avifauna (bird and bat) populations in migratory, breeding and feeding areas and dispersal corridors.

Table 9: Example of a Biodiversity Monitoring Plan template

PARAMETER TO BE MONITORED	MITIGATION MEASURE	FREQUENCY	TARGET	REPORTING	RESPONSIBILITY
e.g., Sedimentation	Minimise soil clearance/maintain vegetation on project site	Weekly during construction	0% sedimentation	e.g., daily E&S monitoring sheet saved in a shared drive.	e.g., EHS Manager
e.g., Fish species population	Monitor impacts on population/relocation of species and team up with conservation efforts within the area	Monthly during construction and operational phases	Population degradation of 0%	e.g., daily E&S monitoring sheet saved in a shared drive. Provide summary data at the end of each month	e.g., a fish expert
e.g., Endangered flora species	Relocation of species and conservation efforts in place	Daily during construction	Population degradation of 0%	e.g., daily E&S monitoring sheet saved in a shared drive. Provide summary data at the end of each month	e.g., EHS Manager

Monitoring and evaluation programmes should consist of three levels:[40]

1. In-field monitoring of relevant biodiversity values.
2. Monitoring of the implementation and effectiveness of all relevant forms of mitigation measures. If a biodiversity offset is part of the mitigation strategy its success should be evaluated independently.
3. As appropriate, and especially in the case of semi-natural habitats, projects should also monitor levels of human activities having an impact on the biodiversity of the site (e.g., changes in agricultural or hunting practice).

Please fill in Section 6.1 of the ESMS Workbook based on the guidance provided above.

6.2. Management of Ecosystem Services

Developers should work to maintain the benefits from ecosystem services. Where the project has adverse effects on an ecosystem, establish an ecosystem service baseline to identify priority ecosystem services, which are:

- Those services on which project operations are most likely to have an impact and, therefore, which result in adverse impacts to affected communities, and/or

[40] EIB's Environmental and Social Handbook. Standard No. 3 (2018)

- Those services on which the project is directly dependent for its operations (e.g., water).
- When affected communities are likely to be impacted, they should participate in the determination of priority ecosystem services in accordance with the stakeholder engagement process (see Section 1.7).

Developers should minimise impacts on ecosystem services and implement measures that increase resource efficiency (see Section 3) of their operations. For example, a developer might plant vegetation in the surrounding areas of the plant to stabilise the soil as well as conserve endangered or medicinal flora species specific to the community and/or agricultural vegetation used in subsistence farming. The relocation and conservation of species can be applied to both flora and fauna to ensure fishing or hunting practices are still maintained to support the community, as well as demonstrate investment in cultural and traditional practices of the community.

In the ESIA report, the E&S consultant should confirm the project-specific impact to ecosystem services, if any.

Where feasible, an economic assessment (cost benefit analysis) of the biodiversity and ecosystem services should be carried out on the site, where possible with a monetary valuation of these benefits.

Good practice considerations:

- Use stakeholder engagement as an opportunity to identify endangered species or species critical to the habitat, since any sampling of biodiversity carried out for the ESIA study will be at a single point in time and will not incorporate year-round population fluxes of different species.

Please fill in Section 6.2 of the ESMS Workbook based on the guidance provided above.

6.3. Sustainable Management of Living Natural Resources

Project developers should promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities. This section is particularly relevant to biomass projects, which includes plantations.

- Developers of biomass plantations should apply credible and globally, regionally, or nationally recognised standards for sustainable management of living natural resources.
- Use independent verification or certification where applicable. Consider Forest Stewardship Council, Programme for the Endorsement of Forest Certification or Sustainable Forestry Initiative.

Note: Camco only invests in renewable biomass projects and follows the UNFCCC guidance on renewable biomass. To that end, biomass is considered "renewable" if:[41]

- The land area it originates from a) remains a forest, and b) is sustainably managed; in particular, this requires that the level of carbon stocks on these land areas does not systematically decrease over time.
- The biomass originates from croplands and/or grasslands where the land area a) remains cropland and/or grasslands or b) is reverted to forest, and c) is sustainably managed.

[41] CDM's Definition of renewable biomass

- The biomass cannot be driven from food crops.
- Any national or regional forestry, agriculture and nature conservation regulations are complied with.
- The biomass is a biomass residue and the use of that biomass residue in the project activity does not involve a decrease of carbon pools (in particular, dead wood, litter or soil organic carbon) on the land areas where the biomass residues are originating from.
- Energy activities generated from biomass sources have a set carbon limit of 250 gCO2/kWh of the overall yearly electricity generation, which is further reduced to 100 gCO2/kWh over the project lifetime.
- Biomass is the non-fossil fraction of an industrial or municipal waste.

Furthermore, the use of biomass from land converted from forest, other high-carbon stock areas and highly biodiverse areas, as well as legally protected and internationally recognised areas, is forbidden.

Sources of biomass that are forbidden include:

- Alien species with an invasive behaviour
- Any food crops, including residues
- Palm oil or by-products of the palm oil industry
- Genetically modified organisms

In accordance with the Convention on Biological Diversity, alien species are subspecies or lower taxon, introduced outside of their natural past or present distribution. This includes any part, gametes, seeds, eggs, or propagules of such species that might survive and subsequently reproduce. An invasive alien species are species whose introduction and/or spread threaten biological diversity.[42]

Please fill in Section 6.3 of the ESMS Workbook based on the guidance provided above.

6.4. Supply Chain

> The identification and management of supply chain impacts on biodiversity and ecosystem services is an important consideration for developers of biomass project in particular.
>
> Where the primary feedstock is purchased in a region that is known for significant conversion risk of natural and/or critical habitats, systems and verification practices should be adopted as part of the project developer's ESMS to evaluate its primary suppliers. This is especially, but not exclusively, relevant to feedstocks that are food or fibre commodities.

Good practice considerations:

The systems and verification process includes:

- Identification of where the supply is coming from and the habitat type of this area.
- Ongoing review of the primary supply chains.
- Limiting procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural and/or critical habitats (this may be demonstrated by delivery of certified product, or

[42] CBD, Guiding Principles COP 6 Decision VI/23, Annex, footnote i. to the Introduction. 2002)

progress towards verification or certification under a credible scheme in certain commodities and/or locations).

Where possible, require actions to shift the project developer's primary supply chain over time to suppliers that can demonstrate that they are not significantly adversely impacting these areas.

Please fill in Section 6.4 of the ESMS Workbook based on the guidance provided above.

7. IFC Performance Standard 7

Indigenous Peoples

7.1. Indigenous Peoples

> Indigenous peoples are defined by the IFC as "social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalised and vulnerable segments of the population. In many cases, their economic, social, and legal status limits their capacity to defend their rights to, and interests in, lands and natural and cultural resources, and may restrict their ability to participate in and benefit from development."
>
> Indigenous peoples are particularly vulnerable if their lands and resources are transformed, encroached upon or significantly degraded. Their languages, cultures, religions, spiritual beliefs and institutions may also come under threat. This performance standard fosters full respect for human rights, dignity, aspirations, culture and natural resource-based livelihoods and applies to communities or groups of Indigenous peoples who maintain a collective attachment, i.e., whose identity as a group or community is linked to distinct habitats or ancestral territories and the natural resources therein.
>
> Furthermore, it may also apply to communities or groups that have lost collective attachment to distinct habitats or ancestral territories in the project area due to forced severance, conflict, government resettlement programmes, dispossession of their lands, natural disasters or incorporation of such territories into an urban area.

This includes:[43]

- Communities of Indigenous peoples who are resident upon the lands affected by the project as well as those who are nomadic or who seasonally migrate over relatively short distances, and whose attachment to ancestral territories may be periodic or seasonal in nature.
- Communities of Indigenous peoples who do not live on the lands affected by the project, but who retain ties to those lands through traditional ownership and/or customary usage, including seasonal or cyclical use. This may include Indigenous peoples resident in urban settings who retain ties to lands affected by a project.
- Communities of Indigenous peoples who have lost collective attachment to lands and territories in the project area of influence, occurring within the concerned group members' lifetime, as a result of forced severance, conflict, involuntary resettlement programmes by governments, dispossession from their lands, natural calamities or incorporation into an urban area but who retain ties to lands affected by a project.
- Groups of Indigenous peoples who reside in mixed settlements, such that the affected Indigenous peoples only form one part of the more broadly defined community.
- Communities of Indigenous peoples with collective attachment to ancestral lands located in urban areas.

The considerations of the IFC PS around Indigenous peoples should be applied during the project-specific ESIA process.

Be aware that projects may adversely impact Indigenous peoples' identity, natural resource-based livelihoods (e.g., through water, grazing, hunting and fishing areas, forest, timber), food security and cultural survival (e.g., fuel wood, medicinal and herbal plants, craft materials, nomadic routes and seasonal uses). Engagement with the Indigenous peoples is therefore required for the assessment of potential impacts.

Key objectives:

- Ensure acknowledgement and full respect of Indigenous peoples' human rights, dignity, aspirations, culture and natural resource-based livelihoods.
- Avoid adverse impacts.

[43] IFC's Guidance Notes: Performance Standards on Environmental and Social Sustainability. Note 7 Indigenous Peoples (2012)

- Where this is not possible, mitigate adverse impacts, establish development benefits and compensate appropriately for impacts caused in consultation with the Indigenous people.
- Establish and maintain an ongoing relationship based on informed consultation and participation (ICP) (see Section 1.7.4) This is required for all projects whose influence area includes Indigenous peoples. Integrate in stakeholder engagement and Grievance Redress Mechanism process presented under Section 1.7.
- Acknowledge the different challenges faced by women, girls and other vulnerable groups within Indigenous communities, and promote the participation and leadership of women in project activities given their role as traditional custodians of cultural and spiritual heritage and values.
- Establish and maintain an ongoing relationship, based on informed consultation and participation, with the Indigenous people(s) affected by a project throughout its lifecycle. This includes engaging the principle of free, prior and informed consent (FPIC) when there are any potential impacts on cultural and/or natural resources, or land owned by or under customary use of Indigenous people(s).
- Ensure there is no physical relocation from community-held lands and natural resources subject to traditional ownership or under customary use.
- Ensure sustainable and culturally appropriate development benefits/opportunities for Indigenous peoples.

Good practice considerations:

Prepare an Indigenous Peoples Plan that, together with the documents prepared by the responsible government agency, will address the relevant requirements of the performance standard. This should involve the following key elements:

- Establishment of an Implementation Plan, and documentation of the ICP process, stakeholder engagement and FPIC, where relevant.
- Description of the government-provided entitlements of affected Indigenous peoples.
- Description of measures proposed to bridge any gaps between such entitlements and the requirements of the performance standard.
- Description of the financial and implementation responsibilities of the government agency and/or project developer.

The Indigenous Peoples Plan should, as a minimum, include the following elements:[44]

- Baseline information from the E&S risks and impacts assessment process, which clearly profiles Indigenous peoples in the project's influence area, including the nature and degree of the expected direct and indirect economic, social, cultural (including cultural heritage) and environmental impacts on Indigenous peoples.
- An overview of the project's key impacts on Indigenous peoples, including risks and opportunities, and recommended possible measures to mitigate adverse impacts. Project activities need to be culturally appropriate and enhance the benefits of Indigenous peoples and should examine alternatives where adverse impacts are significant.
- Assessments of circumstances requiring FPIC and alternative project design/siting to avoid adverse impacts.
- Information disclosure, consultation and participation, including results of consultations during the E&S risks and impacts assessment process and future engagement.
- Mitigation and management measures, including benefit-sharing arrangements and community-based natural resource management.
- Grievance redress mechanism.
- Costs, budget, timetable and organisational responsibilities.

[44] IFC's Guidance Notes: Performance Standards on Environmental and Social Sustainability Note 7 Indigenous Peoples (2017)

- Monitoring, reporting and evaluation.

7.2. Circumstances Requiring Free, Prior and Informed Consent

> A process of FPIC with the affected communities of Indigenous peoples is required with regard to project design, implementation and expected outcomes if these are associated with any of the potentially adverse impacts identified below:[45]
>
> - 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.
> - Use of cultural heritage, including knowledge, innovations or practices of Indigenous peoples for commercial purposes.

FPIC builds on and expands the ICP process described in Section 1.7.4. and should be established through good faith negotiation between the project developer and the affected communities of Indigenous peoples. As the project developer you should document both the mutually accepted process between your company and the affected communities of Indigenous peoples, and evidence of agreement between the parties at the outcome of the negotiations.

To effectively implement FPIC measures, the investee must develop a culturally appropriate Engagement Plan that includes specific provisions, such as the need for project information to be translated or made available in different formats or for Indigenous peoples specialists, anthropologists or communication specialists to be brought in. The process of engaging with Indigenous peoples goes beyond consultation to that of negotiation and full inclusion with the objective of obtaining the explicit consent and approval of the communities for the project, as well as mutually benefitting from the project.

Good practice considerations:

Project developers should take the following steps:[46]

- Document efforts to avoid and otherwise minimise the area of land proposed for the project.
- Document efforts to avoid and otherwise minimise impacts on natural resources and natural areas of importance to Indigenous people.
- Identify and review all property interests and traditional resource uses prior to purchasing or leasing land. Recognise and action customary or traditional land tenure agreements.
- Assess and document the resource use without prejudicing any Indigenous peoples' land claim. The assessment of land and natural resource use should be gender-inclusive and specifically consider women's

[45] IFC's Guidance Notes: Performance Standards on Environmental and Social Sustainability Note 7 Indigenous Peoples (2007)
[46] IFC's Performance Standards on Environmental and Social Sustainability. PS 7 (2012)

roles in the management and use of these resources. Address gender, socio-economic divisions and intergenerational issues that exist amongst Indigenous peoples. Foster meaningful inclusion and participation of Indigenous women and other marginalised groups

- Ensure that affected communities of Indigenous peoples are informed of their land rights under national law, including any national law recognising customary use rights. Protect traditional knowledge through intellectual property rights.
- Build and strengthen inclusivity of Indigenous peoples to participate in development planning or programmes.
- Build and strengthen capacity of regional and national governmental institutions on providing services to Indigenous peoples. Offer affected communities of Indigenous peoples compensation and due process in the case of commercial development of their land and natural resources, together with culturally appropriate sustainable development opportunities, including:

    - Providing land-based compensation or compensation-in-kind in lieu of cash compensation where feasible
    - Ensuring continued access to natural resources, identifying the equivalent replacement resources or, as a last option, providing compensation and identifying alternative livelihoods if project development results in the loss of access to and the loss of natural resources independent of project land acquisition
    - Ensuring fair and equitable sharing of benefits associated with project usage of the resources where the project developer intends to utilise natural resources
    - That are central to the identity and livelihood of affected communities of Indigenous peoples and their usage thereof exacerbates livelihood risk, and
    - Providing Indigenous peoples with access, usage and transit on land it is developing subject to overriding health, safety and security considerations.

Relocation requirements

- Consider feasible alternative project designs to avoid the relocation of Indigenous peoples from their lands (i.e. traditional ownership or under customary use.)
- If relocation is unavoidable the project can only proceed when a FPIC has been obtained.
- Any relocation should be consistent with the requirements described in Section 5.1.

Considerations regarding critical cultural heritage

- Avoid impact on critical cultural heritage that is essential to the identity and/or cultural, ceremonial or spiritual aspects of Indigenous peoples' lives.
- Where significant project impacts on critical cultural heritage are unavoidable, as the project developer you should obtain the FPIC of the affected communities of Indigenous peoples.
- Where a project proposes to use the cultural heritage (including knowledge, innovations or practices) of Indigenous peoples for commercial purposes, project developers should inform the Indigenous peoples of:

    - Their rights under national law
    - The scope and nature of the proposed commercial development
    - The potential consequences of such a development, and
    - Obtain their FPIC.

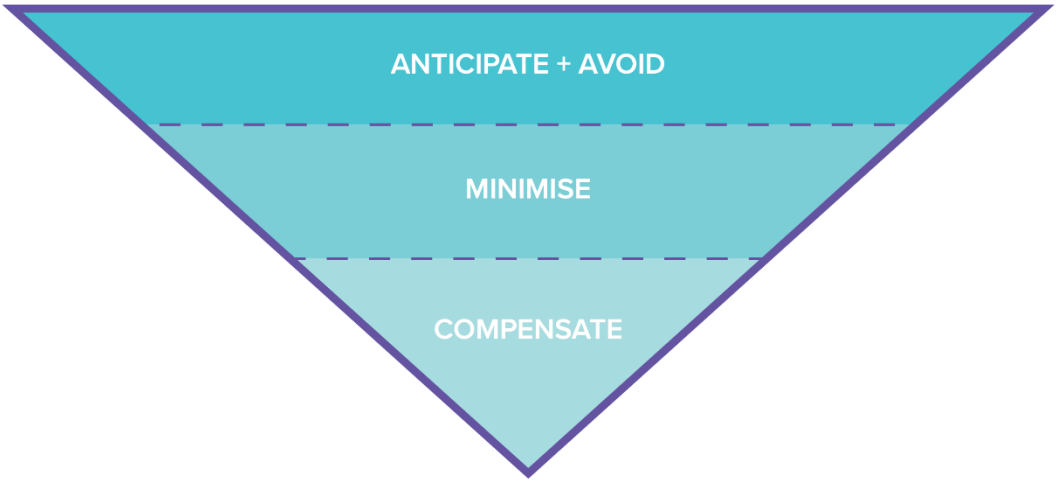
Developers should also obtain Indigenous peoples' FPIC and ensure fair and equitable sharing of benefits from commercialisation of such knowledge, innovation or practice consistent with the customs and traditions of the Indigenous peoples.

Please fill in Section 7.1 of the ESMS Workbook based on the guidance provided above.

7.3. Mitigation and Development Benefits

Various factors, such as the nature of the project, the project context and the vulnerability of the Indigenous peoples, should be assessed to determine how these communities should benefit from the project.

The determination, delivery and distribution of compensation and other benefit-sharing measures to Indigenous peoples should take account of the laws, institutions and customs of these communities, as well as their level of interaction with mainstream society.



Project developers must ensure that the following mitigation hierarchy applies

1. Anticipate and avoid.
2. Where avoidance is not possible, minimise.
3. Where residual impacts remain, compensate/offset impacts to affected communities and the environment.

In addition, you should:

- Ensure the timely and equitable delivery of agreed measures to affected communities of Indigenous communities, and
- Document the process in an Indigenous Peoples Policy (IPP).

The IPP must ensure the following:

- Impact assessments are undertaken by a social expert and address the nature and degree of expected direct and indirect economic, social, cultural (including cultural heritage) and environmental impacts on Indigenous peoples.
- All efforts to avoid and minimise impact on natural resources and alternative project sites are explored and documented in the impact assessment.
- Representatives of the Indigenous peoples - in collaboration with traditional authorities and structures within the communities, and with respect for the traditional decision-making structure and processes
- in the project area - will select a stakeholder meeting venue that is considered as appropriate by way of mutual consensus. Focus group discussions for vulnerable groups, including women and girls, should take place separately to ensure these people are safeguarded.
- Adequate notice is provided for any meetings being held to allow for all vulnerable groups within Indigenous peoples to attend. The meetings should be held at a suitable time and allow time for consensus to build and to ensure full presentation of Indigenous peoples' views and preferences.
- All meetings and consultations must be conducted in the local languages of the Indigenous people(s) and must be conducted in a safeguarded and meaningful manner. The investee should ensure that stakeholder engagement is conducted at the earliest possible stage, prior to substantive project activities. The investee

should make the Indigenous peoples' rights and their role in the project clear to them during all consultations. Consultations must provide information and guidance on the Grievance Redress Mechanism available for submitting concerns or grievances pertaining to the project, as well as provide information on key project contact persons.

- Compensation structures are calculated in the case of the commercial and non-commercial development of Indigenous peoples' land and natural resources, together with culturally appropriate sustainable development opportunities. In calculating these compensation structures, investees should:
    - Identify and assess all property interests without negatively affecting any Indigenous peoples' land claims, tenure arrangements and traditional natural resource consumption prior to purchasing, leasing and undertaking a land acquisition, as a last resort
    - Ensure communication to affected Indigenous peoples provides transparency on:
        - Indigenous land rights under applicable country laws and international best practice standards, and
        - Scope and nature of project activities proposed and their potential impacts
    - Provide comparable land-based compensation to the land acquired from Indigenous people or compensation-in-kind in lieu of cash compensation where feasible
    - Provide a mutually beneficial and agreed upon fair lease arrangement
    - Ensure continued access to natural resources, identifying equivalent replacement resources, or - as a last option - providing compensation and identifying alternative livelihoods if the project development results in the loss of access and/or the loss of natural resources
    - Ensure fair and equitable sharing of the benefits associated with the project's usage of resources, where the investee intends to utilise natural resources that are central to the identity and livelihood of affected communities of Indigenous people. Benefit sharing encompasses revenue distribution, job creation, ownership of companies and shares, negotiated agreements and community development programmes, and
    - Provide affected communities of Indigenous peoples with access to, usage of and transit on land that the investee is developing, subject to overriding health, safety and security considerations.

Please fill in Section 7.2 of the ESMS Workbook based on the guidance provided above.

7.4. Private Sector Responsibilities

> Where the government has a defined role in the management of Indigenous peoples issues in relation to the project, you as the project developer should collaborate with the responsible government agency to the extent feasible to achieve outcomes that are consistent with the objectives of the performance standard. Where government capacity is limited, project developers should play an active role during planning, implementation and monitoring of activities to the extent permitted by the agency.

Suggested further reading

The Indigenous Peoples of Africa Co-ordinating Committee website
LandMark's Global Platform of Indigenous and Community Lands
IFC's General Note 7. Indigenous People, including Annex A: Indigenous Peoples Plan (2012)
Green Climate Fund's Indigenous Peoples Policy

8. IFC Performance Standard 8

Cultural Heritage

8.1. Cultural Heritage

> This performance standard (PS 8) recognises the importance of cultural heritage for current and future generations and is consistent with the Convention Concerning the Protection of the World Cultural and Natural Heritage. The objective of PS 8 is to protect cultural heritage in project design and execution and to promote the equitable sharing of benefits from the use of cultural heritage. The applicability of PS 8 is established during the project-specific ESIA.

Cultural heritage refers to:[47]

- Tangible forms of cultural heritage, such as concrete moveable or immovable objects, property, sites, structures or groups of structures, which have archaeological (prehistoric), paleontological, historical, cultural, artistic or religious values
- Unique natural features or tangible objects that embody cultural values, such as sacred groves, rocks, lakes, and waterfalls, and
- Certain instances of intangible forms of culture that are proposed to be used for commercial purposes, such as cultural knowledge, innovations and practices of communities embodying traditional lifestyles.

8.2. Protection of Cultural Heritage in Project Design and Execution

> As the project developer, you are expected to ensure compliance with applicable laws on the protection of cultural heritage. This involves identifying and protecting cultural heritage by ensuring that internationally recognised practices for the protection, field-based study and documentation of cultural heritage are implemented.
>
> Developers are expected to retain competent professionals to assist in the identification and protection of cultural heritage. Where a project may affect cultural heritage, developers should consult with affected communities within the host country who use, or have used within living memory, the cultural heritage for long-standing cultural purposes. Developers should use the stakeholder engagement process with the local community to identify any potential cultural heritage.

The following mitigation hierarchy applies:

- Favour avoidance.
- Where avoidance is not feasible, minimise adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it.
- Where restoration in situ is not possible, restore the functionality of the cultural heritage in a different location, including the ecosystem processes needed to support it.
- The permanent removal of historical and archaeological artefacts and structures must only be carried out if the following conditions are met:
    - There are no technically or financially feasible alternatives to removal.
    - The overall benefits of the project conclusively outweigh the anticipated cultural heritage loss from removal.
    - Any removal of cultural heritage is conducted using the best available technique.

[47] IFC's Performance Standards on Environmental and Social Sustainability. PS 8 (2012)

- The affected communities are compensated for any loss of that tangible cultural heritage.

Critical cultural heritage consists of one or both of the following:[48]

- The internationally recognised heritage of communities who use, or have used within living memory, the cultural heritage for long-standing cultural purposes.
- Legally protected cultural heritage areas, including those proposed by host governments for such designation.
- Project developers must not remove, significantly alter or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the developers are required to use a process of Informed Consultation and Participation (ICP) of the affected communities as described in Section 1.7.4.

Prescribed steps taken to identify cultural heritage and protect it, including:

- Legal requirements
- Local considerations
- Cultural heritage investigation and surveys
- Development of Chance Find Procedures
    - A chance find procedure is a project-specific procedure that outlines the actions to be taken if previously unknown cultural heritage is encountered, and
    - This procedure should be applied in the event that cultural heritage is discovered during project construction or operation.
    - As a rule, developers must not disturb any chance find suspected artefact until an assessment by competent professionals and community approval is made and actions consistent with the requirements of PS 8 are agreed for the physical cultural resource found.
    - Determine whether the physical cultural resource is of significance through safeguarded consultation with the community. Additional guidance can be sought from local regulatory agencies that are entrusted with the protection of cultural heritage.
    - Where the physical cultural resource holds value and makes the place where it was found a culturally significant site, confirmed through community consultation, the investee should ensure continued access to the site or provide an alternative route. Where the physical cultural resource is not culturally significant, according to members of the affected community, the discussion is recorded to provide evidence of community consultation.
    - When a culturally significant physical cultural resource is found, the site where it is discovered should be avoided, in so far as this is possible. Where this is not possible, the investee should take measures to minimise any adverse impacts and, where relevant and possible, implement restoration measures in situ to ensure the value and functionality of the cultural heritage is maintained, including maintaining or restoring any ecosystem processes needed to support this endeavour. Where restoration in situ is not possible, effort should be made to restore the functionality of the cultural heritage in a different location.
    - If the physical cultural resource is found to be critical, the investee shall notify the fund and the local authority or authorities of the status of the physical cultural resource found. The site must be secured to prevent any damages or loss of any removable objects. The handling of the find will then be determined by the responsible authorities.
- Community access, whereby developers allow continued access to the cultural site or provide an alternative access route, in accordance with the consultation process and subject to overriding health, safety and security considerations

[48] IFC's Performance Standards on Environmental and Social Sustainability. PS 8 (2012)

- Roles and responsibilities
- Training and awareness raising, and
- If no cultural heritage is identified within the project footprint, this should be stated in the project-specific ESIA.

Construction or any activities should only resume after permission is granted from the responsible authorities.

Please fill in Section 8 of the ESMS Workbook based on the guidance provided above.

Suggested further reading

IFC's General Notice 8. Cultural Heritage (2012)

References

Business and Human Rights Resource Centre's Renewable Energy & Human Rights Benchmark. Key Findings from the Wind & Solar Sectors (2020)

Convection on Biological Diversity's Alien species that threaten ecosystems, habitats or species (footnote to Guiding Principles COP 6 Decision VI/23 (2002)

European Investment Bank's Environmental and Social Standards

IFC's Stakeholder Engagement: A Good Patrice Handbook for Companies Doing Business in Emerging Markets (2007)

IFC's General Note 7. Indigenous People (2012)

IFC's Performance Standards on Environmental and Social Sustainability (2012)

IFC's ESMS Implementation Handbook (2015)

IFC's ESMS Toolkit – General Version 2.1 (2015)

IFC's Good Practice Note: Environmental, Health, and Safety Approaches for Hydropower Projects (2018)

IFC's Good Practice Handbook: Land Acquisition and Resettlement (2019, draft version)

IISD's Green Conflict Minerals – interactive map (2019)

IFC's Guidance Notes: Performance Standards on Environmental and Social Sustainability (2019)

ILO's Using the ILO Code of Practice on HIV/AIDS and the world of work

LandMark's Global Platform of Indigenous and Community Lands

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

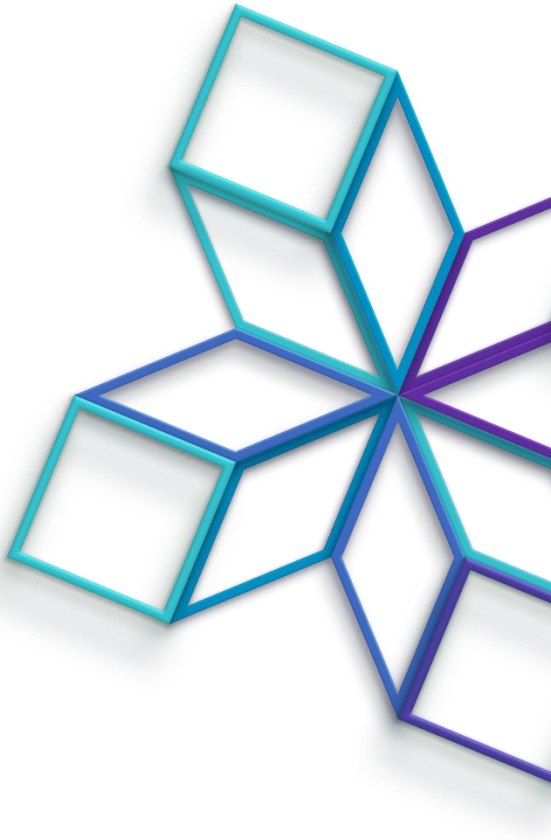
Office of the United Nations High Commissioner for Human Rights' (OHCHR) Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework (2011)

Solar Scorecard's Solar Manufacturer Ratings

The Indigenous Peoples of Africa Co-ordinating Committee website

UNFCCC's Definition of renewable biomass (Annex 18, CDM Executive Board 23 Report)

World Bank Group's Environmental, Health and Safety Guidelines (2007)



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