NCDD

SECRETARIAT

National Committee for Sub-National Democratic Development

Guideline for Managing Environmental and Social Risks in Projects in the Framework of the National Programme for Sub-National Democratic Development

August 2019

Contents

I. Introduction

This Guideline forms Annex 2 to the Policy on Environmental and Social Safeguards for Sub-National Administrations (the "ESS Policy"). The Guideline explains how environmental and social (E&S) risks are managed in projects within the framework of the NP-SNDD.
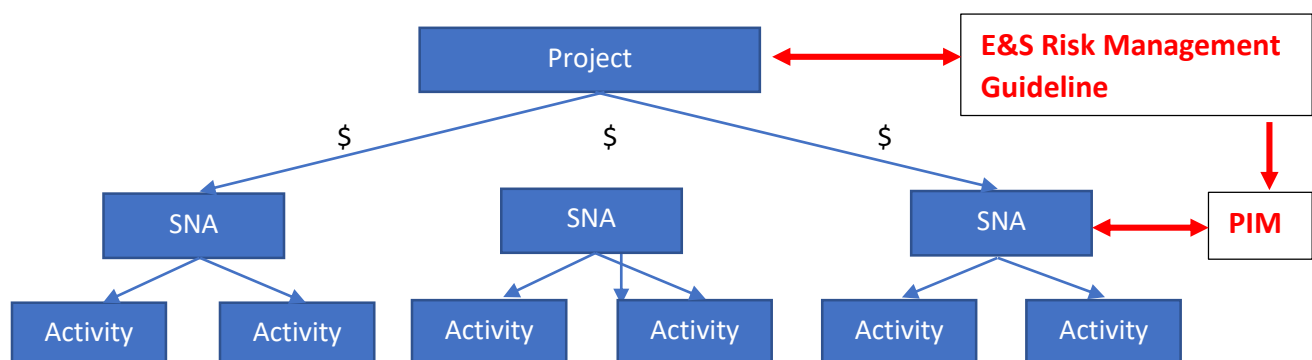
Environmental and Social Risks means risks of negative impacts from a project or an investment of a Sub-National Administration, related to one of the eight Strategies of the ESS Policy:

- Strategy 1: Assessment and Management of Environmental and Social Risks and Impacts
- Strategy 2: Labour and Working Conditions
- Strategy 3: Resource Efficiency and Pollution Management
- Strategy 4: Health, Safety and Welfare of the Community
- Strategy 5: Land Acquisition and Involuntary Resettlement
- Strategy 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Strategy 7: Indigenous People
- Strategy 8: Cultural Heritage.

Management of E&S risks consists of the following parts:

- **Screening** of projects or funding facilities to identify potential risks. After screening, a project is placed in Category A (High Risk); Category B (Medium Risk) or Category C (Low Risk);
- Preparation of an **Environmental and Social Impact Assessment (ESIA) for** Category A projects, or an **Environmental and Social Management Plan (ESMP)** for Category B projects;
- **Disclosure:** this means that people who may be affected have access to information about the project and its risks before the project is approved.
- **Implementation** of measures to reduce risks and to reduce negative environmental and social impacts, as identified in the ESIA or ESMP;
- **Monitoring** to verify that E&S risk management measures are correctly implemented;
- **Learning and Knowledge Management** to strengthen identification and management of E&S risks in future projects;
- **Complaint Handling and Redress Mechanisms**.

Most projects in the framework of the NP-SNDD transfer funds to many different sub-national administrations (SNA). The SNA plan and implement project activities following their implementation guidelines, such as the Capital/Province, District/Municipality/Khan and Commune/Sangkat Fund Project Implementation Manual (PIM). The implementation guidelines (PIM) include procedures for managing E&S risks at the activity level. The procedures in this Guideline are for management of E&S risk in the whole project and will result in guidance to the SNA on how to apply the PIM procedures. This is illustrated in the diagram below.

For large investments (over 1 billion Cambodian riel) by an SNA, risk screening and an ESIA / ESMP should be prepared for the single investment.

II. Type of Projects

NCDD Secretariat will use this Guideline to manage environmental and social risks the following types of project:

- Stand-alone projects within the framework of the National Programme for Sub-National Democratic Development (NP-SNDD) that will transfer project funds or grants to many different sub-national administrations;
- Single projects of sub-national administrations with value more than 1 billion Cambodian riel.

The Guideline will not be applied in the following cases:

- The project is subject to Environmental and Social Safeguards risk management procedures of an external development partner;
- The project is subject to Environmental and Social Safeguards risk management procedures following the legal procedures of a Ministry represented on NCDD, and does not have funding from GCF.

III. Roles and Responsibilities for Environmental and Social Risk Management

The Head of NCDD Secretariat is responsible to ensure that the Environmental and Social Risk Management process is properly implemented.

Implementation is carried out by:

- The **Environmental and Social Safeguards Officers** of NCDD-S, who carry out technical tasks for screening, preparation of ESMP, monitoring, learning and knowledge management.
- The **Project Implementation Unit** or other unit of NCDD-S (or another agency in the NP-SNDD) responsible for design and implementation of the project;
- **Sub-National Administrations** that receive funds from the project.

Even though this Guideline is designed to keep the E&S risk management process as simple as possible, it is important that all responsible officers understand about the purpose of E&S safeguards and the principles of the Policy on Environmental and Social Safeguards for Sub-National Administrations.

In particular, the Environmental and Social Safeguards Officers must thoroughly understand about safeguards procedures. This means that as well as understanding the Policy on Environmental and Social Safeguards for Sub-National Administrations, they should understand related policy, technical materials and requirements of development partners such as GCF. In particular, the Safeguards Officers should be familiar with the following documents:

- **Environmental and Social Safeguards at the Green Climate Fund**
  http://www.gcfreadinessprogramme.org/sites/default/files/Environmental%20and%20Social%20Safeguards%20at%20the%20Green%20Climate%20Fund.pdf
- **IFC Performance Standards on Environmental and Social Sustainability**;
  https://www.ifc.org/wps/wcm/connect/c8f524004a73daeca09afdf998895a12/IFC_Performance_Standards.pdf?MOD=AJPERES

- **Green Climate Fund Indigenous People Policy (IPP**):
https://www.greenclimate.fund/documents/20182/953917/GCF_B.19_05_-
_GCF_Indigenous_Peoples_Policy.pdf/cebd8ee3-c175-4f35-b847-e0a7cbf3e1dc

Part of the job of the Safeguards Officers is to provide trainings to project staff and to SNA on understanding E&S safeguards.

IV. Screening

Screening is the process of identifying environmental and social risks and negative impacts that could result from implementation of a project. In most cases, Environmental and Social Safeguards screening will be done after the project design is drafted but before it is approved.

For some fund sources, including Green Climate Fund, E&S Screening and preparation of an Environmental and Social Management Plan (ESMP) if needed, must be done before the project is submitted to the donor for approval.

Based on Environmental and Social Safeguards screening, projects will be placed into one of the following three categories:

Category A: High Risk

A Category A: High Risk project includes activities that may cause serious and long-lasting negative environmental or social impacts. This may be because of the type of activities (for example, constructing a major dam on a river) or because the activities are in a very sensitive location (for example, a wildlife sanctuary or a cultural heritage site).

> **GCF defines Category A (High Risk) as:**
>
> **"Activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented."**
>
> **Source: Environmental and Social Safeguards at the Green Climate Fund**

High Risk projects require special Environment and Social Impact Assessments to be carried out be specialist experts. Some development partners (for example GCF) may not permit their funds to be used for any projects that are in Category A: High Risk.

Category B: Medium Risk

A Category B: Moderate Risk projects include activities that cause some risk of negative environmental or social impacts, but these impacts will be small in scale, affect only a few people, affect only a limited area and will not be long-lasting. Sensitive locations (for example, wildlife sanctuary, cultural heritage site) will not be affected in any way.

> **GCF defines Category B (Medium Risk) as:**
>
> **"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."**
>
> **Source: Environmental and Social Safeguards at the Green Climate Fund**

If a project is classed as Category B, and Environmental and Social Management Plan (ESMP) must be prepared. The ESMP identifies the specific risks associated with the project and measures that will be taken to reduce the risk or reduce the negative impacts.

For a project that transfers project funds or grants to many sub-national administrations, the ESMP prepared by NCDD Secretariat will be used as a guide for carrying out safeguards screening and risk management at the project activity level, in accordance with the Project Implementation Manual (PIM).

Category C: Low Risk

Category C projects do not include any activities that can cause negative environmental or social impacts. For these projects there is no need to prepare an ESMP.

> **GCF defines Category C (Low Risk) as:**
>
> **"Activities with minimal or no adverse environmental or social risks and/or impacts."**
>
> **Source: Environmental and Social Safeguards at the Green Climate Fund**

V. Screening Process

Screening will be carried out by the NCDD-S Safeguards Officers using the Environment and Social Safeguards Screening Checklist attached to this guideline.

To carry out the screening, the Safeguards Officers must understand clearly about:

- The type of activities that will be financed by project;
- The size of the activities;
- The locations of the project activities;
- The types of people who may be affected by the project activities, particularly if they include vulnerable groups such as indigenous minority communities.

Most projects in the NP-SNDD transfer money to sub-national administrations. The sub-national administrations identify the project activities through their planning process and implement through their core budget or through a project Annual Workplan and Budget (AWPB). For these types of project, the detailed activities and locations will not be known at the time when the Environmental and Social Safeguards Screening is done. Therefore, screening will be carried out on the basis of:

- General description of the type of project activities that can be supported;
- Positive lists of eligible investments;
- Negative lists of types of project that cannot be supported;
- Project target areas.

It is quite acceptable for a project design to include a negative list of activities that are not permitted because they would cause the project to become a Category A project. For example, according to the checklist, any project including constructing a dam more than 15m high or more than 500m long would be Category A. So the negative list may say that any dam more than 15m high or more than 500m long is not permitted.

The Checklist is organised according to the eight Strategies of the Policy on Environmental and Social Safeguards for Sub-National Administration.

Some general questions about the type of project activities and type of area where the project activities are located are grouped under Strategy 1: Assessment and Management of Environmental and Social Risks and Impacts.

For each Strategy, there are a number of questions to answer. For each question, the answer can be "No risk", "Low Risk" or "High Risk." The criteria for each risk category are shown on the checklist.

For example, Question 1.4 is, "Will the project include construction or rehabilitation of any irrigation scheme?

- If the answer is "No" then the project is "Low Risk" for Question 1.4
- If the answer is "Yes. Maximum scheme size less than 100ha." Then the project is "Medium Risk" for question 1.4.
- If the answer is, "Yes. Scheme size can be more than 100ha" then the project is "High Risk" for question 1.4.

The questions on the screening checklist should be treated as a guide. The Safeguards Officers also need to consider the significance of any likely negative impact.

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What is a significant impact?

- **Likelihood – How likely is it that the negative impact will occur?**
- **Frequency – How often will the activity that creates the risk or impact occur?**
- **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?**

Source: Environmental and Social Safeguards in the Green Climate Fund

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The process for screening is:

1. The Safeguards Officers (at least 2 officers) must carefully read the project document including the scope of activities eligible for financing, the target areas and target beneficiaries;
2. The Safeguards Officers answer each question on the E&S Screening Checklist in turn.
3. If the Safeguards Officers are not clear about the answer to any question, they should ask the project design team.
4. In some cases, the Safeguards Officers may want to add a note to the Screening Checklist to indicate types of activity that are not allowed. For example, if "Medium Risk" is chosen for Question 1.4 (see above) the Safeguards Officers may want to note, "Schemes more than 100ha not allowed." Then, these notes are carried forward into the Environmental and Social Management Plan (ESMP).
5. When the Safeguards Officers have completed the checklist, they assign a category to the project, as follows:
   a. If any one answer to any question on the checklist is "High Risk," then the project is classified as "Category A: High Risk."
   b. If no answer to any question is "High Risk," but any one answer to any question is "Medium Risk" then the project is classified as "Category B: Medium Risk."
   c. If ALL the answers to all the questions on the Screening Checklist are "Low Risk" then the project it classified as "Category C: Low Risk."

6. The Safeguards Officers discuss the results of the screening with the project design team. In some cases, the project design team may decide to change some features of the project design, for example so a Category A project becomes Category B, or a Category B project becomes Category C.

VI. Preparing Detailed Risk Management Plans

1. Environment and Social Impact Assessment (ESIA)

If a project is classed as Category A, an Environmental and Social Impact Assessment (ESIA) should be carried out.

A full ESIA should be carried out by specialist experts. Ministry of Environment is preparing standard guidelines for carrying out ESIA in Cambodia. The experts will prepare a detailed Environmental and Social Management Plan according to the needs of the project. Therefore, preparation of a project-level ESIA is not covered in detail in this guideline.

2. Environment and Social Management Plan (ESMP)

For any project classified as Category B (Medium Risk), an Environment and Social Management Plan (ESMP) must be prepared using a simple matrix format. A suitable format for the ESMP is provided as Appendix 2 to this Guideline.

For GCF and some other donors, the ESMP must be submitted for approval together with the project proposal.

The purpose of the ESMP is:

1. List all the environmental and social risks that have been identified by screening (i.e. any screening question with the answer, "Medium Risk" must be listed on the ESMP).
2. For each risk, describe mitigation measures. These may include:
   a. Restrictions on the scope of activities that can be implemented
   b. Restrictions on the scale of activities that can be implemented
   c. Restrictions on the type of location where activities can be implemented
   d. Types of risk mitigation measure to reduce environment and social impacts from permitted project activities.
3. Identify who is responsible for implementing the mitigation measures
4. Identify when the mitigation measures will be implemented (e.g. during planning of project activities, during implementation etc)
5. Key indicators to be monitored by the Safeguards Officers to verify that the ESMP is correctly implemented.

VII. Guidance on Risk Mitigation Measures

To identify appropriate risk mitigation measures, the project team should refer to the ESS Policy which provides guidance for each of the eight Strategies.

Further guidance on risk mitigation measures can also be found in the GCF document "Environmental and Social Safeguards in the Green Climate Fund."

For Strategy 5: Land Acquisition and Involuntary Resettlement; Strategy 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and Strategy 7: Indigenous Peoples; there are already well-established procedures for risk management in the CS Fund PIM and in implementation

procedures for other levels of SNA. These procedures have been found to be "fit for purpose" and appropriate for the type of sub-projects and activities implemented by SNA.

The CS Fund PIM and other documents will be updated to include safeguard procedures relating to the strategies of the ESS Policy that have not been covered in the past.

Some additional notes on types of risk mitigation measures relevant to SNA projects are provided below:

Strategy 2: Labour and Working Conditions

All SNA projects and activities must comply with Cambodian employment laws, provide safe working conditions for employees and ensure there is no discrimination against women, ethnic minorities or any other group.

Compliance with labour laws should be a standard condition for contracts for implementation of SNA projects and activities.

Some types of project may cause hazardous working conditions.

All construction projects can potentially cause hazardous working conditions. All contracts for construction under SNA projects and activities should include clauses for ensuring the safety of workers and other people near the construction work.

Some types of project may cause unusual hazards (for example, breaking down an old building that has asbestos material in the roof). In this case, the need for safety measures (safe breathing equipment) should be mentioned in the ESMP.

In some types of industry (for example, brick making) it is known that children are often employed even though this is against Cambodian labour laws. If this is an identified risk, measures should be taken to make sure it does not happen in the project.

If the project will need a large number of workers who will come from outside and stay in the project area during project implementation, this can cause social problems such as:

- Poor living conditions for the workers;
- Pollution of water sources etc for local people;
- Conflicts between local people and the outside workers;
- Spread of HIV and other sexually transmitted diseases.

Mitigation measures may include:

- Making sure there is appropriate, clean and safe accommodation for the workers,
- Training on HIV awareness.

Strategy 3: Resource Efficiency and Pollution Management

Risk mitigation measures under Strategy 3 may include:

- Measures to reduce pollution by restricting the types of machinery or materials that can be used;
- Measures to ensure that waste gases, liquids and materials are handled and disposed of safely;
- Measures to restrict the use of agriculture chemicals or other polluting materials in the project.

Strategy 4: Health, Safety and Welfare of the Community

In most cases, health and safety impacts of SNA projects and activities will be very small, or are already covered under other Strategies.

One important issue is road safety. Road projects can cause an increase in road traffic and / or traffic travelling faster. This can lead to accidents, particularly when local people are not used to dangerous traffic.

Projects should include mitigation measures including (1) designing safety features in roads, and (2) providing road traffic safety training to local communities.

Strategy 5: Land Acquisition and Involuntary Resettlement

Correct implementation of the C/S Fund PIM (or other SNA level as relevant) procedures will be sufficient to ensure compliance with the ESS Policy.

Strategy 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

Where permitted project activities are located in potentially sensitive areas, a sub-project / activity level environmental impact assessment is carried out using the community-based approach that is well established in the procedures of the C/S Fund PIM (and for other levels of SNA). These procedures have been found "fit for purpose" and sufficient by World Bank and other international donors.

Strategy 7: Indigenous People

The C/S Fund PIM has well-established procedures for safeguarding the rights and interests of indigenous minority peoples affected by project implementation, based on the principle of "free and informed consent" reached through dialogue with representatives chosen by the minority peoples themselves.

The C/S Fund PIM procedures and similar guidelines for other levels of SNA should be reviewed to ensure consistency with the ESS Policy and with current Cambodian laws and regulations.

Strategy 8: Cultural Heritage.

Until now, protection of cultural heritage has not been specifically addressed in the C/S Fund PIM safeguard procedures. Normally, projects should not be located so that there will be impacts on existing physical cultural heritage (e.g. ancient temples). If there is a risk that an ancient temple site may be affected, the [Provincial Department of Culture] should provide advice.

For cultural heritage that is important to the local community, a community-based approach to risk management, similar to the C/S Fund PIM procedure for preparing environmental management plans, should be used.

VIII. Disclosure of the ESMP

After the ESMP is finalised, it should be approved by the Head of NCDD-S or an official with delegated authority (e.g. Head of PMSD).

Then, the project design document and the ESMP must be posted on the NCDD-S website. This is known as Disclosure. The purpose is so that people who may be affected have access to information about the project and potential risks.

Some donors including GCF require that the ESMP is disclosed for a fixed period before the project proposal is submitted for approval. For GCF the rule is that disclosure must take place 30 days before the GCF Board meeting.

IX. Implementation of the ESMP

As a general principle, the implementing SNA are responsible to ensure compliance with the Policy on Environment and Social Safeguards and with relevant Cambodia laws and regulations. For most small-scale sub-projects and activities, this will be ensured by:

- Compliance with the provisions of the relevant Project Implementation Manual (e.g. the C/S Fund PIM);
- Avoiding types of activity that are identified as not eligible through the ESMP;
- In cases where eligible project activities may cause risks that are not adequately covered in the PIM, implementing risk mitigation measures identified in the ESMP.

The first step of implementation of the ESMP is for the project implementation team to review the ESMP and make sure that all its provisions are adequately communicated to the implementing SNA. This may be by:

- Provisions that are already covered in the C/S Fund PIM (etc);
- Provisions in the Grant Agreement, Project Implementation Manual or other document that sets out the eligible uses and implementing procedures for the project;
- Training of the SNA staff where needed.

The SNA will screen planned project activities and identify any activities that may result in environmental and social risks. They will do this using standard procedures (e.g. in the C/S Fund PIM) and any project-specific procedures required by the ESMP. This is the same procedure as is already followed for C/S Fund projects. When a potential risk is identified the SNA will:

- Using the Project Information Database (PID[1]), flag that the sub-project or activity requires risk mitigation measures. The NCDD-S Safeguards team will use this information for monitoring ;
- Take appropriate activity-level risk mitigation measures. Examples of these are:
  - Preparing land acquisition plans;
  - Preparing environmental impact assessments and management plans;
  - Ensuring that construction contracts include necessary safeguards measures, such as worker safety, providing road safety training to local communities etc.

X. Monitoring

The NCDD-S Safeguards Officers will be responsible to follow-up implementation of the ESMP and compliance with the ESS Policy for all projects within the framework of the NP-SNDD, except where alternative arrangements are made in line with donor requirements. **Therefore, all projects in the framework of the NP-SNDD should include a budget for Safeguards Officers to carry out site visits for safeguards monitoring.**

The Safeguards Officers cannot follow up every project activity, so the main responsibility is on the SNA.

The Safeguards Officers will select a sample of projects that have "risk flags" notified through the PID. The Safeguards Officers will visit the selected projects and verify that:

- Safeguards procedures were properly followed.

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[1] Currently, the PID tracks sub-projects requiring land acquisition studies environmental impact assessments and where indigenous minorities may be affected. To bring PID into line with the Policy on ESS, "flags" for each of ESS Strategies 2-7 should be added to the PID.

- Whether any negative environmental or social impacts occurred
- Whether the local community and other stakeholders are satisfied with the implementation of safeguards;
- Whether there are any lessons that can be learned for future projects.

In case that the Safeguards Officers discover that the ESMP and ESS Policy have not been correctly implemented, they should:

- Investigate the reason for incorrect implementation of the ESMP or ESS;
- Investigate whether any serious negative impacts have resulted;
- Discuss with the SNA and with stakeholders and make recommendations to correct the problem, including redress to affected people where appropriate.

In serious cases the Safeguards Officers may recommend to NCDD-S to halt further project financing to the SNA until the problem is resolved and compliance with the ESS Policy and ESMP can be assured in future.

The Safeguards Officers prepare a quarterly summary report and an annual report which should include:

- Number, type and location of project activity sites inspected;
- Number of projects found compliant with the ESMP and ESS Policy;
- Number of projects where violations of the ESMP and ESS Policy were found;
- Actions taken to correct violations of the ESMP and ESS Policy;
- In the Annual Report only, general issues identified with implementation of the ESS Policy and recommendations, including for strengthening of the ESS Policy and this guideline, additional resources, training or other actions needed.

In addition to regular monitoring by the Safeguards Officers, implementation of the ESS Policy should be reviewed by an external evaluator or auditor. This is expected to be a requirement for project funding from GCF. Therefore, an external audit of implementation of the ESS Policy will be conducted one time per three years. The scope of the external audit will include all GCF-financed activities and non-GCF financed activities subject to available resources and agreement with other donors.

XI. Learning and Knowledge Management

The role of the Safeguards Officers includes ensuring that the experience of implementation of the ESS Policy contributes to strengthening the policy and its implementation, and also contributes to building knowledge and capacity for environmental and social safeguards in Cambodia beyond the NP-SNDD.

The means of Learning and Knowledge Management on ESS include:

- The Annual Reports of the Safeguards Officers;
- Presentations at relevant workshops;
- Dialogue with other agencies, particularly the National Council for Sustainable Development which is the National Designated Authority of GCF;
- Preparation of case studies, policy briefs and other materials for publication on the NCDD-S website;
- Development and delivery of training materials for SNA on implementation of the ESS Policy.

XII. Complaints Handling and Redress Mechanisms

All stakeholders and people affected by a project have a right to raise complaints about the implementation of environmental and social safeguards. This includes:

- People who experience, or believe that they have experienced, negative environmental and social impacts from the project; and
- People who are not directly affected themselves but who are concerned that environmental and social safeguards are not adequately implemented.

Complaints may be raised with the implementing SNA or directly with NCDD-S. There is no requirement for the complainant to complain to the SNA before complaining to NCDD-S.

For many international donors, including GCF, stakeholders also have the option of complaining directly to the donor.

In all cases, complaints must be:

- Recorded, forming a record of complaints handling which can be audited;
- Adequately investigated by an investigator who is independent of the project implementation team;
- Complainants have the right to know the outcome of the investigation;
- Where it is established that the complainant or other persons have suffered loss or damage as a result of negative environmental or social impacts of a project, there must be possibilities for compensation (redress).

At the SNA level, complaints are handled through the Accountability Box system.

At NCDD-S the main mechanism for complaints is through the NCDD-S website. The procedure for submitting and managing complaints through the NCDD-S website is described in the NCDD-S Operational Policies and Procedures (OPP) Manual. Complaints can also be submitted to NCDD-S in writing, by telephone or in person. In all cases, the complaint should be recorded and appropriately investigated.

In all cases of complaints concerning environmental and social safeguards, the Safeguards Officers should be informed. The Safeguards Officers should be involved in investigating the complaint, except in the case where the Safeguards Officers, or actions they are responsible for, are the subject of the complaint themselves.

Phnom Penh, 8 August 2019

Head of NCDD Secretariat

Ngan Chamroeun

Appendix 1: Environmental and Social Risk Screening Checklist

Managing Environmental and Social Risks in Projects in the Framework of the National Programme for Sub-National Democratic Development

CHECKLIST FOR PROJECT SCREENING AND RISK CATEGORY

Name of Project	
Proposed Fund Sources	
Brief Description of Project Activities	
Estimated Project Costs	
Proposed Project Start Date	
Proposed Project End Date	
Date of Screening	

Officers Responsible for Screening		
1	*Name:*	*Position:*
2	*Name:*	*Position:*
3	*Name:*	*Position:*

Project Environmental and Social Risk Category Based on Screening (A: High Risk, B: Medium Risk or C: Low Risk)	
Comments	

Approved By:	
Name:	*Position:*
Signature:	*Date:*

STRATEGY 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

General Screening Questions on Project Type

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
1.1	Will the project support construction or repair to any dam more than 15m high or 500m long?		H		
1.2	Will the project support construction or repair to any dam that is less than 15m high and less than 500m long?		M		
1.3	Will the project support construction or repair of any highway (any road with a number in the Cambodian highway numbering system) OR any road more than 10km long?		H		
1.4	Will the project support construction or repair of any section of rural road (road that is not a highway and does not have a number) less than 10km long for one sub-project?		M		
1.5	Will the project support new irrigation development of more than 500ha for any sub-project?		H		
1.6	Will the project support small scale irrigation (less than 500ha new development in any sub-project)		M		
1.7	Will the project support construction of any new building in a place where there was no building before?		M		

STRATEGY 2: LABOUR AND WORKING CONDITIONS

Guidance for Risk Mitigation Measures for Labour and Working Conditions
a. Provide workers with clear and understandable information on their rights, including those related to hours of work, compensation, and benefits.
b. Provide safe and healthy working conditions, taking into account inherent risks in the sector.
c. Not discriminate but instead hire, compensate, manage and lay off employees based on the principle of equal opportunity and fair treatment.
d. Not restrict workers from joining or forming workers' organizations or bargaining collectively, nor retaliate against workers who organize.
e. Create effective grievance mechanisms for employees.
f. Not employ children (under 18) in any manner that is economically exploitative or harmful to the child's health, education or social development.
g. Not employ forced labour or trafficked persons.
h. Make efforts to ensure that contracted workers employed by third parties are protected.
i. Monitor primary supply chains to identify and reduce risks of child or forced labor, or significant safety concerns.

Screening Questions for Risks on Labour and Working Conditions

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
2.1	Will the project require temporary or permanent employment of local labour in the project area?		M		
2.2	Will the project require a labour force from outside the project area (more than 10 workers) who will live in the project area during project implementation (example, a construction team)?		M		
2.3	Will the project require people to be employed in work that is potentially hazardous, and is different from the work they normally do (e.g. construction work)		M		
2.4	For GCF funded projects: is there any other reason why the project could cause a risk related to the GCF guidance for risk mitigation for Labour and Working Conditions (above)?		H or M		

STRATEGY 3: RESOURCE EFFICIENCY AND POLLUTION MANAGEMENT

Guidance for Risk Mitigation on Resource Efficiency and Pollution Prevention
a. Avoid the release of air, water and land pollutants or, when avoidance is not feasible, minimize and/or control project-related pollution.
b. Avoid the generation of waste (both hazardous and non-hazardous), or where unavoidable, minimize and appropriately dispose of waste.
c. Replace hazardous materials with safer substances where feasible, and avoid the manufacture, trade, and use of chemicals and hazardous materials subject to international bans or phase-outs.
d. Use integrated pest management and integrated vector management approaches to reduce the risks of pesticide use.
e. Efficiently use natural resources, including energy and water.
f. Account annually for GHG emissions for all projects anticipated to release over 25,000 tons of CO2 equivalent emissions.
g. Make an effort to reduce GHG emissions.

Screening Questions for Risks on Resource Efficiency and Pollution Management

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
3.1	Will the project support construction / installation of industrial plant or agro-processing facility with more than 20 workers?		H		
3.2	Will the project support construction / installation of small industrial plant or agro-processing facility that uses an engine bigger than 100kVA / 110hp?		M		
3.3	Will the project permanently install any equipment that uses chemicals?		M		
3.4	Will the project result in long-term production of solid waste that is not biodegradable?		M		
3.5	Will the project result in production of polluted water?		M		
3.6	Will the project result in increased use of agricultural chemicals?		M		
3.7	Will the project result in the production or transport of hazardous chemicals?		H		
3.8	Will the project result in increased extraction of groundwater of more than 10 m^3 / day in any one place?		M		
3.9	Will the project result in extraction of more than 10% of the water in any river or stream?		M		
3.10	For GCF funded projects: is there any other reason why the project could cause a risk related to the GCF guidance for risk mitigation for Performance Standard 3 (above)?		M		

STRATEGY 4: HEALTH SAFETY AND WELFARE OF THE COMMUNITY

Guidance for Risk Mitigation Measures for Community Health, Safety and Security
a. Assess and avoid (or if unavoidable, mitigate) adverse impacts on the health and safety of the affected community over the life of the project.
b. Assess and avoid, if possible, project impacts on ecosystem services (such as loss of buffer areas like mangrove forests or resources like freshwater) on which communities depend.
c. Avoid or minimize the potential for community exposure to diseases, including from hazardous waste, taking into consideration the higher sensitivity of certain vulnerable groups.
d. Assess safety risks that the project poses towards local communities and create a system to respond to emergency situations (including both project accidents and natural hazards).
e. Assess and mitigate risks posed by a project's security arrangements, such as use of private security, police or military personnel.
f. Investigate all allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to public authorities.

Screening Questions for Risks on Health, Safety and Welfare of the Community

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
4.1	Will the project cause danger to people from natural disasters such as flash floods, cyclones etc (for example, because people move to live or work in a vulnerable area)?		H		
4.2	Will the project result in people undertaking potentially dangerous activities that they do not do already?		M		
4.3	Will the project support production of food that could cause a health hazard if hygiene standards are not followed?		M		
4.4	Will the project cause any temporary health or safety hazards to the local population?		M		
4.5	Will the project result in a significant increase in road traffic?		M		
4.6	Will the project result in increased ownership or use of firearms?		M		
4.7	Will the project require employment of security guards who could come into conflict with local communities?		M		
4.8	For GCF funded projects: is there any other reason why the project could cause a risk related to the GCF guidance for risk mitigation for Performance Standard 4 (above)?		H or M		

STRATEGY 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

Guidance for Risk Mitigation Measures for Land Acquisition And Involuntary Resettlement
a. Avoid forced evictions, including the use of coercion and manipulation of communities.
b. Avoid and/or minimize physical displacement (moving people off land that they inhabit) and economic displacement (restricting people's access to use of land and/or natural resources).
c. Engage with affected communities throughout the resettlement process, including through the provision of a grievance mechanism for affected communities, beginning early in the project development phase.
d. Provide all displaced persons with fair and equitable compensation, such as replacement land, cash or in-kind replacement of lost assets, and restored access to natural resources.
e. Improve or restore the livelihoods and standards of living of those people who are displaced.
f. For people with a legal right to the land, offer the choice of replacement property of equal or higher value and security of tenure, or (if land is not possible) cash compensation.
g. For people without formal land rights recognized by the government, offer adequate housing options with secure tenure and compensation for lost assets, such as buildings.

Screening Questions for Risks on Land Acquisition and Involuntary Resettlement

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
5.1	Will any sub-project result in more than 20 people having to move their place of residence?		H		
5.2	Will the project result in some people, less than 20, having to move their place of residence?		M		
5.3	Will the project result in any household losing ownership or right to use land that produces more than 10% of the income of the household?		H		
5.4	Will the project result in any household losing ownership or right to use land that produces less than 10% of the income of the household?		M		
5.5	Will the project result in any existing buildings being removed or demolished?		M		
5.6	For GCF funded projects: is there any other reason why the project could cause a risk related to the GCF guidance for risk mitigation for Land Acquisition and Involuntary Resettlement (above)?		H or M		

STRATEGY 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

Guidance for Risk Mitigation Measures For Ps 5: Land Acquisition And Involuntary Resettlement

a. Assess and avoid impacts on biodiversity and ecosystem services if possible, and otherwise implement measures to minimize and restore any impacts.
 b. Apply protection measures to all impacted areas that have significant biodiversity value, even if they are habitats that have been modified by human activity.
 c. Assess the ecosystem services that the project is likely to impact and/or that the project will rely on, and avoid, minimize or mitigate any negative effects, including from alien species.
 d. Not significantly convert or degrade "natural habitat" unless:
    - There are no other feasible options,
    - Stakeholders have been consulted, and
    - Mitigation measures are in place to achieve no net loss of biodiversity.
 e. Not implement activities in "critical habitat" unless:
    - There is no other alternative,
    - The activities does not lead to measurable negative impacts on key biodiversity and ecological processes or a net reduction in endangered species, and
    - A monitoring plan is put in place.
 f. Not implement activities in legally protected or internationally recognized areas unless:
    - The activity is legally permitted,
    - Adequate stakeholder participation is implemented, and
    - Efforts are taken to enhance conservation in the area.
 g. Ensure that activities involving the production of living natural resources (e.g. forestry, agriculture) adhere to relevant globally, regionally, or nationally recognized standards of sustainable management.
 h. Monitor the institution's primary supply chains to ensure that they are not contributing to the conversion of natural or critical habitats.

Screening Questions for Risks on Biodiversity Conservation and Sustainable Management of Living Natural Resources

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
6.1	Will any project activities be in a protected area (national park, wildlife sanctuary etc) or areas of national or international importance for biodiversity conservation?		**H**		
6.2	Will the project result in use of more than 50ha of natural forest land for construction or farming		H		
6.3	Will the project result in draining of more than 50ha of natural wetland?		H		
6.4	Will the project result in conversion of natural forest or wetland less than 50ha to a different use?		M		

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
6.5	Will the project result in crop farming on more than 500ha that is not used for crop farming at present?		H		
6.6	Will the project result in crop farming on land less than 500ha that is not used for crop farming at present?		M		
6.7	Will the project result in increased use of non-timber forest resources?		M		
6.8	Will the project result in increased wild capture fishing?		M		
6.9	Will the project support commercial forestry of size more than 500ha?		H		
6.10	Will the project support commercial forestry of size less than 500ha?		M		
6.11	Will the project change crop farming practices on more than 500ha of land?		M		
6.12	Will the project result in increased livestock grazing on more than 500ha of land?		M		
6.13	Will the project support aquaculture (any site bigger than 25ha)?		H		
6.14	Will the project support small-scale aquaculture (less than 25ha per site)		M		
6.15	Will the project result in use of genetically modified organisms?		H		
6.16	Will the project result in any risk of introducing invasive species (wild plants or animals that did not live in the project area before)?		H		
6.16	Does the project include land and soil conservation activities?		M		
6.17	Does the project include watershed management activities?		M		
6.18	For GCF funded projects: is there any other reason why the project could cause a risk related to the GCF guidance for risk mitigation for Performance Standard 6 (above)?		H or M		

STRATEGY 7: INDIGENOUS PEOPLES

Guidance for Risk Mitigation Measures for Indigenous Peoples
a. Identify indigenous peoples (IPs) that may be affected by the project and the nature of that impact (economic, social, environmental etc.).
b. Avoid negative impacts on IPs where possible, and otherwise minimize, restore or compensate for these impacts in a culturally sensitive manner.
c. Design all measures related to IPs with their informed consultation and participation throughout the life of the project.
d. Not develop a project on land that is traditionally owned or used by IPs unless the risks are thoroughly assessed, IPs are informed of their rights, IPs continue to have access to resources if possible, appropriate compensation is offered, and IPs are offered a fair and equitable sharing of project benefits.
e. Not relocate Indigenous Peoples from land or natural resources that they have traditionally owned or used unless their free, prior and informed consent is first obtained.
f. Not significantly impact critical cultural heritage unless free, prior and informed consent is first obtained from affected IPs.
g. Not use the traditional knowledge or cultural heritage of IPs for commercial purposes without first obtaining their free, prior and informed consent and providing fair benefit sharing arrangements.

Screening Questions for Risks on Indigenous Peoples

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
7.1	Will the project cause development of any land that is traditionally used by an indigenous minority community?		H		
7.2	Will the project make any use of the cultural heritage of an indigenous minority community (e.g. for tourism)?		H		
7.3	Will the project target areas include any place where more than 30% of the population are from an indigenous minority community?		M		
7.4	Will the project have any negative impacts on any indigenous minority community (e.g. their traditions, culture, livelihood or traditional land use patterns)?		M		
7.5	For GCF funded projects: is there any other reason why the project could cause a risk related to the GCF guidance for risk mitigation for Indigenous Peoples (above)?		H or M		

STRATEGY 8: CULTURAL HERITAGE

Guidance for Risk Mitigation Measures For Cultural Heritage
a. Identify and avoid significant adverse impacts on tangible cultural heritage (like archaeological or historical sites) or unique natural features that embody cultural values (like sacred rocks or waterfalls).
b. Consult with affected communities and relevant government agencies in order to identify cultural heritage of importance.
c. Put in place a system for protecting cultural heritage that is discovered during project implementation (so-called "chance find" procedures).
d. Maintain community access to cultural heritage sites located on the project site.
e. Not remove, significantly alter, or damage critical cultural heritage (such as internationally recognized or legally protected heritage sites), except in exceptional circumstances and in collaboration with affected communities.
f. Use intangible cultural heritage (like knowledge, innovations, or practices) for commercial purposes only in collaboration with relevant communities.

Screening Questions for Risks On Cultural Heritage

#	Screening Question	Yes / No	Risk if "Yes"	Risk Level	Comment
8.1	Will any project site be in a location of physical or non-physical cultural heritage that is of national or international importance?		H		
8.2	Will the project activities have any permanent negative impact on any important physical cultural heritage (e.g. ancient temples, buildings etc)		H		
8.3	Will the project activities have any permanent negative impact on any important non-physical cultural heritage (e.g. local traditional culture)?		H		
8.4	Will the project have any minor or short-term negative impact on physical or non-physical cultural heritage?		M		
8.5	For GCF funded projects: is there any other reason why the project could cause a risk related to the GCF guidance for risk mitigation for Cultural Heritage (above)?		H or M		

Appendix 2:   Matrix Format for Environmental and Social Management Plan

Risk	Mitigation Measure	Responsibility	When	Key Indicators for Monitoring