Safeguard Requirements
And the Framework Process

The World Bank
Europe & Central Asia Region

Biskek, Tblisi
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## Role of Bank and Borrower

<table>
<thead>
<tr>
<th>Bank</th>
<th>Borrower</th>
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<tbody>
<tr>
<td>Screens and Sets EA Category</td>
<td>Responsible for carrying out EA</td>
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<tr>
<td>Advises Borrower on the Bank’s EA requirements</td>
<td>Consults project-affected groups and local NGOs</td>
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<tr>
<td>Reviews and determines if EA provides adequate basis for processing project for Bank financing</td>
<td>Provides relevant information in timely manner prior to consultation in a form and language understandable and accessible to groups being consulted</td>
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<td>Makes report available in Infoshop</td>
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Project Concept Note

Integrated Safeguard Data Sheet ISDS

Project Preparation

Loan Agreement

Safeguard Products EIA, EMP EMF, EAF, RPF RAP

Project Appraisal Document PAD
Project Safeguard Policy Process
WB Board Approval

- Borrower/Bank work together to ensure required safeguard documents acceptable
- EIA/EA/PMP/RAP reviewed and sent to Infoshop and made available in country
- Project Appraisal Document (PAD) identifies triggered safeguards, project classification, and safeguard provisions – part of report and annex
- Description of safeguard provisions focused on borrower’s procedures
- Loan Agreement refers to safeguard requirements
## Safeguard Policies Triggered

<table>
<thead>
<tr>
<th>Safeguard Policies Triggered</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Environmental Assessment (OP/BP 4.01)</td>
<td>X</td>
<td></td>
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<tr>
<td>Natural Habitats (OP/BP 4.04)</td>
<td></td>
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<td>Forests (OP/BP 4.36)</td>
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<td>Pest Management (OP 4.09)</td>
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<td>Physical Cultural Resources (Draft OP 4.11)</td>
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<td>Indigenous Peoples (OP 4.10)</td>
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<td>Involuntary Resettlement (OP/BP 4.12)</td>
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<td>Safety of Dams (OP/BP 4.37)</td>
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<td>Projects on International Waterways (OP/BP 7.50)</td>
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<tr>
<td>Projects in Disputed Areas (OP/BP 7.60)</td>
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Key Safeguard Actors -- Actions

Sub-Borrower

- Submit subproject concept to PIU
- Arrange and finance EIA, EMP, EA review, RAP
- Obtain required permits/licenses
- Obtain clearance from ENV authority
- Maintain files documenting safeguard process and selection of experts to do study

Beneficiary Enterprise

Project Implementation Unit

- Have key processes in Operational Manual
- Provide technical support for safeguard screening to borrowers
- Review loan application package for safeguard documentation
- Maintain safeguard documents for all subprojects
- Monitor subproject compliance with mitigation plans
Key Safeguard Actors -- Actions

World Bank Project Team & Safeguard Specialists

- Conduct supervision
- Provide safeguard enhancement

World Bank Safeguard Compliance

- Ensure Policies are followed
- Conduct reviews

Ministry of Environment

- Review and clear sub-projects according to national/local regulatory requirements
- Issue permits and licenses
Project Implementation Cycle
Subproject Identification and Planning Process
Implementation
Annual Planning and Budgeting Process
Procurement Procedures
Financial Management Procedures
Budgeting Process
Institutional Arrangements

Operational Manual

Environmental Review and Implementation Procedures
Screening Form
Environmental and Social Impact Mitigating Measures
Monitoring Checklists
Operations Manual

Appraisal & Approval

Subproject Sponsor / PIU
Undertakes Environmental Screening, Use of Checklist

Implementation and Monitoring

Annual reporting
(include safeguard performance)

Supervision & Evaluation

Special requirements for Category A projects

World Bank
Supervision

Third Party
Assessment

Periodic site visits, audits, if appropriate
(include safeguard performance)
Environmental & Social Safeguard Framework Applications

**Formulation**

**Objective:** Ensure that environmental issues are considered at the earliest stage of the subproject cycle

**Actions:**
- Provide technical assistance directly to subproject formulators when necessary, or direct them to qualified specialist who can help in subproject formulation
- Ensure impacts and mitigation measures are considered by subproject proposers

**Evaluation/ Approval**

**Objective:** Ensure that environmental impacts have been analyzed and appropriate mitigation measures designed

**Actions:**
- Screen proposals to categorize subprojects according to the type of environmental review that will be necessary
- Carry out either an environmental review, limited environmental assessment, or a full environmental assessment report, which will identify impacts and design appropriate mitigation measures
Environmental & Social Safeguard Framework Applications

**Implementation and Supervision**
- Prepare contracts with environmental clauses for companies, organizations, and communities to execute subprojects.
- Undertake site visits to ensure that environmental criteria and mitigation measures, as required by contracts, have been incorporated into subprojects.
- Require changes to subproject design and/or implementation if unforeseen impacts occur.
- Approval required to issue final payment for subproject construction.

**Monitoring and Evaluation**
- Site visits during subproject execution and operation to assess how environmental screening and mitigation measures are succeeding or have succeeded in minimizing impacts.
- Determine if changes are needed to improve environmental assessment process.
- Meet with contractors and community representatives to gather feedback.
Environmental Assessment Categories:

**CATEGORY A:** major or significant environmental impacts which are not easily identified or mitigated

**ACTION:** Environmental Impact Assessment

**CATEGORY B:** significant environmental impacts which are easily identified and can be mitigated

**ACTION:** Environmental Analysis, pre-EIA, LEA, checklist

**CATEGORY C:** minor or no environmental impacts associated with the project

**ACTION:** No assessment required
Indicative List Category A SubProjects

- Large dams and reservoirs
- Large-scale forestry production projects
- Irrigation, drainage, and flood control (large-scale)
- Food processing, agro industries (large-scale)
- Livestock/Animal farming/production (large scale)
- Aquaculture and mariculture (large scale)
- Fisheries development, export promotion
- Large scale water extraction (aquifers, groundwater)
- Land clearance and leveling
- Highway construction (major roads, arteries, toll roads)
- Bridge construction (major)

- Reclamation and new land development
- River basin development;
- Wind turbine farms (large scale)
- High Tension transmission lines
- Major urban housing development
- Wastewater treatment plants
- Waste collection systems (large scale)
- Solid waste collection and management systems (large scale)
- Projects that include use of pesticides (in large volumes or significant use)
- Manufacture, transportation, and use of hazardous and/or toxic materials
- Projects which pose serious occupational or health risks
- Projects with resettlement
Indicative List of Category B SubProjects

- Agro-industries (small-scale)
- Electrical transmission (rural)
- Aquaculture and mariculture
- (moderate to small scale)
- Protected area and biodiversity affecting resource access,
- Irrigation and drainage (small-scale)
- Micro-hydropower (less than 5 mw);
- Renewable energy (other than hydropower)
- Rural electrification
- Tourism (small scale, lodges, bed and breakfasts, cottages, eco-lodges)
- Rural water supply and rural latrines

- Wastewater collection (small scale)
- Watershed projects (management or rehabilitation)
- Road Rehabilitation (maintenance, and upgrading, small-scale)
- Moderate to small-scale manufacturing/industry
- Health with health Posts, health units
- Education with school expansion, school construction
Environmental Assessments
Category A

- Borrower/Sponsor is usually responsible for commissioning the environmental assessments.
- The PIU should oversee and review:
  - Scoping results.
  - The TORs for any EIA studies.
  - The shortlists of consultants
  - EIA reports.
- The PIU can use internal environmental/social specialists or contract outside services
- It is encouraged for the PIU to consult with ECA safeguards coordinator for feedback.
Environmental Impact Assessment (EIA)

- Incorporates environmental and social considerations into the formal EIA Report.

- Process should be initiated in the early preparation stages of project planning.

- The objectives of the EIA process are to:
  - provide an analysis of project alternatives incorporates all relevant social and environmental issues;
  - ID all environmental and social impacts
  - anticipate and avoid, minimize or offset the significant adverse physical, biological and social effects of proposed development operations;
Environmental Impact Assessment (EIA)

- protect the productivity and capacity of natural systems and the ecological processes that maintain their functions;
- promote development that is environmentally and socially sustainable;
- incorporate environmental and social measures fully into project design and execution; and
- engage the public and effected stakeholders by providing appropriate information about the project and EIA process.
Environmental Management Plan (EMP)

- Is an integral part of the EIA
- Includes the design of all mitigation and compensation measures recommended in the EIA
- Ensures that impacts are avoided or addressed
- Also applies to category B projects
Environmental Management Plan (EMP)

- *Environmental mitigation implementation program* – options and recommendations to prevent, avoid, reduce, mitigate, eliminate or compensate for any adverse impacts. All measures should be designed with a sufficient detail for adequate implementation.

- A *detailed budget* and a schedule of implementation that is compatible with the overall schedule of project execution.

- *Monitoring program* - the monitoring, reporting and evaluation of requirements during the execution of the operation and thereafter. The EMP should include a set of indicators that are relevant to the evaluation of the projects’ development effectiveness.

- The standards, guidelines or targets for *performance measurement* for the monitoring program are specified as well. This may include social economic measurements in cases where re-settlement is required.

- Performance standards are typically based on national legislation and the guidelines contained in the World Bank’s *Pollution Prevention and Abatement Handbook and associated sector guidance*
PIU Monitoring during Project Implementation (1)

- Ensures operations are being implemented according to Agreements and Operational Manual
- Work with clients at projects to improve knowledge about sustainability
- Provide advice/guidance to borrower to enhance project
PIU Monitoring during Project Implementation (2)

Subproject Safeguard Performance is mainly documented through:

- Periodic safeguard progress reports (category A)
- Regular safeguard monitoring reports
- Site visits by PIU or consultants for verification
- Independent safeguard audits (at specified intervals) ideally as part of portfolio review
- Press/NGO information (ooops!)
Environmental Assessment Frameworks: Used in the case of WB projects with multiple subprojects not known ex-ante. It spells out corporate environmental and social safeguard policy frameworks, institutional arrangements and capacity available to identify and mitigate potential environmental and social safeguards issues and impacts of each subproject.

Environmental Screening: The process of identifying, as early as possible, the potential adverse environmental impacts of a proposed subproject; assigning an environmental category indicating the level of anticipated impact and corresponding level of environmental assessment required; and identifying the most relevant EA instruments needed to address potential impacts and environmental issues associated with the subprojects. In this document we recommend that the screening process indicate whether further environmental assessment is required for each subproject, and if so, which environmental instruments should be used.

Environmental Impact Assessment (EIA): A suggested environmental assessment instrument to identify and assess major potential environmental impacts of proposed subprojects, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures (generally in the form of an environmental management plan). World Bank Category “A” projects require an EIA.
Environmental Management Plan: An instrument that consists of a set of mitigation, monitoring and institutional measures to be taken during project implementation and operation to eliminate adverse environmental and social impacts.

Environmental Review (ER): A suggested environmental assessment instrument in which the subproject is likely to have minimal impacts but should be reviewed with a simple and standardized checklist of possible impacts and mitigation measures.

Limited Environmental Assessment (LEA): An instrument to assess whether a subproject is likely to cause environmental impacts that merit consideration by an environmental specialist, and which special measures of mitigation should be incorporated into the design. Detailed checklists, customized for different subproject types, would normally be used and supplemented on a case-by-case basis, possibly by field visits. Impacts and appropriate mitigation measures.

Consultation: The process of engaging people’s views on proposed actions and engaging them in dialog – characterized by a two-way information flow, from project authorities to people and from people to project authorities.
World Bank EA Terminology

- **Monitoring:** Technical and institutional activities that are implemented by the executing agency/sponsor/lender to measure and evaluate environmental (including health and socioeconomic) and social actions and changes induced by a project/subproject. The overall objective is to identify predicted and unanticipated changes to the physical, biological, and social environment brought about by the project.

- **Supervision:** Any activity directed towards ensuring that the executing agency implements subprojects responsibly, regarding agreed environmental safeguards and the need to address unanticipated environmental problems. This involves visiting subproject sites, meeting with beneficiaries, and reviewing environmental monitoring reports.