

MEMO – Independent Assessment of UNDP’s Background Information for the FCPF Common Approach to Environmental and Social Safeguards

To: FCPF Task Force (TF) on a Common Approach to Environmental and Social Safeguards for Multiple Delivery Partners

From: Elspeth Halverson, independent consultant¹

Date: 3 June 2011

Introduction

This document summarizes the results of an independent assessment of Background Information provided by UNDP which includes information about UNDP’s proposed policies, procedures and gap filling commitments to demonstrate its capacity to achieve Substantial Equivalence as defined in the Common Approach. For the results of the complete assessment please see the gap analysis table that accompanies this document.

This document has been updated to reflect the contents of the Common Approach that the Task Force will convey to the FCPF Participants Committee for review and approval at PC9. It is intended to provide the Task Force and the PC with an assessment of UNDP’s environmental and social safeguard policies and procedures and to identify potential gaps in UNDPs safeguard policies and procedures and those of the World Bank (WB). This assessment does not touch upon policies and procedures related to information disclosure or grievance and accountability.

Methodology

This assessment uses the Operational Principles that are contained in Table A1 in OP 4.00, “Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank-Supported Projects” (Source: <http://go.worldbank.org/XFBVTIUDK0>). These Operational Principles are being used in this context to provide an overview of and a framework for analyzing the World Bank’s safeguards relevant for REDD+.

Given that many of the individual Operational Principles in the World Bank’s OP 4.00 contain multiple requirements, they have been disaggregated in order to allow for “apples-to-apples” comparisons in the accompanying table (each safeguard area is contained on its own excel sheet; see tabs on lower left of the accompanying table). The Operational Principles are listed in the left hand columns. The middle column contains elaborations and clarifications from WB operational policies and procedures. The right column lists comparable UNDP policy provisions and provides comments.

Comparisons are scored on a simple three indicator scale: ✓=no gap; ✕=gap; – = partial gap. In cases where gaps or potential gaps have been identified, they have only been assessed against the Operational Principles (not the additional elaborations/clarifications in the middle column).

For the Task Force’s information, the table also identifies several important provisions of WB safeguard policies that do not appear in the Operational Principles; these are included in a Notes section at the end of each topical area in the accompanying table.

Gap analysis of UNDP’s Background Information with Operational Principles

Please note that the Background Information provided by UNDP includes reference to a number of gap filling commitments in the form of planned amendments to existing draft policies and procedures. UNDP has committed to applying these amendments to projects delivered as a partner to FCPF as part of the “ground-truthing” process that UNDP intends to complete for the draft policies and procedures in question. The assessment takes these amendments into consideration, noting where further details or

¹ Consultant can be reached at ehalverson@cantab.net or US +1 646 270 4757.

clarification is needed in order to assess whether there are any gaps between the UNDP's policies and those of the WB.

Please also note that UNDP has committed, as a partner to the UN-REDD Programme, to apply UN-REDD Programme policies and procedures to projects delivered as a partner to FCPF. As such, UNDP's Background Information for the Common Approach proposal includes reference to a number of UN-REDD Programme policy documents, including principles, guidelines, and guidance notes. These measures are equally considered in the summary of the assessment presented below. Where both UNDP and UN-REDD Programme policies and procedures are referenced as responses to the same operational principle, it is expected that both will apply, with the more stringent policy taking precedence if there is overlap in substance or focus.

This summary document of the assessment does not make specific reference to Operational Principles where substantial equivalence is clearly demonstrated. However, for the sake of clarity, this summary document does highlight Operational Principles for which interpretation of two or more policies was required to address any gaps between the UNDP's policies and those of the World Bank.

As a matter of basic transparency and accountability, all policy documents (including drafts) cited in UNDP's Background Information for the Common Approach should be accessible to stakeholders.

Environmental and social safeguard policies applicable to the FCPF Readiness Fund:

A. Environmental Assessment:

UNDP recently adopted a policy statement on mainstreaming environmental sustainability into its corporate 'programme and operations policies and procedures' (POPP). In order to support implementation this policy, UNDP developed draft guidance notes on environmental screening and environmental assessment outlining the procedures that will apply to projects delivered by UNDP that may result in environmental and related social risks. The environmental screening and assessment guidance has been endorsed by UNDP's management and is currently undergoing a pilot application and review process. It is anticipated that the guidance will be adopted formally into the POPP later this year. UNDP's common approach proposal includes the draft guidance notes on environmental screening and assessment, committing UNDP to follow these procedures for projects carried out as a delivery partner to FCPF.

Gaps Identified:

- **Operational Principle 4, "Provide for assessment of feasible investment, technical, and siting alternatives, including the "no action" alternative...":** UNDP calls for an examination of all technically and financially feasible scenarios, but does not require consideration of a "no action" alternative. However, as it can be reasonably assumed that ceasing to pursue the project is among the 'technically and financially feasible' alternatives that may be explored in order to prevent, minimize, mitigate or compensate environmental impacts, this gap can be filled by UNDP committing to explicitly include a no action alternative as one of the 'technically and financially feasible alternatives'.
- **Operational Principle 5, "Where applicable to the type of project being supported, normally apply the Pollution Prevention and Abatement Handbook² (PPAH/EHS)...":** UNDP states that the World Bank's PPAH does not apply to UNDP projects. UNDP states that pollution is

² Note that the PPAH has been updated and are now known as the Environmental Health and Safety Guidelines. The PPAH, has updated and revised into the Environmental, Health, and Safety Guidelines (EHS). The EHS establish technical standards on emissions, effluents, energy conservation, water conservation, hazardous materials, occupational health and safety, among others. The EHS guidelines are widely referenced by the MDB, export credit agencies, and private lenders. ME should be updated.

addressed through the environmental screening and assessment process. In this regard, there is a gap between UNDP's proposal and this operational principle.

- **Operational Principle 9, "Provide measures to link the environmental assessment process and findings with studies of economic, financial, institutional, social and technical analyses of a proposed project":** UNDP's guidance does not address linking related analysis to the environmental assessment process and findings. UNDP has proposed a gap filling commitment to amend the draft guidance note on environmental assessment to include clauses that recommend linking the environmental assessment process with studies of economic, financial, institutional, social and technical analyses of proposed projects.
- **Definitions – Categorization of risks:** UNDP does not categorize projects according to severity of environmental risks to determine the scope and extent of environmental assessment required. All projects that are expected to have environmental risks must undergo the environmental assessment process, including development of an environmental management plan. If there is insufficient information to determine via screening if the project presents risks to the environment, further investigation is required until that determination can be made and environmental assessment is or is not indicated..

B. Natural Habitats:

Risks to natural habitats are addressed as part of UNDP's environmental screening and assessment guidance and additionally through the UN-REDD Programme's Social and Environmental Principles and Criteria (draft).

Gaps Identified:

- **Operational Principle 1, "Use a precautionary approach to natural resources management...":** UNDP's guidance does not address the precautionary approach. UNDP has proposed a gap filling commitment to amend the draft guidance note on environmental assessment to add reference to a precautionary approach to the "Key Elements" section of the environmental assessment guidance note (section 2.1).
- **Operational Principle 2, "Avoid significant conversion or degradation of critical natural habitats in land use plans/ strategies...":** UNDP's environmental screening and assessment guidance requires environmental assessment where projects are anticipated to result in the degradation or conversion of natural habitats, or take place within critical habitats. With the stated aim of preventing, minimizing, mitigating or compensating potential environmental impacts, UNDP's environmental assessment and management plan does not expressly exclude financing of projects that involve significant conversion or degradation of critical natural habitats, as contained in the Operational Principle. In this regard, there is a gap between UNDP's proposal and this operational principle.
- **Operational Principle 4, "Whenever feasible, give preference to siting projects/strategies on lands already converted":** UNDP's procedures do not address this issue. UNDP has proposed a gap filling commitment to amend the draft guidance note on environmental assessment to include a new component in the "alternatives" sections ("Scoping and Planning the EA: Step 2", and "Conducting an EA: Step 4") that encourages projects/strategies to take place on already converted lands.
- **Definitions –** UNDP does not define 'significant conversion' or 'degradation'. UNDP does not provide an equivalently detailed definition of 'critical natural habitat'.

C. Forests:

Risks to forests are addressed as part of UNDP's environmental screening and assessment guidance and additionally through the UN-REDD Programme's Social and Environmental Principles and Criteria (draft).

Gaps Identified:

- **Operational Principle 2, "Do not finance projects that would involve significant conversion or degradation of critical forest areas or related critical natural habitats...":** UNDP states that environmental screening and assessment guidance requires environmental assessment where projects are anticipated to involve natural forest harvesting or plantation development without an independent forest certification system for sustainable forest management. UNDP's environmental assessment guidance does not expressly exclude financing of projects that involve significant conversion or degradation of critical forest areas or related critical natural habitats. In this regard, there is a gap between UNDP's proposal and this Operational Principle.
- **Operational Principle 3, "Do not finance natural forest harvesting or plantation development that would involve any conversion or degradation of critical forest areas or related critical natural habitats":** As above, UNDP's environmental assessment guidance does not expressly exclude financing of natural forest harvesting or plantation development that would involve conversion or degradation of critical forest areas or related critical natural habitats. In this regard, there is a gap between UNDP's proposal and this Operational Principle.
- However, the UN-REDD Programme's Social and Environmental Principles and Criteria state that the Programme will protect and conserve natural forest, specifying that the programme protects natural forest from degradation or conversion to other land uses, including plantation forest. Further, the Programme will ensure that REDD+ activities do not cause the conversion of natural forest, and do address the other causes of conversion. The Programme will also minimise degradation of natural forest in order to maintain biodiversity and other key values.
- **Operational Principle 7 and 8, "Give preference to small-scale community-level management approaches..." and "Support commercial harvesting by small-scale landholders, local communities...":** UNDP procedures do not give preference to specific types of management approaches. In this regard, there is a gap between UNDP's proposal and this operational principle.
- **Operational Principle 9, "Use forest certification systems that require...":** UNDP's guidance on environmental screening requires environmental assessment for projects that involve natural forest harvesting or plantation development without an independent forest certification system for sustainable forest management (e.g. PEFC, the Forest Stewardship Council certification systems, etc.) UNDP's does not require use of forest certification systems that are substantially equivalent to the specifics of this operational principle. In this regard, there is a gap between UNDP's proposal and this Operational Principle.
- **Definitions** – Neither UNDP's environmental screening and assessment guidance nor the UN-REDD Programme's Social and Environmental Principles and Criteria define what constitutes 'critical forests', 'significant conversion' or 'degradation of forests', as the World Bank policy does.

D. Involuntary Resettlement:

Involuntary resettlement is addressed as part of UNDP's environmental screening and assessment guidance and additionally through the UN-REDD Programme's Social and Environmental Principles and Criteria (draft). UNDP's environmental screening and assessment guidance requires environmental assessment where projects are anticipated to result in involuntary resettlement of populations. The UN-

REDD Programme's Social and Environmental Principles states that the Programme will avoid involuntary resettlement. Further, the Criteria specify that the programme will not be involved nor will it be complicit in involuntary resettlement.

Gaps Identified:

- **Operational Principle 5, “Inform displaced persons of their rights, consult them on options, and provide them with technically and economically feasible resettlement alternatives and needed assistance, including...”:** The UN-REDD Programme states that it is not involved and not complicit in involuntary resettlement. UNDP's guidance on environmental assessment includes consultation with affected stakeholders, including sharing information on rights and participation in determining options, alternatives and mitigation measures included in environmental management plans. UNDP guidance on environmental management plans refers to inclusion of 'resettlement plans' but does not elaborate the elements of such plans. In this regard, there is a partial gap between UNDP's proposal and this operational principle
- **Operational Principle 6, “Give preference to land-based resettlement strategies for displaced persons whose livelihoods are land-based”:** The UN-REDD Programme Social and Environmental Principles and Criteria state that the Programme is not involved and not complicit in involuntary resettlement. UNDP guidance on environmental management plans refers to inclusion of 'resettlement plans' but does not elaborate the elements of such plans. In this regard, there is a gap between UNDP's proposal and this Operational Principle.
- **Operational Principle 7, “For those without formal legal rights to lands or claims to such land that could be recognized under the laws of the country, provide resettlement assistance...”:** UNDP's proposal states that this issue will be dealt with as part of the resettlement action plan that is produced as part of the environmental management plan as an outcome of the environmental assessment process. However, the guidance note on environmental assessment does not specify what issues should be included in the resettlement action plan. In this regard, there is a gap between UNDP's proposal and this Operational Principle.
- **Operational Principle 9, “Apply the operational principles described in the involuntary resettlement section of this Table, as applicable and relevant, to subprojects or sub-strategies requiring land acquisition”:** UNDP states that readiness grants will not involve sub-projects. UNDP states that where a UN Agency or CSO is selected as an implementing partner (in accordance with UNDP's policies and procedures), the Common Approach will be included in the terms of the agreement. In this regard, there is a partial gap between UNDP's proposal and this Operational Principle.
- **Operational Principle 11, “Implement all relevant resettlement plans before project completion...”:** UNDP's guidance does not elaborate the elements of a resettlement plan. UNDP has proposed a gap filling commitment to amend the draft guidance note on environmental assessment to require all action plans contained within the EMP to be completed prior to project completion.

Definitions – UNDP does not define 'displaced persons', 'involuntary', 'land', 'involuntary restriction of access' or 'replacement cost' as the World Bank policy does.

E. Indigenous Peoples:

Impacts to and involvement of indigenous peoples in UNDP projects is addressed in a number of policy instruments, including UNDP's draft environmental screening and assessment guidance, UNDP's policy of engagement with indigenous peoples, and UNDG's guidelines on Indigenous Peoples Issues. Additionally, the involvement of indigenous peoples and impacts to their territories, resources and livelihoods are also

addressed by the UN-REDD Programme's Social and Environmental Principles and Criteria, the FCPF and UN-REDD Guidelines on Stakeholder Engagement in REDD+ Readiness with a Focus on the Participation of Indigenous Peoples and Other Forest Dependent Communities and the UN-REDD Programme's Draft Guidelines for Seeking Free, Prior and Informed Consent of Indigenous Peoples and Other Forest Dependent Communities.

UNDP's commitment to apply the FCPF and UN-REDD Programme Guidelines on Stakeholder Engagement in REDD+ Readiness with a Focus on the Participation of Indigenous Peoples and Other Forest Dependent Communities includes provisions for the development of a consultation and engagement strategy to effectively involve indigenous peoples in all stages of national readiness supported by UN-REDD, including programme design, implementation, and monitoring and evaluation and for activities and resources to support ongoing consultation, engagement and partnership to ensure that national UN-REDD activities take into account the priorities and concerns articulated by representatives of Indigenous Peoples and other forest dependent communities.

In addition, for the UN-REDD Programme, these guidelines include specific requirements for indigenous peoples to participate in decision-making to approve projects at the national level. The Programme also specifies that the principle free, prior and informed consent will apply in countries that have signed the UN Declaration on the Rights of Indigenous Peoples.

Potential Gaps identified:

- **Operational Principle 4, "Where restriction of access of Indigenous Peoples to parks and protected areas...":** UNDP's policies and procedures do not specifically address the case of indigenous peoples in parks and protected areas. However, as both UNDP and UN-REDD guidance require that indigenous peoples participate in the design, implementation, monitoring and evaluation of management plans for projects that impact their rights and/or livelihoods and UN-REDD Principles and Criteria include provisions for equitable benefit distribution arising from readiness activities supported by the Programme, there is not a gap between UNDP's policy and this Operational Principle.
- **Operational Principle 5, "Put in place an action plan for the legal recognition of customary rights to lands and territories, when the project involves...":** UNDP's common approach proposal does not expressly require that an action plan for the legal recognition of customary rights to lands and territories be put in place as specified by this operational principle. However, UN-REDD guidance does state that consent must be sought from indigenous peoples whose rights and/or livelihoods may be impacted by project activities and that the consent process should be set in a national legal and policy framework that respects the internationally recognized rights of indigenous peoples, including analysis of the national legal framework for indigenous peoples rights with recommendations to align the framework with commitments to international agreements. As such, there is not a gap between UNDP's policy and this Operational Principle.
- **Operational Principle 7, "Prepare an Indigenous Peoples Plan that is based on the social assessment and draws on indigenous knowledge, in consultation with the affected Indigenous Peoples' communities and using qualified professionals":** UNDP's environmental assessment guidance refers to the inclusion of an Indigenous Peoples Development Plan within the Environmental Management Plan when appropriate to the mitigation measures identified through the environmental assessment process, but does not elaborate the provisions of these plans. However, UN-REDD Programme guidance elaborates the specific steps that must be taken while undertaking consultation with indigenous peoples when seeking consent, including plans for mitigation measures, benefits and compensation, grievance, monitoring and evaluation and

budget implications. As such, there are no gaps between UNDP's proposal and this Operational Principle.

Definitions – UNDP does not define 'collective attachment' or 'forced severance', as the World Bank does.

F. Physical and Cultural Resources:

Risks to physical cultural resources are addressed as part of UNDP's environmental screening and assessment guidance, which requires that the project undergo an environmental assessment and management plan process prior to approval when the operation of the project may involve changes to physical cultural resources.

Gaps Identified:

- **Operational Principle 1, "Use an environmental assessment (EA) or equivalent process to identify PCR...":** UNDP has proposed a gap filling commitment to amend the draft guidance note on environmental assessment to screen for negative impacts to significant physical and cultural resources and provide guidance on what constitutes negative impacts to significant physical and cultural resources.
- **Operational Principle 2, "As part of the EA, as appropriate, conduct field based surveys, using qualified specialists":** UNDP has proposed a gap filling commitment to amend the draft guidance note on environmental assessment to include physical and cultural resources among the issues for which current and projected baseline data must be presented for the project's area of influence.
- **Operational Principle 4, "For materials that may be discovered during project implementation, provide for the use of "chance find" procedures...":** UNDP does not address chance find procedures concerning physical and cultural heritage. UNDP has proposed a gap filling commitment to amend the draft guidance note on environmental assessment to include a "chance find" procedure as a component of the Environmental Management Plan.

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
			Key: ✓ = no gap; ✕ = gap; – = partial gap	
A. ENVIRONMENTAL ASSESSMENT		OP/BP 4.01 and Annexes		
1	Screening			
a	screen all proposed projects		✓	UNDP screens all proposed projects
b	screen as early as possible		✓	Screening takes place prior to project appraisal and approval
c	determine appropriate type and extent of EA based on risk	OP defines risk categories, assigns them to projects; requires EMP for highest risk (OP 8; OP Annex A.3)	✓	UNDP does not define type and extent of EA based on risk. If risk of env impact is present, EA is required. If insufficient information is available to make that determination, further screening is required to indicate whether or not an EA is needed. Type of EA is differentiated between 'discrete projects' and 'programmatic projects'
d	assess direct, indirect, cumulative, associated impacts	OP requires assessment of project's "area of influence," incl. "all ancillary aspects" (OP 2, OP Annex A5). Regional & sectoral EAs pay particular attention to cumulative impacts (OP Annex A 6 & 8)	✓	Screening assesses direct, indirect, cumulative and associated impacts
e	use sectoral or regional EA when appropriate	OP requires these when "project is likely to have sectoral or regional impacts." (OP 7)	✓	Regional or sectoral EA can be employed where appropriate
2	Assess Impacts			
a	assess impacts on physical, biological, socio-economic, and physical cultural resources		✓	UNDP assesses impacts on physical, biological, socio-economic, and physical cultural resources
b	assess transboundary and global concerns		✓	Spatial and temporal scope includes transboundary and global concerns
c	assess impacts on human health		✓	UNDP assesses impacts on worker and community health and
3	Assess legal framework			
a	assess adequacy of applicable legal and institutional framework		✓	EA assesses the adequacy of the identified applicable policy, legal/regulatory and institutional framework relative to implementing and sustaining the proposed project
b	include applicable international environmental agreements		✓	EA and env management measures will comply with obligations under international law
c	ensure projects do not contravene international obligations		✓	EA and env management measures will comply with obligations
4	Assess alternatives			
a	assess feasible alternatives		✓	UNDP examines all feasible technical and financial alternatives
b	include no action alternative		✕	UNDP does not include reference to a 'no action' alternative
c	include recurrent costs, suitability, training and monitoring		✓	EA assesses cost, suitability, training and monitoring associated

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
				Key: ✓ = no gap; ✕ = gap; – = partial gap
5	Apply pollution abatement standards			
a	apply PPAH standards		✕	UNDP does not apply PPAH
b	justify deviations		–	Pollution and associated abatement measures are addressed as
6	Prevent or mitigate impacts			
a	prevent where possible or at least minimize or compensate for adverse impacts		✓	Potential adverse impacts or risks are to be avoided or minimized, where possible, or mitigated if not (not stated in attachment but stated in policy statement)
b	enhance positive impacts		✓	EA identifies ways to enhance positive impacts (not stated in attachment but stated in EA guidance)
c	utilize management and planning that includes mitigation, monitoring, institutional capacity development, training, implementation schedule, cost estimates		✓	EMP includes monitoring, capacity building, training and implementation plan, including schedule and cost estimates (not stated in attachment but stated in EA guidance)
7	Stakeholder participation			
a	involve stakeholders as early as possible in project preparation	For highest risk projects (Cat. A), OP requires consultations before EA TOR completed and when draft EA is prepared (OP 14)	✓	Consultation is to begin early in the EA process, which takes place prior to project implementation
b	include project-affected groups and local NGOs		✓	Consultation includes stakeholders who will be affected directly or indirectly, positively or negatively by the project, including local communities, NGOs and individual citizens, especially those who are disadvantaged or of vulnerable status
c	ensure stakeholder views and concerns are taken into account		✓	Consultation process ensures that stakeholder views are taken
d	consult throughout project implementation		✓	Project stakeholder engagement is an ongoing process involving the disclosure of information to and consultation with project stakeholders.
8	Independent Expertise			
a	use independent expertise in EA preparation where appropriate	OP requires that independent experts carry out Cat. A	✓	For projects requiring an EA, an Independent Advisory Panel to
b	use independent advisory panels, during preparation and implementation, for highly risky or contentious projects		–	For projects requiring an EA, an Independent Advisory Panel to oversee the EA process will be considered
9	Integration of EA			
a	link EA with economic, financial, institutional, social, technical analyses	OP emphasizes need for EA considerations to be given adequate weight in project selection, siting, and design (OP 2 & ft. nt. 7)	✕	Gap filling commitment proposed
10	Subprojects			
a	apply ME principles to subprojects and financial intermediary activities	OP requires prior review/approval of Cat. A and some Cat. B FI subprojects if there is a lack of capacity (OP 11)	✕	Gap filling commitment proposed
11	Disclosure			

FCPF Social & Environmental Operational Principles			Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information
				Key: ✓ = no gap; ✕ = gap; – = partial gap
a	disclose draft EA in a timely manner, before appraisal			✓ disclosure will occur early in the EA process and on an ongoing basis
b	disclose draft EA in accessible place			– No mention of place of disclosure, but EA & EMP will be publicly disclosed and made available to stakeholders in culturally appropriate form and language as part of consultation process
c	disclose in form & language understandable to key stakeholders			✓ Information will be shared with stakeholders in culturally appropriate form and language
	DEFINITIONS			<p>UNDP does not categorize projects according to env risks to determine scope and extent of EA required.</p> <p>UNDP defines EMP similarly to the WB, with the exception that UNDP requires an EMP for all projects requiring EA, without differentiating between categories of risk.</p>

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
			Key: ✓ = no gap; ✕ = gap; – = partial gap	
B. NATURAL HABITATS				
1	Precautionary Approach			
	a use precautionary approach	BP requires highest due diligence standard (Cat. A) if project may significantly convert/degrade NH (BP 2)	✕	No mention of precautionary approach in GN EA Gap filling commitment proposed.
	b determine if benefits substantially outweigh potential		–	Question k of Section 6 of the Checklist for Quality Programming
2	Avoid significant conversion of CNH			
	a Avoid significant conversion or degradation of critical natural habitats (CNH)	OP "does not support" such projects (OP 4)	–	UNDP recommends that a requirement to avoid significant conversion of critical habitats be included as part of the Common Approach
	b CNH includes those habitats that are (a) legally protected, (b)	OP definition includes "sites that maintain conditions"	–	UNDP screening requires an EA for all projects that may result in
3	Non-critical natural habitats			
	a if adverse impacts on non-critical natural habitats, proceed only if no viable alternatives exist and include mitigation measures		✓	Where it is not technically or financially feasible to mitigate, minimize or reduce risks and impacts, identify measures to offset
	b Mitigation measures to include those necessary to maintain	BP requires that costs of offsets ("compensatory natural	–	Where it is not technically or financially feasible to mitigate,
4	Siting Preference			
	a whenever feasible site projects on lands already converted	OP excludes siting on lands converted in anticipation of	✕	No mention of this issue in either the GN ES or GN EA.
5	Stakeholder participation			
	a consult stakeholders including local NGOs and communities		✓	UNDP states the need to engage stakeholders in the process of identifying, evaluating and addressing potential impacts. Stakeholders are defined to include local communities and NGOs. (Not stated in Attachment, but stated in GN EA)
	b involve such stakeholders in design and implementation of		✓	Consultation process required as part of EA involves stakeholders
6	Appropriate expertise			
	a use appropriate expertise for design and implementation of		✓	As under EA. For projects with significant impacts that are diverse,
7	Disclosure			
	a disclose draft mitigation plan/strategy in timely manner, before appraisal formally begins		✓	As under EA. Draft EA and EMP disclosed to stakeholders prior to appraisal.
	b disclose in accessible place		–	No mention of place of disclosure, but EA & EMP will be publicly disclosed and made available to stakeholders in culturally appropriate form and language as part of consultation process
	c disclose in form and language understandable to key stakeholders		✓	As under EA. Information will be shared with stakeholders in

FCPF Social & Environmental Operational Principles			Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
					Key: ✓ = no gap; ✕ = gap; – = partial gap
		[Capacity development]	OP specifies that If there are potential institutional capacity problems, "project includes components that develop the capacity of national and local institutions for effective environmental planning and management" (OP 6)	✓	The EMP will detail a plan to assess and develop as necessary the capacity to implement the EMP and other project environmental components. Determine if there is sufficient capacity within the responsible organizations or institutions for implementing the EMP. If not, determine if it will be possible to develop the appropriate capacity and, if so, at what cost and in what timeframe.
		[DEFINITIONS]		✕	UNDP does not define significant conversion or degradation. UNDP's definition of critical natural habitat does not provide an equivalent level of detail to the WB's definition.

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
			Key: ✓ = no gap; ✗ = gap; – = partial gap	
C. FORESTS				
1 Screening				
a	screen for impacts on forest health and quality and on rights and welfare of forest-dependent people		✓	UNDP and UN-REDD Guidance screen for impacts on the environment, including forest habitats and for impacts on forest dependent communities, including IPs
b	screen as early as possible		✓	As under EA. Screening takes place early, in advance of appraisal
c	evaluate prospects for new markets/arrangements as		✗	No mention of new markets or marketing arrangements.
2 Critical forest areas				
a	do not finance projects that would significantly concern or degrade critical forest areas or related critical natural habitats		–	UNDP does not expressly exclude financing for projects that significantly convert or degrade critical forest/natural habitats UN-REDD ensures that REDD+ activities do not cause the conversion of natural forest and minimise degradation of natural forest in order to maintain biodiversity and other key values
b	do not finance projects that would contravene applicable		✓	As under EA. EA and env management measures will comply with
3 Plantations/commercial harvesting				
a	do not finance natural forest harvesting or plantations that involve any conversion or degradation of critical forest areas of related CNH	OP includes siting preference for plantations on unforested or already converted lands (OP 7). OP requires plantation projects be designed to prevent and mitigate threat of invasive species (OP 7)	–	UNDP does not expressly exclude financing for projects that involve conversion or degradation of critical forest/natural habitat. UN-REDD ensures that REDD+ activities do not cause the
4 Non-critical forest areas				
a	if adverse impacts on non-critical natural forests or related NH, proceed only if no viable alternatives exist and		✓	UN-REDD minimises degradation of natural forest in order to maintain biodiversity and other key values
5 Certification for commercial harvesting				
a	support commercial, industrial-scale forest harvesting only when certified under independent forest certification system or have time-bound action plan to meet		–	EA required for any projects involving deforestation without internationally recognized forest certification.
6 Restoration projects				
a	ensure forest restoration projects maintain or enhance biodiversity and ecosystem functionality		✓	UN-REDD minimises degradation of natural forest in order to maintain biodiversity and other key values: REDD+ activities, including work with other sectors, are designed to maintain (protect from degradation) biodiversity and other key values in natural forest.
b	ensure all plantation projects are environmentally		–	UN-REDD ensures that REDD+ activities do not cause the
7 Preference to small-scale approaches				

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
			Key: ✓ = no gap; ✗ = gap; – = partial gap	
	a	give preference to small-scale community-level management approaches when best reduce poverty in	–	UNDP procedures do not give preference to specific types of management approaches, however as a matter of course, UNDP
8	Community forestry			
	a	support commercial small-scale harvesting by local	✗	UNDP procedures do not give preference to specific types of
	b	monitoring includes meaningful participation of local	✗	UNDP procedures do not give preference to specific types of
9	Certification criteria			
	a	use forest certification systems that require (a) compliance with relevant laws; (b) recognition of, and respect for, legal or customary land tenure and use rights as well as the rights of Indigenous Peoples and workers; (c) measures to enhance sound community relations; (d) conservation of biological diversity and ecological functions; (e) measures to maintain or enhance environmentally sound multiple benefits from the forest; (f) prevention or minimization of environmental impacts; (g) effective forest management planning; (h) active monitoring and assessment of relevant forest management areas; and (i) independent, cost effective, third-party assessment of forest management performance against measurable standards	✗	UNDP does not define what constitutes acceptable forest certification systems
	b	ensure decision-making procedures are fair, transparent, independent, and designed to avoid conflict of interest	✗	UNDP does not define what constitutes acceptable forest certification systems
	c	ensure meaningful participation of key stakeholders, including private sector, local communities, IPs	✗	UNDP does not define what constitutes acceptable forest certification systems
		OP contains clearer participation requirement that "the system's standards must be developed with the meaningful participation of local people and communities; indigenous peoples; non-governmental organizations representing consumer, producer, and conservation interests; and other members of civil society, including the private sector." (OP 11)		
10	Disclosure			
	a	disclose any time-bound action plans in timely manner, before appraisal formally begins	✓	As under EA. Draft EA and EMP disclosed to stakeholders prior to appraisal
	b	disclose said plans in accessible place	–	No mention of place of disclosure, but EA & EMP will be publicly
	c	disclose in form and language understandable to key	✓	As under EA. Information will be shared with stakeholders in
			✗	Definitions: UNDP does not define 'critical forest areas'

FCPF Social & Environmental Operational Principles			Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
					Key: ✓ = no gap; X= gap; – = partial gap

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
			Key: ✓ = no gap; X = gap; – = partial gap	
D. INVOLUNTARY RESETTLEMENT				
		OP contains additional objective of executing resettlement as “sustainable development programs, providing sufficient investment resources to enable displaced to share in project benefits.” (OP 2b)		
1	Alternatives			
	a assess all viable alternative project designs to avoid, where feasible, or minimize IR		✓	UN-REDD is not involved and not complicit in involuntary resettlement
2	Assess impacts			
	a identify, assess, and address potential economic and social impacts that are caused by involuntary taking of land or involuntary access restrictions to legally designated parks and protected areas		✓	UN-REDD is not involved and not complicit in involuntary resettlement UNDP EA identifies IR as an adverse social impact that should be prevented, minimizes or mitigated through the EA/EMP process.
	b use census and socio-economic surveys to identify people who will be affected		✓	Socio-economic surveys will be undertaken when necessary as part of the environmental assessment process
	c impacts caused by involuntary taking of land include relocation or loss of shelter, loss of assets or access to assets, loss of income sources of means of livelihood, whether or not affected person must move to another location		–	UN-REDD is not involved and not complicit in involuntary resettlement UNDP EA identifies IR as an adverse social impact that should be prevented, minimizes or mitigated through the EA/EMP process
3	Address impacts of related activities			
	a identify and address impacts of other activities (a) directly related to project, (b) necessary to achieve project objectives, and (c) carried out or		✓	UNDP screens for proposed projects that pose indirect, secondary or consequential development which could lead to environmental effects or to the potential for cumulative impacts with other
4	Stakeholder participation			
	a consult project-affected communities and local NGOs, as appropriate		✓	As under EA. Consultation includes stakeholders who will be affected directly or indirectly, positively or negatively by the project, including local communities, NGOs and individual citizens, especially those who are disadvantaged or of vulnerable status
	b provide them opportunities to participate in planning, implementation, monitoring of resettlement program, especially in developing and implementing procedures for determining eligibility for compensation/assistance and in establishing appropriate grievance mechanisms		✓	As under EA. Stakeholders contribute to the establishment of a “stakeholder engagement plan” to build and maintain a constructive relationship with stakeholders. The nature and scope of the engagement is determined by the risks and impacts associated with the project. The plan includes provisions (at a minimum) for information disclosure, consultation (including implementation issues), and grievance mechanism.
	c pay particular attention to needs of vulnerable groups among displaced, especially poor, landless, elderly, women and children, IPs, ethnic minorities	OP emphasizes complexity IP relocation, requiring consideration of all viable alternatives to avoid IP displacement; if relocation, then should be “compatible with cultural preferences.” (OP 9)	✓	As under EA. Stakeholders include local communities, NGOs and individual citizens, especially those who are disadvantaged or of vulnerable status. Where groups are identified as disadvantaged or vulnerable, the project will include differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities.
5	Compensation			UN-REDD is not involved and not complicit in involuntary resettlement
	a inform displaced persons of rights and consult on options		–	The EA process requires public disclosure as part of the stakeholder engagement process
	b provide them with technically and economically feasible resettlement alternatives and assistance		–	The EA process requires that stakeholders contribute to identifying technically and financially feasible alternatives, planning mitigation measures and EMP.

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
				Key: ✓ = no gap; ✗ = gap; – = partial gap
c	provide prompt compensation at full replacement cost for loss of assets	OP defines "full replacement cost" (OP ft. nt. 11)	✗	UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans. UNDP does not address compensation for loss of assets
d	if relocation, provide assistance during relocation		✗	UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans. UNDP does not address assistance for relocation
e	if relocation, provide residential housing, or housing sites, or agricultural sites of equivalent productive potential, as required	OP requires that compensatory agricultural sites also include "locational advantages" at least equivalent to old site (OP 6)	✗	UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans. UNDP does not address provision of alternative housing/equivalent productive potential
f	provide transitional support and development assistance (i.e., land preparation, credit, training) in addition to compensation		✗	UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans. UNDP does not address transitional support or development assistance in addition to compensation
g	provide cash compensation for land when impact of land acquisition on livelihoods is minor		✗	UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans. UNDP does not address compensation for land
e	provide civic infrastructure and community services as required	OP requires that alternative or similar resources be provided to compensate for "loss of access to community resources (such as fishing areas, grazing areas, fuel, or fodder)"	✗	UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans. UNDP does not address provision of civic infrastructure and community services
6 Land-for-land preference				
a	prefer land-based resettlement strategies for displaced persons whose livelihoods are land-based	OP calls for preference be given to land with at least equivalent productive and locational advantages as land taken (OP 11)	–	UN-REDD is not involved and not complicit in involuntary resettlement. UNDP references 'resettlement plans' but does not provide details
7 No formal title				
a	provide resettlement assistance, in lieu of compensation, to those without formal legal rights to lands or recognized claims to help		–	UN-REDD is not involved and not complicit in involuntary resettlement. UNDP references 'resettlement plans' but does not provide details
8 Disclosure				
a	disclose draft resettlement plans in timely manner, before appraisal formally begins		✓	As under EA. Draft EA and EMP disclosed to stakeholders prior to appraisal
b	disclose in an accessible place		–	No mention of place of disclosure, but EA & EMP will be publicly disclosed and made available to stakeholders in culturally appropriate form and language as part of consultation process
c	disclose in form & language understandable to		✓	As under EA. Information will be shared with stakeholders in
9 Sub-projects				
a	apply IR material elements to sub-projects or sub-	OP requires submission of a resettlement plan	✗	Gap filling commitment proposed: Where a UN Agency or CSO is
10 Access restrictions to parks				
a	For projects involving involuntary access restrictions to legally designated parks and protected areas, develop participatory process for (a) preparing and implementing components, (b) establishing eligibility criteria, (c) agreeing on mitigation measures that help improve or restore livelihoods in a manner that maintains sustainability of areas, (d) resolving conflicts, (e) monitoring implementation	OP specifies that "the nature of restrictions" is determined with the participation of the displaced persons during the design and implementation of the project." (OP 7)	–	UNDP does not have specific arrangements for restrictions to parks. However, UNDP EA process requires stakeholder consultation, participation in planning and identification of mitigation measures, grievance mechanism and monitoring.
b	disclose participatory process plan before project		✓	Stakeholder engagement process must take place (and be

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information
			Key: ✓ = no gap; X = gap; – = partial gap
11	Timing of plans and compensation		
a	implement all relevant resettlement plans before project completion		X Gap filling commitment: The GN EA will be amended to require all action plans contained within the EMP to be completed prior to project completion
b	provide resettlement entitlements before displacement or restriction of access		X UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans.
c	for projects involving access restrictions, impose restrictions in accordance with timetable of plan		X UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans.
12	Evaluate success		
a	assess whether resettlement objectives have been achieved upon completion, utilizing baseline conditions and monitoring results		– UNDP references 'resettlement plans' but does not provide details on what must be contained in such plans. The EMP will include EA follow-up measures including: (1) monitoring of baseline, compliance and impacts; (2) evaluation of conformance with standards, predictions, expectations and environmental performance....
	[DEFINITIONS]		X UNDP does not define displaced person, involuntary, land, involuntary restriction of access or replacement cost.

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information
			Key: ✓ = no gap; ✗ = gap; – = partial gap
E. INDIGENOUS PEOPLES			
1	Screening		
a	screen early to determine whether IPs are present in, or have collective attachment to, project area		✓ EA required where screening identifies that proposed project may have environmental impacts that could affect local communities or other stakeholders, including on areas of indigenous people. EA also required where screening identifies that a project likely to have environmental impacts that could affect indigenous people's ability to use, develop and protect natural resources and other natural capital assets.
b	IPs are identified as possessing following characteristics in varying degrees: self-identification and recognition of this identity by others; collective attachment to geographically distinct habitats or ancestral lands and to natural resources in these areas; distinct customary cultural, economic, social or political institutions; and indigenous language	Regarding identification of IPs, OP also includes groups that lost collective attachment to lands due to prior forced severance. (OP 4). OP also requires screening involve technical judgment of qualified social scientists (OP 8)	✓ The terms "indigenous peoples," "indigenous ethnic minorities," and "tribal groups" are used to describe social groups that share similar characteristics, namely a social and cultural identity that is distinct from dominant groups in society. United Nations human rights bodies, ILO, the World Bank and international law apply four criteria to distinguish indigenous peoples: (a) indigenous peoples usually live within (or maintain attachments to) geographically distinct ancestral territories; (b) they tend to maintain distinct social, economic, and political institutions within their territories; (c) they typically aspire to remain distinct culturally, geographically and institutionally rather than assimilate fully into national society; and (d) they self-identify as indigenous or tribal.
2	FPICon and Broad Community Support		
a	undertake free, prior, informed consultation with affected IPs to ascertain their broad community support for proposed projects	OP sets 'FPICon resulting in BCS' as a financing condition ("Bank provides project financing only where") (OP 1). Also, OP requires FPICon at each stage of project (OP 6) and defines FPICon (OP 10 and fn nt 4)	✓ UN-REDD commits to seeking free, prior and informed consent where project activities impact the rights or livelihoods of indigenous peoples.
b	solicit IP participation in designing, implementing, and monitoring avoidance and mitigation measures and	OP 6 requires 'FPICon resulting in BCS' as participation standard	✓ EA requires stakeholder consultation, including IPs, in designing, implementing or monitoring measures agreed in the EMP (avoidance,
3	Social assessment		
a	use social assessment or similar methods to assess potential impacts on IPs	OP requires social assessment be carried out by "social scientists whose qualifications, experience, and terms of reference are acceptable to the Bank" (OP 9)	✓ UN-REDD requires socio-environmental assessment of impacts on IPs. UNDP requires assessment of impacts on biological and physical environment, socio-economic conditions, physical-cultural resources,
b	avoid adverse impacts, or, when avoidance is not feasible, minimize, mitigate, or compensate for such effects		✓ The purpose of EA is to avoid, minimize, mitigate and/or compensate for adverse impacts on the environment, including livelihood impacts.
c	give full consideration to options preferred by the affected IPs in the provision of benefits and design of mitigation measures		✓ EA consultation requires that stakeholders are engaged in this planning process to communicate and confirm the plan, methods, schedule and reporting, as well as the capacity development needed for them to participate effectively
d	tailor social and economic benefits in a culturally appropriate manner and are gender and intergenerationally inclusive		✓ UN-REDD requires 'equitable benefit sharing' and gives guidance that agreements reached through FPI consent include description of delivery and distribution of benefits associated with the proposed activity
4	Access restrictions to parks and benefits		
a	Where access restrictions are not avoidable, ensure affected IPs participate in the design, implementation, monitoring and evaluation of management plans for such parks and protected areas	OP emphasizes that access restrictions are to occur only under "exceptional circumstances" and that priority be given to collaborative arrangements that enable IPs to continue to use areas/resources	– UN-REDD and UNDP guidance does not address the specific case of restrictions to parks and benefits, but requires that affected IPs participate in the design, implementation, monitoring and evaluation of management plans associated with any adverse env impact. Further, UN-REDD requires FPIConsent where there are impacts on the rights and livelihoods of indigenous peoples
b	ensure affected IPs share equitably in benefits from the parks and protected areas		✓ UN-REDD requires 'equitable benefit sharing' and gives guidance that agreements reached through FPI consent include description of delivery and distribution of benefits associated with the proposed activity
5	Action plan for legal recognition		
a	put in place action plan for legal recognition of customary rights to lands and territories when project involves (a) activities that are contingent on establishing legally recognized rights to lands/territories that IPs traditionally owned, or customarily used or occupied; or (b) the acquisition of such lands		✓ UN-REDD guidance states that the FPIC process should be set in a national legal and policy framework which respects these rights...and requires that the FPIC process include review of the national legal framework related to indigenous peoples and forest dependent communities. Identify gaps between international and national frameworks on rights and national legislation... Draft and disseminate a report analyzing the existing policy, making recommendation for reform, and identifying elements of the Programme that require FPIC and outlining the process to implement FPIC.

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
			Key: ✓ = no gap; ✗ = gap; – = partial gap	
6	Commercial development			
	a do not undertake commercial development of cultural resources or knowledge of IPs without prior agreement		✓	UN-REDD requires FPIConsent where proposed activities involve the removal of cultural, intellectual, spiritual or religious property of IPs
	[b commercial development natural resources]	For commercial development of natural resources on lands/territories traditionally owned, or customarily used or occupied by IPs, OP requires IPs be informed of their rights, equitable benefit sharing, and rights to due process equivalent to that of landowners with full legal title (OP 17)	✓	UN-REDD requires FPIConsent where proposed activities impact the lands or territories and other resources of indigenous peoples, particularly in connection with the development, utilization or exploitation of mineral, water or other resources
7	Indigenous Peoples Plan			
	a prepare Indigenous Peoples Plan (IPP) based on social assessment and IP consultations that includes mitigation measures, culturally appropriate benefits/compensation, and includes grievance, M&E, and budget arrangements		–	UNDP EA guidance refers to the inclusion of IP development plans under the EMP, but does not include details of what must be contained within such a plan. UN-REDD guidance elaborates the specific steps that must be taken while undertaking consultation with IPs when seeking consent, including plans for mitigation measures, benefits/compensation, grievance, M & E budget implications.
	b use qualified professionals in development of IPP		✓	UN-REDD guidance states that consultation plans must be developed jointly with IPs and that consultations should be undertaken by facilitators with both technical knowledge of the issue under consideration and cultural knowledge of IP practices and language.
8	Disclosure			
	a disclose draft IPP in timely manner, before appraisal formally begins	OP requires that as part of FPICon, "all relevant information about the project" be disclosed at each stage of preparation and implementation (OP 10)	✓	As under EA. Draft EA and EMP disclosed to stakeholders prior to appraisal. UN-REDD guidance states that the consultation plan must be developed jointly with IPs and shared with IPs prior to implementation.
	b disclose in accessible place		✓	UN-REDD guidance states that information must be shared with IPs in their communities.
	c disclose in form and language understandable to stakeholders		✓	As under EA. Information will be shared with stakeholders in culturally appropriate form and language
9	Monitoring			
	a monitor IPP implementation using experienced social scientists		✓	UN-REDD guidance requires verification of implementation of consultation plans for seeking FPIC and IP participation in monitoring.
	[Physical relocation]	OP emphasizes complexity of relocation of IPs and "requires the borrower to explore alternative project designs to avoid physical relocation of Indigenous Peoples. In exceptional circumstances, when it is not feasible to avoid relocation, the borrower will not carry out such relocation without obtaining broad support for it from the affected Indigenous Peoples' communities as part of the free, prior, and informed consultation process." (OP 20)	✓	UNDP does not define physical relocation. UN-REDD is not involved and not complicit in involuntary resettlement, any projects involving resettlement would require FPIConsent.
	[emphasis on customary rights]	OP includes emphasis on attention to IP customary rights in social assessment and IPP as well as on issues of illegal intrusion/encroachment, cultural and spiritual values attributed to lands and IP NRM practices. (OP 16)	✓	UN-REDD guidance enumerated the rights of indigenous peoples as set out in the UNDRIP.
	[DEFINITIONS]	[FPICon, Collective Attachment, Forced Severance, Customary Rights to Lands and Resources]	–	UNDP/UN-REDD guidance defines IP and FPIConsent, but not 'collective attachment', 'forced severance', 'customary rights to land and resources' apart from as enumerated under UNDRIP.

FCPF Social & Environmental Operational Principles		Elaboration from WB Operational Policies/Bank Procedures	Gap Analysis of UNDP Background Information	
			Key: ✓ = no gap; X = gap; – = partial gap	
F. PHYSICAL CULTURAL RESOURCES				
1	Assess and address			
a	use EA to identify PCR	OP lists project types that require risk categorization for potential PCR impacts (significant excavations, demolition, earth movement, flooding, PCR preservation projects) (OP 5)	X	PCR among impacts EA applies to. Gap filling commitment to include impacts to PCR among specific screening to determine whether an EA is required.
b	prevent or minimize or compensate for adverse impacts on PCR	OP requires development of a PCR management plan that specifies mitigation measures, capacity strengthening, and monitoring (OP 9)	✓	Purpose of EA is to prevent, minimize or mitigate adverse impacts, including impacts to PCR.
c	enhance positive impacts on PCR through site selection and design		✓	EA identifies ways to enhance positive impacts (not stated in attachment but stated in EA guidance)
2	Field surveys			
a	conduct field based surveys using qualified specialists to identify PCR issues		X	Gap filling commitment proposed to add PCR to issues for which data availability must be assessed and addressed.
3	Consultation			
a	consult government authorities, relevant NGOs, experts, and local people in PCR identification, impact assessment, and design and implementation of mitigation plans		✓	As under EA. Consultation includes stakeholders who will be affected directly or indirectly, positively or negatively by the project, including local communities, NGOs and individual citizens, especially those who are disadvantaged or of vulnerable status
4	Chance find procedures			
a	provide for use of "chance find" procedures for PCR that may be discovered during project implementation		X	Gap filling commitment proposed: The EMP component of the GN EA will be amended to include a "chance find" procedure.
5	Disclosure			
a	disclose draft mitigation plans as part of EA in timely manner, before appraisal formally begins		✓	As under EA. Draft EA and EMP disclosed to stakeholders prior to appraisal
b	disclose in accessible place		–	No mention of place of disclosure, but EA & EMP will be publicly disclosed and made available to stakeholders in culturally appropriate form and language as part of consultation process
c	disclose in form and language understandable to stakeholders		✓	As under EA. Information will be shared with stakeholders in culturally appropriate form and language
	[monitoring]			