



OBSERVATOIRE DU SAHARA ET DU SAHEL
SAHARA AND SAHEL OBSERVATORY

OSS' ENVIRONMENTAL & SOCIAL POLICY



April 2016

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Environmental and Social Policy of Sahara and Sahel Observatory (OSS)

1. BACKGROUND

This Environmental & Social Policy (ESP) details the procedures and workflow that will be followed for investments made by OSS under the management and administration of the Environmental and Social Risk Officers.

The Sahara and Sahel Observatory (OSS) is an international, intergovernmental organization operating in Africa's Sahara-Sahel region. OSS provides a platform for North-South-South partnerships aimed at strengthening the capacity of African member countries to address environmental challenges as part of a long-term, sustainable development vision for the Sahel-Sahara region. OSS members include 22 African countries, five non-regional countries, ten organizations (including sub-regional organizations representing West Africa, East Africa and North Africa), and a non-governmental organization. OSS works with its member countries according to the principle of subsidiarity. It acts as both an initiator and a facilitator of partnerships to address common environmental challenges.

The management of transboundary water resources and the implementation of Multilateral Environmental Agreements, notably those addressing desertification, biodiversity and climate change, constitute key areas in the organization's work.

The main themes addressed by the organization's work include:

- Environmental monitoring
- Joint management of transboundary aquifers
- Support to the implementation of the Multilateral Environmental Agreements
- Disaster-Risk Reduction
- Integrated Water Resources Management (IWRM): modelling and study of linkages between aquifers and surface water
- Study of the socio-economic dimensions of water demand
- Climate change adaptation and resilience
- Transition to the Green Economy

1.1 Objectives of the policy

This Policy describes principles and procedures to assess the environmental, social and gender impacts during the preparation and implementation of measures carried out by OSS in the following circumstances:

- Direct access under the GCF
- Role as regional implementing entity for the Adaptation Fund

The policy forms an integral part of the Environmental and Social Risk Management System (ESMS) and is intended to build on the existing policies, operating procedures, and project cycle of OSS. In this context, the Policy pursues the following objectives:

- Ensure that in furthering OSS's mission of "strengthening the capacity of African member countries to address environmental challenges as part of a long-term, sustainable development vision for the Sahel-Sahara region", projects and programmes supported by OSS do not result in unnecessary environmental and social harms.
- Define a common all-encompassing framework to incorporate environmental, social and gender standards into the planning, appraisal, implementation and monitoring of measures financed by OSS.
- Promote transparency, predictability and accountability in the decision-making processes of environmental and social impact assessments (ESIA) and screenings.
- Bring OSS's practices in line with the practice of other international intergovernmental organisations executing and implementing environmental and development projects.
- Encourage project proponents and Executing Entities of projects directly funded or supported through OSS to have appropriate consideration for environmental and social impacts.
- Ensure that the management as well as the member countries and organisations of OSS understand the policy commitments made by OSS in this area.

The due diligence conducted includes the level of social and environmental risks commensurate to the scale and nature of the project being financed.

1.2 Policy scope and coverage

The applicability of the environment and social policy presently will be extended to the following types of projects/programmes:

All projects receiving funding from

- the World Bank Group,
- the African Development Bank Group,
- the Global Environment Facility,
- the Green Climate Fund and
- the Adaptation Fund.

1.3 Applicable Requirements of the Policy

OSS will ensure that all projects which fall into the domain of those listed in Section 1.3 above are reviewed and evaluated against the following Environmental & Social requirements:

1. The IFC Exclusion List for all projects (See Annex 3)
2. The applicable national laws on environment, health, safety and social issues and any standards established therein (See Annex 4)
3. The GCF's interim environmental and social objectives and safeguards (See Annex 2)
4. The Environmental and Social Risk Assessment Checklist (see Annex 6)

1.4 Governance of the ESP

The Performance Standard 1 (PS1) outlines the need of OSS to establish and maintain an organizational structure that defines roles, responsibilities, and authority to implement the ESMS. This means designating personnel with E&S responsibilities and ensuring that resources are available for the effective implementation of the ESMS across OSS.

1.4.1 Technical Committee for Environmental and Social Considerations

OSS would establish a Technical Committee for Environmental and Social Considerations comprising of internal and external experts with the knowledge necessary to provide policy advisory relating to Environmental and Social Considerations.

1.4.2 Environmental and Social Risk Officers

OSS will assign Environmental and Social Risk Management Officers who will have the responsibilities of carrying out the following tasks:

- (i) During due diligence, the evaluation of environmental and social compliance of an executing entity with Applicable Requirement of this policy;
- (ii) Supervising projects in the portfolio against on-going compliance with the Applicable Requirements.
- (iii) The preparation of an annual environmental and social performance report, based on the annual performance report prepared by the executing entities.

Please see Annex 1 for a complete list of duties for the Environmental and Social Risk Management Officers.

This Environmental and Social Policy will be communicated to all staff and associated consultants of OSS

Signed

Executive Secretary

Effective Date

April 2016



2 PILLARS OF THE ENVIRONMENTAL AND SOCIAL POLICY

2.1 General Environmental and Social Commitment

Environmental and social policies are fundamental to ensuring that OSS does not support projects/programmes that unnecessarily harm the environment, vulnerable communities or women or contribute to poverty, social inequality or gender discrimination.

To carry out its Policy, OSS shall:

- Have an environmental and social management system that ensures environmental and social risks are identified and assessed at the earliest possible stage of project/programme design,
- Adopt measures to avoid or where avoidance is impossible to minimize or mitigate or manage those risks during implementation, and
- Monitor the status of those measures during and at the end of implementation.
- Assure that adequate opportunities are provided for the informed participation of all stakeholders in the formulation and implementation of projects/programmes supported by OSS.

2.2 Environmental and Social Performance Standards (PSs)

All projects/programmes supported by OSS shall be designed and implemented to meet the following ten Environmental and Social Performance Standards (PSs). It is recognized that depending on the nature and scale of a project/programme all of the PSs may not be relevant to every project/programme. These Performance Standards are in line with the international best practices for assessment of environmental and social risks e.g. those of the International Finance Corporation (IFC), Adaptation Fund, etc.

PS1: Assessment and management of environmental and social risks and impacts

PS1 outlines the need of OSS to establish and maintain an organizational structure that defines roles, responsibilities, and authority to implement the ESMS. This means designating personnel with E&S responsibilities and ensuring that resources are available for the effective implementation of the ESMS across OSS.

PS1 also requires that OSS identify the E&S risks and impacts associated for those activities falling into the scope and coverage outlined in section 1.3 above. This means conducting an environmental and social due diligence (ESDD) at the project level to identify the risks and impacts associated with environmental, social, labour, occupational health and safety, and security of the activities considered for financing. As an outcome of the ESDD process, OSS can identify necessary mitigation or corrective measures for executing partners.

The procedures for carrying out the ESDD are detailed in Section 3 of this document. As follows is a summary:

- (a) Identify funding proposal's environmental and social risks and impacts;
- (b) Adopt mitigation and adaptation hierarchy: anticipate, avoid; minimize; compensate or offset;

- (c) Improve performance through an environmental and social management system;
- (d) Engagement with affected communities or other stakeholders throughout funding proposal cycle. This includes communications and grievance mechanisms.

PS2: Labour and working conditions

- (a) Fair treatment, non-discrimination, equal opportunity;
- (b) Good worker–management relationship;
- (c) Comply with national employment and labour laws;
- (d) Protect workers, in particular those in vulnerable categories;
- (e) Promote occupational safety and health;
- (f) Avoid use of forced labour or child labour.

PS3: Resource efficiency and pollution prevention

- (a) Avoid, minimize or reduce project-related pollution (Air, Water, Land, Noise, etc);
- (b) More sustainable use of resources, including land, energy and water;
- (c) Reduced project-related greenhouse gas emissions.

PS4: Community health, safety and security

- (a) To anticipate and avoid adverse impacts on the health and safety of the affected community;
- (b) To safeguard personnel and property in accordance with relevant human rights principles.

PS5: Land acquisition and involuntary resettlement

- (a) Avoid/minimize adverse social and economic impacts from land acquisition or restrictions on land use:
 - (i) Avoid/minimize displacement;
 - (ii) Provide alternative project designs;
 - (iii) Avoid forced eviction.
- (b) Improve or restore livelihoods and standards of living;
- (c) Improve living conditions among displaced persons by providing:
 - (i) Adequate housing;
 - (ii) Security of tenure.

PS6: Biodiversity Conservation and sustainable management of living natural resources

- (a) Protection and conservation of biodiversity;
- (b) Maintenance of benefits from ecosystem services;
- (c) Promotion of sustainable management of living natural resources;
- (d) Integration of conservation needs and development priorities.

PS7: Indigenous peoples

- (a) Ensure full respect for indigenous peoples
 - human rights, dignity, aspirations;
 - livelihoods;
 - culture, knowledge, practices;
- (b) Avoid/minimize adverse impacts;
- (c) Sustainable and culturally appropriate development benefits and opportunities;
- (d) Free, prior and informed consent in certain circumstances.

PS8: Cultural heritage

- (a) Protection and preservation of cultural heritage including avoiding the alteration, damage, or removal of any physical cultural resources, cultural sites, and sites with unique natural values recognized as such at the community, national or international level.
- (b) Promotion of equitable sharing of cultural heritage benefits.

PS9: Gender Equity and Women's Empowerment

Both women and men:

- (a) Participate fully and equitably;
- (b) Receive comparable social and economic benefits; and
- (c) Do not suffer disproportionate adverse effects

PS10: Access and Equity and protection of Human Rights

- (a) Provide fair and equitable access in an inclusive manner
- (b) Does not impede access to basic health services, clean water and sanitation, energy, education, housing, safe and decent working conditions, and land rights.
- (c) Does not exacerbate existing inequities, particularly with respect to marginalized or vulnerable groups including children, women and girls, the elderly, tribal groups, displaced people, refugees, people living with disabilities, and people living with HIV/AIDS.
- (d) Respect and where applicable promote human rights.

3 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

The environmental and social risk management system shall be commensurate in scope and ambition to the potential scope and severity of environmental and social risks inherent in the project/programme design. The Executing Entities in OSS member countries shall be responsible for conducting an environmental and social due diligence (ESDD) screening of all projects/programmes to determine the extent to which they present environmental or social risks, including all risks associated with OSS's environmental and social principles identified above, under OSS supervision and guidance.

Executing entities proposing projects/ programmes that present environmental and social risks shall ensure that the environmental and social impacts of such projects/programmes are thoroughly assessed and will identify mitigation measures for avoiding, reducing or mitigating

all environmental and social impacts; and will ensure that the implementation of such measures is monitored and reported on through the life of the project/programme.

Wherever, the Executing Entity does not have the requisite capabilities for assessing and managing Environmental and Social Risks, OSS will guide the Executing Entity in these tasks either through its own staff and/or through Consultants. Unless otherwise stipulated by the donor, the cost for the same will be a part of the overall Project Cost.

2.3 Environmental and Social Policy Delivery Process

2.3.1 Environmental and Social Due Diligence by the Executing Entity

All proposed projects/programmes either executed by OSS itself, or implemented by OSS together with executing entities shall be screened by OSS or the executing entities through an Environmental and Social Due Diligence (ESDD) to determine their potential to cause environmental or social harm. Under the guidance of OSS all executing entities must also review proposed projects against the IFC exclusion List (see Annex 3) and national E&S laws and regulations where they exist and are applicable (see annex4), requiring at a minimum that executing entities have all necessary permits where required and that their operations are not unlawful.

The ESDD screening process shall seek to identify potential environmental and social impacts and risks, taking into consideration OSS’s environmental and social performance standards outlined above. The screening process shall consider all potential direct, indirect, trans boundary, and cumulative impacts in the project’s/programme’s area of influence that could result from the proposed project/programme.

All proposed projects/programmes shall be categorized according to the scale, nature and severity of their potential environmental and social impacts. The following classification will be adopted

Sr. No	Category of Project/Programme	Remarks
1	A	Projects/programmes likely to have significant adverse environmental or social impacts that are for example diverse, widespread, or irreversible.
2	B	Projects/programmes with potential adverse impacts that are less adverse than Category A projects/programmes, because for example they are fewer in number, smaller in scale, less widespread, reversible or easily mitigated
3	C	Those projects/programmes with no adverse environmental or social impacts

The ESDD will determine the extent to which the project/programme requires further environmental and social assessment, mitigation, and management. The results of the

environmental and social screening shall be included in the project/programme proposal initially submitted by the executing entity to OSS.

If during the project/programme review process using the Environmental and Social Risk Assessment Checklist OSS determines that further information on the environmental and social assessment, mitigation, and management of risks is required, the executing entities can be asked to provide it. If appropriate, this will be reflected in the agreement between OSS and the executing entity.

Regardless of the outcome of the screening procedure, all proposed projects/programmes shall comply with OSS's environmental and social performance standards, which are based on the GCF's interim environmental and social objectives and safeguards (See Annex 2); applicable national and local laws and regulations (see Annex 4); and IFC's Exclusion List (see Annex 3).

2.3.2 Environmental and Social Impact Assessment

Following the initial screening process, OSS and/or executing entities shall prepare an environmental and social impact assessment (ESIA) for all projects/programmes that have the potential to cause environmental or social harm (i.e. all Category A and B projects/programmes).

The ESIA will identify any environmental or social risks, including any potential risks associated with OSS's environmental and social performance standards set forth above. The assessment shall:

- (i) consider all potential direct, indirect, trans boundary, and cumulative impacts and risks that could result from the proposed project/programme;
- (ii) assess alternatives to the project/programme; and
- (iii) assess possible measures to avoid, minimize, or mitigate environmental and social risks of the proposed project/programme.

For the case of OSS executing a project by itself, ESIA must be completed before the project/programme proposal submission to the donor.

For the case of a project proposal coming from an executing entity, the ESIA must be completed before the project/programme proposal submission to OSS.

In some Category B projects/programmes where the proposed activities requiring such assessment represent a minor part of the project, and when inclusion in the proposal is not feasible, a timeline for completing the environmental and social assessment before construction the project begins shall be incorporated in the agreement between OSS and the executing entity following the project/programme approval, and reported through the annual project/programme performance report. A copy of the ESIA shall be provided to OSS as soon as the assessment is completed.

Prior to submitting the ESIA, OSS may require further information from the executing entity on the environmental and social assessment, mitigation, and management of risks, if deemed necessary.

Outline of an Environmental and Social Impact Assessment Report: An assessment report is required for all environment category A and B projects. Its level of detail and comprehensiveness is commensurate with the significance of potential environmental impacts and risks. A typical Environmental and Social Impact Assessment (ESIA) report contains the major elements listed in Annex 5 and an Initial Environmental and Social Examination (IESE) may have a narrower scope depending on the nature of the project. The substantive aspects of this outline will guide the preparation of environmental and social impact assessment reports, although not necessarily in the order shown.

2.3.3 Environmental and Social Management Plan

Where the environmental and social assessment identifies environmental or social risks, the assessment shall be accompanied by an environmental and social management plan that identifies those measures necessary to avoid, minimize, or mitigate the potential environmental and social risks, especially those risks that cannot be avoided. A commitment by the executing entity to execute the management plan shall be a condition of the project/programme approval and reflected in the monitoring and reporting plan for that project/programme.

Further, OSS would also evolve environmental and social management plan for projects under category A and B. Reporting systems would include identification and management of risks (including unanticipated risks and impacts). OSS would designate roles responsible for implementing the programme and management of such programmes.

2.3.4 Monitoring, Reporting, and Evaluation

Performance Standard 1 requires that OSS Executing Entities establish monitoring procedures to review progress and compliance of operations with any legal and/or contractual obligations and regulatory requirements.

Executing entities' monitoring and evaluation of projects/programmes supported by OSS shall address all environmental and social risks identified by the executing entity during project/programme assessment, design, and implementation. The executing entities' annual project/programme performance reports shall include a section on the status of implementation of any environmental and social management plan, including those measures required to avoid, minimize, or mitigate environmental and social risks. The reports shall also include, if necessary, a description of any corrective actions that are deemed necessary. The mid-term and terminal evaluation reports shall also include an evaluation of the project/programme performance with respect to environmental and social risks.

2.3.5 Public Disclosure and Consultation

Executing entities shall identify stakeholders and involve them as early as possible in planning any project/programme supported by OSS. The results of the environmental and social screening and a draft environmental and social assessment, including any proposed management plan, shall be made available for public consultations that are timely, effective, inclusive, and held free of coercion and in an appropriate way for communities that are directly affected by the proposed project/programme. OSS will publicly disclose the final

environmental and social assessment through its website as soon as it is received. The executing entity is responsible for disclosing the final environmental and social assessment to project-affected people and other stakeholders. Project/programme performance reports including the status on implementation of environmental and social measures shall be publicly disclosed. Any significant proposed changes in the project/programme during implementation shall be made available for effective and timely public consultation with directly affected communities.

2.3.6 Grievance Mechanism

The executing entity shall identify a grievance mechanism that provides people affected by projects/programmes supported by OSS with an accessible, transparent, fair and effective process for receiving and addressing their complaints about environmental or social harms caused by any such project/programme.

2.3.7 Roles and Obligations of Executing Entities

The Executing Entity is responsible for assessing projects and their environmental and social impacts, preparing safeguard plans, and engaging with affected communities through information disclosure, consultation, and informed participation following all policy principles and safeguard requirements. The Executing Entity will submit all required information, including assessment reports, safeguard plans/frameworks, and monitoring reports, to OSS for review.

2.4 Environmental and Social Due Diligence by OSS

OSS is responsible for the following:

- (i) screening projects undertaking due diligence
- (ii) reviewing the Executing Entity's social and environmental assessments and plans to ensure that safeguard measures are in place to avoid, wherever possible, and minimize, mitigate, and compensate for adverse social and environmental impacts in compliance with OSS's Environmental and Social Performance Standards;
- (iii) helping the Executing Entities to meet the standards put forth in OSS's Environmental and Social Policy through building capacity ; and
- (iv) monitoring and supervising the Executing Entity's social and environmental performance throughout the project cycle.

2.4.1 Applicable procedures

To make sure that the Executing entity has complied with OSS's ESP, OSS's Environmental and Social Risk Management Officer will use the Environmental and Social Risk Assessment Checklist provided in Annex 6 to conduct its own Environment and Social Screening. This may consist of a desk review or may require a full-scale review and site-visit conducted by a technically qualified consultant.

In particular the following procedure will be undertaken by OSS as a part of its overall ESMS:

1. OSS will verify that the proposed business activity is not on OSS's prohibited activities list (as provided in Annex 3).

2. If a project has a history of environmental and social incidents, it will not be considered for support.
3. Project compliance with applicable national laws on environment, health, and safety will be verified.
4. Using the Environmental and Social Risk Checklist for all proposals received from executing entities, the Environmental and Social Risk Officers shall undertake an initial assessment of whether the relevant business activities in the reasonable opinion of OSS, have the potential to have an adverse environmental or social impact as per the Performance Standard PS2 to PS10 as identified at section 2.2 above. The Environmental and Social Risk Officers will then assign an environmental risk category to the project based on three factors:
 - a. Activities or sectors
 - b. Proximity to environmentally sensitive areas
 - c. Potentially irreversible impacts.

In the event that OSS determines, in its reasonable opinion, that the relevant activities of the executing entities have the potential to have an adverse environmental or social impact, it shall, prior to providing any support, advisory or other services to such executing entities undertake a detailed and comprehensive assessment (as per detailed Environmental and Social Impact Assessment Study Report provided in Annex 5) as part of the due diligence process in order to reasonably satisfy itself that the relevant activities of the executing entities comply with all applicable environmental & social requirements

In the event that OSS is not able to reasonably satisfy itself that the relevant activities of the executing entities comply with all applicable environmental & social requirements, it shall either:

- (i) decline to provide any support, advisory or other services to such executing entities; or
- (ii) offer to provide the relevant support, advisory or other services subject to the condition that the executing entities shall implement an agreed corrective action plan within a specified period of time.

2.4.2 Organizational capacity and competency

Executing entities key E&S responsibilities would be defined and communicated, and supported with technical and financial resources. Technical staff with direct responsibility for the project/programme performance would have the knowledge, skills and experience necessary to understand and ensure implementation of the ESMS. OSS would also build organizational and manpower competencies related to E&S responsibilities, which will include assigning and training Environmental and Social Risk Management Officers.

2.4.3 Implementation and Monitoring by OSS

Performance Standard 1 requires OSS's Executing Entities establish monitoring procedures to review progress and compliance of operations with any legal and/or contractual obligations and regulatory requirements as well as in accordance with OSS's Environmental and Social Policy (ESP). The extent and frequency should be commensurate with the E&S risk and

potential impacts of the project as identified through the Environmental and Social Due Diligence (ESDD).

For each project or programme, a record of supporting documentation of environmental and social reviews will be maintained by OSS. This includes the initial evaluation of environmental and social risks at the time a project is considered for investment as well as records of on-going compliance.

The implementation of the Environment and Social Policy (ESP) at the organisational level will be guided by 3-year medium term action plans, beginning with the financial year 2016/2017. Subject to availability of funds, the action plans would be developed based on the following key elements:

- (i) Supporting capacity development of Executing Entities for Environmental and Social Due Diligence (e.g. Environmental and Social Assessments, safeguard delivery, etc.);
- (ii) Developing and maintaining the tools and instruments (such as Manuals and handbooks) to assist in implementing ESP;
- (iii) Ensuring OSS's organizational capacity and resources for ESP implementation; and
- (iv) Improving and maintaining OSS's internal review and compliance monitoring system.

2.4.4 Grievance Mechanism

OSS has put in place a system for collecting reviewing and handling all formal complaints delivered to the executing entities and to OSS as part of its grievance mechanism. The aim of the grievance mechanism is to provide people affected by projects/programmes supported by OSS with an accessible, transparent, fair and effective process for receiving and addressing their complaints about environmental or social harms caused by any such project/programme.

The OSS grievance mechanism provides a transparent system for collecting reviewing and handling all formal complaints delivered to OSS.

The complaints form is made accessible on OSS website for use by individuals for filing complaints (<http://www.oss-online.org/en/grievance-mechanism>).

Complaints regarding projects/programmes supported by OSS can also be communicated per e-mail directly to OSS: doléances@oss.org.tn. All formal complaints and their follow-up will be published on the OSS website, to assure transparency of process and outcome. OSS is obliged to record and acknowledge the receipt of any request, within five working days following receipt of the request. Within thirty working days of registration of the application OSS will post on its website an assessment of the feasibility of the grievance resolution activities. The assessment will also include recommended actions, if any, that OSS will be prepared to undertake or facilitate to encourage the pursuit of the resolution of the dispute under consideration, or it will conclude on the uselessness of the resolution of the dispute at this level and close the case. Once the process of resolution of dispute is completed, OSS will submit its report, including settlement (if applicable) and all recommendations for additional actions to all involved stakeholders and post the report on the website.

2.4.5 Resource Implications

OSS will allocate appropriate resources to ensure effective implementation of the ESP.

Immediate requirements for implementation of the Policy include:

- (i) Identifying experts within OSS for environmental and social risk assessment and management.
- (ii) Training and Capacity building of OSS officers and, subject to availability of funds, to Executing Entities.

2.4.6 Risks involved

The potential environment and social risk for OSS do not apply, since it does not support environment sensitive and large projects.

4 ESMS REVIEW AND CONTINUOUS IMPROVEMENT

An ESMS and ESP needs to be reviewed periodically to ensure that it remains relevant and effective over time and incorporates OSS's evolving needs. This involves identifying potential difficulties with operational aspects of ESMS implementation and making changes as necessary; reviewing the scope of ESMS procedures to ensure that emerging environmental and social risks of projects are detected and identified during the due-diligence process; and updating ESMS to reflect revisions in applicable national laws on environment, health, and safety.

The Policy cannot specifically anticipate and encompass all circumstances and, consequently, it is conceivable that the OSS may approve departures from one or more of the directives in the Policy. In such circumstances, proposals advocating any such departure in either programming or in project development and execution must demonstrate the exceptional characteristics of the situation that justify the departure.

ANNEXES

ANNEX 1 | TERMS OF REFERENCE

TECHNICAL COMMITTEE FOR SOCIAL AND ENVIRONMENTAL ASSESSMENT

CONTEXT

With an experience of more than two decades, the Sahara and Sahel Observatory (OSS) has gained throughout the years an advanced level of maturity translated in the implementation of various activities and projects in partnership with different financial and technical partners (WB, GEF, EC, FFEM, SDC ...). Moreover, in 2013, OSS was accredited as a Regional Implementing Entity (RIE) for the Adaptation Fund and is currently on its way for accreditation by the Green Climate Fund.

In order to meet the requirements of its partners, OSS had to adopt its own structured and integrated Environmental and Social Policy. Centered on the Environmental and Social Management System, this policy will enable OSS to be perceived as an ethical organization that fulfills the eligibility conditions imposed by certain partners.

The Environmental and Social Policy has been set up at OSS after its adoption by the General Assembly in 2016. The Policy highlights the main steps and procedures to follow in the framework of the projects in which OSS is involved, and that under the supervision of a committee in charge of social and environmental risks assessment.

The OSS's Environmental and Social Policy integrates the following items:

- A system for the classification of environmental and social risks of projects conducted by OSS at the national and regional levels;
- An environmental and social risks management system;
- An efficient and transparent mechanism to receive and respond to complaints on environmental or social damage caused by the projects/ programs during their execution process;
- A mechanism for public consultation and publication of information.

The effective implementation of the social and environmental policy at OSS necessarily requires the presence of a committee to ensure its optimal application.

The committee will be composed of:

- President of the technical committee for social and environmental assessment
- Gender Policy Officer
- Officer in charge of the social component
- Officer in charge of the environmental component

Responsibilities

President of the Technical Committee for social and environmental assessment

- Organize the meetings of the technical committee to perform the following :
 - Analyze risks of projects under development
 - Classify the project risk level
 - Elaborate a risk management plan, if necessary
 - Monitor the implementation of this plan
- Coordinate and oversee the compliance of OSS activities with the agreed measures;
- Ensure the internal and external communication of these measures;
- Coordinate the preparation of OSS annual environmental and social performance report and report to OSS's bodies and stakeholders;
- Represent OSS in internal and external events focusing on environmental and social issues;
- Validate the Environmental and Social reports submitted by the officials in charge of the Gender, environmental and social Policies.

Officer in charge of the social component

- Coordinate and supervise the compliance of OSS activities with the measures stipulated by the policy in terms of its social component, particularly the following IFC standards:
 - PS2: labor and working conditions
 - PS4: Community Health, Safety and Security
 - PS5: Land acquisition and involuntary resettlement
 - PS7: Indigenous people
 - NP8: Cultural heritage
- Review on a regular basis (annually) OSS social policy; propose updates and revisions to the technical committee and ensure the compliance of OSS activities with the modifications proposed;
- Supervise the creation and administration of a social database and use its data to formulate social objectives;
- Regularly ensure that information pertaining to social regulations is up to date, and adjust the OSS social policy in line with the new legal provisions as appropriate;

- Propose to the technical committee for environmental and social assessment an annual budget plan for social management;
- Coordinate and ensure the monitoring of the staff training program on social issues;
- Ensure compliance with the social regulations and standards in the management of the social and environmental impacts of projects classified as having a medium or high level environmental risk.

Officer in charge of the environmental component

- Coordinate and ensure the compliance of OSS activities with the measures stipulated in the Policy in terms of its environmental component, particularly the following IFC standards:
 - SP1: Assessment and management of environmental and social risks and impacts
 - SP3: Resource efficiency and pollution prevention
 - SP6: Biodiversity conservation and sustainable management of living natural resources
- Review on a regular basis (annually) OSS environmental policy; propose updates and revisions to the technical committee and ensure the compliance of OSS activities with the modifications proposed;
- Supervise the creation and administration of an environmental database and use its data to formulate environmental objectives;
- Regularly ensure that information pertaining to environmental regulations is up to date; and adjust the OSS environmental policy in line with the new legal provisions as appropriate;
- Propose to the technical committee for environmental and social assessment an annual budget plan for environmental management;
- Coordinate and ensure the monitoring of the staff training program on environmental issues;
- Ensure compliance with the environmental and social regulations and standards in the management of the social and environmental impacts of projects classified as having a medium or high-level environmental risk;
- Ensure the preparation of ToR relative to potential environmental assessments with the support of OSS projects coordinators;
- Support projects coordinators in the recruitment of consultants for the implementation of these assessments.

Gender Officer

The integration of the gender concept in the context of OSS projects and programs across all sectors: climate, population, water, environment, and OSS internal functioning.

- Responsible for the implementation of the gender policy within OSS,
- Mainstreaming of gender in OSS projects and programs, as well as in the functioning of the executive secretariat;
- Promote gender and ensure that gender issues are addressed in projects and other activities of OSS;
- Ensure that all documents issued by OSS as part of its administrative activity and as part of its projects and programs are gender sensitive and allow for gender equality;
- Regularly report on the achievements and makes sure they are documented.

ANNEX 2 | GCF'S INTERIM ENVIRONMENTAL AND SOCIAL OBJECTIVES AND SAFEGUARDS

(Source: GCF/B.07/11)

I. Overview of the International Finance Corporation Performance Standards

1. The eight Performance Standards (PS) and the objectives of each are as follows:

1.1 PS1: Assessment and management of environmental and social risks and impacts

- (a) Identify funding proposal's environmental and social risks and impacts;
- (b) Adopt mitigation hierarchy: anticipate, avoid; minimize; compensate or offset;
- (c) Improve performance through an environmental and social management system;
- (d) Engagement with affected communities or other stakeholders throughout funding proposal cycle. This includes communications and grievance mechanisms.

1.2 PS2: Labour and working conditions

- (a) Fair treatment, non-discrimination, equal opportunity;
- (b) Good worker–management relationship;
- (c) Comply with national employment and labour laws;
- (d) Protect workers, in particular those in vulnerable categories;
- (e) Promote safety and health;
- (f) Avoid use of forced labour or child labour.

1.3 PS3: Resource efficiency and pollution prevention

- (a) Avoid, minimize or reduce project-related pollution;
- (b) More sustainable use of resources, including energy and water;
- (c) Reduced project-related greenhouse gas emissions.

1.4 PS4: Community health, safety and security

- (a) To anticipate and avoid adverse impacts on the health and safety of the affected community;
- (b) To safeguard personnel and property in accordance with relevant human rights principles.

1.5 PS5: Land acquisition and involuntary resettlement

(a) Avoid/minimize adverse social and economic impacts from land acquisition or restrictions on land use:

- (i) Avoid/minimize displacement;
- (ii) Provide alternative project designs;
- (iii) Avoid forced eviction.

- (b) Improve or restore livelihoods and standards of living;
- (c) Improve living conditions among displaced persons by providing:

- (i) Adequate housing;
- (ii) Security of tenure.

1.6 PS6: Biodiversity conservation and sustainable management of living natural resources

- (a) Protection and conservation of biodiversity;
- (b) Maintenance of benefits from ecosystem services;
- (c) Promotion of sustainable management of living natural resources;
- (d) Integration of conservation needs and development priorities.

1.7 PS7: Indigenous peoples

- (a) Ensure full respect for indigenous peoples
 - (i) Human rights, dignity, aspirations;
 - (ii) Livelihoods;
 - (iii) Culture, knowledge, practices;
- (b) Avoid/minimize adverse impacts;
- (c) Sustainable and culturally appropriate development benefits and opportunities;
- (d) Free, prior and informed consent in certain circumstances.

1.8 PS8: Cultural heritage

- (a) Protection and preservation of cultural heritage;
- (b) Promotion of equitable sharing of cultural heritage benefits.

2. The International Finance Corporation (IFC) PS can be viewed at:

http://www.ifc.org/wps/wcm/connect/c8f524004a73daeca09afdf998895a12/IFC_Performance_Standards.pdf?MOD=AJPERES.

II. Performance Standard Guidance Notes

3. A set of eight Guidance Notes, corresponding to each PS, offers guidance on the requirements contained in the PS. In addition, the World Bank Group Environmental, Health and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of good international practice and are linked to the PS through PS₂ and PS₃.

4. The Guidance Notes and EHS Guidelines can be found at:

http://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/IFC+Sustainability+Sustainability+Framework/Sustainability+Framework+-+2012/Performance+Standards+and+Guidance+Notes+2012/.

ANNEX 3 | IFC EXCLUSION LIST

NOTE: This Exclusion List relates to IFC's investments prior to IFC's introduction of the Environmental and Social Review Procedure version 2 dated July 30, 2007.

IFC Exclusion List

The IFC Exclusion List defines the types of projects that IFC **does not** finance.

IFC does not finance the following projects:

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- Production or trade in weapons and munitions.ⁱ
- Production or trade in alcoholic beverages (excluding beer and wine).ⁱ
- Production or trade in tobacco.ⁱ
- Gambling, casinos and equivalent enterprises.ⁱ
- Trade in wildlife or wildlife products regulated under CITES.ⁱⁱ
- Production or trade in radioactive materials.ⁱⁱⁱ
- Production or trade in or use of unbonded asbestos fibers.^{iv}
- Purchase of logging equipment for use in primary tropical moist forest.
- Production or trade in pharmaceuticals subject to international phase outs or bans.
- Production or trade in pesticides/herbicides subject to international phase outs or bans.
- Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.

A reasonableness test will be applied when the activities of the project company would have a significant development impact but circumstances of the country require adjustment to the Exclusion List.

All financial intermediaries (FIs), except those engaged in activities specified below*, must apply the following exclusions, in addition to IFC's Exclusion List:

- Production or activities involving harmful or exploitative forms of forced labor/harmful child labor.^{vi}
- Commercial logging operations for use in primary tropical moist forest.
- Production or trade in products containing PCBs.^{vii}
- Production or trade in ozone depleting substances subject to international phase out.^{viii}

* When investing in **microfinance** activities, FIs will apply the following items in addition to the IFC Exclusion List:

- Production or activities involving harmful or exploitative forms of forced labor/harmful child labor.^{vi}
- Commercial logging operations for use in primary tropical moist forest.
- ☑ Production or trade in products containing PCBs.^{vii}
- ☑ Production or trade in ozone depleting substances subject to international phase out.^{viii}
- Production or trade in wood or other forestry products from unmanaged forests.

- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals.^{ix}
- Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples.

*When engaged in **trade finance**, given the nature of the transactions, FIs will apply the following Exclusion List:

- Production or activities involving harmful or exploitative forms of forced labor/harmful child labor.^{vi}
- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- Production or trade in weapons and munitions.ⁱ
- Production or trade in alcoholic beverages (excluding beer and wine).ⁱ
- Production or trade in tobacco.ⁱ
- Gambling, casinos and equivalent enterprises.ⁱ
- Trade in wildlife or wildlife products regulated under CITES.ⁱⁱ
- Production or trade in radioactive materialsⁱⁱⁱ
- Production or trade in or use of unbonded asbestos fibers.^{iv}
- Commercial logging operations or the purchase of logging equipment for use in primary tropical moist forest.
- Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.
- Production or trade in products containing PCBs.^{vii}

Footnotes

ⁱ This does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a project sponsor's primary operations.

ⁱⁱ CITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora. A list of CITES listed species is available from the Environment Division.

ⁱⁱⁱ This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.

^{iv} This does not apply to the purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.

^v Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

^{vi} Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

^{vii} PCBs: Polychlorinated biphenyls - a group of highly toxic chemicals. PCBs are likely to be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950-1985.

^{viii} Ozone Depleting Substances (ODSs): Chemical compounds which react with and deplete stratospheric ozone, resulting in the widely publicized 'ozone holes'. The Montreal Protocol lists ODSs and their target reduction and phase out dates. A list of the chemical compounds regulated by the Montreal Protocol, which includes aerosols, refrigerants, foam blowing agents, solvents, and fire protection agents, together with details of signatory countries and phase out target dates, is available from the Environment Division.

^{ix} A list of hazardous chemicals is available from the Environment Division. Hazardous chemicals include gasoline, kerosene and other petroleum products.

ANNEX 4 | LIST AND BRIEF DESCRIPTION OF LEGISLATION AND REGULATIONS THAT COULD BE RELEVANT FOR ENVIRONMENTAL AND SOCIAL TOPICS

The content of annex-4 is available under this link:

<http://projet.oss-online.org/ftp/national-environmental-laws-regulations.pdf>

ANNEX 5 | OUTLINE OF AN ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) REPORT*

An environmental and social assessment report is required for all environment category A and B projects. Its level of detail and comprehensiveness is commensurate with the significance of potential environmental and social impacts and risks. A typical ESIA report contains the following major elements, and an Initial Environmental and Social Examination (IESE) may have a narrower scope depending on the nature of the project. The substantive aspects of this outline will guide the preparation of environmental and social impact assessment reports, although not necessarily in the order shown.

A. Executive Summary

This section describes concisely the critical facts, significant findings, and recommended actions.

B. Policy, Legal, and Administrative Framework

This section discusses the national and local legal and institutional framework within which the environmental assessment is carried out. It also identifies project-relevant international environmental agreements to which the country is a party.

C. Description of the Project

This section describes the proposed project; its major components; and its geographic, ecological, social, and temporal context, including any associated facility required by and for the project (for example, access roads, power plants, water supply, quarries and borrow pits, and spoil disposal). It normally includes drawings and maps showing the project's layout and components, the project site, and the project's area of influence.

D. Description of the Environment (Baseline Data)

This section describes relevant physical, biological, and socioeconomic conditions within the study area. It also looks at current and proposed development activities within the project's area of influence, including those not directly connected to the project. It indicates the accuracy, reliability, and sources of the data.

E. Anticipated Environmental and Social Impacts and Mitigation Measures

This section predicts and assesses the project's likely positive and negative direct and indirect impacts to physical, biological, socioeconomic (including occupational health and safety, community health and safety, vulnerable groups and gender issues, and impacts on livelihoods through environmental media and physical cultural resources in the project's area of influence, in quantitative terms to the extent possible); identifies mitigation measures and any residual negative impacts that cannot be mitigated; explores opportunities for enhancement; identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions and specifies topics that do not require further attention; and examines global, trans boundary, and cumulative impacts as appropriate.

F. Analysis of Alternatives

This section examines alternatives to the proposed project site, technology, design, and operation - including the no project alternative - in terms of their potential environmental and social impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions; and their institutional, training, and monitoring requirements. It also states the basis for selecting the particular project design proposed and, justifies recommended emission levels and approaches to pollution prevention and abatement.

G. Information Disclosure, Consultation, and Participation

This section:

- (i) describes the process undertaken during project design and preparation for engaging stakeholders, including information disclosure and consultation with affected people and other stakeholders;
- (ii) summarizes comments and concerns received from affected people and other stakeholders and how these comments have been addressed in project design and mitigation measures, with special attention paid to the needs and concerns of vulnerable groups, including women, the poor, and Indigenous peoples; and
- (iii) describes the planned information disclosure measures (including the type of information to be disseminated and the method of dissemination) and the process for carrying out consultation with affected people and facilitating their participation during project implementation.

H. Grievance Redress Mechanism

This section describes the grievance redress framework (both informal and formal Channels), setting out the time frame and mechanisms for resolving complaints about environmental and social performance.

I. Environmental and Social Management Plan

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

- (i) Mitigation:
 - (a) identifies and summarizes anticipated significant adverse environmental and social impacts and risks;
 - (b) describes each mitigation measure with technical details, including the type of impact to which it relates and the conditions under which it is required (for instance, continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; and

(c) provides links to any other mitigation plans (for example, for involuntary resettlement, Indigenous Peoples, or emergency response) required for the project.

(ii) Monitoring:

(a) describes monitoring measures with technical details, including parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits and definition of thresholds that will signal the need for corrective actions; and

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

(iii) Implementation arrangements:

(a) specifies the implementation schedule showing phasing and coordination with overall project implementation;

(b) describes institutional or organizational arrangements, namely, who is responsible for carrying out the mitigation and monitoring measures, which may include one or more of the following additional topics to strengthen environmental and social management capability: technical assistance programs, training programs, procurement of equipment and supplies related to environmental and social management and monitoring, and organizational changes; and

(c) estimates capital and recurrent costs and describes sources of funds for implementing the environmental and social management plan.

(iv) Performance indicators: describes the desired outcomes as measurable events to the extent possible, such as performance indicators, targets, or acceptance criteria that can be tracked over defined time periods.

J. Conclusion and Recommendation

This section provides the conclusions drawn from the assessment and provides recommendations.

ANNEX 6 | ENVIRONMENTAL AND SOCIAL RISK ASSESSMENT CHECKLIST
TO BE APPLIED BY EXECUTING ENTITIES / OSS DIRECTLY IMPLEMENTING THE PROJECT

Project description	
Project name	
Location	
Sector	
Brief project description	
Checklist Potential Social and Environmental Risks	
	Answer (Yes/No)
PS 1: Assessment and management of environmental and social risks and impacts	
Please refer to the sections below	
PS2: Labour and working conditions	
Does the project/programme pose potential risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project/programme construction, operation, or decommissioning?	
Does the project/programme involve support for employment or livelihoods that may fail to comply with national and international labor standards?	
Does the project/programme engage security personnel that may pose a potential risk to health and safety of communities and/or individuals (e.g. due to a lack of adequate training or accountability)?	
PS 3: Resource efficiency and pollution prevention	
Would the project/programme potentially result in the release of pollutants to the environment with the potential for adverse local, regional, and/or transboundary impacts?	
Would the proposed project/programme potentially result in the generation of waste (both hazardous and non-hazardous)?	
Will the proposed project/programme potentially involve the manufacture, trade, release, and/or use of hazardous chemicals and/or materials?	
Does the project/programme propose use of chemicals or materials subject to international bans or phase-outs?	
Will the proposed project/programme involve the application of pesticides that may have a negative effect on the environment or human health?	
Does the project/programme include activities that require significant consumption of raw materials, energy, and/or water?	
PS 4: Community health, safety and security	
Would elements of project/programme construction, operation, or decommissioning pose potential safety risks to local communities?	
Would the project/programme pose potential risks to community health and safety due to the transport, storage, and use and/or disposal of hazardous or dangerous materials (e.g. explosives, fuel and other chemicals during construction and operation)?	

Does the project/programme involve large-scale infrastructure development (e.g. dams, roads, buildings)?	
Would failure of structural elements of the project/programme pose risks to communities? (e.g. collapse of buildings or infrastructure)	
Would the proposed project/programme be susceptible to or lead to increased vulnerability to earthquakes, subsidence, landslides, erosion, flooding or extreme climatic conditions?	
Would the project/programme result in potential increased health risks (e.g. from water-borne or other vector-borne diseases or communicable infections such as HIV/AIDS)?	
PS 5: Land acquisition and involuntary resettlement	
Would the project/programme potentially involve temporary or permanent and full or partial physical displacement?	
Would the project/programme possibly result in economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	
Is there a risk that the project/programme would lead to forced evictions?	
Would the proposed project/programme possibly affect land tenure arrangements and/or community based property rights/customary rights to land, territories and/or resources?	
PS 6: Biodiversity conservation and sustainable management of living natural resources	
Would the project/programme potentially cause adverse impacts to habitats (e.g. modified, natural, and critical habitats) and/or ecosystems and ecosystem services? <i>For example, through habitat loss, conversion or degradation, fragmentation, hydrological changes</i>	
Are any project/programme activities proposed within or adjacent to critical habitats and/or environmentally sensitive areas, including legally protected areas (e.g. nature reserve, national park), areas proposed for protection, or recognized as such by authoritative sources and/or indigenous peoples or local communities?	
Does the project/programme involve changes to the use of lands and resources that may have adverse impacts on habitats, ecosystems, and/or livelihoods?	
Would project/programme activities pose risks to endangered species?	
Would the project/programme pose a risk of introducing invasive alien species?	
Does the project/programme involve harvesting of natural forests, plantation development, or reforestation?	
Does the project/programme involve the production and/or harvesting of fish populations or other aquatic species?	
Does the project/programme involve significant extraction, diversion or containment of surface or ground water? <i>For example, construction of dams, reservoirs, river basin developments, groundwater extraction</i>	
Does the project/programme involve utilization of genetic resources? (e.g. collection and/or harvesting, commercial development)	
Would the project/programme generate potential adverse trans boundary or global environmental concerns?	
Would the Project result in secondary or consequential development activities, which could lead to adverse social and environmental effects, or would generate cumulative impacts with other known	

existing or planned activities in the area?	
PS 7: Indigenous people	
Are indigenous peoples present in the project/programme area (including project/programme area of influence)?	
Is it likely that the project/programme or portions of the project/programme will be located on lands and territories claimed by indigenous peoples?	
Would the proposed project/programme potentially affect the rights, lands and territories of indigenous peoples (regardless of whether Indigenous Peoples possess the legal titles to such areas)?	
Does the proposed project/programme involve the utilization and/or commercial development of natural resources on lands and territories claimed by indigenous peoples?	
Is there a potential for forced eviction or the whole or partial physical or economic displacement of indigenous peoples, including through access restrictions to lands, territories, and resources?	
Would the project/programme adversely affect the development priorities of indigenous peoples as defined by them?	
Would the project/programme potentially affect the traditional livelihoods, physical and cultural survival of indigenous peoples?	
Would the project/programme potentially affect the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices?	
PS 8: Cultural heritage	
Will the proposed project/programme result in interventions that would potentially adversely impact sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture?	
Does the project/programme propose utilizing tangible and/or intangible forms of cultural heritage for commercial or other purposes?	
PS 9: Gender equity and Women's empowerment	
Is there a likelihood that the proposed project/programme would have adverse impacts on gender equality and/or the situation of women and girls?	
Would the project/programme potentially reproduce discriminations against women based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?	
Have women's groups/leaders raised gender equality concerns regarding the project/programme during the stakeholder engagement process and has this been included in the overall project/programme proposal and in the risk assessment?	
Would the project/programme potentially limit women's ability to use, develop and protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services?	
PS 10: Access and equity and protection of human rights	
Could the project/programme lead to adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalized groups?	

Is there a likelihood that the project/programme would have inequitable or discriminatory adverse impacts on affected populations, particularly people living in poverty or marginalized or excluded individuals or groups?	
Could the project/programme potentially restrict availability, quality of and access to resources or basic services, in particular to marginalized individuals or groups?	
Is there a likelihood that the project/programme would exclude any potentially affected stakeholders, in particular marginalized groups, from fully participating in decisions that may affect them?	
Are there measures or mechanisms in place to respond to local community grievances?	
Is there a risk that duty-bearers do not have the capacity to meet their obligations in the project/programme?	
Is there a risk that rights-holders do not have the capacity to claim their rights?	
Have local communities or individuals, given the opportunity, raised human rights concerns regarding the Project during the stakeholder engagement process?	
Is there a risk that the Project would exacerbate conflicts among and/or the risk of violence to project-affected communities and individuals?	