

## **Infrastructure Development Bank of Zimbabwe**

# **Environmental and Social Sustainability Management System Manual**

Title	Environmental and Social Sustainability	Management
	System Manual	
<b>Document Number</b>	RMCF	
Procedure applicable to	All Bank Staff	
	By:	Date
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Approved	<b>Executive Committee</b>	21/11/18

### 2018 Edition

#### **PREAMBLE**

The Environmental and Social Sustainability Management System (ESSMS) has been structured in line with the general provisions of the International Standards Organization (ISO) 14001 to facilitate integration of the ESSMS with any other Management System that IDBZ has in place or intends to develop. The ESSMS also follows the Green Climate Fund/International Finance Corporation Environmental and Social Management requirements closely. Due to the diversity of the potential entities and activities which this ESSMS must govern, it is largely a framework.

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#### **ACRONYMS**

Acronym Meaning

**AfDB** African Development Bank

CAP. Chapter

**CITIES** Convention on International Trade on Endangered Species

**DOTS** Development Outcomes Tracking System

**E&S** Environmental and Social

**E&SS** Environmental and Social Sustainability

**ECM** External Communication Mechanism

**EHS** Environmental Health and Safety

**EHSGs** Environmental, Health and Safety Guidelines

**EMA** Environmental Management Agency

**ESIA** Environmental and Social Impact Assessment

**ESMP** Environmental and Social Management Plan

**ESSMS** Environmental and Social Sustainability Management System

**FI** Financial Intermediary

**GAP** Gender Action Plan

**GCF** Green Climate Fund

**GHG** Green House Gases

**GIIP** Good International Industry Practice

**GRM** Grievance Redress Mechanism

**IDBZ** Infrastructure Development Bank of Zimbabwe

**IFC** International Finance Corporation

**IUCN** International Union for the Conservation of Nature

**JV** Joint Venture

**NCCRS** National Climate Change Response Strategy

**NMMZ** National Museums and Monuments of Zimbabwe

**NSSA** National Social Security Authority

**PPP** Public Private Partnerships

**PS** Performance Standard

**SPV** Special Purpose Vehicle

**STEP** Sustainability Training and E-Learning Program

**UNFCCC** United Nations Framework Convention on Climate Change

**ZERA** Zimbabwe Energy Regulatory Authority

**ZINWA** Zimbabwe National Water Authority

**ZPC** Zimbabwe Power Company

## **DEFINITIONS**

Term	Definition
Continual improvement	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organization's environmental policy.
Environmental and social aspect	The element of the organization's activities or products or services that can interact with the environment.
Environmental and social impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspect.
Environmental and Social Sustainability Management System	Part of an organization's management system used to develop and implement its environmental and social sustainability policy.
Environmental sustainability	The maintenance of the factors and practices that contribute to the quality of environment on a long-term basis
Environment (Environmental and Social)	(a) The natural and man-made resources physical resources, both biotic and abiotic, occurring in the lithosphere and atmosphere, water, soil, minerals and living organisms whether indigenous or exotic and the interaction between them; (b) Ecosystems, habitats, spatial surroundings or other constituent parts whether natural or modified or constructed by people and communities, including urbanised areas, agricultural areas, rural landscapes, and places of cultural significance; (c) The economic, social, cultural or aesthetic conditions and qualities that contribute to the value of the matters set out in paragraphs (a) and (b);
Gender	Aconcept referring to the comparative or differential roles, responsibilities and opportunities (all socially constructed) of women and men in a given society.
Pollution prevention:	The use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.
Residual impact	The smallest measure of environmental or social impact that remains after administering mitigation measures.
Social sustainability	A process for creating sustainable, successful places that promote wellbeing, by understanding what people need from the places they live and or work.
Sustainability	The process of maintaining change in a balanced fashion, in which the exploitation of resources, the direction of investments, the orientation of technological development and institutional change are all in harmony and enhance both current and future potential to meet human needs and aspirations.

# PART 1: ENVIRONMENTAL AND SOCIAL SUSTINABILITY POLICY (ESSP)

## **Environmental and Social Sustainability Policy**

Policy	Environmental and Social Sustainability	
Level	Bank Wide	
Туре	Operations Management	
Policy owner:	Director - Resource Mobilisation and Climate Finance	
Reviewed by:	Board Finance and Risk Management/Corporate Governance Committee	
Approved by:	Board of Directors	
Policy Number:	RMCF - 001/001	

**Version: 1.0 - 2018** 

## 1.0 ENVIRONMENTAL AND SOCIAL SUSTAINABILITY POLICY

#### 1.1 Environmental and Social Sustainability Policy Statement

#### 1.1.1 Overview

The Infrastructure Development Bank of Zimbabwe (IDBZ) envisions a Zimbabwe with robust, inclusive and sustainable growth and development. The Bank champions sustainable infrastructure development in Zimbabwe. IDBZ is committed to sustainable environmental and social management practices, climate change management, staff wellness, worker and community health and safety. The Bank engages in systematic identification, assessment, management, mitigation and compensation (where required) of environmental and social risks and impacts associated with all projects the Bank is involved in. Projects are developed and implemented with full participation of key stakeholders and in compliance with all applicable national legislation and international laws and standards. The Bank endeavours to ensure that environmental, social and gender issues are an integral part in decision making and fundamental in informing economic policies.

#### **1.1.2. Purpose**

The policy seeks to:

- i. Identify and manage environmental and social risks and impacts of all IDBZ supported projects throughout the project cycle;
- ii. Optimise the social and environmental outcomes of all IDBZ supported activities;
- iii. Enhance equitable access to development benefits;
- iv. Give due consideration to vulnerable populations, groups, and individuals (including women, children, people with disabilities and youths), local communities, indigenous peoples and other marginalised groups of people and individuals that are affected by or have an interest in IDBZ-financed activities;
- v. Provide guidance and capacity building to project proponents in identifying and managing environmental and social risks and impacts;
- vi. Provide a robust framework for managing the Bank's operational and reputational risks related to environmental and social safeguards matters; and
- vii. Facilitate cooperation on environmental and social safeguards matters with joint-financing partners.

#### 1.1.3. Scope

This policy covers all IDBZ operations. IDBZ-related infrastructural development project categories will include:

- i. IDBZ's own infrastructural development projects. These are projects that are owned and implemented by IDBZ directly, including and not limited to water and sanitation, housing, energy (power generation and transmission), transport (road construction) and any such projects that may fully be under the purview of IDBZ and may have potential to generate environmental and social risks or impacts. Environmental and Social Management Plans (ESMPs) will be developed for specific projects to address the identified risks and impacts, and they will be monitored to improve on their effectiveness.
- ii. IDBZ intermediary projects. These are projects where IDBZ is the intermediary through which financial other implementing agents/entities access investment capital from the Government (Public Sector Investment Projects), Bilateral and International Financiers such as the Green Climate Fund (GCF), African Development Bank (AfDB) and the World Bank. In this case, IDBZ will ensure that the implementing agency (also referred to as borrower/investee) complies with the environmental and social requirements of both the national and relevant International Financiers through this policy by ensuring that the agencies have relevant safeguards measures in place that will endeavour to improve the environmental and social outcomes and generate positive co-benefits to the environment and the communities.
- iii. Joint financing with partner institutions. These are projects where funding is jointly provided by IDBZ and other institutions, such as the Joint Ventures (JV) Arrangement, Public-Private Partnership (PPP) and Special Purpose Vehicles (SPV). In this case, the Bank will have to be satisfied that the partner institution's Environmental and Social Impact Assessment (ESIA), ESMP, Environmental and Social Sustainability Management System (ESSMS) and/or specific requirements for funding of the project are consistent with this Policy and that appropriate monitoring modalities are foreseen. On a case by case basis, the Bank will decide whether to rely on the partner institution's assessment of compliance with the applied policies and procedures or the Bank will need its own independent assessment, or the assessments

are conducted by partners under Bank support. In all the cases, the Bank must be satisfied that the environmental and social requirements are synchronized with the project life cycle.

Capacity Building and Knowledge generation: The Bank will also support institutional capacity building to enable institutions to integrate environmental and social safeguards and support knowledge generation and share lessons learnt.

#### 1.1.4 Integrated Project Life Cycle.

This policy will apply to all project categories and project phases, ensuring that the environmental and social risks and impacts are identified, assessed, evaluated, mitigated, managed and compensated while positive impacts are enhanced during the following phases:

- Project Identification
- Project Appraisal
- Project Implementation
- Project Completion

The environmental and social sustainability management cycle will be synchronized with the IDBZ project life cycle (Bank Loans and Project Investment Approval Process) and the two will be integrated to ensure that the environmental and social assessments add value to the conventional project life cycle approach. The Policy owner and all project managers in responsible Divisions will ensure that the environmental and social sustainability processes do not lag behind the other aspects (technical, financial) of the project life cycle. The integrated project life cycle will be applied to both IDBZ implemented projects and those implemented by other implementers/agencies where IDBZ is the financial intermediary.

#### 1.1.5 Compliance

All employees of the Bank and stakeholders are required to abide by this Policy always. Any exceptions to this Policy shall require Board Approval. The Bank will consistently conduct regular reviews of the policy to ensure continual improvement of the Environmental and Social Sustainability Management System (ESSMS). The RMCF through its Climate Finance and Sustainability Division will receive feedback from internal and external stakeholders on the ESSMS and initiate timely policy recommendations for consideration by Management. Management will be responsible for recommending final policy review to the IDBZ Board for approval.

#### 1.1.6 Related Information

The Environmental and Social Sustainability Policy will be integrated with other complementary existing IDBZ policies and manuals, including and not limited to;

- Operations Manual
- Gender Policy
- HIV and AIDS Policy
- Human Resources Management Policy
- Procurement Policy
- Risk Management Policy
- Lending and Investment Policy
- Information Disclosure Policy
- Emergency Preparedness Procedure

#### 1.1.7 Policy Administration

Director – Resource Mobilisation and Climate Finance

## 1.1.8 IDBZ Environmental and Social Sustainability Policy Commitments

In pursuit of this policy, IDBZ commits to undertake the following:

- Mainstream climate change in project design and implementation, incorporating innovative technology that enhances adaptation to climate change and mitigation of climate change impacts
- Continually undertake comprehensive environmental and social planning management consistent with the project life cycle approach and commensurate with the scope of the project i.e.
  - Formulating specific objectives, implementing programs and activities that enhance environmental protection management; and
  - Implement the mitigation and adaptation measures encompassing prevention of water pollution, land degradation, inefficient use of resources, air pollution (including greenhouse gas emissions), occupational accidents, community health impacts, involuntary resettlement and/or economic displacement.
  - Establish an appropriate ESSMS implementation structure, engage suitably qualified and experienced staff with proven professionalism, assigning clear roles and responsibilities to ensure objective formulation, effective implementation and timely monitoring and evaluation of all environmental and social risk management initiatives.

- Communicate the provisions of this policy to both internal and external stakeholders,
- Strive to obtain prior, free and informed consent in project development
- Communicate inconsistency with all public disclosure standards that the IDBZ subscribes to.
- Ensure compliance with all applicable Zimbabwean legislation, national obligations under international law (including United Nations Framework Convention on Climate Change (UNFCCC)) and standards to which IDBZ subscribes, including and not limited to the Environmental Management Act (CAP 20:27) and related regulations, National Social Security Authority (NSSA) Regulations, the Green Climate Fund (GCF) Policies and, depending on circumstances, those of the World Bank, African Development Bank, Development Bank of Southern Africa and the International Finance Corporation (IFC) Performance Standards PS1-PS8 which are:
- **PS1**. Assessment and management of environmental and social risks and impacts;
- **PS2.** Labour and working conditions; protect the rights, health and safety of workers, including those working on projects overseen/supported by IDBZ;
- **PS3.** Resource efficiency and pollution prevention;
- **PS4.** Community health, safety and security;
- **PS5.** Land acquisition and involuntary resettlement;
- **PS6.** Biodiversity conservation and sustainable management of living natural resources and ecosystems;
- **PS7.** Respecting the rights of Indigenous Peoples; and
- **PS8.** Cultural Heritage Protection.
- Achieve the aspirations of this policy through the formulation, implementation and review of the ESSMS. The ESSMS includes the following key elements:
- a. Environmental and Social Sustainability Planning Framework
  - Identification and analysis of environmental and social risks and impacts;
  - Determining the significance of environmental and social aspects/impacts/risks;

- Framework for compliance with legal and other compliance requirements, and
- Framework for setting environmental and social sustainability objectives, targets and programs.
- b. Implementation arrangements.;
- c. Monitoring mechanisms.
- d. Management review framework.

#### **1.1.9 Guiding Principles**

In the operationalisation of this policy, IDBZ is guided by the following principles in all projects;

#### a) Environmental and Social Impacts Management Hierarchy

All projects, in consistency with other IDBZ sustainability principles, should ensure incorporation of project risk management options that will exhibit the following impact management outcomes in the following order of preference:

- (i) Impact anticipation and avoidance.
- (ii) Impact reduction.
- (iii) Impact mitigation,
- (iv) Impact compensation as necessary, including ecological offsets.

Through its environmental and social assessment and monitoring processes, the Bank will seek to ensure that the Projects it finances, co-finances and/or administers are designed and implemented in such a way as to:

- Optimise social and environmental benefits;
- Implement the adaptation measures
- Avoid, minimise and or mitigate adverse environmental and social impacts/risks and
- Comply with appropriate environmental and social standards

#### b) The Precautionary Principle

IDBZ is guided by the understanding that negative project impacts should be prevented, even if there is no conclusive scientific proof of linking that activity to environmental and social damage. The precautionary approach will be implemented in view of Zimbabwe's local choice of "acceptable risk", best practices, the need for transparent and knowledge sharing about project impacts and options, comprehensive monitoring, recognition of different cultural contexts and the diversity of knowledge sources including indigenous knowledge systems. The Bank will not knowingly support Projects which:

- i. Are identified as harmful to human beings or undermining human rights;
- ii. Are likely to cause significant and irreversible negative environmental and/or adverse social impacts and
- iii. Fail to meet established environmental and social safeguard requirements.

#### c) Exclusion List

Based on the IFC Exclusion List, IDBZ will not finance the following activities:

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone depleting substances, persistent organic pollutants such as Polychlorinated Biphenyls (PCB's), wildlife or products regulated under Convention on International Trade in Endangered Species (CITES)
- Production or trade in weapons and munitions<sup>1</sup>
- Production or trade in alcoholic beverages (excluding beer and wine)<sup>1</sup>
- Gambling, casinos and equivalent enterprises<sup>1</sup>
- Production or trade in radioactive materials. 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
- Drift net fishing in the marine/aquatic environment using nets more than
   2.5 km. in length.

A reasonableness test will be applied when the activities of the financial intermediary client would have a significant development impact, but circumstances of Zimbabwe require adjustment to the Exclusion List.

IDBZ will also apply the following exclusions:

- Production or activities involving harmful or exploitative forms of forced labour and in line with the constitution the Bank will not support any form of child labour
- Commercial logging operations for use in primary tropical moist forest
- Production or trade in wood or other forestry products other than from sustainably managed forests.

<sup>&</sup>lt;sup>1</sup> 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.

 Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples.

#### d) Stakeholder Engagement

The Bank upholds good governance, sound business ethics and the importance of prior, free and informed consent with all its stakeholders. IDBZ will ensure timely identification and engagement of stakeholders when and where applicable, consistent with the project life cycle to ensure the input of the stakeholders add value at every stage of the project. A stakeholder engagement plan will thus be developed for each project. Project information will be packaged in an appropriate format and communicated through the appropriate media to the relevant stakeholders to ensure adequate understanding of projects, programs and activities for inclusive stakeholder engagement. Stakeholder engagement will uphold the IDBZ Gender Policy and guidelines (Equitable participation of women and men), be non-discriminatory and assure prior, free and informed consent of interested and project affected persons, including clear application of the grievance redress mechanism.

#### e) Addressing Climate Change

The Bank acknowledges that the carbon footprint of its Projects can influence the extent of climate change in future. To address the challenges of climate change and to support a low carbon economy, IDBZ will carry out screening of proposed Projects to identify potential climate change risks and impacts as well as opportunities for climate change mitigation and adaptation. The screening process will determine if, and which climate considerations are relevant and whether further analysis is needed to assess them. The climate change parameters will include, but not be limited to:

- i. *Carbon Footprint potential:* to determine if the Project is expected to generate significant volumes of Green House Gas (GHG) during its economic lifetime;
- ii. *Climate Change sensitivity:* to determine the likely vulnerability of the Project or its target population to climate change and whether further climate risk analysis should be considered. The vulnerability analysis will capture the extend of vulnerability of women and men in the project, including their different needs and perspectives;
- iii. *Mitigation and adaptation potential:* to identify the Project's potential for contributing to climate change mitigation and adaptation, typically in terms of the reduction of GHG emissions and adopting new technologies. The

Bank will strive to target Projects with high mitigation and adaptation potential.

#### 1.1.10 Conclusion

The Infrastructure Development Bank of Zimbabwe will undertake due diligence and give priority to ensuring that environmental and social safeguards are considered in appraising and financing infrastructure projects in order to avoid, minimise and/or mitigate adverse impacts and risks. The Bank endeavours to enhance the positive impacts (benefits; co-benefits) of each project to protect the environment and improve the livelihoods of the people and their communities. IDBZ will not engage in or support projects that are likely to create significant irreversible adverse environmental and social risks and impacts, including any with activities on the Exclusion List.

# PART 2: ENVIRONMENTAL AND SOCIAL SUSTAINABILITY MANAGEMENT SYSTEM (ESSMS)

## 2.0. ENVIRONMENTAL AND SOCIAL SUSTAINABILITY PLANNING FRAMEWORK

#### 2.1. General provisions of the planning framework

- 1. This Planning Framework implements the Environmental and Social Sustainability Policy commitment and IDBZ's mission to establish, implement and maintain an Environmental and Social Sustainability Management System. This Environmental and Social Sustainability Planning Framework serves the following purposes;
- i. Identification, assessment, evaluation and management of significant environmental and social aspects, risks and impacts.
- ii. Identification and implementation of applicable legal requirements and other compliance requirements to which IDBZ subscribes.
- iii. Setting of environmental and social objectives, targets, standards and establishing programs to achieve them.
- 2. The Planning Framework follows the project life cycle, based on the Deming Cycle and the Environment and Social Impact Assessment (ESIA) process as the planning tools. The integration of the project planning and the environmental and social planning process is to ensure that there is early identification of the associated environmental and social risks/hazards/aspects/impacts. Table 1 shows the synchronization expected between the project life cycle and the Environmental and Social Planning process;

Table 1: Synchronization of the Project Development Process with the Environmental and Social Planning Process.

<b>Project Development Stage</b>	Corresponding Deming Cycle and the ESIA
	framework
1. National Development	1. Plan
Strategy	i. Environmental and social screening
2. Project identification	ii. Initial scoping of major E&S issues
(Mandate, policy, strategy fit,	iii. Develop TORs for ESIA if required
business case, high level risks	iv. ESIA Process or ESMP
budget and milestone	Project justification
schedule)	Project description
3. Project Preparation	<ul> <li>Legal and Policy review</li> </ul>
(Planning, pre-feasibility and	<ul> <li>Environmental and social baseline</li> </ul>
feasibility studies,	Stakeholder consultation
topographic surveys, project	Impact identification
design)	<ul> <li>Impact analysis</li> </ul>
4. Project Appraisal	<ul> <li>Impact assessment</li> </ul>
(Review of prepared	Impact mitigation
documents and see if they are	• Environmental and Social
in line with Bank's standards	Management Plan (ESMP)
and regulations)	formulation
5. Project Approval	ESIA review and certification
6. Project implementation	2. Do
(Construction, project	i. Implementation of the Environmental
management, operation and	and Social Management Plan.
supervision)	
7. Project Monitoring	3. Check
	i. Monitoring of the Environmental and
	Social Management Plan
	ii. Environmental and Social
	Compliance Audits
9 Duoingt Classes	iii. Management review of ESSMS
8. Project Closure Post implementation	<ul><li>4. Act</li><li>i. Lessons learnt/Continual</li></ul>
Post implementation evaluation	i. Lessons learnt/Continual improvement
(Decommissioning, post	improvement
implementation reports,	
independent evaluation)	

#### 2.2. Environmental and Social Aspects

#### 2.2.1. Understanding IDBZ activities, products and services

IDBZ is the champion for sustainable infrastructure development in Zimbabwe. IDBZ focuses on project financing, capacity building and knowledge generation. The Bank provides medium- to long-term financing for infrastructure projects in the energy, water and sanitation, transport, ICT and housing sectors. The Bank performs its role as both an investor and lender i.e. through providing funding via equity or debt instruments respectively. The Bank also supports industry players in the infrastructure value chain by providing loans and guarantees.

IDBZ undertakes project implementation directly through its Projects Division and indirectly undertakes projects through project financing as an intermediary. Some of the infrastructure projects undertaken include and not limited to;

- i. Social Infrastructure Development: Under this sector, the Bank secures land from various landowners (Private, Municipal or State), develops the land to the required developmental standard (water supply, sewerage, electricity supply, road networks, drainage systems, communication infrastructure) sells stands or constructs targeted infrastructure such as housing units for various beneficiaries (individuals, institutions and government), schools, clinics and hospitals among other social infrastructure.
- ii. Energy Infrastructure Development: The Bank works on power generation and distribution infrastructure. Depending on the technology targeted for power generation and through various options for implementation with key stakeholders, IDBZ conducts feasibility studies, carries out detailed designs, and constructs the desired power generation and distribution infrastructure.
- iii. Water and Sanitation Infrastructure Development: With the involvement of relevant stakeholders, IDBZ funds the feasibility studies, detailed designs and construction of water pipelines, dams, wastewater infrastructure before handover for operation to the relevant stakeholders.
- iv. **Transport Infrastructure Development.** In this sector, with the involvement of the stakeholders, IDBZ invests in road or railway feasibility studies, detailed designs and construction or rehabilitation.
- v. Information Communication Technology (ICT) Development The Bank support the ICT (Optical fibre) backbone and distribution infrastructure.

- vi. **Other development projects.** Depending on the prioritization in the National Development Strategy, IDBZ may invest in other sectors including and not limited to;
  - Drainage and Irrigation
  - Forestry
  - Iron and Steel industry
  - Smelting industry
  - Cement industry
  - Agro Processing
  - Mining
  - Waste Management

#### 2.2.2 Identifying Environmental and Social Aspects

#### 2.2.2.1 Sources for Environmental and Social Aspects Information

Environmental and Social (E&S) aspects are elements of the organization's activities that can interact with the environment, employees and communities directly or indirectly. This framework aims at identifying and assessing the significance of these E&S aspects to enable the Bank to control such aspects directly for projects under its direct implementation and influence those projects that are under its implementing/executing partners. In identifying E&S aspects, the Bank will consider quantitative and qualitative data on the characteristics of its activities, products and services such as inputs, processes and technology used and outputs of material or energy, facilities and locations, transportation methods and human factors. In addition, IDBZ will collect information on its activities from various sources including and not limited to;

- i. Cause and effect relationships between elements of its activities, products and services and possible or actual changes to the biophysical and social environment.
- ii. Concerns of interested/affected parties.
- iii. Possible E&S aspects identified in government regulations and permits, in other standards or by industry associations, academic institutions and others.
- iv. International law and standards to which the Bank subscribes.

#### 2.2.2.2 Project Specific E&S Management Issues of Infrastructure Projects

IDBZ can implement and finance a spectrum of many types of investment projects. The general E&S issues presented here showcase the functionality of the ESS Planning Framework and the approach that will be undertaken on IDBZ

investment projects. The following Infrastructure Development activities are important for E&S analysis

#### i. Project Identification and Appraisal - Planning Phase

- Land Acquisition
- Topographic Surveys
- Project Design
- Stakeholder consultation
- Resettlement Plans and compensation of the affected persons

#### ii. Project Implementation - Construction Phase

- Land clearing, fencing and barricading
- Recruitment of employees
- Contractor camp establishment
- Water supply for contractor camp
- Waste disposal for contractor camp
- Vegetation clearing
- Excavations
- Gravel extraction
- Gravel Transportation
- Use of heavy equipment
- Blasting
- Waste soils disposal
- Drainage systems
- Storage facilities

#### iii. Project Implementation – Operation and maintenance Phase

- Occupation of the infrastructure
- Use of the infrastructure

#### iv. Project Closure - Decommissioning phase

- Rehabilitation of degraded areas
- Disengagement of employees
- Contractor camp demobilization

The above identified infrastructure activities result in E&S risks and impacts.

#### 2.3. Identification of Environmental and Social Impacts

#### 2.3.1. Guidelines to impact identification

Environmental and Social Impacts are changes in the environment and social settings, adverse or beneficial, partially or wholly, which come as a result of the project. The IFC's Environmental, Health and Safety Guidelines (EHSGs) contain an analysis of the general environmental and social considerations and likely impacts for various sectors which will be referred to when identifying the areas of concern for each project on the screening form contained in Appendix A. The EHSGs are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP).

**EHSGs** for other sectors also available on the **IFC** website are www.ifc.org/ehsguidelines. The website will be checked periodically, at least twice a year to determine if new or updated EHSGs are available. The General EHSGs are applicable to all sectors in that they provide a cross-cutting analysis of environmental and social issues to consider in most projects involving construction and contain general guidance on handling of hazardous materials, community issues, worker health and safety issues and decommissioning. These General EHSGs apply to the Housing and Land Development Sector and can be used with other sectors that may or may not have sector-specific guidelines.

## 2.3.2. Reflection on International Finance Corporation (IFC) Performance Standards

During impact identification, deliberate attention will be made to the impacts that fall within the scope of IFC Performance Standards and any others that are significant. The IFC Performance Standards are the following;

- i. PS1. Assessment and management of environmental and social risks and impacts.
- ii. PS2. Labour and working conditions.
- iii. PS3. Resource efficiency and pollution prevention.
- iv. PS4. Community health, safety and security.
- v. PS5. Land acquisition and involuntary resettlement.
- vi. PS6. Biodiversity conservation and sustainable management of living natural resources.
- vii. PS7. Indigenous peoples.
- viii. PS8. Cultural heritage.

#### 2.3.3 Derivation of E&S impacts from the Project Aspects/Activities

Table 2: Sample Environmental and Social Impacts from the Infrastructural Development Sector

<b>Project Phase</b>	Aspects/Activity	Potential ES Impact
<b>Planning Phase</b>	Land Acquisition	PS5. Land Acquisition and Involuntary Resettlement.  - Land-use conflict  Distribution of Figure 1
Construction Phase	Fencing and barricading	<ul> <li>Disturbance of livelihoods</li> <li>PS4. Community Health, Safety and Security</li> <li>Inconveniencing the community</li> <li>Community safety hazards.</li> </ul>
	Recruitment of employees.	PS2. Labour and Employment Conditions.
	<ul> <li>Contractor camp establishment.</li> <li>Occupational safety and health</li> </ul> Vegetation Clearing.	community to the camp.  - Littering.  PS6. Biodiversity Conservation and sustainable management of
		living resources.  - Destruction of natural habitat.  - Soil erosion potential.  - Destruction of traditional medicines.  PS8. Cultural Heritage  - Destruction of Physical cultural resources.
	Gravel extraction	<ul> <li>PS5. Land Acquisition and involuntary Resettlement.</li> <li>Disruption of farming activities.</li> <li>PS6. Biodiversity conservation and sustainable use of living resources.</li> <li>Destruction of natural habitat.</li> </ul>

		- Land degradation
<b>Operation Phase</b>	Use of infrastructure by	PS3. Resource Efficiency and Pollution control.
	individual or community	- Increased demand in water supply.
	beneficiaries.	- Increased demand in waste disposal services.
		- Population explosion.
Decommissioning	Contractor Camp	PS2. Labour and working conditions.
phase	Demobilization.	- Unemployment
		- Loss of markets to community

NB. The general approach to impact identification will be applicable to any other project including and not limited to the projects in section 2.2.1 (understanding of the IDBZ activities, products and services).

#### 2.4. Screening of Project Activities and Sites

#### 2.4.1. Exclusion List

All proposed projects will be screened against the adopted IFC Exclusion List of project activities. IDBZ will not finance any project with activities on that list (subject to the conditions discussed in the IDBZ E&SS Policy).

#### 2.4.2. Project Categorization

IDBZ will classify the proposed projects into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts/risks. Preliminary project identification will be done at project identification and later when a final Environmental and Social Impact Assessment (ESIA) is complete and the actual impacts and risks are known, categorization will be revised accordingly.

#### a. Category A

A proposed project is classified as Category A if it is likely to have significant adverse environmental or social impacts that are sensitive, diverse, or unprecedented and irreversible. Such impacts could be highly risky and/or present a significant reputational risk to the Bank or other relevant entity. These impacts may affect an area broader than the sites or facilities subject to physical works. Environmental and Social Assessment for a Category A project examines the project's potential negative and positive environmental impacts, compares them with those of feasible alternatives (including the "without project" situation), and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance. For a Category A project, IDBZ will prepare an ESIA (or a suitably comprehensive regional or sectorial environmental and social assessment) that includes all the necessary scope as revealed in the scoping process and as described in the TORs.

#### b. Category B

A proposed project is classified as Category B if its potential adverse environmental or social impacts/risks are less adverse than those of Category A. These impacts are site-specific; few if any of them are irreversible; and in most cases mitigatory measures can be designed more readily than for Category A projects. The scope of the environmental and social assessment for a Category B project may vary from project to project, but it is narrower than that of Category

A. Like Category A environmental and social assessment, it examines the project's potential negative and positive environmental impacts and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance. The findings and results of Category B environmental and social assessment are described through an Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plan (ESMP) or Resettlement Action Plan (RAP), whichever is applicable, where required.

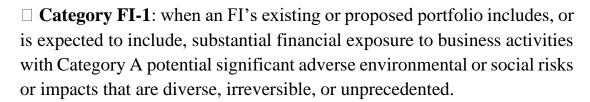
#### c. Category C

A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental or social impacts. Beyond screening, no further environmental and social assessment is required for a Category C project although a simple Environmental and Social Management Plan (ESMP) may be used if necessary.

When a Bank plays an intermediary role, the projects will be categorized as follows:

#### d. Category FI

A proposed project is classified as Category FI if the project involves access to investment funds through IDBZ as a financial intermediary. The following is the break-down of the sub categories for FIs;



□ Category FI-2: when an FI's existing or proposed portfolio comprises, or is expected to comprise, business activities that have potential limited adverse environmental or social risks or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; or includes a very limited number of business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented [i.e. Category B level impacts].

Category FI-3: when an FI's existing or proposed portfolio includes financial exposure to business activities that predominantly have minimal

or no adverse environmental or social impacts [i.e. Category C level impacts].<sup>2</sup>

Since IDBZ is a Financial Intermediary and it will finance projects in all Categories, overall it is considered an FI-1 because that is the highest level of risk project it finances.

This classification has implications for which IDBZ projects can access outside international resources such as the GCF. IDBZ's screening and categorization process will classify each subproject using the A, B, C classification. The project may be found to require an ESIA, ESMP, RAP or any other management tool that is applicable.

#### 2.4.3. Environmental and Social Analysis and Documentation

After a project is categorized and screened, the following documentation will be developed:

Projects involving specifically identified physical elements, aspects and facilities that are likely to generate limited adverse impacts and risks (Category B) need documentation on the risks and impacts screening process, risks and impacts analysis, proposed mitigation measures, and the process of disclosure of information, and stakeholder engagement (if there are Affected Communities).

Whether or not the activity requires an ESIA by Zimbabwean law, at a minimum, IDBZ and its FI clients will document the following:

☐ The project and its environmental and social aspects, including maps and
drawings (which at a minimum show any protected areas, natural or
archaeological (or other cultural heritage site)
$\hfill\square$ A delineation or description of the project's area of influence (direct and
indirect), including maps
$\hfill\Box$ Environmental and health and safety performance levels established for the
project, compliance with the legal and regulatory framework, consistent with the
applicable Performance Standards
$\hfill \Box$ Potential adverse impacts and risks identified, including the identification of
the Affected Communities
$\hfill\square$ Planned mitigation and any areas of concern that need to be further addressed
☐ The process of stakeholder engagement

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<sup>&</sup>lt;sup>2</sup> IFC, Interpretation Note on Financial Intermediaries (2012), p3.

For projects involving specifically identified physical elements, aspects and facilities that are likely to generate significant adverse impacts and risks (Category A), a formal ESIA report should be prepared in compliance with applicable and relevant legal requirements, as required, and in accordance with good international industry practice (for additional guidance, see the Bibliography). For such projects, the ESIA should be conducted whether or not Zimbabwean law requires it. For these projects, summaries of analyses will explain findings clearly and objectively, and be understandable to laypersons.

If assets to be developed, acquired or financed have yet to be defined, IDBZ or the FI investee/borrower will document the establishment of an environmental and social due diligence process (like a framework approach) ensuring that risks and impacts will be adequately identified at some point in the future when the physical elements, assets, and facilities are reasonably understood.<sup>3</sup>

#### 2.4.4. Projects prescribed for compulsory ESIA

The Environmental Management Act [CAP 20:27], first schedule lists the projects that are prescribed for ESIA prior to implementation. However, all projects need screening to facilitate formulation of the appropriate TORs.

- 1. Dams and man-made lakes.
- 2. Drainage and irrigation.
- 3. Forestry land conversions.
- 4. Housing developments.
- 5. Industry development.
- 6. Infrastructural development (Transport).
- 7. Mining and quarrying.
- 8. Petroleum production, storage and distribution.
- 9. Power generation and transmission.
- 10. Tourist, resorts and recreational developments.
- 11. Waste treatment and disposal.
- 12. Water supply.

2.4.5. Projects not prescribed for ESIA under Zimbabwean law

There are other projects that may not have been prescribed for compulsory ESIA but may need ESIA consideration based on the perceived impacts and best practices. Such projects will be subject to screening using the IFC Categorization and Screening Guidelines into the appropriate category referred to in sections

<sup>&</sup>lt;sup>3</sup> IFC, Guidance Note 1 Assessment and Management of Environmental and Social Risks and Impacts (2012), p19.

2.4.2 and the appropriate environmental and social management tool will be developed.

#### 2.5. Analysis of Environmental and Social Impacts

#### **Impacts Analysis Parameters**

Following the identification of the various E & S impacts, it is very important that the impacts be fully understood. This impact analysis framework will ensure the applicable impacts are understood and appropriate mitigation measures can be formulated. The impact analysis framework will look at the impacts under the following categories;

- Nature of the impact: This parameter tells whether the impact is negative or positive.
- Magnitude: This parameter discusses the intensity of the impact, whether it is low, moderate or high intensity.
- Extent: The extent gives the quantitative aspects of the impact and the spatial distribution of the impact.
- Timing: This shows when the impact would occur in terms of the project life cycle.
- Duration: The parameter reveals whether the impact is short term or long term, intermittent or continuous.
- Permanence: This shows whether the impact is reversible or irreversible.
- Likelihood: This tells us the probability of the impact occurring.
- Significance: This tells the value that the affected stakeholders put on the aspect affected.
- Cumulativeness: This parameter indicates whether their impact is being added to an already existing impact from other related or unrelated projects.

### **1.6 General Impacts Analysis**

Table 3 shows the typical impact analysis procedure that will be applicable under the ESSMS for the various types of projects. For clarity, the impact analysis is based on Housing development.

Table 3: Sample Impact Analysis for the Land and Housing Development

		Mognitude		Likelihood and	Cumulativanass	
Impact	Nature	Magnitude	Timing and	Permanence		Cumulativeness
I		and extent	duration	<b>5</b>	significance	N. G. 1.1
1.Land	Negative	E.g. :10		Permanent.	Definite since	Non-Cumulative.
acquisition and		households,	the planning		the households	
involuntary		100 people to	phase.		are within the	
resettlement		be relocated.			targeted land.	
2.Employment	Positive	Magnitude	Occurs	Temporary for	Definite once	Cumulative
creation		depends on the	continuously in	the duration of	funding for	impact because of
		employment	the	the project.	construction is	other projects
		thresholds.	construction.		available and	employing people
		Direct benefit			very significant	_ , , , ,
		to the			considering the	•
		employed			need to reduce	
		workers,			unemployment	
		indirect benefit			in local	
		country wide.			communities and	
		Analysis to			nationwide.	
		include sex				
		disaggregated				
		data instead of				
		being				
		generalised e.g.				
		on employment				
		creation how				
		many men and				
		how many				

		TITOM ON ONE				
		women are				
		likely to be				
		employed.				
3.Spread of	Negative	Directly affects	Occurs	Permanent and	Probable	Cumulative since
HIV and AIDS		the community	incidentally in	has long term	considering	the affected
from/to		and mobile	the	effect on the	contractors do	people will add to
workers in		construction	construction	affected people	not move with	
temporary		teams and	phases.	and families.	their wives and	
camps and		nationwide	1		high significance	
community		considering the			since its life	
interaction		mobility of the			threatening.	
(labor influx		disease.			tineatening.	
issues).		Analysis to				
188ues).		•				
		include				
		indication of				
		who is most				
		vulnerable,				
		men, women,				
		sex workers				
		etc.				
4.Occupational	Negative	Directly affects	Continuously	Temporary	Definite and	Non-cumulative.
safety, health		the work	during		moderate	
and		environment.	construction		significance.	
environmental					_	
risks						

# 1.7 Determining significance of environmental and social impacts/risks

Following the identification of the E&S impacts, this section focuses on the evaluation of the significance of the identified impacts. The impact evaluation is the formal stage at which a 'test of significance' is made.

# 1.7.1 Environment and Social Impact Evaluation Methodology 2.7.1.1 Impact Evaluation Factors

Significance is a relative concept and cannot be absolute. This process involves a combination of technical and subjective considerations by a team of experts. In establishing the criteria for E&S significance, the following key factors are considered;

- i. Environmental and Social Criteria. The approach presumes a close understanding of the interaction of the following factors with the project host baseline conditions;
  - Nature of the impact
  - Magnitude
  - Extent
  - Timing
  - Duration
  - Permanence
  - Likelihood
  - Significance
  - Cumulativeness:
- ii. Applicable legal requirements
  - Emission standards
  - Waste discharge standards
  - Environmental licenses
  - Environmental Procedures
- iii. Concerns of internal stakeholders
  - E&S Sustainability Policy
  - Gender Policy
  - Related Corporate Policies
  - Corporate Image/Reputation
- iv. Concerns of external stakeholders and organizations to which IDBZ subscribes

- ✓ Green Climate Fund ES Policies and Standards.
- ✓ IFC Performance Standards;

# 2.7.1.2 Impact Evaluation Procedure

A systematic process will be followed in evaluating significance, distinguishing between 'as predicted' and 'residual' impacts. This sample procedure also serves to determine the anticipated impact of the mitigation measures, thus estimating the residual impact.

- 1. **Step one** involves evaluating the significance of 'as predicted' impacts to define the requirements for mitigation and other remedial actions.
- 2. **Step two** involves evaluating the significance of the 'residual' impacts, i.e. after mitigation measures are considered. This test is the critical measure of whether a proposal is likely to cause significant impacts. It is determined by the joint consideration of its characteristics (magnitude, extent, duration etc.), that is severity and the importance (or value) that is attached to the resource losses, environmental deterioration or alternative uses which are foregone.

First, a technical judgment is made of the extent to which mitigation will reduce 'as predicted' impacts. Second, a subjective value is placed on the significance of residual impacts, using criteria and tests described below. Assessed significance is found as a product of severity and importance as given below;

#### **Severity x Importance = Significance**

In the above equation, severity refers to the quantitative characteristics (magnitude, frequency of occurrence, duration) of the impact while the importance is based on value that the affected stakeholders place on the impact. Severity is based on facts of the impact while the attached importance is subjective and is greatly influenced by the perceived value. The following key in table 4 will be used in the allocation of significance and importance.

Table 4: Key for impact severity, importance and significance

Range	Severity	Importance	Significance range	Significance
1	Extremely low severity	Extremely low importance	1-<5	Extremely low significance
2	Low severity	Low importance	5 - <10	Low significance
3	Moderate severity	Moderate importance	10 -<15	Moderate significance
4	High severity	High importance	15 -<20	High significance
5	Extremely high severity	Extremely high importance	20 -25	Extremely high significance

The conventional classification is applied for both the positive and negative impacts with the only difference being that when considering positive impact, enhancement measures will be applicable while mitigation is applied to negative impacts. The "as predicted significance" pertains to unmitigated negative impacts and level of utility the beneficiaries had before the enhancement measures. The residual significance refers to the magnitude of negative impacts that remain even after mitigation and also refers to the utility that the beneficiaries will have after the enhancement measures are implemented. In addition to the above methodology, any other valid impact evaluation method may be used.

# 2.7.1.3 Typical Environmental and Social Impact Evaluation

Note that this is just a sample based on the example of the "Land and Housing Development Sector" that we have been using from the beginning. The methodology will be applicable to any and all IDBZ projects. Table 5 shows an example impact evaluation.

Table 5: Sample Environmental and Social Impact Evaluation Process

	Negative ES Impact						
Impact 1	PS5. Land Acquisition and Involuntary Resettlement						
Predicted	Severity	Importance	Significance				
significance	5	5	25				
Enhancement required	Prepare a Resettlement Action Plan (RAP) with the full participation of the affected persons Implement compensation effectively. Offer relocation assistance where required. Implement livelihoods restoration.						
Resultant	2	1	2				
significance	Notes. The resultant severity reduces because of the implementation of the RAP.	livelihoods restoration and relocation assistance reduce the importance that the Project Affected Persons placed on the initial lost land.	impacts are effectively managed. Of course, the significance will not get to zero because of some un-compensable features of the impact. A				
<b>Positive Environme</b>	ent and Social Impac	et e					
Impact 2		ion (PS2. Labor and working positive; however, it results in					
Predicted	2	5	10				
significance	Nb. Despite high importance, the actual amount of new employment is	employment creation is					

	small due to high mechanization in most construction activities, e.g. employment thresholds rank as follows;  1. up to 50 2. up to 100 3. up to 150 4. up to 200 5. above 200		high	
Enhancement required	Maximize employm		-	ive wages, create safe working conditions, allow council, allow equal employment opportunity for
Resultant Impact	4	5		20

# 1.8 Projects at Risk Assessment Framework

This Framework will also be implemented together with the Projects at Risk Assessment under the administration of the Risk Unit. The purpose of this framework is to set out the formal processes deployed in the identification, assessment and management of project risks for proposed projects.

In this regards the Bank shall;

- Carry out an adequate, accurate and objective due diligence and evaluation of proposed projects to ascertain risks presented to include environmental and social risks and impacts.
- Quantify and/or rate the level of identified risks of every proposed project.
- Propose relevant and appropriate measures to avoid, minimise, mitigate, offset and/or compensate for any identified adverse impacts on a proposed project.
- Fund projects that are in compliance with Environmental and Social prescriptions /regulations.
- Continuously assess, monitor risks and implement proposed risk mitigation strategies during project implementation and operation
- Ensure adequacy of risk management practices by reviewing the policy and its Framework on an annual basis or when there are material changes in the market that warrant the same.

The general risk list and risk breakdown structure are in Annexes.

### 1.9 Management of Environment and Social Impacts

# 1.9.1 Environment and Social Impact Management Hierarchy

If the risks and impacts identification process confirms potential impacts and risks associated with the project, IDBZ and borrowers/investees will develop a program of measures and actions to avoid, minimize, compensate for or offset potential adverse impacts, or to enhance positive or beneficial impacts. As a general principle, for adverse environmental and social impacts, the risks and impacts identification process will apply a mitigation hierarchy, focusing on measures to prevent these impacts from occurring in the first place, as opposed to minimization, mitigation, or compensation. Prevention is not always possible and mitigation measures will be drawn from options that are technically and financially feasible (as defined in footnotes 21 and 22 of Performance Standard 1) that will be detailed in the respective ESMP for the project ESIA or standalone ESMP.

IDBZ uses a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize, or compensate/offset for risks and impacts to workers, Affected Communities, and the environment which is good international industry practice approach to managing environmental and social risks and impacts. In accordance with the Performance Standards, IDBZ will use an approach consistent with the following:

- **1. Avoidance:** identify and, where available and technically and financially feasible, make changes to the project's design (or potential location) to avoid adverse risks and impacts on social and/or environmental features. Avoidance is the most acceptable form of mitigation.
- 2. Minimization/Mitigation: where avoidance is not possible, adverse impacts and risks can be minimized through environmental and social measures/treatments/design. Acceptable options to minimize/mitigate will vary and include: lessen the impact or intensity, abate, rectify, repair, and/or restore impacts, as appropriate.
- **3.** Compensation/Offset: where avoidance or minimization measures are not available, it may be appropriate to design and implement measures that compensate/offset for residual risks and impacts. It should be noted that these measures do not eliminate the identified adverse risks and impacts, but they seek to offset it with an (at least) comparable positive one.

The risks and impacts mitigation hierarchy is further discussed and specified in the context of Performance Standards 2 through 8, where relevant.

Certain types of projects may result in, or contribute to, cumulative, transboundary and global impacts. Where the incremental contribution of the projects under evaluation is believed to be significant, the management program will include specific actions and mitigation measures that contribute to and support efforts to be carried out by relevant authorities to manage and monitor these larger-scale impacts.

The management program will apply broadly across IDBZ and the borrower/investor's organizations, including its contractors and primary suppliers over which they have control or influence, and to specific sites, facilities, or activities. The program will include provisions and agreements relevant to associated facilities, as appropriate. For some projects, the risks and impacts associated with supply chains may be significant. In such cases, these impacts should be assessed, and IDBZ/borrowers/clients should collaborate with third parties (as appropriate) to take actions related to supply chain risks and impacts,

to the extent of their influence or control over such parties. All such actions will be incorporated into the IDBZ's or borrower/investee's management programs. IDBZ/borrowers/investees will determine and document adequate allocation of financial resources and designate responsible personnel within their organization to implement the management program.

IDBZ will discuss the ESMP with the borrowers/investees and agree on its scope and timeframe for completion. The ESMP is developed as part of the transaction review process and should be referenced in the legal agreement. The timeframe for implementing specific mitigation measures will vary according to the E&S risk and may range from being a condition of transaction approval to a condition of disbursement or post investment condition.<sup>4</sup>

#### 1.9.2 Performance Levels and Measures

During the formulation of a project ESIA, ESMP or a simple standalone ESMP (perhaps for projects that do not require ESIA but still need management of impacts), specialists will also use the World Bank Group Environmental, Health and Safety Guidelines (EHSGs) amongst other guiding standards. The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP) and are referred to in the IFC's Performance Standards.

The EHS Guidelines contain the performance levels and measures that are normally acceptable to the IFC, and that are generally considered to be achievable in new facilities at reasonable costs by existing technology. IFC requires borrowers/clients to apply the relevant levels or measures of the EHS Guidelines. If Zimbabwean regulations differ from the levels and measures presented in the EHS Guidelines, projects will be required to achieve whichever is more stringent or justify in the ESIA why it is not possible or desirable. The various sector guidelines applicable to IDBZ financed activities have already been discussed in section 2.3 (Identification of Environmental and Social Impacts).

#### 1.9.3 Standard E&S Terms for Contracts

To ensure that borrowers/investees comply with its E&S policy, IDBZ will incorporate E&S provisions and investment conditions into legal agreements. Standard E&S terms are typically represented as general E&S definitions, representations and warranties, disbursement conditions, and/or covenants regarding compliance with the requirements as defined by the E&S policy.

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<sup>&</sup>lt;sup>4</sup> IFC, Interpretation Note on Financial Intermediaries (2012), p8.

ESMPs including mitigation measures to address performance gaps as well as annual reporting on E&S performance will also be included in the legal agreement.<sup>5</sup> IDBZ will use the Equator Principle guidance on standard E&S terms to model its terms.<sup>6</sup>

#### 1.9.4 Disclosure

The Bank will disclose all Environmental and Social Impact Assessment reports and ESMP reports to the public for 60 days for Category A and 30 days for Category B before IDBZ approves the project in line with the Bank's Disclosure Policy. Where IDBZ should comply with disclosure standards of its International Partners, compliance will be made in accordance with the respective category of the particular project. Category A projects will require 90 to 120 days before for World Bank funded projects are approved.

# 1.10 Compliance with legal requirements and other requirements

#### **1.10.1 General**

- i. This framework outlines how IDBZ will ensure that it sets, achieves and reviews objectives on compliance with legal and other requirements to which it subscribes.
- ii. Legal requirements refer to any requirement or authorization that is related to IDBZ's ES aspects as issued by a governmental authority (including international, national, state, provincial or local authority) and has legal force. Legal requirements can take many forms including and not limited to;
  - Legislation
  - Decrees or directives
  - Permits, licenses or other authorizations
  - Orders by regulatory authorities
  - Judgments by courts
  - Customary or indigenous laws
  - Treaties, conventions or protocols. The GCF requirements fall within the legal context owing to the fact that the requirements arise out of the UNFCCC, to which Zimbabwe is a signatory. Additionally, since IDBZ is following the IFC Performance Standards, it will also not finance any projects involving

<sup>&</sup>lt;sup>5</sup> IFC, Interpretation Note on Financial Intermediaries (2012), p 8.

<sup>&</sup>lt;sup>6</sup> Found at http://equator-principles.com/wp-content/uploads/2017/03/ep\_guidance\_for\_epfis\_on\_loan\_documentation\_march\_2014.pdf, accessed July 9, 2018.

activities on the adopted IFC Exclusionary List and it will follow the EHSGs which detail performance levels, targets and other, sometimes sector-specific, requirements.

- iii. To the extent that they relate to ES Aspects, other requirements IDBZ may subscribe to include and not limited to;
  - Agreements with public authorities
  - Agreements with customers
  - Non-regulatory guidelines
  - Voluntary environmental labelling and standards
  - Requirements of trade associations
  - Agreements with community groups or non-governmental organizations
  - Corporate requirements
- iv. Through this framework, IDBZ will establish procedures to;
  - Establish, implement and maintain access to information on legal requirements and other requirements to which IDBZ subscribes
  - Establish, implement, maintain and review policies, objectives, targets, programs and activities on compliance with legal requirements and other requirements to which IDBZ subscribes
  - Relate and apply the legal requirements and other requirements to which IDBZ subscribes to, to environment and social aspects and impacts
  - Communicate to all employees and applicable stakeholders on the applicable requirements and other requirements to which IDBZ subscribes
- v. The legal requirements and other requirements to which IDBZ subscribes will be summarized in a legal and another requirement register.

# 1.10.2Framework Procedure for compliance with legal and other requirements to which IDBZ subscribes.

In this procedure, legal requirements and other requirements to which IDBZ subscribes is shortened to "legal and other compliance requirements"

# 1.10.3 The framework procedure for the ESSMS in general and for each project in particular is as follows;

1. Identify applicable legal and/or other compliance requirements.

- 2. Consult relevant stakeholders to fully understand the particular legal or other compliance requirements and implications.
- 3. Establish clear legal and or other compliance requirements, objectives, targets, success indicators, implementation arrangements, monitoring system and resources.
- 4. Communicate the compliance objective and associated details to all relevant stakeholders.
- 5. Implement the compliance activity to achieve the objective.
- 6. Evaluate compliance.
- 7. Communicate and act on any non-compliance.
- 8. Carry out review on legal and other requirements compliance during Management Review.
- 9. Consider any changes that could have arisen to the initial legal and other requirements for compliance, continual improvement and updating legal and other requirements register.
- 10. Maintain records on compliance with legal and other requirements.

## 1.10.4Legal Framework and Other Compliance Requirements

IDBZ will identify the existing legal and other compliance requirements for potential activities. This will be updated and adapted for each project. The framework legal and other compliance requirements are in Appendix G.

# 1.11 Environment and Social Objectives, Targets and Programs

IDBZ will formulate environmental and social objectives at Strategic Management Level, making them part of the Strategic Plan. The Strategic ES objectives will be communicated throughout the organization and the various levels will in turn formulate corresponding ES objectives, targets and programs to contribute towards the achievement of the ES Policy aspirations at their levels in an integrated manner, including individual project level.

The ES objectives will have specific indicators that will be used in the monitoring of the success of the ESSMS.

# 1.11.1 Setting Environment and Social Objectives and Targets

In setting the objectives and targets for itself, IDBZ will consider input from several sources including;

- i. Principles and Commitments of the Environment and Social Sustainability Policy. This process should focus on the Policy commitments and expand them into objectives, targets and programs.
- ii. Outputs from the identification, assessment and ranking of the significant ES aspects and impacts. Clear objectives should be made to ensure that the major ES impacts are mitigated and monitored throughout the project life and feedback into the whole ESSMS as appropriate.
- iii. Applicable legal and compliance requirements.
- iv. Views of stakeholders.
- v. Technology options.
- vi. Findings from management review. This allows the review and modification of previous ES objectives.

# 1.11.2 Programs for achieving objectives and targets

Through the planning framework, IDBZ will formulate specific programs for achieving the Environment and Social objectives. The programming will specify the following aspects of the environment and social objectives;

- Roles and Responsibilities. This will highlight the different players within the organization and their expected contribution to the achievement of the objective and target. The allocation will span from senior management to the activity level and spell out the integration required.
- **Processes.** Programming also spell out the various activities that need to be conducted in order to achieve the objectives and targets. This may include application of various licenses to the regulatory authorities in order to comply with legal and other compliance requirements, consultation process with the key stakeholders.
- **Resources required.** The resources required should also be detailed clearly so that lack of resource allocation will not prevent achieving the objectives and targets. The resources can be financial, human, time allocation or technology among others.
- **Timeframes.** This aspect indicates the time required to achieve the objective and target. The timeframes should be synchronized with the project life cycle for consistency. Example could be "Compliance with the Involuntary resettlement" Requirement, the

implementation of this objective should be done in the planning phase of the project so that people are resettled and compensated before the project commences on the ground.

• **Priorities.** The objectives and targets should reflect the priorities of the organization as derived from the national priorities since IDBZ's objective is to spur sustainable national infrastructural development priorities. This may require consideration of other stakeholders' inputs so that the prioritization is consistent at organization, national and international levels.

#### 1.11.3Performance Indicators

As part of the setting of objectives and targets, IDBZ will also identify a specific performance indicator for each objective. The performance indicator will be used to track IDBZ's progress on achieving the objective and target. The following factors will be considered in the identification of indicators;

- Objectivity
- Verifiability
- Reproducibility
- Mandate fit
- Consistency with the Environmental and Social Policy
- Consistency with the Gender Policy
- Cost Effectiveness
- Technological Feasibility
- Efficiency

# 1.11.4Framework Objective, Targets, Programs and Performance Indicators

Framework Environmental and Social Objectives constitute the broad environmental and social objectives for the organization and are not project specific. These objectives need to be further adapted to project level at the time that the various projects are being identified, planned and implemented. This means that for each proposed project, IDBZ will undertake a project-specific environmental and social sustainability planning process to ensure that the framework objectives are mainstreamed into the respective specific projects. The framework objectives, targets, programs and performance indicators are in Table 6.

**NB: Budgetary allocations.** To ensure effective ESSMS implementation across IDBZ, it is important to allocate adequate resources, commensurate with the

ESSMS objectives, targets and programs. The budgetary allocations should also include and not limited to preparation and distribution of ESSMS documents and materials, training of staff on ESSMS procedures and other related ESSMS responsibilities.

Table 6: Framework Objectives, Targets, Programs and Performance Indicators.

<b>Objective</b>	Program/Activity	Target/Indicat	Time	Budget	Implementation	
	v	or			and monitoring	
					Responsibilities	
1.Environm	1.Conduct ES		Project	Project	- IDBZ	
ental and	Assessment for all	2.Strategic	Planning	Specific	Compliance	
Social	projects.	ESIA	Phase		Department/IPDR	
Assessment		3.ESIA			/RMCF.	
for all		4.ESMP			- IDBZ	
projects.		5.RAP			Implementation	
					Partners.	
2.15	1.0	4 4 1	D	D : .	- EMA	
2.Mainstrea	1.Project cycle to	_	Project	Project	IDBZ	
m Climate	include climate	and Mitigation	Planning	Specific	Compliance	
Change	change aspects.	strategy.	Phase,		Department/RMC	
throughout		2.Climate	Project		F IDD7 Projects	
the project operation		Technological Innovation.	Operatio n Phase.		- IDBZ Projects Units.	
_		innovation.	ii Filase.		-IDBZ	
cycle (planning,					Implementing	
operation,					Partners.	
and					- MEWC.	
monitoring)					WIL W.C.	
3.Mainstrea	1.Maximize	1.Women	Project	Project	-IDBZ	
m Gender	women	beneficiaries	Planning	Specific	Compliance	
throughout	beneficiaries.	maximized.	and	Prince	Department/RMC	
the project			Design		F.	
operation	2.Identify for	2.Gender	Phase;			
cycle	gender specific ES	specific risks	,		-IDBZ Projects	
(project	risks and impacts.	and impacts	Project		Units.	
design,	_	mitigated.	Operatio			
planning,	3.Include women		n Phase.		-Ministry of	
operation	during	3.Percentage of			Women Affairs	
and	consultations to	women in			and Community	
monitoring)	ensure their	stakeholder			Development.	
	feedback.	consultation				
4. Water	1.Reduce amount	1.Effluent	Planning	Project	IDBZ	
Pollution	of effluent.	Discharge	and	Specific	Compliance	
Prevention		compliant to	Operatio		Department/IPDR	
and Control.		Blue Band	n phases.		/RMCF.	

	<ul> <li>2.Avoid direct waste discharge to water courses.</li> <li>3.Reuse effluent.</li> <li>4.Recycle effluent.</li> <li>5.Treatment of effluent before</li> </ul>	Effluent Classification.  2.Equipment workshop with functional oil interception.  3.Surface drainage system in place			IDBZ Contractors. EMA.
5.Air Pollution	disposal.  6.Contain all oil related discharges. 7.Control surface drainage.  1.Project vehicles servicing.	1.Regular vehicle	Planning ,	Project Specific	IDBZ Compliance
Prevention and Control.	2.Dust suppression at work areas.  3.Install industry specific air pollution abatement devices.  4.Incorporate emission free energy requirements  5.Include sound proofing in infrastructure	2.Dust suppression at construction sites. 3.Efficient and effective emission cleaning devices installed.	Construction and Operation phases		Department. IDBZ Contractors. EMA. NSSA.
6. Prevent land Degradation	design. 6.Manage blasting impacts  1.Rehabilitate all worked areas.	5.Sound proofing incorporated. 6.Blasting risks and impacts managed. 1.Worked areas rehabilitated.	Construction and Decomm issioning phases.	Project Specific	IDBZ Compliance Department/IPDR /RMCF.

	1.0.1	<b>A.F.</b> :		1	IDDG
	1.Reduce erosion		Construc		IDBZ
	potential.	control works.	tion		Contractors.
			phase.		EMA.
7. Maintain	Ensure safe work	1.Internal and	Construc	Project	IDBZ
Occupationa	environment.	external	tion,	Specific	Compliance
l Health and	1.Ensure work	Compliance	Operatio		Department.
Safety.	nutrition.	Inspection	n and		IDBZ
	2.Ensure	Report.	Decomm		Contractors.
	appropriate PPE.	2.HIV	issioning		NSSA.
	3.Maintain	mainstreamed	phases.		Employees
	emergence	in the			Council.
	preparedness.	workplace.			
	3.Mainstream HIV	•			
	management in the				
	workplace.				
8.Minimize	1.Integrate existing	1.Minimum	Planning	Project	IDBZ
interference	infrastructure into	disturbance to	and	specific	Compliance
with existing	project design.	service	Construc		Department/RMC
infrastructu	2.Consult and liaise	delivery;	tion		F.
re and	with beneficiaries	2.Transport	phases		IDBZ Projects
service	of existing	system			Unit.
delivery	infrastructure	3.Sewer			IDBZ
systems.	ensuring female				Contractors.
	participation.	4. Water supply			Utility
	1. Provide for				Companies.
	smooth	management			Residents.
	changeover.	6.Electricity			
		supply			
		7.Communicati			
		on			
		8.Housing			
		9.Recreation			
		10.Commercial			
		activities			
9.Comply	1.Create a legal and	1.Legal and	All	Project	IDBZ
with legal	other compliance	other	project	Specific	Compliance
and other	requirements	compliance	phases	Sp come	Department.
compliance	register.	requirements in	r		IDBZ Projects
requirement		place.			Units.
4		2.Compliance			
		Audit Report.			
		radii Kepori.		<u> </u>	

	1.Comply with EMA Act requirements.  1.Comply with Municipal by-laws  1.Comply with the Public Health Act	certificates 2.Environment al Licences. 1.Municipal land use and architectural approvals. 1.Municipal and Ministry of Health	All Project Phases.  Planning phase  All project phases.	Project Specific Project Specific Project Specific	IDBZ Contractors. IDBZ Partners. Regulatory Authorities.
10 Comply	1.Comply with NSSA Act Requirements.  PS1. Assessment	inspection reports.  1.NSSA Work Safety operational licenses.  1.ES Screening	All project phases.	Project Specific	IDBZ
10.Comply with the GCF ES Policy and standards	and Management of ES risks and impacts	report. 2.ESIA 2.ESMP 3.RAP	Planning Phase	Project Specific	Compliance Department/RMC F. IDBZ Projects Units. EMA.
	PS2. Labour and working conditions.	1.Maximize employment of locals and women employment. 2.Employment Contracts and sustainable remuneration. 3.Occupational safety and Health management system.	All project phases.	Project Specific	IDBZ Compliance Department/RMC F. IDBZ Human Resources Unit. IDBZ Works Council. Ministry of Labour.
	PS3. Resources Efficiency and Pollution Prevention.	1.Energy efficient project design.	Planning phase	Project specific	IDBZ Compliance Department/RMC F.

	2 D 11 4			IDDZ D
	2.Pollution			IDBZ Projects
	Preventive			Unit.
	project design.			ZERA.
	3.Energy and			ZESA.
	water .			EMA.
	consumption			Local authority.
	monitoring.			
PS4. Community	1.Community	All	Project	IDBZ
Safety, Health and	Project risks	project	Specific	Compliance
Security	awareness.	phases		Department/RMC
	1.Emergence			F
	preparedness			IDBZ Community
	plan.			Liaison Unit
				IDBZ Contractor
				Local Authority.
				NSSA
PS5. Land	1.Resettlement	Planning	Project	IDBZ
Acquisition and	Action Plan.	Phase	Specific	Compliance
Involuntary	Standard in		_	Department/RMC
Resettlement.	Appendix D			F.
	2.Process			Local Authority.
	Framework			District.
				Administrator.
				Forestry/
				EMA.
				PWMA.
PS6. Biodiversity	1.Biodiversity	Planning	Project	IDBZ
Conservation and	Management	Phase	Specific	Compliance
Sustainable use of	Plan		1	Department/RMC
living natural				F.
resources.				EMA.
				Forestry.
				PWMA.
PS7. Indigenous	1.Indigenous	Planning	Project	IDBZ
Peoples	Peoples Plan	Phase	Specific	Compliance
1 00p100	1 000100 1 1411	111000	Specific	Department/RMC
				F.
				District
				Administrator.
				Local Authority
				<u> </u>
				Applicable
				NGOs.

	PS8. Cultural Heritage	1.Heritage Studies/ Archaeological Impact Assessment 2.Implement the Chance Finds Procedure (Appendix F)	Planning Phase/ Construc tion Phase	Project Specific	IDBZ RMCF/Complian ce Department. Local Traditional leaders. NMMZ.
11.Stakehol der engagement	1.Create a Stakeholder List. 2.Disclosure of project aspects to stakeholders. 3.Consult the stakeholders prior to project implementation. 4.Review and implements stakeholder recommendations	1.Public Disclosure notices 2.Stakeholder consultation records	Planning Phase	Project Specific	IDBZ Compliance Department/RMC CF. IDBZ Public Relations. IDBZ Projects Units.  EMA Stakeholders.
12.Monitori ng and Evaluation.	1.Conduct monthly Project ESS Audits 2.Conduct Bi- Annual internal compliance audits of the ESSMS 3.Conduct annual external Compliance audits of the ESSMS 4.Conduct Quarterly Management Review of the ESSMS	ESSMS Compliance Audit report. 3.Annual External ESSMS	All project phases.	Project Specific ESSMS specific	IDBZ Compliance Department/RMC F. Evaluation Department All participating IDBZ Units/Divisions.

5.Continual		
improvement		
of the ESSMS		

# 3.0 ESSMS Implementation and Operational Arrangements

Responsibility for implementation of the ESSMS rests with the Chief Executive Officer (CEO), who is represented by the Manager, Climate Finance and Sustainability Unit, reporting to Director, Resource Mobilisation and Climate Finance on day-to-day activities. The internal implementation responsibility is delegated to various persons who work for or on behalf of IDBZ through applicable contracts of employment. There are some Environmental and Social Experts within various IDBZ departments for the purpose of implementing project specific environmental and social requirements. In addition to those practitioners, IDBZ sets out a separate and additional personnel to implement the ESSMS and ensure that the activities of various arms of the organization are consistent with the ESSMS. The ESSM personnel executes the ESSMS while other E&S Practitioners within IDBZ implement the ESSMS requirements within their respective departments or projects. For external implementation, IDBZ will liaise with various external stakeholders through legal and other compliance requirements. Fig 1 shows the Environmental and Social Sustainability Organogram.

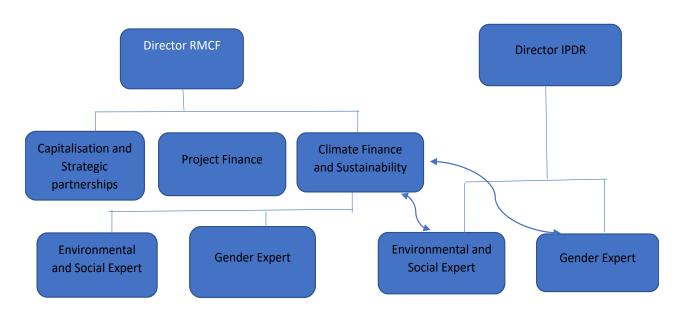


Figure 1: Organogram for Implementing Environmental and Social Issues

# 3.1Resources, Roles, Responsibilities and Authority

- Management establishes the financial institution's i. IDBZ Senior and conditions for environmental and social requirements clients/investees. In cases of unresolved environmental and social issues or non-compliance associated with a transaction that cannot be resolved by the Credit and Operations/Corporate Banking Senior Management determines the appropriate course of action to follow to reduce the financial institution's potential exposure to environmental and social risk, which may include taking legal action against the client/investee. Senior Management will determine and avail adequate resources for the establishment, implementation, maintenance and improvement of the Environment and Social Sustainability Management System. Table 7 summarizes the various internal stakeholders and their functions for the ESSMS. The resources will include and not limited to;
  - infrastructure
  - information systems
  - training
  - technology
  - financial
  - human
- ii. IDBZ CEO will appoint a Management Representative(s) or function(s) with enough authority, awareness, competence and resources to;
  - Be responsible for the Bank's overall commitment to environmental and social objectives
  - Ensure the establishment, implementation and the maintenance of the ESSMS at all applicable levels of the organization and
  - Report to the top management on ESSMS performance and its opportunity for improvement.
- iii. Other roles will include and not limited to the following broad functions;
  - a. Climate Finance and Sustainability Division
    - i. Climate Finance and Sustainability Manager, among other duties, is responsible for leading IDBZ's effort to develop and implement the ESSMS as well as for communicating with senior management on environmental and social issues and concerns. This individual is also responsible for developing and updating the procedures and documents that are part of IDBZ's ESSMS. As can be expected, the manager will

manage the staff in this Unit and actively coordinate the approach to issues or concerns that are both environmental and social such as disclosure and worker health and safety. This person also evaluates the environmental and social risks at the portfolio level and provides assistance to relevant Project Managers and Analysts in evaluating and monitoring the environmental and social performance of clients/investees.

- ii. **Environmental Specialist** is responsible for environmental aspects of ESSMS development and execution, project: selection, screening, due diligence, supervision and management including technical and other aspects. This person also evaluates the environmental risks at the portfolio level and provides assistance to various projects experts in evaluating and monitoring the environmental performance of clients/investees. This Specialist reports to the Climate Finance and Sustainability Manager.
- iii. **Social Specialist** is responsible for social aspects of ESSMS development and execution, project: selection, screening, due diligence, supervision and management including technical and other aspects. This specialist will be primarily responsible for gender, resettlement, indigenous peoples, communications, community relations, cultural heritage and complaints mechanisms. This person also evaluates the social risks at the portfolio level and provides assistance various projects experts in evaluating and monitoring the social performance of clients/investees. This Specialist reports to the Climate Finance and Sustainability Manager.
- iv. Gender Specialist is responsible for the gender aspects of the ESSMS development and execution, project: selection, screening, due diligence, supervision and management including technical and other aspects. They ensure the Bank carries out gender responsive actions in project planning and implementation and Gender Actions Plans (GAPs) are implemented as planned. This Specialist reports to the Climate Finance and Sustainability Manager

- v. **SHE Technicians** is responsible for environmental aspects of ESSMS development and execution, project: selection, screening, due diligence, supervision and management including technical and other aspects. The Technician focuses on Safety Health and Environment field inspections, compliance audits, ESSM data collection and processing.
- b. Projects Officers (e.g. Corporate Banking and Trade Finance) liaise with the ESSM unit in following the procedures of the ESSMS at the transaction level. They discuss and negotiate possible environmental and social mitigation measures with the client/investee.
- c. **Project Officers** liaise with the ESSM unit in evaluating the environmental and social risks at the level of individual transactions and make a recommendation to the Credit/Investment Committee on whether to proceed with a transaction.
- d. **Credit/Investment Committee** liaises with the Climate Finance and Sustainability Division in deciding if E&S risks are acceptable to the Bank's overall exposure to risk before proceeding with a transaction.
- e. **Legal Department** liaises with the ESSM unit in ensuring that the Bank's environmental and social requirements are incorporated in legal agreements for each transaction. The Legal Department may advise if a client's/investee's non-compliance with environmental and social clauses constitutes a breach of contract and is considered an Event of Default under the terms of the legal agreement that requires follow up by Senior Management.

Table 7: General IDBZ- wide ESSMS Roles and Responsibilities

ESSMS Roles	Responsibility	
Overall direction of the ESSMS	CEO	
ESS Policy	CEO and Director RMCF	
Environmental and Social Sustainability Strategic Planning, compliance assurance, continual improvement (Corporate planning)	CEO, Directors, Managers and Senior Officers	
ESSMS Operational Planning and compliance assurance, promote continual improvement (Departmental planning)	Respective Departmental Managers, Finance Director/Manager, and Project Team Leaders	
ESSMS Tactical Planning and compliance assurance, promote continual improvement (Project planning)	Respective Project Team Leaders and Managers	
ESSMS implementation (Activity planning)	Project Team Leaders, Managers and RMCF	
ESSMS awareness, training and internal and external communications.	Project Team Leaders, Human Resources Manager, Public Relations and Sustainability Representative.	
ESSMS conformance monitoring, corrective action.	Project Team Leaders, RMCF, Managers and Compliance Department.	
Review of the ESSMS implementation.	CEO, Directors, Managers and Senior Officers.	

- iv. IDBZ, through the Management Representative, will work with all the relevant external stakeholders to ensure that the ESSMS is compliant with the legal and other compliance requirements. The various areas of interest for the various stakeholders and regulatory authorities are highlighted in the legal and other compliance requirements register. The regulatory authorities are project-specific, consistent with the legal and other compliance register for the Sub-Project, include and not limited to;
  - Consultants. Through the applicable Terms of References, Consultants will be engaged in various applicable areas of the

- ESSMS (ESIA formulations, Occupational Safety and Health, Auditing, Training)
- GCF. Through its GCF accreditation and monitoring process, GCF will continuously monitor IDBZ compliance with GCF ES Policy, standards and procedures for projects it finances
- **EMA**. Through its inspectorate, EMA will monitor IDBZ compliance with environmental legal requirements. This includes the ESIA formulation, implementation and monitoring
- NSSA. Through its inspectorate, NSSA will monitor IDBZ compliance with occupational safety and health requirements
- Zimbabwe Energy Regulatory Authority (ZERA). Through its inspectorate, ZERA will monitor IDBZ compliance with energy sector legal requirements
- Zimbabwe National Water Authority (ZINWA). Through its inspectorate, ZINWA will monitor IDBZ compliance with water abstraction and management requirements
- National Museums and Monuments of Zimbabwe (NMMZ). The organisations facilitates exhumation and relocation of cultural heritage from targeted project areas
- Local Authorities. Through their inspectorate, local authorities will monitor IDBZ compliance with local bye laws
- Ministry of Lands, Agriculture, Water, Climate and Rural Resettlement. Through the Climate Change Management Department, the ministry will monitor IDBZ projects conformance to the National Climate Change Response Strategy (NCCRS)
- Ministry of Women Affairs, Community Small an Medium Enterprise Development. Through its official channels, the ministry will monitor IDBZ project compliance with the National Gender Strategy. This will ensure gender mainstreaming in all project facets.

- Ministry of Health and Child Welfare. Through its inspectorate, the ministry will monitor IDBZ compliance with public health requirements.
- **Project Implementation Partners**. For projects that are not directly implemented by IDBZ, respective project implementers will administer the requirements of both IDBZ ESSMS which in turn leads to compliance with GCF requirements.
- Ministry of Public Service, Labour and Social Welfare. Through its inspectorate, the ministry will monitor IDBZ compliance with labour legal requirements.
- Non-Governmental Organizations (NGOs). Where applicable, some NGOs with special interest in some projects or stakeholder grouping will be continually engaged to assist in the ESSMS monitoring processes especially where there are Indigenous People within the project area.
- **Individual Affected Persons**. IDBZ will engage individuals that are affected by its projects and activities.
- **Traditional Leaders**. IDBZ will engage such leaders and work closely with them in cultural heritage or indigenous peoples related issues like graves exhumation or resettlement of rural project affected persons.
- **District Administrators**. Will work with IDBZ in mobilizing local support from other government departments within the respective project areas.
- Law Courts and Tribunals. The Courts will intervene where there is an unresolved disagreement between IDBZ and its stakeholders, though negotiation will be the first option to dispute resolution.

# 3.2 Competence, training and awareness

- i. IDBZ will ensure that all persons working for or on behalf of the Bank are aware of;
  - the importance of conforming to the ESS policy and the requirements of the ESSMS
  - their roles and responsibilities within the ESSMS
  - the significant ES aspects and associated impacts of their activities
  - benefits of improved ES performance and

- consequences of non-conformance with the ESSMS requirements
- ii. IDBZ will ensure that persons undertaking work activities that involve potential significant environmental and social impacts are competent to do so in a manner that meets the requirements of the ESSMS.
- iii. Identified competence needs gap can be rectified through;
  - additional formal education
  - on the job training
  - additional skills training off the job
  - induction
  - seminars
  - exchange programs
- iv. The responsible managers working together with the Human Resources Department will undertake the following training procedure where deemed necessary;
  - a. Identify the employee training needs.
  - b. Design and develop a training plan to address the need.
  - c. Verify the need in relation with the ESSMS requirements.
  - d. Conduct the training.
  - e. Document the training conducted.
  - f. Evaluate impact of the training received.

The training procedure will be based on the relevant risks and potential improvement opportunities as well as staff background and needs.

v. Typical training courses:

The E&S staff will be trained on E&S management for financial institutions. There are two online training opportunities for staff responsible for environmental and social risk management: the Sustainability Training and E-Learning Program (STEP) and E-Learning Course on Managing Environmental and Social Performance both designed for managers and staff of financial institutions.<sup>7</sup> This, online training provides an understanding of sustainable finance and outlines how financial institutions can

<sup>&</sup>lt;sup>7</sup> https://www.ifc.org/wps/wcm/connect/topics\_ext\_content/ifc\_external\_corporate\_site/sustainability-at-ifc/company-resources/tools+for+clients, accessed August 22, 2018.

identify and manage environmental and social risks and environmental business opportunities.

More specifically relevant staff must also be trained on ESSMS procedures contained in this Manual or developed later.

Some of the typical training courses that IDBZ will consider when choosing a training program for staff are in Table 8.

Table 8: Typical training courses for staff breakdown<sup>8</sup>

Department	Relevant topics for training	
Senior	Introduction to IFC Performance Standards and ESSMS; Sectorial	
Management	best practices.	
<b>ESSMS Team</b>	Introduction to IFC Performance Standards and the nine ESSMS	
	elements; Environmental legal requirements; Identification and	
	evaluation of environmental and social risks and impacts; Root	
	cause analysis; Stakeholder engagement; Monitoring of	
	performance indicators; Internal compliance auditing;	
	Environmental and social reporting.	
HR	Introduction to ESSMS and IFC Performance Standard 2 – Labor	
Department	and Working Conditions; Hiring, non-discrimination, anti-	
	harassment, remuneration and other labor policies; Effective	
	complaint management and resolution procedures for workers;	
	Worker-management interaction.	
Workers and	Introduction to ESSMS; ESSMS policies; Instructions on new or	
Managers	modified operational procedures relevant to the tasks performed	
	(e.g. waste management procedure; storage and handling of	
	hazardous chemicals; use and maintenance of PPE); Emergency	
	response procedures; Instruction on complaint management system;	
	Worker-management interaction.	
Procurement	Supply chain assessment based on environment and social	
	requirements; Supply chain audits.	

#### 3.3 Communication

IDBZ will establish, implement and maintain procedures for communicating internally and externally on the ESS policy and the requirements of the ESSMS. Through effective communication, IDBZ envisages the following benefits;

- Demonstrate commitment to ES Sustainability
- Initiate dialogue on IDBZ ESS policy and the ESSMS
- Establish a platform for continual improvement
- Inform stakeholders of respective investment projects

-

<sup>&</sup>lt;sup>8</sup> IFC (2015), ESSMS Toolkit General, p 31,

 $https://www.ifc.org/wps/wcm/connect/38089d8048377ccb9384f7299ede9589/ESSMS\_Toolkit\_General.pdf? MOD=AJPERES\ accessed\ August\ 23,\ 2018.$ 

• Establish a platform for environment and social impact identification, mitigation and monitoring

#### i. Internal Communication

- a. Internal stakeholders include and not limited to;
  - IDBZ Board
  - Management
  - Employees
  - Contractors
  - Implementation Partners

#### b. Internal communication methods include and not limited to:

- Meetings
- Billboards
- News letters
- Intranet
- Emails
- Website

#### ii. External communication

Since IDBZ will apply IFC's Performance Standards to its financing and investment activities, it will establish and maintain an External Communications Mechanism (ECM). The ECM involves implementing a process for receiving, analysing, recording, and responding (if deemed necessary) to views, opinions, concerns (real or perceived), and requests for information from third parties—e.g., concerns related to IDBZ's investment activities and/or a borrower in its portfolio.<sup>9</sup> The ECM will provide publicly available and easily accessible channels (e.g., phone number, website, e-mail address) to receive communications and requests from the public for information regarding E&S issues. IDBZ will assess the relevance of the external communication received and determine the level of response required, if any.

External communication, in addition to other matters, will sometimes include methods to receive, register, screen and assess, track, respond to, and act upon external inquiries and complaints from the public. If a project involves specifically identified physical elements—aspects and facilities that are likely to generate adverse ES impacts on Affected Communities—a grievance redress mechanism (GRM) is required. Only when IDBZ's own operations generate

<sup>&</sup>lt;sup>9</sup> Also subject to provisions of any confidentiality agreement between IDBZ and its borrowers/investees.

adverse E&S impacts on Affected Communities (e.g., If IDBZ sponsored construction of its own new office building(s)), is a grievance mechanism required as an element of IDBZ's ESSMS. Requirements for a GRM are discussed in Appendix H.

#### a. External stakeholders include and not limited to;

- Regulatory Authorities
- Suppliers
- Customers
- Complainants
- Project Affected Peoples/Persons
- Other interested parties

### b. External communication methods include and not limited to

- Stakeholder Meetings
- Workshops
- Conferences
- Open days
- Website
- Community events
- Press releases
- News letters
- Letters
- Electonic communication
- Brochures
- Annual reports
- Telephone hotlines
- Bulk text mail

# iii. Communication process.

The authorized person will undertake the communication process in line with the Bank's Communication Policy and ensure feedback is received accordingly. The responsible person will determine amongst other things the following;

- Communication audience
- Information to be communicated
- Appropriate packaging of the information
- Appropriate method of communication

- Time to communicate
- Maintaining records of complaints, resolution of complaints and responses in appropriate time frames

#### 3.4 Documentation

The ESSMS Manual will be kept in both electronic and hard copy versions.

# 3.5 Operational Control

# 3.5.1 Operational Procedures

The following operational processes are clearly regulated by applicable legal and other compliance requirements. IDBZ commits itself to complying with the applicable statutory operational controls, including and not limited to;

- ESIA standard and procedure (Environmental Management Act (EMA Act) [Chapter 20:27])
- Accident investigation and report (NSSA Act [Chapter 17:04])

## 3.5.2 Control of project scenarios

- a. IDBZ identifies whether the project will be implemented by itself or another borrowing/ executing entity which will govern overall management of ES aspects. Three scenarios are possible:
- i) **Scenario 1:** Where the Bank is the sole financier The Bank will engage an external consultant and technically oversee any required ESIA to ensure that it is conducted in line with regulatory and own requirements.
- ii) **Scenario 2:** Where the Bank is co-financing The Bank and its financing partners will jointly engage an external consultant and technically oversee any required ESIA to ensure that it is conducted in line with regulatory and own requirements. The Bank and its partners will ensure compliance with the highest standards of any of the financing partners.
- iii) **Scenario 3:** Where the Bank is a Financial Intermediary (FI) The borrower/investee is responsible for conducting any necessary ES work. The Bank will provide technical assistance for the beneficiaries to meet the ES investors' requirements as they relate to any required ESIA and this ESSMS.

- b. IDBZ conducts Environment and Social Screening. For own and cofinanced projects, IDBZ will complete the screening process (including the screening form) located in Appendix A. IDBZ will ensure that financial intermediary client investees or borrowers, complete the necessary screening as established in this Manual. In Zimbabwe, projects that require ESIA are listed in the first schedule of the EMA Act. So IDBZ project screening is not the ultimate decision-making point on whether the project requires ESIA or not. IDBZ screening process is essential for the determination of whether the project triggers any of the IFC Performance Standards. This process requires rationalization between EMA's general ESIA screening process and the IFC Performance Standards specific screening and using the ESHSGs. During the screening process, IDBZ will review the borrower's/investee's track record on E&S issues in terms of compliance to national regulations and to enhance positive publicity and action. Although the Bank does not usually target small or medium sized enterprises, should they be relevant FI clients, such enterprises need only to be screened against or apply the Exclusionary List in this ESSMS and national laws.
- c. IDBZ/investees/borrowers conduct a scoping meeting with key stakeholders. The meeting reviews the screening results and develops appropriate Terms of References for the targeted applicable ESSM tools required. See sample ESIA Terms of Reference (TORs) in appendix B. It is at this stage that IDBZ/investees/borrowers will ensure that all the applicable Performance Standards are specifically provided for in the TORs since the smooth execution of the ESIA process rests on the integrity of the TORs.
- d. Conclusions will be documented on whether or not an ESIA is prescribed. If the initial review or the screening concludes that a proposed lending/investment activity will have minimal or no potential E&S risks or adverse impacts, this conclusion will be documented as part of the project records.
- e. IDBZ/investees/borrowers submit ESIA prospectus to EMA. In Zimbabwe a prospectus can be produced by either a Consultant or IDBZ depending on internal capacity and the targeted details of the

prospectus. For a prescribed project, the ESIA prospectus report will serve to inform EMA on how the ESIA process will be conducted and the key areas of focus. Where this ESSMS screening outcome shows that the nature of the project impacts are minimal, IDBZ will seek exemption from full ESIA process through submission of a detailed ESIA prospectus report. Due to the requirements of the detailed prospectus report, IDBZ will engage a registered EMA ESIA Consultant.

- f. IDBZ pays ESIA prospectus review fees. IDBZ will pay the EMA ESIA prospectus review fees before submission of the prospectus to EMA for review. Financial Intermediary investees/borrowers will pay their own ESIA prospectus review fees.
- g. EMA reviews ESIA prospectus report. EMA will review the prospectus report within a prescribed period of up to twenty days. Through the review process, EMA will authorize IDBZ to proceed to conduct the ESIA process with additional issues added to the TORs where EMA deems necessary. Where EMA concurs that the project impacts are minimal and does not warrant full ESIA, EMA will issue ESIA exemption certificate but requires submission of ESMP.
- h. IDBZ will document the findings and conclusions of whether an ESIA is required or not in a report, including recommendations to proceed with financing and any conditions of investment agreed with the borrower/investee to mitigate identified E&S risks and impacts within their operations.
- i. Even if no ESIA is required, an initial socio-economic analysis (including gender aspects among others) (Appendix N) will be conducted for all projects.
- j. IDBZ engages EMA registered ESIA Consultant to conduct and/or formulate the ESMP or ESIA. The procurement process will be transparent and target highly experienced and knowledgeable ESIA Consultants through detailed Terms of Reference.
- k. ESIA Consultant conducts ESMP and produces a draft ESMP or conducts a full ESIA process when deemed necessary and produce an ESIA report.

- 1. IDBZ disclosure of project as part of the stakeholder consultation and ESIA formulation will be done through the local daily newspapers, stakeholder meetings and any other media including the Bank's website.
- m. IDBZ reviews the draft report internally until the ESIA Consultant submits a final ESMP or ESIA report to IDBZ for authorization to submit to EMA.
- n. IDBZ pays EMA ESIA review fees. Borrower/investees pay their own ESIA review fees.
- o. IDBZ submits final ESMP or ESIA report to EMA and its investor where necessary for review.
- p. EMA/Investor reviews ESMP or ESIA, verifies stakeholder consultation and any other important aspects of the report. When EMA is satisfied with the report, a certificate is issued for project implementation. Where investor is satisfied with report, clearance is given. Where EMA/investor is not satisfied, additional work is required until the report is satisfactory to EMA/investor.
  - Where EMA certifies a project that the investor has not cleared, the final project implementation clearance rests with investor and IDBZ will engage investor further on the matters raised.
  - Where investor clears a project that EMA has not cleared, the final project implementation clearance rests with EMA and IDBZ will engage EMA further on the matters raised.
- q. IDBZ will discuss the ESIA or other Environmental and Social Analysis and/or Action Plan with the borrower/investee and agree on its scope and timeframe for completion. If the ESMP is developed as part of the transaction review process, it should be referenced in the legal agreement. The timeframe for implementing specific mitigation measures will vary according to the E&S risk and may range from being a condition of transaction approval to a condition of disbursement or post investment condition.

- r. IDBZ second disclosure of project identified impacts, mitigation measures and implementation arrangements in a completed ESIA report through the local daily or any other media.
- s. IDBZ undertakes regular stakeholder update meetings, consultations and project visits in the project area during project implementation phase to keep stakeholders appraised about the project and for purposes of preparing the mandatory environmental and social reports required by EMA.

# 3.5.3 Special Control Points

IDBZ will enforce the following investment conditions;

- a. No internal IDBZ project will be implemented before obtaining EMA ESIA certificate where such project requires ESIA certification.
- b. IDBZ as a Financial Intermediary (FI), will not release funding for a project that has not secured EMA ESIA certification where such projects require ESIA certification.
- c. Terms of reference will include cross-cutting issues such as Gender, Climate Change and emergency preparedness.
- d. To ensure that borrowers/investees and contractors comply with IDBZ's E&S policy, IDBZ should incorporate E&S provisions and investment conditions into legal agreements. Standard E&S terms are typically represented as general E&S definitions, representations and warranties, disbursement conditions, and/or covenants regarding compliance with the requirements as defined by the IDBZ's E&S policy. Any ESIA or other EA or ESMPs including mitigation measures to address performance gaps as well as annual reporting on E&S performance should also be included in the legal agreement.
- e. Payments of contractors will only be released after both technical and the E & S contractual obligations have been met where any of the conditions for pre-disbursement include E&S issues. This will be verified by the applicable technical Unit/Division and the Resource Mobilisation and Climate Finance Department.

Each project will implement its ESMP during project execution ensuring as much stakeholder consultation as is practical and warranted without causing consultation fatigue.

# 3.6 Monitoring Arrangements

### 3.6.1 Objectives of monitoring the ESSMS

The objectives of the monitoring system are;

- Identify non-conformities in the ESSMS
- Institute corrective action to address the non-conformities
- Devise preventive actions to avoid occurrence or recurrence of nonconformities
- Achieve continual improvement of the ESSMS

# 3.6.2 Monitoring Framework

The monitoring system will be based on the intended ESSMS deliverables at every stage of the integrated project cycle. The figure below summarizes the expected synchronization between the other aspects of the project life cycle with the deliverables of the ESSMS;

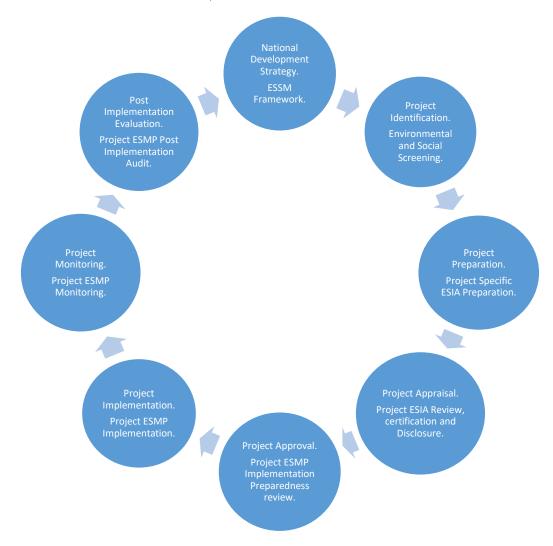


Fig 2 ESSMS Deliverables in the project life cycle

#### 3.6.3 ESSMS Monitoring

The monitoring system will focus on ESSMS planning, ESSMS implementation and Management Review of the ESSMS. The monitoring framework is targeting both the ESSMS wide aspects and project specific aspects in line with the project life cycle approach.

#### 3.6.4 Monitoring and Review of Projects

Effective management programs have an adaptive approach. Monitoring of environmental and social conditions and review of the program, following implementation of actions and mitigations, are fundamental elements of an adequate management system. IDBZ/borrowers/investees will develop and implement procedures to adjust policies and operations and adapt actions and mitigations as appropriate based on the environmental and social monitoring data. This iterative process promotes flexible decision making that takes into consideration uncertainties, recognizes the importance of variability of the social and natural systems, and can be adjusted as outcomes from management actions, mitigations and other events become better understood.

Independent due diligence of projects, conducted by financiers, may result in finding that the IDBZ/borrowers/investees will need to carry out additional measures and actions to ensure compliance with the Performance Standards, Zimbabwe laws, or other obligations beyond actions identified by the client in its management programs. Where such findings are made, those additional measures and actions should be incorporated into the client's management program and should typically include a description of additional measures and actions identified to ensure compliance with Performance Standards, responsible entity for implementation of the actions and measures, relevant completion indicators and agreed timeline.<sup>10</sup>

At the project level, the environmental and social management requirements will be summarized in the project ESMP as shown in table 5 and in accordance with the operational control arrangements in section 3.5., The ESMP contains the following key aspects that will be essential in project monitoring;

• Environmental and social objectives including gender mainstreaming, climate change mainstreaming, legal and other compliance requirements, IFC Performance Standards.

<sup>&</sup>lt;sup>10</sup> Guidance Note 1. *IFC Guidance Notes*: Performance Standards on Environmental and Social Sustainability (2012), p 22, www.ifc.org/performancestandards, accessed July 7, 2018.

- Activities planned to meet the objectives including mitigation and enhancement measures for negative impacts and positive impacts respectively. Such activities may include dust suppression, reclamation of gravel borrow areas or implementation of a resettlement action plan.
- Timing of the activities. This will tell whether such activities are targeted for implementation during the planning, construction or operation phase of the particular infrastructure.
- Implementation responsibility for the activity. This specifies who will be responsible for implementing the activities. This may include gender mainstreaming by the Human Resources Department, climate change innovation by design engineer, management review by management or conducting internal compliance audit by the Compliance Department.
- The budget requirements to implement the activity. They may include the
  resources required to ensure personal protective equipment is purchased,
  EMA environmental license fees, engagement of a consultant to conduct
  training or resources required for construction of solid waste landfill to
  mitigate demand on solid waste disposal facility in a housing development
  project.
- Key performance indicators to show objectives are being achieved. This is what the monitoring agent will use to ensure that the environmental and social objective has been achieved. Examples include the EMA ESIA certification for the objective to comply with legal requirements, Training records for objective to empower personnel or 50% of women employees for the objective of gender mainstreaming.
- Monitoring agent for the activity. This tells who will be responsible for monitoring and confirming that the objective or activity has been successfully implemented. This may include Compliance Department/RMCF environmental and social safeguards oversight on IDBZ contractors, EMA monitoring on IDBZ legal compliance, GCF monitoring on compliance with IFC performance standards or the local authority oversight on technical integrity of the infrastructural drawings and building standards.

For IDBZ's project and long-term corporate finance related activities, the monitoring process will (i) focus on the key risks and impacts of the borrower's/investee's operations on their workers, communities, and the natural environment as identified during the Environmental and Social Due Diligence

process; and (ii) review progress with regard to implementing the agreed ESMMP.

To support the Environmental and Social Due Diligence (ESDD) process, IDBZ will develop the necessary supporting guidance documents and checklists for use by its staff. This will reflect E&S issues that will be reviewed, as well as other factors that will be considered to review compliance with IDBZ's E&SS policy. A good starting point is a review of the E&S issues associated with those industry sectors to which IDBZ is the most exposed in its portfolio which can be found in the IFC EHSGs. Also, IDBZ will appoint or hire personnel to develop a comprehensive understanding of relevant national E&S laws and regulations.

### 3.7 Monitoring Methodologies and Reporting

The monitoring process may employ several methodologies depending on the targeted monitoring output. The Climate Finance and Sustainability Division and Compliance Department will ensure the monitoring and reporting frequencies that are stipulated by regulatory requirements are met. The Compliance Department will be responsible for oversight monitoring of E&S compliance issues.

The following are some of the methods that will be employed in monitoring;

- a. **Audits.** These audits can be internal or external. Internal compliance audits will be conducted by IDBZ voluntarily for its own purposes while external audits may be initiated by external stakeholders like EMA, NSSA, Ministry of Health or GCF.
- b. **Documents review.** Borrowers/investees are required to submit regular E&S performance reports to IDBZ to provide an update on progress made with respect to the ESMP (if there is one), overall E&S performance (to include any accidents, fatalities, etc.), and any changes in its operations that may result in additional E&S risks and impacts. A template for this form is located in Appendix M. The scope and frequency of reporting will vary according to the E&S risk and potential impacts of each transaction but quarterly environmental and social reports should be submitted to EMA and IDBZ during the construction phases of a project. Borrowers and other project implementors should submit biannual ES reports during other stages of the project cycle. Accident investigation reports required by NSSA in the event of an accident will also be reviewed and followed up on with preventative or corrective actions.

- c. The IDBZ Board, management, project managers and supervisors will ensure that ESSMS documents that fall under their jurisdictions will be reviewed and approved accordingly before being put to use. IDBZ will review project specific environment and social safeguards documents for project implementers where IDBZ is the financial intermediary. EMA will also review project specific ESIA reports before projects are certified. GCF and other related financiers will review IDBZ ESSMS and project environment and social safeguards documents before approval.
- d. **Facility inspections**. IDBZ Compliance Department and Climate Finance and Sustainability Division will conduct construction site inspections to check on the project contractors' compliance on the project specific ESMP. Regulatory authorities including EMA, NSSA, Ministry of Health, Local Authority Inspectorate will conduct their site inspections at the various construction stages in line with their construction monitoring and approval stages. The Ministry of Women Affairs, Small and Medium Enterprise Development will also make headcounts of the employees against the targeted number of female employees.
- e. **Interviews**. During site inspections, the Climate Finance and Sustainability Division and Compliance Department or any other monitoring agent may carryout interviews on the employees, supervisors or contractors on key issues including and not limited to general working conditions, safety and health conditions.
- f. **Progress review meetings.** The Compliance Department will hold scheduled weekly, monthly, quarterly and annual meetings to review progress on the implementation of the ESSMS applicable to such intervals. EMA, NSSA and other regulatory authorities will also discuss the IDBZ related issues in the various meetings of common interest with IDBZ will periodically contact such regulatory stakeholders and other general stakeholders and solicit and feedback that will be discussed in the IDBZ progress review meetings.
- g. **Project or work reviews.** These are post implementation inspections to ensure the constructed infrastructure or lending facility was implemented and is working in good order. This may include defect and liability period, operability of the infrastructure. This may include verification of the intended beneficiaries and whether the beneficiaries are really being positively impacted as was intended or whether the anticipated negative

impacts have any long term and residual effect and also how the project affected persons are coping up with the residual impacts.

The Compliance Department will ensure the monitoring and reporting frequencies that are stipulated by regulatory requirements are met and the Climate Finance and Sustainability will endeavour to comply with the set monitoring and reporting frequencies. This may include the environmental reports that should be submitted to EMA during the construction phases of a project, the biannual reports during other stages of the project cycle, or the accident investigation report required by NSSA in the event of an accident.

# 3.8 Non-conformity (non-compliance), corrective action and preventive action procedure

IDBZ will work to identify actual or potential non-conformity with the ESSMS. Where actual non-conformity manifest, corrective action will be administered together with actions to ensure there will be no recurrence. Where there is potential non-conformity, preventive action will be administered.

#### 3.8.1 The procedure for handling non-conformity is as follows

- i. Identification of potential or actual non-conformity.
- ii. Investigate the cause of the non-conformity.
- iii. Establish corrective action required, who will implement it, by when should it be implemented and who will close the non-conformity when it is completely implemented.
- iv. Take corrective action to restore the intended state.
- v. Take preventive action to prevent recurrence of the same non-conformity.
- vi. Extrapolate the cause and assess if a similar non-conformity would manifest in another related area of the ESSMS or project.
- vii. Extrapolate preventive actions to potential non-conformity.
- viii. Responsible person signs off to signify closure on the non-conformity.

IDBZ will not rank non-conformity as major or minor, all conformities carry the same weighting for the ESSMS despite the fact the legal requirements may result in prosecution and other compliance requirements may result in disqualification from related institutions or also prosecution.

When corrective action or preventive action required affects the whole ESSMS, the Compliance Department will make the necessary corrections on all the affected documents and communicate to all the internal and external stakeholders.

# 3.9 Control of records

The Compliance Department will ensure that ESSMS documents are filed, readily retrievable and updated accordingly where required.

To ensure that the authentic version of the ESSMS document is in use, the Compliance Department will ensure documents have clear identification index, safe storage facility, filling system, retrieval system and validity period.

Some of the ESSMS documents include and not limited to;

- ESS Policy
- Planning meetings minutes
- Operational controls (design reports, maintenance reports, operators' manuals)
- Statutory Licenses, Permits, inspection reports, fines, fees paid
- Environmental and social screening reports, ESIA TORs, ESIA Prospectuses, ESIA reports, ESIA Certificates
- Gender analysis reports
- Gender action plans
- Environmental monitoring reports (water quality, air quality, soil quality)
- Accident investigation reports
- ESSMS procedures
- ESSMS Standards
- ESSMS Compliance Audit reports
- Non-conformity, corrective action and preventive action
- Management review meeting minutes
- Employment records
- Training records
- Communication records with both internal and external stakeholders
- Grievances raised, mitigation and closure

# 3.10 Compliance Audit

The Compliance Department will conduct an internal ESSMS compliance audit once a year. The audit may be conducted by qualified personnel from the Compliance Department with technical support from the Climate Finance and Sustainability Division or by hired and competent ESSMS Consultant. The Compliance Department will undertake the following to ensure a value-adding ESSMS audit;

- Establish an audit program. This will detail the timing of the audit in relation to other organizational processes. The ESSMS audit may be a standalone audit or it can be integrated with other audits within the organization, the Human Resources Audit may include gender mainstreaming aspects, or the Financial Audit may include ESSMS implementation budgeting and expenditure.
- Establish the scope of the audit, which aspects of the ESSMS will be audited. The audit may just cover legal and other compliance requirements, ESSMS planning and objectives, targeted projects, safety and health aspects, record keeping, gender mainstreaming, Climate Change mainstreaming, GCF or any other International Financiers requirements.
- Establish the audit team. The audit team members will consist of personnel that understand the ESSMS and its related aspects.
- Establish an audit criterion. There will be clarity on what constitutes conformity and nonconformity in an objective manner.
- Conduct the compliance audit. The audit will involve several activities including meetings, document review, and interviews with informants within IDBZ and outside IDBZ, direct observations of employees conducting their usual work processes and also site inspections.
- Prepare the compliance audit report.
- Communicate the compliance audit findings to the various stakeholders.
  The nonconformities will be summarized and communicated to the
  respective responsible persons. The nonconformities will be investigated
  with corrective and preventive measures being instituted, while
  conformities will be reinforced.
- Follow up on any matters arising from the compliance audit.
- Present the audit findings and recommendations for ESSMS management review. This is a source of continual improvement and an important input into the management review process.

# 3.11 Management Review Framework

IDBZ will review the performance of the ESSMS every six months. The broad objective of management review is to ensure its continual improvement. The specific objectives are to;

• Decide on the systems suitability, adequacy and effectiveness.

- Decide on changes to physical, human and financial resources.
- Decide on action related to possible changes to the environmental policy, objectives, targets and other elements to the ESSMS.

# 3.12 Management review team composition

The Climate Finance and Sustainability Division is the secretariat to the Management review process, with the CEO being the chairperson of the Management review meetings. The management review team consists of the following;

- i. CEO (chairing)
- ii. Climate Finance and Sustainability Division (secretariat)
- iii. Project Managers
- iv. Departmental Heads
  - Human Resources
  - Finance
  - Information Technology
  - Public Relations
  - Legal Services
  - Infrastructure Department
  - Evaluation
  - Economics, Strategy and Performance Monitoring Unit
  - Risk Management
  - Procurement
  - Resource Mobilization and Climate Finance
  - Internal Audit
  - Compliance
  - Regional Managers

#### 3.13 Review of the ESSMS

The ESMS will be reviewed after every two year and or when necessary. The review will cover the environmental and social aspects of activities, products and services within the scope of the ESSMS. Considerations during the review will include and not limited to;

- i. Results of compliance audits and evaluations of compliance with legal and other requirements.
- ii. Communication from external stakeholders including complaints.

- iii. Environmental and social performance of the Bank, the ESMP is the implementation and assessment document for the specific projects and the degree of implementation of the ESMP should be reviewed at Management level.
- iv. Extent to which environmental and social objectives are met.
- v. Status of corrective and preventive action. There could be some corrective action for a project that may be difficult to implement without the intervention of management, these may be to do with achievement of the women quarter targets in the housing infrastructure beneficiaries, financial constraints in the full implementation of the ESMP or a need for more human resources to be able to achieve effective supervision of some aspects of the ESSMS. The non-conformities that remain unclosed should be dealt with at management review meetings.
- vi. Changes in the circumstances within which the ESSMS had initially been configured. This may include;
  - Change of IDBZ portfolios such that the organization intends to provide services in a different sector to the ones it had been serving and the new sector may have different negative environmental and social impacts to the forecasted impacts.
  - Changes in legislation. EMA may come up with new environmental requirements that need to be provided for in the ESSMMs, or GCF requirements change radically such that the initial ESSMS provisions no longer adequately provide for the GCF environment and social performance standards.
  - Views of interested parties. The initial ESSMS is configured to provide for the expectations of the stakeholders. If there is a notable change in the views of the stakeholders, it is important that management repositions the ESSMS to cover the new expectations. For example, the stakeholders may reiterate that IDBZ provides housing infrastructure with complete sewage treatment system and separate solid waste landfill as way to avert water pollution and poor solid waste management from IDBZ related housing infrastructure, or the market may be favouring housing infrastructure with solar heating system. Such views may result in radical changes in the future project designs and resultantly the associated environmental and social aspects arising from the projects.
  - Advances in science and technology.

vii. Recommendations for improvement. During the monitoring processes of the ESSMS and the formulations of corrective and preventive actions, some recommendations are generated for continual improvement and such recommendations should be collated and considered at management review for fuller consideration and adoption. The Compliance Department will therefore be very attentive to the feedback from various stakeholders and document them for consideration in management review of the ESSMS.

Finally, the entire ESSMS, including the budget and training plan, will be reviewed (see Appendix M Checklist) and approved by Senior Management to ensure that it is integrated as part of the Financial Institution's standard operating procedures.

#### 3.14 Contents of Environmental and Social Performance Reports

IDBZ may have additional reporting requirements to different stakeholders (internal and external) regarding E&S risks and impacts associated with its activities but E&S performance reports will at least include:

- Portfolio breakdown by industry sector, high-risk transactions and E&S
   Due dilligence process prior to transaction approval where relevant;
- Cases of non-compliance and significant E&S accidents or incidents related to a transaction;
- Information on the implementation of and changes to the ESSMS; and
- Information on Results Measuring Framework indicators.

# **3.15 Records of Management Review**

The ESSM Unit will ensure that the evidence for the management review of the ESSMS is clearly documented, stored and available for ESSMS compliance audit. The following records will constitute the records for management review;

- Copies of agenda items
- Lists of management review meeting attendees
- Copies of management review meetings minutes
- Presented materials during management review meeting
- Management review decision
- Correspondents following up on management review resolutions

# 3.16 Continual improvement

- i. The Management review process will always look for opportunities for continual improvement of the ESSMS. The sources for continual improvement opportunities include;
  - Experience gained through corrective and preventive actions.
  - Benchmarking against best practices. IDBZ will not only target to achieve legal requirements, but will endeavour to surpass such legal requirements. Best practices may be applied following environmental and social screening of projects. In the event that some projects that may not be prescribed for ESIA by the EMA may still be recommended for ESIA based on best practices as benchmarked against the IFC project categorization.
  - Proposed changes to the legal requirements.
  - Results of the ESSMS compliance audit.
  - Review of the ESSMS objectives.
  - Feedback from monitoring of project implementation.
  - Views of interested parties including employees, customers, suppliers and regulatory authorities.
  - Lessons learnt
- ii. When an opportunity for improvement of the ESSMS is identified, plans to implement, monitor and review its effectiveness will be made. Changes to the ESSMS arising from the quest for continual improvement will be communicated internally as well as externally to all implementation partners.

# **Appendices**

# Appendix A: Project Environment and Social Screening Guidelines 1.0Introduction

This section sets out the general guidelines for screening IDBZ projects. The environmental and social screening process will be used to classify the level of environmental and social significance as well as preliminarily identify the likely environmental and social risks of importance of each project. The objectives of the screening guidelines are to:

- i. Determine which project activities are likely to have significant potential negative environmental and social impacts.
- ii. Determine the level of environmental and social assessment work required i.e. whether a full ESIA is required or not.
- iii. Forecast appropriate mitigation measures for addressing adverse impacts early in the project life cycle.
- iv. Forecast environmental and social impact monitoring parameters during the project implementation.
- v. Indicate which IFC Performance Standards need to be considered in the environment and social impact assessment and management.
- vi. Facilitate the review and approval of the environment and social management tools proposed.

The extent of environmental and social assessment work that might be required, prior to the commencement of project, will depend on the outcome of the screening process described below in sections (steps 1-4).

# 1.1Screening of project activities and sites

#### 1.1.1 Exclusion List

All proposed project will be screened against the Adopted IFC Exclusion List of project activities. IDBZ will not finance any project with activities on that list.

# 1.1.2 Project Categorization

IDBZ will classify the proposed projects into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts.

#### a. Category A

A proposed project is classified as Category A if it is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works. Environmental and Social Assessment for a Category A project examines the project's potential negative and positive environmental impacts, compares them with those of feasible alternatives (including the "without project" situation), and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance. For a Category A project, IDBZ will prepare a report, normally an ESIA (or a suitably comprehensive regional or sectorial environmental and social assessment) that includes all the necessary scope as revealed in the scoping process and as described in the TORs.

#### b. Category B

A proposed project is classified as Category B if its potential adverse environmental impacts on human populations or environmentally important areas (including wetlands, forests, grasslands, and other natural habitats) are less adverse than those of Category A. These impacts are site-specific; few if any of them are irreversible; and in most cases mitigatory measures can be designed more readily than for Category A projects. The scope of the environmental and social assessment for a Category B project may vary from project to project, but it is narrower than that of Category A. Like Category A environmental and social assessment, it examines the project's potential negative and positive environmental impacts and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance. The findings and results of Category B environmental and social assessment are described through an Environmental and Social Management Plan or Resettlement Action Plan where required.

### c. Category C

A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental impacts. Beyond screening, no further environmental and social assessment is required for a Category C project.

Where the Bank is a financial Intermediary, the following categories will apply:

# d. Category FI

A proposed project is classified as Category FI if the project involves access to investment funds through IDBZ as a financial intermediary. The following is the break-down of the sub categories for FIs;

□ Category FI-1: when an FI's existing or proposed portfolio includes, or is expected to include, substantial financial exposure to business activities with [Category A] potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

□ Category FI-2: when an FI's existing or proposed portfolio comprises, or is expected to comprise, business activities that have potential limited adverse environmental or social risks or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; or includes a very limited number of business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented [i.e. Category B level impacts].

Category FI-3: when an FI's existing or proposed portfolio includes financial exposure to business activities that predominantly have minimal or no adverse environmental or social impacts [i.e. Category C level impacts].<sup>11</sup>

Since IDBZ is a Financial Intermediary and it will finance projects in Categories A, B and C, overall it is considered an FI-1 because that is the highest level of risk project it finances.

This classification has implications for which IDBZ projects can access outside international resources such as the GCF. IDBZ's screening and categorization process will classify each subproject using the A, B, C classification. The project may require an ESIA, ESMP, RAP or any other management tool that is applicable.

<sup>&</sup>lt;sup>11</sup> IFC, Interpretation Note on Financial Intermediaries (2012), p3.

# 1.2Projects prescribed for compulsory ESIA

The Environment Management Act (CAP 20:27), first schedule lists the projects that are prescribed for ESIA prior to implementation.

- 1. Dams and man-made lakes
- 2. Drainage and irrigation
- (a) Drainage of wetland or wild life habitat.
- (b) Irrigation schemes.
- 3. Forestry
- (a) Conversion of forest land to other use
- (b) Conversion of natural woodland to other use within the catchment area of reservoirs used for water supply, irrigation or hydropower generation or in areas adjacent to the Parks and Wild Life Estates
- 4. Housing developments
- 5. Industry
- (a) Chemical plants
- (b) Iron and steel smelters and plants
- (c) Smelters other than iron and steel
- (d) Petrochemical plants
- (e) Cement plants
- (f) Lime plants
- (g) Agro-industries
- (h) Pulp and paper mills
- (i) Tanneries
- (j) Breweries
- (k) Industries involving the use, manufacture, handling, storage, transport or disposal of hazardous or toxic materials
- 6. Infrastructure
- (a) Highways
- (b) Airports and airport facilities
- (c) New railway routes and branch lines

- (d) New towns or townships
- (e) Industrial sites for medium and heavy industries
- 7. Mining and quarrying-
- (a) Mineral prospecting
- (b) Mineral mining
- (c) Ore-Processing and concentrating
- (d) Quarrying
- 8. Petroleum production, storage and distribution
- (a) Oil and gas exploration and development
- (b) Pipelines
- (c) Oil and gas separation, processing, handling and storage facilities
- (d) Oil refineries
- 9. Power generation and transmission
- (a) Thermal power stations
- (b) Hydropower schemes
- (c) High-Voltage transmission lines
- 10. Tourist, resorts and recreational developments
- (a) Resort facilities and hotels
- (b) Marinas
- (c) Safari operations
- 11. Waste treatment and disposal
- (a) Toxic and hazardous waste: incineration plants, recovery plants (off-site), wastewater treatment plants (off-site), landfill facilities, storage facilities (off-site)
- (b) Municipal solid waste: incineration, composting and recovery/recycling plants, landfill facilities
- (c) Municipal sewage: waste treatment plants, outfalls into aquatic systems, effluent water irrigation schemes
- 12. Water supply
- (a) Groundwater development for industrial, agricultural or urban water supply

- (b) Major canals
- (c) cross-drainage water transfers
- (d) Major pipelines
- (e) Water withdrawals from rivers or reservoirs

# 1.3 Projects not prescribed for ESIA

There are other projects that may not have been prescribed for compulsory ESIA but may need ESIA consideration based on the perceived impacts and best practices. Such projects will be subject to screening using the IFC Screening Guidelines (detailed below) into the appropriate category and the appropriate environmental and social management tool will be developed.

IDBZ will classify (Category A, B, C or FI) the proposed projects into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts.

### 1.4 Screening and prospectus submission

The Bank shall conduct project screening and submit the screening outcome to EMA for review in a detailed prospectus. As part of the screening process, the screening team will undertake the following activities;

i. To ensure that the screening form is completed correctly for the various project locations and activities, training will first be provided to members of the screening team prior to screening to ensure common understandings of definitions, interpretations, etc. Conduct detailed desk review of the project description and design. Using the general environmental and social considerations and likely impacts for a project's types of activities located in the aforementioned relevant IFC Environmental, Health and Safety Guidelines (EHSGs), the trained personnel can fill out the screening form. **EHSGs** are also available **IFC** website on the The will www.ifc.org/ehsguidelines. website be periodically, at least twice a year to determine if new sector-specific EHSGs are available. The General EHSGs are applicable to all sectors in that they provide a cross-cutting analysis of environmental and social issues to consider in most projects involving construction and contain general guidance on handling of hazardous materials, community issues, worker health and safety issues

decommissioning. Review the borrower's/investee's track record on E&S issues in terms of potential non-compliance with national regulations or negative publicity.

- ii. Carry out the initial screening in the field, through the use of the Environmental and Social Screening Form. This form will be completed by personnel qualified in the implementation of the screening process. The screening form, when correctly completed, will facilitate the identification of potential environmental and social impacts, the determination of their significance, the assignation of the appropriate environmental category, the determination of appropriate environmental mitigation measures, and the need to conduct an ESIA/ESMP and or IPP where required.
- iii. Document the screening outcome in a prospectus. If the initial review or the screening concludes that a proposed lending/investment activity will have minimal or no potential E&S risks or adverse impacts, this conclusion should be documented as part of the project records. The structure and contents of the prospectus shall include the following;
  - ✓ Details of the proponent.
  - ✓ Basic project description outlining project size, purpose, location, preliminary design, alternatives, technology, construction and operation procedures.
  - ✓ Site plan and location details.
  - ✓ Site key stakeholders (including females) to the project and how they have or will be consulted.
  - ✓ Summary of any stakeholder submissions.
  - ✓ Overview of the environmental and social impacts related to the project.
  - ✓ IFC Performance Standards and Environmental, Health and Safety Guidelines (EHSGs) applicable to the project and overview of compliance requirements.
  - ✓ Discuss management measures applicable to the project.

- ✓ Recommendation and justification for the screening outcome (whether ESIA/ESMP is required or not).
- ✓ Attach screening forms and location maps used during screening.

# 1.5 Prospectus review and outcomes

EMA will review the prospectus within 20 days of submission. As part of the review process, EMA will relay the prospectus through the provincial office and to the head office. Field inspections and consultations will also be conducted where deemed necessary. Depending on the scope of the project and its associated environmental and social impacts, EMA will either exempt the project or prescribe that an ESIA be conducted. An exemption letter or certificate will be issued. These conclusions will be documented whether or not an ESIA is prescribed.

IDBZ will document the findings so far and conclusion of ESIA or not in a report, including recommendations to proceed with financing and any conditions of investment agreed with the borrower/investee to mitigate identified E&S risks and impacts within their operations. If at the time of the FI's transaction with a borrower/investee the physical assets to be developed, acquired, or financed have yet to be defined, the ESIA or other Environmental and Social Analysis and/or Action Plan should require the borrower/investee to develop an E&S risk management process at the operations level to ensure that E&S risks and impacts will be adequately identified in the future when the physical assets are defined, i.e. a framework approach.

IDBZ will discuss the ESIA or other Environmental and Social Analysis and/or Action Plan with the borrower/investee and agree on its scope and timeframe for completion. If the ESMP is developed as part of the transaction review process, it should be referenced in the legal agreement. The timeframe for implementing specific mitigation measures will vary according to the E&S risk and may range from being a condition of transaction approval to a condition of disbursement or post investment condition.

# 1.6 Carrying out environmental and social impact assessment process

When it has been determined that an ESIA is required, the following activities shall be undertaken by the Bank:

- i. Formulation of the TORs for the ESIA.
- ii. Recruitment and commissioning of the ESIA consultant.

- iii. ESIA process in line with the TORs.
- iv. Review and certification of the ESIA by EMA.
- v. Disclosure of review outcome to key stakeholders.

#### **SCREENING FORM**

# 1. Instructions to members:

- This form shall be jointly completed by the screening team, therefore thorough discussion and consultation is required during the screening process and a desk review before field project review. The form will be part of the prospectus that is sent to EMA for review.
- Attach maps and sketches used during screening.

2.	Names of the screening team members:
3.	General Project description :

# 4. Impact identification

Impact on	Impact analysis Mitigation								Significan			
	Na	Rev	Ex	Siz	Ti	Dur	Prob	Imp		ce		
	tur	ersi	ten	e	mi	atio	abili	orta				
	e	bilit	t		ng	n	ty	nce				
		у										
Physical features							_			L	M	H
Soil quality												
Drainage												
Topography												
Surface water												
quality												
Surface Water												
flows												
Ground water												
supply												
Air												<u> </u>
Aesthetics												
Climate												
Biotic features												
Forest												
Vegetation in												
general												
Rare plants												
Protected parks												
Wildlife – Small												
mammals												
Wildlife – Big												
mammals												
Wildlife- Birds												
Wildlife – Other												
Wetlands												
Forests												
Socio-economic &	cultı	ıral				]		]				
Land ownership												
Farming												
operations												
Fishing												
operations												
Wildlife viewing												

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Commercial									
hunting									
Commercial									
logging									
Commercial									
fishing									
General									
livelihoods									
nvennoods									
Human wildlife									
conflict									
HIV and AIDS									
Gender-based									
violence									
Occupational									
safety and health.									
Recreational									
facilities									
Education access									
Health access									
Fire risks									
General security									
				l	l l				
Impact on women									
Impact on women and girls									
and girls	Gene	ral fo	recas	st on ]	PS		Mitigation		
	Gene	ral fo	recas	st on 1	PS		Mitigation required		
and girls IFC PS	Gene	ral fo	orecas	st on 1	PS		Mitigation required		
and girls IFC PS PS2. Labor and	Gene	ral fo	orecas	st on 1	PS		Mitigation required		
and girls IFC PS  PS2. Labor and working	Gene	ral fo	orecas	st on 1	PS		Mitigation required		
and girls IFC PS  PS2. Labor and working conditions	Gene	ral fo	orecas	st on 1	PS		Mitigation required		
and girls IFC PS  PS2. Labor and working conditions impacts.	Gene	ral fo	orecas	st on 1	PS		Mitigation required		
and girls IFC PS  PS2. Labor and working conditions impacts. PS 3. Resource	Gene	ral fo	orecas	st on 1	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and	Gene	ral fo	precas	st on ]	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution	Gene	ral fo	orecas	st on 1	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention	Gene	ral fo	recas	st on	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.	Gene	ral fo	precas	st on 1	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community	Gene	ral fo	precas	st on ]	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.	Gene	ral fo	precas	st on ]	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.  PS 5. Land	Gene	ral fo	recas	st on 1	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.	Gene	ral fo	precas	st on	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.  PS 5. Land	Gene	ral fo	precas	st on 1	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.  PS 5. Land acquisition and	Gene	ral fo	precas	st on	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.  PS 5. Land acquisition and involuntary resettlement.	Gene	ral fo	precas	st on ]	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.  PS 5. Land acquisition and involuntary resettlement.  PS 6. Biodiversity	Gene	ral fo	precas	st on 1	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.  PS 5. Land acquisition and involuntary resettlement.  PS 6. Biodiversity conservation	Gene	ral fo	precas	st on ]	PS		Mitigation required		
and girls  IFC PS  PS2. Labor and working conditions impacts.  PS 3. Resource efficiency and pollution prevention aspects.  PS 4. Community health and safety.  PS 5. Land acquisition and involuntary resettlement.  PS 6. Biodiversity	Gene	ral fo	precas	st on ]	PS		Mitigation required		

PS 8. Cultural			
Heritage			
Does this activity h	ave any identified physical elements (e.g. aspects ar	nd	
facilities) that are li	kely to generate adverse E&S impacts on Affected		
Communities? If Y	es, a GRM is required.		
Overall significance	e and discussion		
Recommended scre	ening outcome		

# **GENERAL RISK LIST**

TYPE OF RISK	EXAMPLES
Financial Risk	<ul> <li>Variation in project cost (inflation, forex shortage, miscalculation)</li> <li>Inaccurate cost estimates</li> <li>Budget variance (cost overruns, leakages)</li> <li>Low revenue/returns</li> </ul>
<b>Procurement Risk</b>	<ul> <li>Probity Issues</li> <li>Failure by parties to fulfil conditions (Delivery delays, downtime, quality of service)</li> </ul>
Joint Venture Risk	<ul><li> Unmet expectations</li><li> Lack of full disclosure</li></ul>
Environmental and Social Risk	<ul> <li>Physical displacement of communities</li> <li>Economic displacement</li> <li>Destroying cultural heritage sites</li> <li>Disturbing natural habitats</li> <li>Destroying/modifying sensitive ecosystems such as wetlands</li> <li>Disturbing/destroying protected areas like national parks</li> <li>Occurrence of veld fires</li> <li>Spillage of hazardous substance</li> <li>Environmental pollution</li> <li>Incomplete Environmental analysis.</li> <li>Insufficient availability of project data and mapping at the beginning of the environmental study</li> <li>Effects of projects on endangered/ endemic species of flora and fauna,</li> </ul>

	<ul> <li>Design changes require additional Environmental analysis</li> <li>Natural disasters</li> </ul>
External risk	<ul> <li>No buy in from local communities.</li> <li>Insufficient Stakeholder engagements.</li> <li>Inaccurate expectations from users or stakeholders.</li> <li>Changes in Political factors or support for project.</li> <li>Changes in stakeholders (existing or emerging) requests</li> <li>Delays in agency reviewing or issuance of relevant permits.</li> <li>Change in Environmental regulations.</li> <li>Controversy on environmental and gender grounds.</li> <li>Pressure to deliver project on an accelerated schedule</li> <li>Labour shortage or strike</li> </ul>
Project Scope risk	<ul> <li>Ill-defined scope (Omission of key activities)</li> <li>Continuous changes and growth in scope.</li> <li>Additional unsanctioned functionalities.</li> <li>Inaccurate and/or incomplete material quantity estimates</li> </ul>
Project Schedule risk	<ul> <li>Unrealistic timelines</li> <li>Inaccurate assumptions</li> <li>Omission of critical tasks</li> <li>Unavailability of critical inputs</li> <li>Unforeseen delay in one task affecting dependent tasks.</li> <li>Changes in cost structure</li> <li>Delays in delivery by contractors/delivery of wrong quality components.</li> <li>Failure to get ESIA certificates in time</li> </ul>
Project Design risk	<ul> <li>Quality factors for technical components         (stability, availability, scalability, usability,         security, extensibility, sustainability)</li> <li>Inappropriate and Poor quality designs</li> <li>Unexpected geotechnical issues</li> <li>Inaccurate assumptions on technical issues in         planning stage</li> </ul>
<b>Construction Risk</b>	Inaccurate time estimates

	<ul> <li>Change requests due to differing site conditions</li> <li>Changes during construction require additional coordination with resource agencies</li> <li>Lack of adequate labour resources.</li> <li>poor workmanship</li> </ul>
	<ul> <li>Unrealistic stakeholder expectations</li> <li>Unclear Project scope, schedule, objectives, cost, and deliverables.</li> <li>Consultant or contractor delays</li> <li>Estimating and/or scheduling errors</li> <li>Unplanned work that must be accommodated</li> <li>Unresolved project conflicts not escalated timeously</li> <li>Local agency supports not attained</li> <li>Public awareness/campaign not planned</li> <li>Requirements for unforeseen agreements.</li> <li>Lack of a proper change management system</li> </ul>
Organisational Risk	<ul> <li>Non-alignment of project with organisational strategy</li> <li>Weak Executive Commitments</li> <li>Resource turnover</li> <li>Insufficient planning time</li> <li>Change in priorities on existing program</li> <li>Inconsistent cost, time, scope and quality objectives</li> <li>Change in funding for fiscal year</li> <li>skills shortage</li> </ul>
Legal Risk	<ul> <li>Lack of clear contractual and binding agreements</li> <li>Unenforceable contractual terms</li> </ul>
Governance risk	Lack of approval from relevant governing body
<b>Counterparty Risk</b>	Failure by third Parties to deliver their terms
Assets Transfer Risk	Improper handover of Assets/handover of an unusable asset
Commercial Risk	<ul><li>Low product uptake</li><li>Product liability</li><li>Negative publicity</li></ul>
Compliance risk	<ul> <li>Failure to comply with applicable laws</li> <li>Failure to comply with Bank Policies</li> <li>Non-compliance with AML and CFT</li> </ul>

NB: This list is a sample risk list hence not exhaustive.

# RISK BREAKDOWN STRUCTURE (RBS)

#### Risk Breakdown Structure

Level 0	Level 1	Level 2	Level 3
		Designs	Feasibility Completeness Functionality
	Technical	Scope	ill-defined scope Inaccurate material quantity estimates Additional unsanctioned functionalities
		Project Schedule	Feasibility of schedule Unavailability of resources Delays in delivery by contractors
Project Risk	Financial	Project Costs	Inadequate Funding Inaccurate cost estimates Project cost variation (inflation, forex shortage)
	Timanola	Revenue	Low product uptake High default
		AML/CFT	Sanctioned partners Illicit business partners Non-compliance to taxation regulations
	Regulatory	Governance	Lack of proper company incorporation for partners Lack of approval from relevant governing bodies Non compliance to relevant Acts
		Legal	Lack of clear contractual agreements Breach of agreements
		Regulations	Change in environmental regulations Failure to acquire environmental certification
	Environmental & Social	Stakeholder Management	Inadequate stakeholder engagements Invalid stakeholder expectations Lack of stakeholder buy in
		Environmental analysis	Incomplete Environmental and Social Analysis Design changes requiring additional environmental analysis Disturbing natural habitats and cultural heritage Environmental pollution
		Social Analysis	Physical displacement of communities Incomplete gender analysis Controversy on gender issues

# **Project Risk Categorisation**

List of Sample Projects Under Different Risk Categories						
CATEGORY A (High Risk Category)	CATEGORY B (Medium Risk Category)	CATEGORY C (Low Risk Category)				
Large Dams and reservoirs	Water supply projects	Health services projects				
Water transfer schemes	Medium to small wastewater treatment projects	Institutional developments and capacity building projects				
Major oil and gas developments	Water purification plants	Advisory assignments				
Thermal and hydropower developments  Tourism (Hotel and resort developments)	Small dams/ reservoir for public water supply  Renewable energy	Technical assistance, excluding studies Internal reticulations at existing urban developments				
Large scale wastewater treatment plants	General manufacturing	Small community livelihoods projects and programmes				
Projects affecting tribal or indigenous populations	Telecommunication projects	Ecosystems management				
Roads, railways, airfields and associated infrastructure Textile industries	Electrical transmission projects  Small and medium					
Manufacture, transportation and use of hazardous materials Housing developments receded by relocations	irrigation schemes  Housing Developments with no relocations					

Source: Adopted from DBSA Environmental Appraisal Procedures, 2006

# Appendix B: Sample Terms Of References (ToRs) For Procurement Of ESIA Consultancy Services

#### 1.Introduction

Consultancy Services for Environmental and Social Impact Assessment (ESIA) Study for ...... (insert project name)

### 2. Background and Rationale (Justification)

The aim of this TORs is to guide the engagement of an ESIA consultant to prepare an ESIA/RAP/ESMP reports compliant with EMA and IFC standard for such environmental and social management tools.

- Provide the reader with background of the project, its status and stage of implementation
- Some facts to justify carrying out the project and assignment
- How the assignment fit with the Bank's Mandate and its Strategy.
- Benefits to the Bank and society of delivering on the project/assignment, including a gender impact assessment i.e. development impacts expected to be realised from project

Provide detailed project description to allow the bidding Consultants to fully understand the project and be able to cost their services

### 3. Geographical Location of Assignment

Provide a brief description of the location of the project

# 4. Objectives

- Overall objective of the assignment
- -Specific objectives of the assignment

# **5.** Scope of consultancy

Highlight the scope of the environmental and social assess in line with the screening and scoping outcomes and also as stated in the ESIA prospectus report. The scope of the consultancy will include the following;

### i. Detailed Desk-top Review

The Consultant shall review all existing documentation and ensure the ESIA is correctly conceptualized through an inception report.

### ii. Project Description

The Consultant shall fully describe the project to enable effective impact forecasting by Stakeholders and EMA in the review of the ESIA report.

# iii. Description of the baseline environment

The Consultant shall be required to collect, collate and present baseline information on the environmental, social and gender characteristics of the existing project setting. This description should include but not limited to the baseline scope presented in the ESIA standard in Appendix C

### iv. Legislative and Regulatory Framework

The Consultant shall identify and describe the pertinent regulations and standards - both local and international, governing the environmental quality, health and safety, protection of sensitive areas, land use control at the national and local levels and ecological and socio-economic issues. Thereafter, the Consultant shall identify the project activities that should comply with the identified regulations and recommend compliance measures. The Consultant shall include the legal and other requirements of the ESSMS.

v. Conduct stakeholder consultation, analyse, and present stakeholder submissions. Development of a stakeholders' engagement plan (SEP) identifying all key stakeholders and the means through which they will be communicated to effectively, so that they input into the project development process throughout the project cycle. Ensure stakeholder consultation assists in the identification and mitigation of project impacts. Stakeholder consultation methodology should be justified and consistent with the ESSMS provisions for stakeholder consultation. Consultations must include female participation and consideration of their feedback as well as that of male participants.

# vi. Determination of impacts of project.

The Consultant shall identify, analyse and evaluate all environmental and social impacts, negative or positive accompanying the project. Include some highlights of impacts identified during screening and presented in the ESIA prospectus report. The Consultant shall analyse and evaluate the impacts in line with the ESSMS standard.

# vii. Development of management plan

The management plan helps to mitigate the negative impacts and enhance the positive impacts. The Consultant should meet the ESMP standard (Appendix C).

#### viii. Development of resettlement action plan (If required).

The consultant shall undertake a socio-economic survey of the communities affected by the project. The Consultant shall meet the RAP standard of the ESSMS.

# ix. Development of Grievance Redress Mechanism.

This will handle all complaints related to the project. It may build up on already existing mechanisms in the executing entity, but it must adhere to the requirements outlined in Appendix H of the IDBZ ESSMS Manual.

### 6. Expected Outcome/Outputs/Activities

The expected outcome of the study is an ESIA study report complete with a Gender Action Plan. These reports must be prepared in accordance with the Bank's Environmental and Social Sustainability Policy (ESSP) and Environmental and Social Sustainability Management System (ESSMS). The following are the deliverables shall be made;

The following outputs are expected from the assignment:

- Prospectus report
- ESIA Report
- Stakeholder Engagement Plan (SEP);
- Environmental and Social Management Plan (ESMP)
- Gender Action Plan
- Technical and Non-Technical Summary (NTS) of ESIA statement.

# **Approval**

The Consultant shall be responsible for making any modifications that EMA may demand before approval of the report without charging IDBZ additional costs.

# **Counterpart Staff**

For the purpose of capacity building the Consultant shall undertake the study together with counterpart staff seconded by the IDBZ

# 7.0 Consultant's Methodology

In the technical proposal the consultant shall describe the methodology used for conducting the ESIA.

# 8.0 Reporting

#### 9.0 Quality Assurance

The work will be reviewed and approved by the IDBZ before submitting to EMA and any other desired reviewers.

# 10.0 Key Professional Personnel

To adequately address the core issues of the study, the consultancy team includes the following key personnel;

- i) Corporate Registration Requirements. The following registration certification is mandatory for a consulting firm to be eligible;
  - Registrar of companies' certification
  - ZIMRA VAT certification and current Tax Clearance
  - NSSA clearance
  - EMA certification
  - Environment Professions Council of Zimbabwe (EPCOZ)
  - Procurement Authority of Zimbabwe registration if applicable
  - References from at least three companies for related work
  - Other tender requirements in terms of IDBZ procurement standards

# ii) Principal Consultant or Team Leader

The ESIA Team Leader should have at least a Master's Degree in Environmental Management or related field and a minimum of 10 years of experience in environmental impact assessment processes, 5 of which are at leadership or management level. The Team Leader should have experience with the EMA ESIA standards and International Financiers' ESIA processes including the IFC environmental and social performance standards, World Bank Environment and Social Safeguards and the Green Climate Fund environment and social safeguards. He/she must be registered with the relevant professional body.

iii) **Environmental Specialist** with at least a master's degree in Environmental Management or related field and a minimum of 5 years' experience in environmental impact assessments of related projects. The specialist should have experience with the EMA ESIA standards and the

- IFC environmental and social performance standards. He/she must be registered with the relevant professional body.
- iv) **Social and Gender Specialist** with least a Master's Degree in Social Sciences or equivalent and a minimum of 5 years' experience in Social Impact Assessments and Management including development of resettlement action plans, community relations, indigenous people's plans, consultation and gender mainstreaming. He/she should have experience with the EMA ESIA standards and the IFC environmental and social performance standards.
- v) Water Quality Specialist with at least a degree in Water Quality Management or its equivalent and a minimum of 5 years relevant experience in carrying out water quality impact assessments. He/she must be registered with the relevant professional body.
- vi) **Ecologist** with at least a degree in Ecology or equivalent and a minimum of 5 years relevant experience in ecological impacts assessments. He/she must be registered with the relevant professional body.
- vii) **Hydro-geologist** with at least a degree in hydrology, hydro-geology or equivalent and a minimum of 5 years relevant experience in water resources impact assessment. He/she must be registered with the relevant professional body.
- viii) **Civil Engineer** with at least a related degree in Engineering or equivalent and a minimum of 5 years relevant experience in related engineering work. He/she must be registered with the Engineering Institution of Zimbabwe or any relevant professional body.
- ix) **Public Health Expert** with at least a degree in Public Health or equivalent with a minimum of 5 years of relevant experience in water and sanitation related fields including epidemiology and public health baseline assessments. He/she must be registered with the He/she must be registered with the relevant professional body.
- x) Land use Planner with at least a degree in urban planning and a minimum of 5 years' experience in related work. He/she must have experience of working in Sub Saharan Africa or similar conditions.

## xi) Other relevant specialist

Any other Consultancy Team member should have at least 5 years post qualification experience and registered with EMA as an ESIA Consultancy Team Member

- Archaeologist
- GIS
- Community Development
- Climatologist

## 11.0 Reporting Arrangements

The Consultant is accountable to IDBZ and should report to the relevant Division Manager. The consultant will submit regular progress updates as agreed in the Project Agreement, detailing work progress, constraints and solutions whilst carrying out the assessment. The Consultancy Team Leader should be available for subsequent discussions about the consultancy work with IDBZ.

#### 12.0. Duration

The consultancy work is expected to be conducted over a period of XX weeks of contract signing as follows;

- i. Inception report (XX week)
- ii. ESIA Prospectus (XX weeks)
- iii. ESIA Report for IDBZ review (XX weeks)

The Consultant is expected to give a schedule of work in line with the about outputs. The ESIA period is also dependent on the scope of the project and not limited to 7 weeks.

## 13.0. Obligations of IDBZ or Borrower/Investee

IDBZ will participate or facilitate the ESIA process in some of the following aspects:

- Provide technical information required for the smooth executions of the ESIA process
- Attend and participate in stakeholder meetings
- Pay all the statutory ESIA review fees to EMA Provide all certificates, plans, drawings and/or layouts that may be required by EMA
- Pay all the stakeholder consultation fees to stakeholders that charge for stakeholder consultation

- Pay for the hosting of stakeholder meetings where such meetings are required
- Pay for any environmental samples that are required in the ESIA process
- Pay the counterpart staff seconded to the consultant where such payment is required

## 14.0. Obligations of the consultant

The Consultant is expected to be fully self-sufficient in all respects for undertaking the ESIA work as outlined in para 3.0. ("Scope") above; including accommodation, office space, equipment and supplies, communication and transportation.

## 15.0. Reporting and Submission Procedures

- Language to be used
- Required outputs to be submitted and at what time
- Required documentation when applying
- Submission of inception, draft and final reports
- Submission methods (electronic and hardcopies)

## **16.0 Payment arrangements**

The Consultancy work is deemed complete when IDBZ is issued with the EMA certification, unless the certification has been inhibited by circumstances beyond the consultant's control. The following payment schedule shall apply

No.	Milestone	Payment Disbursement	
		Schedule	
1	Advance payment	20 %	
	Contract signed, and inception report		
	approved by IDBZ		
2	Final ESIA/ESMP/RAP/IPMP/PF	60%	
	Report approved by IDBZ and submitted		
	to EMA for review.		
3	Final ESIA/ESMP/RAP/IPMP/PF	20%	
	Report reviewed and approved by EMA		
	and EMA certificate delivered to IDBZ.		
	Total	100%	

# Other important issues to consider:

- Bid should be VAT inclusive
- Bid should be total and final, no variation allowable

# Appendix C: Environmental and Social Impact Assessment Report Standard

## The ESIA Report will have a minimum of the following standard

- **1.** Cover Page
- 2. Preliminary Pages
  - Acronyms
  - Definitions
  - Non-Technical Executive Summary
  - Table of contents
- **3.** Chapter 1: Introduction.

This chapter may contain important background information including and not limited to:

- Proponent overview
- Project justification
- ESIA methodology
- Brief on the ESIA consultant.
- **4.** Chapter 2: Project description.

This chapter contains:

- Project location including project activities, construction campsites, water supply, electricity, housing in relation to the existing topography
- Detailed technical information on the project activities applicable for the planning, construction, operation and decommissioning phases
- The technological options adopted and analysis alternatives
- The activities should be matched with the potential impacts, applicable legislation and key stakeholders. This will assist EMA to marry the identified impacts with the characteristic project phase
- Emergence preparedness and response (see guidance in Appendix J from IDBZ ESSMS Manual)
- Targeted resource consumption (labor requirements, water, electricity, services and land)
- Targeted waste generation and disposal
- Project cost. EMA is particular on the project cost because it uses it for ESIA review fees formulation. EMA will charge up to 1.5% of the project cost as ESIA review fees

## 5. Chapter 3: Legal and Policy Review.

This chapter scans through all the applicable legal and other compliance requirements including World Bank Group Environmental, Health and Safety Guidelines (EHSGs) and details how the project will provide for compliance throughout the project phases. Overview of the legal and other compliance requirements is in Appendix G.

**6. Chapter 4: Environmental Baseline.** This chapter details the biophysical, social, economic and cultural setting of the project area. This is important for identification, management and monitoring the environmental and social impacts that accompany the project in respect to the host conditions. The baseline will include the following in line with the TORs;

## i. Biophysical Environmental

- Water quality
- Hydrology
- Hydrogeology
- Geology
- Soils
- Air quality
- Climatology and Climate Change
- Ecology
- Topography

#### ii. Social Environment

- Demographics
- Epidemiology
- Gender related information (IDBZ Gender Policy contains detailed requirements for this)
- Administrative arrangements
- Governance
- Land-use pattern
- Land tenure system
- Settlement system
- Vulnerable groups
- Livelihoods
- Cultural Heritage
- Micro economics

- Traffic networks
- Source of drinking water
- Sanitation types and demand
- Solid waste management status
- Energy supplies
- Literacy levels
- Community Based Organization networks
- Communication channels and networks
- Conflict resolution channels
- Poverty level
- Vulnerable groups within the community
- Dispute resolution mechanisms

## iii. Gender Aspects

An initial Socio-economic and Gender Assessment will be conducted for all projects in order to collect baseline data, and to:

- a. determine how the project/programme can respond to the needs of women and men in view of the specific project issues (for example climate change if the proposed project is a climate change project) to be addressed;
- b. Identify and design the specific gender elements to be included in the project/programme activities;
- c. Estimate the implementation budgets;
- d. Design project/programme implementation and monitoring institutional arrangements to address social (including gender-related) impacts;

This assessment of the whole project area in general may include identification of the following:

- Household demographics
- Gender analysis (template provided in the Gender Policy) including gender disaggregated data
- Land holding and tenure (will also identify/confirm the need for Resettlement if possible or further analysis)
- Vulnerability
- Livelihoods
- Cultural heritage

- Ethnicity and Identification of Indigenous Peoples Standard related concerns
- Micro economics
- Energy supplies
- Literacy levels
- Access to communication channels and networks
- Access to medical facility
- Access to education facilities
- Access to transport network
- Access to water supply
- Access to shopping services
- Access to entertainment
- Access to worship centers
- Access to waste disposal facilities
- Access to administrative centers
- Access to fertile land
- Access to financial services and government assistance

# 7. Chapter 5: Stakeholder Consultation.

The chapter is a synthesis of the stakeholder input that would have been gathered during the stakeholder consultation. Accompanying this chapter is the raw data that will be in the appendix. The raw data includes the public notices placed, completed questionnaire, minutes of stakeholder meeting and interview reports. Stakeholder listing depends on the project setting. The general stakeholder listing will include and not limited to the following;

- District Administrators (DA)
- Rural District Councils (RDC)
- Local Authorities
- Zimbabwe Republic Police (ZRP)
- Zimbabwe Electricity Supply Authority (ZESA)
- Ministry of Lands and Rural Development
- Department of Public Works
- Ministry of Women Affairs, Gender and Community Development
- Ministry of Youth Development, Indigenization and Empowerment
- Ministry of Agriculture and Mechanization
- National Museums and Monuments of Zimbabwe (NMMZ)

- Department Social Welfare
- Ministry of Health and Child Welfare
- Zimbabwe National Water Authority (ZINWA)
- Agricultural Extension (AREX)
- Forestry Commission
- Department of Parks and Wildlife
- Local Communities
- Local Councilors
- Local Traditional Leaders (Village Head, Headmen, Chief)
- Local institutions
- Local businesses
- Local Non-Governmental Organizations
- Public and distant interested parties

Consultation methods, justification and analysis will be presented. The above stakeholders will be informed and consulted using a blend of the following methods depending on applicability;

- Questionnaire
- Community Meetings
- Interviews
- Focus Groups Discussions
- Open Houses
- Public notices
- Website displays
- Posters
- Electronic communication

Consultations will be gender sensitive to include male, female, youth and other vulnerable groups participation and or ensure means to obtain feedback from all potentially Project Affected Persons.

# 8. Chapter 6: Impact Analysis and Assessment.

The chapter documents the identified impacts and the application of the impact matrix. Impact assessment will forecast the resultant impact ranking after the implementation of the impact mitigation or enhancement measures. Impact analysis will explore all the dimensions including;

- Direct or indirect
- Immediate or long-term

- Local or distant
- Permanent or temporal
- Reversible or irreversible
- Positive or negative
- Magnitude of impacts
- Probability of occurrence
- Impact significance
- Analysis of alternatives

Impact evaluation will be presented as exemplified in section 2.5.1.2 of the ESSMS

## 9. Chapter 7: Environment and Social Management Plan (ESMP).

This recognizes the residual impacts and puts forward a management and monitoring plan. An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. This chapter will (a) identify the set of responses to potentially adverse impacts;(b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and (c) describe the means for meeting those requirements.

Depending on the project, an ESMP may be prepared as a stand-alone document<sup>12</sup> or the content may be incorporated directly into the ESCP. Design measures are discussed such that the basis for selecting the particular project design proposed is detailed along with the applicable World Bank Group Environmental, Health and Safety Guidelines (EHSGs). Where EHSGs are not applicable, recommended emission levels and approaches to pollution prevention and abatement consistent with good international industry practice (GIIP) are justified.

#### **Indicative outline of ESMP**

The content of the ESMP will include the following:

<sup>12</sup> This may be particularly relevant where contractors will be engaged and the ESMP sets out the requirements to be followed by such contractors. In such case, the ESMP should be incorporated as part of the contract

to be followed by such contractors. In such case, the ESMP should be incorporated as part of the contract between the project proponent (IDBZ or borrower) and the contractor, together with approporiate monitoring and enforcement provisions.

## (a) Mitigation

• The ESMP identifies measures and actions in accordance with the mitigation hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels. The plan will include compensatory measures, if applicable. Specifically, the ESMP: (i) identifies and summarizes all anticipated adverse environmental and social impacts (including those involving indigenous people or involuntary resettlement); (ii) describes—with technical details—each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; (iii) estimates any potential environmental and social impacts of these measures; and (iv) takes into account, and is consistent with, other mitigation plans required for the project (e.g., for involuntary resettlement, indigenous peoples, or cultural heritage).

### (b) Monitoring

Monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. Such information enables the IDBZ to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed.

• The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

## (c) Capacity Development and Training

• To support timely and effective implementation of environmental and social project components and mitigation measures, the ESMP draws on the

environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level.

- Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training).
- To strengthen environmental and social management capability in the agencies responsible for implementation, the ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

### (d) Implementation Schedule and Cost Estimates

• For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

## (e) Integration of ESMP with Project

• IDBZ's decision to proceed with or support a project is predicated in part on the expectation that the ESMP (either stand alone or as incorporated into the Environmental and Social Impact Assessment) will be executed effectively. Consequently, each of the measures and actions to be implemented will be clearly specified, including the individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.

Environmental impacts and the mitigation measures will be synthesized and tabulated as follows:

Environmental/Soci al objective	Activity	Success Indicators	Project phase	Budgetary requireme nt	Implementing and Monitoring responsibility
E.g. Prevent water pollution.	Install zero discharge arrangem ent by waste recycling	Effluent recycling in place	Constru ction phase	Part of project cost	IDBZ implements EMA monitors
Mainstream gender concerns	Gender gap analysis	Gender analysis report. Gender Action Plan	Plannin g phase	Part of cost	IDBZ and Contractors implement.  Ministry of Women Affairs Gender and Community Development to Monitor
	Affirmati ve loaning to women.	% loan allocation to women.	Operatio n phase	0.00	
	Affirmati ve employme nt of women	% of women employed in project.	Construction phase	0.00	

## **Chapter 8 Conclusions and Recommendations**

**10.Appendix.** This will contain several reference data used in the ESIA formulation. This will include and not limited to:

- ESIA TORs if required
- Completed stakeholder consultation questionnaire
- Minutes of stakeholder consultation meeting
- Cutting/copy of public notice
- Location maps
- Technical drawings
- Process datasheets
- References (published and unpublished)
- List of associated reports or plans
- List of individuals or organizations that prepared or contributed to the ESIA

## **Appendix D: Resettlement Guidelines**

## A. Resettlement key principles

Project-related land acquisition or restrictions on land use<sup>13</sup> may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood<sup>14</sup>), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

- Forced evictions<sup>15</sup> will not be carried out except in accordance with Zimbabwe law and the requirements of IFC Performance Standard 5 (PS5).
- Where the exact nature or magnitude of the land acquisition or restrictions on land use related to a project with potential to cause physical and/or economic displacement is unknown due to the stage of project development, the client will develop a Resettlement and/or Livelihood Restoration Framework outlining general principles compatible with PS5. Once the individual project components are defined and the necessary information becomes available, such a framework will be expanded into a specific Resettlement Action Plan or Livelihood Restoration Plan and procedures in accordance with PS5.
- IDBZ shall formulate and implement a Resettlement Action Plan (RAP) in accordance with PS5 each time a project has physical resettlement impacts no matter how many people are affected, but the first preference will be to avoid resettlement as much as possible.
- To help avoid expropriation and eliminate the need to use governmental authority to enforce relocation, IDBZ will use negotiated settlements meeting the requirements of PS5, even though it may have the legal means to acquire land without the seller's consent.

<sup>13 &</sup>quot;Restrictions on land use" refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, and restrictions on land use within utility easements or safety zones.

<sup>&</sup>lt;sup>14</sup> "Livelihood" refers to the full range of means that individuals, families and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade and bartering.

<sup>&</sup>lt;sup>15</sup> The permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection.

- In the case of projects involving only economic displacement, IDBZ will develop a Livelihood Restoration Plan to compensate affected persons and/or communities and offer other assistance that meet the objectives of PS5. The Livelihood Restoration Plan will establish the entitlements of affected persons and/or communities and will ensure that these are provided in a transparent, consistent, and equitable manner. The mitigation of economic displacement will be considered complete when affected persons or communities have received compensation and other assistance according to the requirements of the Livelihood Restoration Plan PS5 and are deemed to have been provided with adequate opportunity to reestablish their livelihoods.
- Economically displaced persons who face loss of assets or access to assets will be compensated for such loss at full replacement cost.
  - O In cases where land acquisition or restrictions on land use affect commercial structures, affected business owners will be compensated for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment.
  - In cases affecting persons with legal rights or claims to land which are recognized or recognizable under national law (see paragraph 17 (i) and (ii)) of PS5, replacement property (e.g., agricultural or commercial sites) of equal or greater value will be provided, or, where appropriate, cash compensation at full replacement cost.
  - Economically displaced persons who are without legally recognizable claims to land (see paragraph 17 (iii) in PS5) will be compensated for lost assets other than land (such as crops, irrigation infrastructure and other improvements made to the land), at full replacement cost. IDBZ is not required to compensate or assist opportunistic settlers who encroach on the project area after the cut-off date for eligibility.
- In addition to compensation for lost assets, if any, as required under paragraph 27 of PS5, economically displaced persons whose livelihoods or income levels are adversely affected will also be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living:

- o For persons whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost should be offered as a matter of priority.
- o For persons whose livelihoods are natural resource-based and where project-related restrictions on access envisaged in paragraph 5 of PS5 apply, implementation of measures will be made to either allow continued access to affected resources or provide access to alternative resources with equivalent livelihood-earning potential and accessibility. Where appropriate, benefits and compensation associated with natural resource usage may be collective in nature rather than directly oriented towards individuals or households.
- o If circumstances prevent IDBZ from providing land or similar resources as described above, alternative income earning opportunities may be provided, such as credit facilities, training, cash, or employment opportunities. Cash compensation alone, however, is frequently insufficient to restore livelihoods.
- Transitional support should be provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.
- Where a project results in both physical and economic displacement, the requirements of compensating for Economic Displacement should be incorporated into the Resettlement Action Plan or Framework (i.e., there is no need to have a separate Resettlement Action Plan and Livelihood Restoration Plan).
- Resettlement process will be completed before the project is implemented on the ground.
- Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of PS5. Additional provisions apply to consultations with Indigenous Peoples, in accordance with IFC Performance Standard 7.

- A census will be conducted to collect all the relevant baseline details to enable full implementation of the RAP. The census will establish the status of the displaced persons with respect to whether they (i) have formal legal rights to the land or assets they occupy or use; (ii) do not have formal legal rights to land or assets, but have a claim to land that is recognized or recognizable under national law<sup>16</sup>; or (iii) have no recognizable legal right or claim to the land or assets they occupy or use.
- A cut-off date after which new infrastructure will not be eligible for compensation will be agreed on and publicized to avoid inconvenience to the communities in terms of their own development thrust.
- A participatory approach will be implemented in the valuation of the household property to ensure that the community gets a fair and equitable compensation. Replacement cost of their property or market value of property, whichever is higher will be used.
- An independent evaluator will be used and agreed compensation values will be signed for by the Evaluator, IDBZ, the affected household and the District Administrator or equivalent depending on administrative structures of the project area.
- Validity period for the valuation will be agreed to prevent loss to the community on inflation. In such cases an inflation correction factor will be used if there is long interval (more than three months) between valuation and compensation. An inflation corrected compensation figure will be used if the waiting period exceeds three months.
- As much as possible, land will be compensated with land and money for land compensation will be adopted last where there is consent.
- Special resettlement impacts related to vulnerable groups will be specifically targeted, including gender related impacts.

## **B.** Resettlement Procedure

The resettlement process will be undertaken in line with the project life cycle and the ESIA process:

1. Step 1: Screening of the sites based on screening form. This should be done early in project screening stage of the ESIA process. The ESIA TORs should include scope for RAP formulation as part of the ESIA process.

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 $<sup>^{16}</sup>$  Such claims could be derived from adverse possession or from customary or traditional tenure arrangements.

- 2. Step 2: Preparation of resettlement action plan for a project, including socio- economic baseline, households' consultations, census of people, asset inventory, valuations of assets, alternative land and the associated assistance requirements. This is conducted during the ESIA formulation process.
- **3. Step 3:** Review and approval of resettlement action plan by EMA. The ESIA submitted to EMA should be accompanied by the RAP.
- **4. Step 4:** Implementation of Resettlement Action Plan, including payment of compensations, resettlement assistance and actual relocation. This is done during the implementation stage of the ESIA process.
- **5. Step 5:** Monitoring and Evaluation of resettlement activities. This is meant to identify any additional assistance that is required to ensure the resettled households fully get established in their new settlement area. Additional assistance may be provided where necessary.

#### C. Standard Resettlement Action Plan

The Resettlement Action Plan will be designed to mitigate the negative impacts of displacement and contain the followings:

- 1. Detailed project description and specific areas giving rise to the need for resettlement.
- 2. Socio-economic baseline of the project area in general as well as the specific household socio-economic setting including;
  - Household demographics
  - Gender analysis
  - Land holding and tenure
  - Vulnerability
  - Livelihoods
  - Cultural heritage
  - Micro economics
  - Energy supplies
  - Literacy levels
  - Access to communication channels and networks
  - Access to medical facility
  - Access to education facilities
  - Access to transport network
  - Access to water supply

- Access to shopping services
- Access to entertainment
- Access to worship centers
- Access to waste disposal facilities
- Access to administrative centers
- Access to fertile land
- Access to financial services and government assistance
- 3. Eligibility Criteria. This summarizes who is eligible for compensation. A cut-off date for asset inventory is required and must be publicized.
- 4. Inventory of the project affected people and assets to be lost. This will include all the household belongings including and not limited to:
  - immovable assets
  - movable assets
  - lost opportunities
- 5. Lost access to community social services
- 6. Community consultation and engagement
- 7. Method of payment of compensation. Compensation is at full replacement cost for land and other assets lost.
- 8. Integration with host population in the targeted relocation sites, including relocation assistance required.
- 9. Work plan for implementation of the resettlement including dates, times, responsibilities, budget for compensation of lost assets, transport, establishment costs like new uniforms for school children, land clearing, tillage and other reestablishment costs.
- 10.Implementation and monitoring mechanisms
- 11. Grievance redress mechanisms

# **Appendix E: Indigenous Peoples Considerations in the ESSMS 1.1 Introduction**

During the environmental and social impact assessment process, any project issues or impacts related to Indigenous Peoples should be identified and analysed as soon as possible. The term "Indigenous Peoples" generally refers to a distinct social and cultural group possessing the following characteristics in varying degrees:

- Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- Customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture; or
- A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

IFC Performance Standard 7 (PS7) applies to communities or groups of Indigenous Peoples who maintain a collective attachment, i.e., whose identity as a group or community is linked, to distinct habitats or ancestral territories and the natural resources therein. It may also apply to communities or groups that have lost collective attachment to distinct habitats or ancestral territories in the project area, occurring within the concerned group members' lifetime, because of forced severance, conflict, government resettlement programs, dispossession of their lands, natural disasters, or incorporation of such territories into an urban area. Project screening should determine whether these issues are applicable and should be assessed further. Qualified, competent professionals on this subject matter may need to be engaged to fully assess the applicability of this standard (IFC Performance Standard 7).

#### 1.2 IPs in Zimbabwe

Various ethnic groups in Zimbabwe such as the Ndebele, Kalanga, Shona, Tonga, Nambya. Wesa, Doma, Barwe, Venda, Shangani/Ndau, and the San may be in a project area and necessitate the development of a plan or framework to ensure

<sup>&</sup>lt;sup>17</sup>PS7, *IFC Performance Standards on Environmental and Social Sustainability* (2012), p 2, www.ifc.org/performancestandards, accessed June 29, 2018.

they can benefit. The national drive throughout the country is to integrate all communities under one development strategy. Though there is integration of ethnic groups, each group has its own distinct characteristics. The constitution of Zimbabwe upholds the diversity of the ethnicity in Zimbabwe and the Government has an obligation to ensure that this diversity has been maintained harmoniously for the benefit of all the citizens of Zimbabwe.

The Indigenous Peoples Management Performance Standard (IP PS) may be applicable in certain project activities if a particular Project's Affected Peoples are Indigenous as defined above.

### 1.3 Instruments for IP PS

Adverse impacts on Affected Communities of Indigenous Peoples should be avoided where possible. Where alternatives have been explored and adverse impacts are unavoidable, IDBZ will minimize, restore, and/or compensate for these impacts in a culturally appropriate manner commensurate with the nature and scale of such impacts and the vulnerability of the Affected Communities of Indigenous Peoples. IDBZ's proposed actions will be developed with the Informed Consultation and Participation (ICP) of the Affected Communities of Indigenous Peoples and contained in a time-bound plan, such as an Indigenous Peoples Plan (IPP), or a broader community development plan with separate components for Indigenous Peoples.1819

## 1.4 Participation and Consent

IDBZ will undertake an engagement process with the Affected Communities of Indigenous Peoples as required in Performance Standard 1. This engagement process includes stakeholder analysis and engagement planning, disclosure of information, consultation, and participation, in a culturally appropriate manner. In addition, this process will:

☐ Involve Indigenous Peoples' representative bodies and organizations (e.g.,
councils of elders or village councils), as well as members of the Affected
Communities of Indigenous Peoples; and

<sup>19</sup> PS7, IFC Performance Standards on Environmental and Social Sustainability (2012), p 2, <a href="www.ifc.org/performancestandards">www.ifc.org/performancestandards</a>, accessed August 21, 2018.

<sup>&</sup>lt;sup>18</sup> The determination of the appropriate plan may require the input of competent professionals. A community development plan may be appropriate in circumstances where Indigenous Peoples are a part of larger Affected Communities.

☐ Provide enough time for Indigenous Peoples' decision-making processes.2021

## 1.5 Consultation of Indigenous Peoples

Through this IPPF, IDBZ shall ensure that, in applicable projects, Indigenous Peoples will be consulted in order to obtain their free, prior and informed consent (FPIC) basis. IPs can be vulnerable to exploitation of themselves and their natural resources and so IDBZ will obtain the FPIC of the Affected Communities of Indigenous Peoples in the following circumstances: i) Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use; ii) Relocation of Indigenous Peoples from Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use and iii) unavoidable impacts on critical cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual aspects of Indigenous Peoples lives. FPIC applies to project design, implementation, and expected outcomes related to impacts affecting the communities of Indigenous Peoples. When any of these circumstances apply, the client will engage external experts to assist in the identification of the project risks and impacts.

FPIC builds on and expands the process of Informed Consultation and Participation (ICP) described in Performance Standard 1 and will be established through good faith negotiation between the client and the Affected Communities of Indigenous Peoples. The client will document: (i) the mutually accepted process between the client and Affected Communities of Indigenous Peoples, and (ii) evidence of agreement between the parties as the outcome of the negotiations. FPIC does not necessarily require unanimity and may be achieved even when individuals or groups within the community explicitly disagree.22

The consultation process will be maintained throughout the project life. This will include the use of the appropriate consultation methods depending on the social assessment. The consultation methods will include and not limited to;

Community focus group meetings in their native language.

Notification of the various NGOs working for their interests.

Publications in print media in local language.

<sup>&</sup>lt;sup>20</sup> Internal decision making processes are generally but not always collective in nature. There may be internal dissent, and decisions may be challenged by some in the community. The consultation process should be sensitive to such dynamics and allow sufficient time for internal decision making processes to reach conclusions that are considered legitimate by the majority of the concerned participants.

<sup>&</sup>lt;sup>21</sup> PS7, IFC Performance Standards on Environmental and Social Sustainability (2012), p 3, <a href="www.ifc.org/performancestandards">www.ifc.org/performancestandards</a>, accessed August 21, 2018.

<sup>&</sup>lt;sup>22</sup>Guidance Note 7. *IFC Guidance Notes*: Performance Standards on Environmental and Social Sustainability (2012), www.ifc.org/performancestandards, accessed June 29, 2018, p 3.

Usually meeting with the IP community is a very sensitive issue in most districts and such meeting will have to be cleared by the District Administrator's Office. Prior notification of the DA's Office is therefore essential.

For projects affecting indigenous communities, whether positively or adversely, a more elaborate consultation process is required. This will include, as appropriate:

Inform affected indigenous communities about project objectives and activities. Discuss and assess possible adverse impacts and ways to avoid or mitigate them. Discuss and assess potential project benefits and how these can be enhanced.

- ✓ Discuss and assess land and natural resource use and how management of these resources may be enhanced.
- ✓ Identify customary rights to land and natural resource use and possible ways of enhancing these.
- ✓ Identify and discuss (potential) conflicts with other communities and how these might be avoided.
- ✓ Discuss and assess food security and how it might be enhanced through project interventions.
- ✓ Elicit and incorporate indigenous knowledge into project design.
- ✓ Facilitate and ascertain the affected communities' broad support to the project.
- ✓ Develop a strategy for indigenous participation and consultation during project implementation, including monitoring and evaluation.

## 1.6 Objectives of consultation

The objective of consultation is to ensure that any project-affected IP Community has a full understanding of the project, get the opportunity to contribute to the forecasting of potential negative and positive benefits of the project, discuss how the positive impacts can be enhanced while the negative impacts are mitigated, solicit suggestions on the project design, implementation and monitoring where applicable and attain a high level of participation from the IP community such that they will be involved as much as possible and relevant. Local language, maps, and images may need to be used to achieve effective communication.

The general agenda of the meetings may follow the sequence;

- i. Introductions (Local leadership in the IP community).
- ii. Overview of the IFC IP Performance Standard (Consultant).

- iii. Overview of the project (IDBZ).
- iv. Plenary Session (Consultant).
- v. Presentation of IP submission as minutes (Consultant)
- vi. Minutes signed (Representatives of local leadership, Consultant, IDBZ)
- vii. Closing (Local Leader)
- viii. Refreshments where applicable (IDBZ).

## 1.7 Important Items

- Provide an attendance register to capture details including gender, age, location and contacts. Explain to the audience why an attendance register is required to reduce the likelihood of participants refusing to sign it.
- Assess if the objectives of the consultation and meetings were met
- Take pictures or videos with the knowledge and permission of participants
- Arrange for minutes review and signing if they can be finalized on site

## 1.7.2 Discussion of issues raised during the stakeholder meeting

This section discusses the important issues raised from the consultation and how the issues add to impact identification, mitigation, management and monitoring.

## 1.8 Impact analysis and evaluation

The process of impact assessment has two major components: impact analysis and impact evaluation. Though the details of the specific projects are not yet clearly known, the IPPF will still be able to forecast some general impacts that may be applicable. More detailed impact identification, analysis and evaluation will be conducted when the details of the projects are clearly understood.

# 1.8.1 Impact analysis

Following the identification of the various potential environmental impacts, the impact analysis framework should look at the impacts under the impact analysis categories provided in the ESSMS.

# 1.8.1.1 General identification and analysis of the IDBZ impacts on IP.

The general project impact identification and analysis on IP include and not limited:

- Potential access to employment
- Potential for community development
- Involuntary Resettlement

- Access to protected forests
- HIV and AIDS
- Livelihoods
- Social exclusions
- Cultural erosion
- Populations explosions
- Competition with construction teams on community services
- Disruption of community cohesion

## 1.8.2 Impact assessment

Following the identification and analysis of potential environmental impacts in each project, this section focuses on the evaluation of the significance of the identified impacts and the impact of the potential remedial action or enhancement measures. Following impact prediction and identification, impact evaluation is the formal stage at which a 'test of significance' is made in accordance the ESSMS impact evaluation standards.

## 1.9 The Indigenous Peoples Plan (IPP)

#### 1.9.1 Contents of the IPP

an Indigenous Peoples Plan, or a broader community development plan with separate components for Indigenous Peoples is a time-bound plan that reflects IDBZ's proposed actions to address PS7.

The IPP is prepared in a flexible and pragmatic manner, and its level of detail varies depending on the specific project and the nature of the effects to be addressed. In general, and where appropriate, an IPP should include the following elements<sup>23</sup>:

# (a) Baseline information (from environmental and social risks and impacts assessment process)

Summarize relevant baseline information that clearly profiles the Affected Communities, their circumstances and livelihoods, with description and quantification of the natural resources upon which the Indigenous Peoples depend.

# (b) Key Findings: Analysis of Impacts, Risks & Opportunities (from environmental and social risks and impacts assessment process)

<sup>&</sup>lt;sup>23</sup>Guidance Note 7. *IFC Guidance Notes*: Performance Standards on Environmental and Social Sustainability (2012), p 22, www.ifc.org/performancestandards, accessed June 29, 2018.

Summarize key findings, analysis of impacts, risks and opportunities and recommended possible measures to mitigate adverse impacts, enhance positive impacts, conserve and manage their natural resource base on a sustainable basis, and achieve sustainable community development.

# (c) Result of Consultations (during environmental and social risks and impacts assessment process) and Future Engagement

Describe the process of information disclosure, consultation and informed participation and, where relevant, the Free, Prior and Informed Consent (FPIC)<sup>24</sup> process including Good Faith Negotiation and documented agreements, with the Affected Communities of Indigenous Peoples, and how issues raised have been addressed. The consultation framework for future engagement should clearly describe the process for ongoing consultations with, and participation by Indigenous Peoples (including women and men), in the process of implementing and operating the project.

# (d) Avoid, Minimize, and Mitigate Negative Impacts and Enhance Positive Impacts

Clearly describe the measures agreed to in the process of information disclosure, consultation and informed participation to avoid, minimize and mitigate potential adverse effects on Indigenous Peoples, and to enhance positive impacts. Include appropriate action times that detail the measures to be taken, responsibilities and agreed schedule and for implementation (who, how, where and when) (refer to Performance Standard 1 and Guidance Note 1 for more details of the contents of an Action Plan). Whenever feasible, avoidance or preventative measures should be given primacy over mitigatory or compensatory measures.

## (e) Community Based Natural Resource Management Component

Where applicable, focus on the means to ensure continuation of livelihood activities key to the survival of these communities and their traditional and cultural practices. Such livelihood activities may include grazing, hunting, gathering, or artisanal fishing. This component clearly sets out how the natural resources upon which the Affected Communities depend, and the geographically distinct areas and habitats in which they are located, will be conserved, managed and utilized on a sustainable basis.

Performance Standard 1 and will be established through good faith negotiation between the client and the Affected Communities of Indigenous Peoples. The client will document: (i) the mutually accepted process between the client and Affected Communities of Indigenous Peoples, and (ii) evidence of agreement between the parties as the outcome of the negotiations. FPIC does not necessarily require unanimity and may be achieved even when individuals or groups within the community explicitly disagree. Source: IFC, PS7 (2012) p 3.

<sup>&</sup>lt;sup>24</sup> There is no universally accepted definition of FPIC. For the purposes of Performance Standards 1, 7 and 8, "FPIC" has the meaning described here: FPIC builds on and expands the process of ICP described in

## (f) Measures to Enhance Opportunities

Clearly describe measures to enable Indigenous Peoples to take advantage of opportunities brought about by the project, and to conserve and manage on a sustainable basis the utilization of the unique natural resource base upon which they depend. Such opportunities should be culturally appropriate.

## (g) Grievance Mechanism

Describe appropriate procedures to address grievances by Affected Communities of Indigenous Peoples arising from project implementation and operation. When designing the grievance procedures, the client will take into account the availability of judicial recourse and customary dispute settlement mechanisms among the Indigenous Peoples. Affected Communities (both women and men) must be informed of their rights and the possibilities of administrative and legal recourse or remedies, and any legal aid available to assist them as part of the process of consultation and informed participation. The grievance mechanism should provide for fair, transparent and timely redress of grievances without costs, and if necessary provide for special accommodations for women, youth and the elderly, and other vulnerable groups within the community, to make their complaints.

## (h) Costs, budget, timetable, organizational responsibilities

Include an appropriate summary of costs of implementation, budget and responsibility for funding, timing of expenditure and organizational responsibilities in managing and administering project funds and expenditures.

## (i) Monitoring, Evaluation & Reporting

Describe monitoring, evaluation and reporting mechanisms (including responsibilities, frequencies, feedback and corrective action processes). Monitoring and evaluation mechanisms should include arrangements for ongoing information disclosure, consultation and informed participation with the Affected Communities of Indigenous Peoples (both women and men) and for the implementation and funding of any corrective action identified in the evaluation process.

## 1.10 Impact management

In the event of presence of project affected Indigenous Peoples, the respective subproject shall manage the impact in a sustainable manner. The management initiatives will include and not limited to:

i. Promoting inclusion of the Indigenous Peoples at all project phases in access to project benefits to cushion their livelihoods.

- ii. Protecting indigenous knowledge within the Indigenous Peoples through documentation.
- iii. Addressing gender and intergenerational issues of Indigenous People.

## 1.11 Implementation and monitoring mechanism

The implementation of an IPP will rests within the Infrastructure Projects Department with compliance monitoring from the Climate Finance and Sustainability Unit. The Unit responsible for the screening of the respective subprojects and ensure that the appropriate level of this IPPF is effectively administered. The key players in the implementation of this IPPF are;

- i. The District Administrator
- ii. Related NGOs
- iii. Local Leaders within the IP community
- iv. Local IP community.
- v. Rural District Council (RDC)

Each implementing agency will liaise with the networks and structures on the ground to ensure effective implementation of an IPP. The local networks will include and not limited to the following;

- i. Local Traditional leaders (Chief and Village head). The local leadership will be very instrumental in making sure the local communities are mobilized for meetings and participation in the project.
- ii. Local District Administrators. The DA's office is instrumental in giving the overall local government blessing to the project. The DA mobilizes local government departments for screening and monitoring of any impacts that fall in the respective government departments' jurisdictions.
- iii. Government departments. They give technical support in subproject screening and impact identification and management.
- iv. NGOs on the ground. The NGOs, if mobilized, can be used as a very effective communication vehicle to access the locals. Usually the support of the NGOs is important in the overall perception of the project by the locals.
- v. RDC. The RDC hosts the project in that the impact zones where people are settled belong to the RDC.
- vi. The Local Community

The sustainability of the project largely anchors on the effective participation of the targeted local communities. The local communities are essential in the identification, mitigation and monitoring of the project impacts, whether positive or negative. The local communities will be participating in the following areas of joint responsibility with the respective subproject implementing agencies;

- Ensure proper and sustainable management of natural resources at a local level.
- Participate in the formulation of local level project implementation structures like environmental subcommittee at ward and village levels.
- Volunteer as environmental monitors in respective subprojects project areas.
- Participation of community representatives in participatory screening for subprojects activities.
- Participate in the monitoring of the implementation of an IPP.

### vii. RDCs

The RDCs are the custodians of all the communal land in the country and are essential for the smooth implementation of an IPP. For sustainable formulation and implementation of the associated IPP that may arise from some projects, the RDCs should be closely involved.

#### 1.12 IPP Disclosure

As part of disclosing an IPP, the following actions will be done;

- a) IDBZ will apply for EMA certification of the IPP as part of the ESIA certification
- **b**) IDBZ will disclose the IPP locally as follows;
  - 1.0As part of the IP continuous consultation when the IPP is finalized.
  - 2.0The summary of the IPP will be published in the local daily indicating that the copy of the IPP is accessible at the specified local area.

### 1.13 Grievances and conflict resolution

i. Sources of conflict and grievances

Conflicts or grievances may arise from the implementation of project activities or may already be in existence within the community before the project introduction. Conflicts generally arise from poor communication, inadequate or lack of consultation, inadequate flow of relevant up to-date information, or restrictions that may be imposed on PAP. Conflict may arise on some of the following matters;

- Boundaries of the project affected land
- Selection of beneficiaries
- Valuation and delivery of compensation
- Relocation arrangements
  - ii. Preventive measures

As preventive measure, the implementation of a good communication strategy is an absolute requirement to reduce misunderstanding and grievances. Project awareness raising activities will be conducted throughout the life of the project. Consultations and negotiations will be carried out with PAP where there are indications of potential conflicts. Monetary issues are often a source of grievance. Another important preventive measure is to provide clear information on the project's budget for community related expenditure. Any community related expenditure should clearly target benefiting the community and not individual members of the community; however, where individuals are involved in project activities they should be adequately resourced to avoid negative externalities on the individuals' part (this may include travel expenditure for community representative who may be required to attend meetings offsite). In order to ensure effective communication with PAPs, IDBZ will closely use the existing communication network and also ensure all such communication is done in the local language to avoid misunderstanding.

### 3.0Grievance resolution

Conflict and grievances that may arise will be multifaceted and directed to different respondents. Some conflict may be amongst community members as they will be relating to the project activities in different ways, other conflict may be between the IP communities against the IDBZ who will be implementing project activities. In time of any of such conflict, the level of interventions depends on the gravity of the matters. The resolution will also involve a multifaceted approach so that all stakeholders will be involved. In times of conflict, usually the following stakeholders are involved to some applicable extends;

- The Office of the President of Zimbabwe
- The Minister of Environment, Tourism, and Hospitality Industry
- The Ministry related to the proposed development

- The District Administrator
- The Magistrate Court
- IDBZ management
- IDBZ Contractors
- Member of Parliament
- Local Ward Councillor
- Local Chief
- Local Headman
- Households

Grievance mechanisms would involve the local community leaders in providing a first level of listening and giving informal resolution to community level conflicts. These leaders will be involved in project consultation and awareness raising. Community leaders can also take grievance to the IDBZ management or IDBZ contractors for discussion and resolution. IDBZ contractor or project management should resolve the matter or register it for Chief Executive Officer within 48 hours from the day of notification of grievance. If there is no agreement between the aggrieved and the IDBZ contractor and management, an appeal can be made to the IDBZ Chief Executive Office. The Chief Executive Office should resolve the matter within 14 Days of notification. In the event that there is no resolution by the Chief Executive Officer, the aggrieved may escalate the matter through the courts. As the matter is escalating from the local front to Administrative Court, there are other community representatives that may be included to avert court resolution, these include District Administrator, the Member of Parliament and other high profile interested parties. IDBZ will continually raise awareness on how to resolve conflicts without going to courts unless there is real need to. In the event that the out of court resolution is not achieved, the final route is to use the formal courts available at the local level. If the local Magistrate Court fail to resolve the issue, the matter can be escalated to the High Court, the Supreme Court and the Constitutional Court. Usually the community is encouraged to resolve their matters at the community level or organizational level as the courts are expensive and inconvenient especially to the community members who must leave their work and attend court sessions.

IDBZ will ensure that a project-level grievance redress mechanism (GRM) or other complaints resolution mechanism exists and is sensitive and responsive to the needs of IPs. Such mechanism will record or in-take complaints through various channels ensuring that provisions are made for complainants who are illiterate. The complaints will be kept confidential and records will be kept ensuring that they are resolved in a reasonable time. Complaints status will be included in project status reports.

# **1.14 Budget**

# The IPP should have a budget for its implementation. the budget may include:

# **Indicative IPP Budget Framework**

Item	Description	Amount (USD)
Training on IP	Training of IDBZ staff and other stakeholders on the requirements and implementation of the IP Performance Standard where necessary.	
Subproject screening	The screening process may require funding is the project area is not fully understood.	
Capacity building on IP CBOs and NGOs	Training of CBOs and NGOs on IP provisions, and registration of the CBOs.	
IP specific livelihood support activities.	Depending on the Social Assessment, there may be need to assist the IP cope with the potential project impacts.	
IP specific education intervention.	This may include sponsorship of school related budget. This is meant to capacitate the IP to be able to participate fully in school related benefits of the projects.	
Monitoring and Evaluation	Supervision of the implementation of the various IPP and its resultant tools.	

## **Appendix F: Cultural Heritage and Chance Find Procedures**

#### 1.0 Introduction

IDBZ will adhere to IFC Performance Standard 8 with respect to any issues that arise related to cultural heritage. Cultural heritage refers to a variety of phenomena including i) tangible forms of cultural heritage, such as tangible moveable or immovable objects, property, sites, structures, or groups of structures, having archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values; (ii) unique natural features or tangible objects that embody cultural values, such as sacred groves, rocks, lakes, and waterfalls; and (iii) certain instances of intangible forms of culture that are proposed to be used for commercial purposes, such as cultural knowledge, innovations, and practices of communities embodying traditional lifestyles.<sup>25</sup> Cultural heritage includes phenomena that are legally protected and those that are not legally recognized as well as pristine assets and those which have already been disturbed or even be deteriorated. In Zimbabwe, some physical cultural resources include graves, cultural shrines, monuments other artefacts.

## b) Cultural Heritage During the Project Cycle

IDBZ and its project proponents will site and design projects to avoid significant adverse impacts to cultural heritage. In addition to complying with applicable law on the protection of cultural heritage, including national law implementing Zimbabwe's obligations under the Convention Concerning the Protection of the World Cultural and Natural Heritage, IDBZ will identify and protect cultural heritage by ensuring that internationally recognized practices for the protection, field-based study, and documentation of cultural heritage are implemented.<sup>26</sup>

During project identification and the environmental and social assessment process, Cultural Heritage related concerns will be identified through project screening and other means. In line with the requirements of the performance standard and based on the project screening results, the National Museums and Monuments of Zimbabwe ('NMMZ') and environmental and social baseline, an Archaeological Impact Assessment ('AIA') will be conducted in accordance with the National Museums and Monuments of Zimbabwe as part of the ESIA to ensure

<sup>&</sup>lt;sup>25</sup> PS8, *IFC Performance Standards on Environmental and Social Sustainability*, (2012), www.ifc.org/performancestandards, accessed June 29, 2018, p 1.

<sup>&</sup>lt;sup>26</sup> PS8, *IFC Performance Standards on Environmental and Social Sustainability*, (2012), <a href="https://www.ifc.org/performancestandards">www.ifc.org/performancestandards</a>, accessed June 29, 2018, p 1.

that any physical cultural resources within the project area are identified, assessed and measures implemented to protect and preserve them. The NMMZ will review the AIA as part of the EMA review to ensure integrity in the AIA. Where the screening results indicate no need for a full AIA, a Chance Finds Procedure will always be part of the ESIA so that during implementation, should any unforeseen artifacts become apparent, the procedure detailed below will be followed.

### 1.2 Chance Finds Procedure

Chance finds are archaeological artifacts, features, structures or historical cultural remains such as human burials that are found accidentally in context previously not identified during cultural heritage scoping, screening and assessment studies. Such finds are usually found during earth moving activities of IDBZ activities including excavations, trenching for water and sewer infrastructure just to mention a few. The objectives of this procedure are to provide protocols that will minimize disruption to construction scheduling while promoting the preservation of archaeological remains in accordance with the National Museums and Monuments of Zimbabwe Act [Chapter 25:11]. Below is the step-by-step Chance Finds response procedure.

- i. All activities in the immediate vicinity of the discovered material is temporarily ceased and barricaded. This is the contractor's responsibility.
- ii. Contractor notifies IDBZ, who will in-turn notify National Museums and Monuments of Zimbabwe (NMMZ).
- iii. IDBZ arranges for adequate security for the site through Zimbabwe Republic Police (ZRP) or private security.
- iv. IDBZ facilitates that the National Museums and Monuments of Zimbabwe immediately deploy a qualified specialist to consider the heritage resource based on a site visit.
- v. IDBZ facilitates that the NMMZ Specialist furnishes appropriate measures to both NMMZ, IDBZ and any other stakeholder.
- vi. Should the specialist conclude that the find is a heritage resource protected in terms of the National Museums and Monuments of Zimbabwe Act [Chapter 25:11] and may require rescue excavations, NMMZ will submit costs and proposal to the developer for mitigation including and not limited to rescue excavations.
- vii. IDBZ funds the recommendations and monitor the implementation process by the NMMZ.

viii. NMMZ notifies IDBZ when works may start again after the appropriate measures have been taken.

#### 1.3 Consultation

If a project may affect cultural heritage, IDBZ or the other project proponent will consult with Affected Communities who use, or have used within living memory, the cultural heritage for long-standing cultural purposes. IDBZ or other project proponent will consult with the Affected Communities to identify cultural heritage of importance, and to incorporate into the IDBZ's or other project proponent's decision-making process the views of the Affected Communities on such cultural heritage. Consultation will also involve the relevant national or local regulatory agencies that are entrusted with the protection of cultural heritage.<sup>27</sup>

## 1.4 Community Access

Where the IDBZ or other project proponent's project site contains cultural heritage or prevents access to previously accessible cultural heritage sites being used by, or that have been used by, Affected Communities within living memory for long-standing cultural purposes, IDBZ will, based on consultations, allow continued access to the cultural site or will provide an alternative access route, subject to overriding health, safety, and security considerations.<sup>28</sup>

# 1.5 Removal of Replicable Cultural Heritage

Where IDBZ/the project proponent has encountered tangible cultural heritage that is replicable<sup>29</sup> and not critical, the client will apply mitigation measures that favor avoidance. Where avoidance is not feasible, the client will apply a mitigation hierarchy as follows:

1. Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes (Consistent with requirements in Performance Standard 6 related to ecosystem services and conservation of biodiversity) needed to support it;

<sup>&</sup>lt;sup>27</sup>PS8, *IFC Performance Standards on Environmental and Social Sustainability* (2012), www.ifc.org/performancestandards, accessed June 29, 2018, p 2.

<sup>&</sup>lt;sup>28</sup>PS8, *IFC Performance Standards on Environmental and Social Sustainability* (2012), www.ifc.org/performancestandards, accessed June 29, 2018, p 2.

<sup>&</sup>lt;sup>29</sup> Replicable cultural heritage is defined as tangible forms of cultural heritage that can themselves be moved to another location or that can be replaced by a similar structure or natural features to which the cultural values can be transferred by appropriate measures. Archeological or historical sites may be considered replicable where the particular eras and cultural values they represent are well represented by other sites and/or structures.

- 2. Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it;
- 3. The permanent removal of historical and archeological artifacts and structures is carried out according to the principles described above; and
- 4. Only where minimization of adverse impacts and restoration to ensure maintenance of the value and functionality of the cultural heritage are demonstrably not feasible, and where the Affected Communities are using the tangible cultural heritage for long-standing cultural purposes, compensate for loss of that tangible cultural heritage.

## 1.6 Removal of Non-Replicable Cultural Heritage

Most cultural heritage is best protected by preservation in its place, since removal is likely to result in irreparable damage or destruction of the cultural heritage. The client will not remove any nonreplicable cultural heritage,<sup>30</sup> unless all the following conditions are met:

- 1. There are no technically or financially feasible alternatives to removal;
- 2. The overall benefits of the project conclusively outweigh the anticipated cultural heritage loss from removal; and
- 3. Any removal of cultural heritage is conducted using the best available technique.<sup>31</sup>

# 1.7 Critical Cultural Heritage

Critical cultural heritage consists of one or both of the following types of cultural heritage: (i) the internationally recognized heritage of communities who use or have used within living memory the cultural heritage for long-standing cultural purposes; or (ii) legally protected cultural heritage areas, including those proposed by the Zimbabwe government for such designation.

IDBZ and project proponents will not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the client will use a process of Informed Consultation and Participation (ICP) of the Affected Communities as described in IFC Performance Standard 1 and which uses a good faith negotiation process

<sup>31</sup> PS8, *IFC Performance Standards on Environmental and Social Sustainability*, (2012), <u>www.ifc.org/performancestandards</u>, accessed June 29, 2018, p 2.

<sup>&</sup>lt;sup>30</sup> Nonreplicable cultural heritage may relate to the social, economic, cultural, environmental, and climatic conditions of past peoples, their evolving ecologies, adaptive strategies, and early forms of environmental management, where the (i) cultural heritage is unique or relatively unique for the period it represents, or (ii) cultural heritage is unique or relatively unique in linking several periods in the same site.

that results in a documented outcome. IDBZ or other project proponents will retain external experts to assist in the assessment and protection of critical cultural heritage.

Legally protected cultural heritage areas such as world heritage sites and nationally protected areas are important for the protection and conservation of cultural heritage, and additional measures are needed for any projects that would be permitted under the applicable Zimbabwean law in these areas. In circumstances where a proposed project is located within a legally protected area or a legally defined buffer zone, IDBZ/project proponent, in addition to the requirements for critical cultural heritage cited above, will meet the following requirements:

- Comply with defined Zimbabwe or local cultural heritage regulations or the protected area management plans;
- Consult the protected area sponsors and managers, local communities and other key stakeholders on the proposed project; and
- Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area.<sup>32</sup>

Where a project proposes to use the cultural heritage, including knowledge, innovations, or practices of local communities for commercial purposes<sup>33</sup>, IDBZ/project proponent will inform these communities of (i) their rights under national law; (ii) the scope and nature of the proposed commercial development; and (iii) the potential consequences of such development. Such commercialization will not proceed with unless it (i) enters a process of ICP as described in Performance Standard 1 and which uses a good faith negotiation process that results in a documented outcome and (ii) provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with their customs and traditions.<sup>34</sup>

<sup>34</sup> PS8, *IFC Performance Standards on Environmental and Social Sustainability* (2012), <u>www.ifc.org/performancestandards</u>, accessed June 29, 2018, p 4.

<sup>&</sup>lt;sup>32</sup> PS8, *IFC Performance Standards on Environmental and Social Sustainability* (2012), <a href="www.ifc.org/performancestandards">www.ifc.org/performancestandards</a>, accessed June 29, 2018, p 3.

<sup>33</sup> Examples include, but are not limited to, commercialization of traditional medicinal knowledge or other sacred or traditional technique for processing plants, fibers, or metals.

#### **Appendix G: Legal Framework and Other Compliance Requirements**

#### 1.0 Introduction

Considering the fact that IDBZ works in a wide range of sectors, this Framework Legal and Other Compliance requirements would need to be adapted at a project specific level and a project specific legal and other compliance requirement register developed in line with the Environmental and Social aspect and impact assessment. Listed below are some of the applicable legal and policy requirements for IDBZ;

## 2.0 International Financing Corporation (IFC) Performance Standards (PS) on Environmental and Social Sustainability

IFC's Sustainability Framework articulates its strategic commitment to sustainable development and is an integral part of IFC's approach to risk management. The Performance Standards are directed towards clients, providing guidance on how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way. IFC requires its clients to apply the Performance Standards to manage environmental and social risks and impacts so that development opportunities are enhanced. The Performance Standards are applicable to the IDBZ operations because it is accredited to the Green Climate Fund (GCF) which compel all accredited institutions to comply with the performance standards.

IDBZ shall meet the eight Performance Standards throughout the life of an investment.

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labor and Working Conditions
- Performance Standard 3: Resource Efficiency and Pollution Prevention
- Performance Standard 4: Community Health, Safety, and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Performance Standard 7: Indigenous Peoples
- Performance Standard 8: Cultural Heritage

#### i. Performance Standard 1. Assessment and Management of Environmental and Social Risks and Impacts

Performance Standard 1 underscores the importance of managing environmental and social performance throughout the life of a project. An effective, dynamic and continuous Environmental and Social Sustainability Management System ('ESSMS'), initiated and supported by management is a requirement. Drawing on the elements of the established business management process of "plan, do, check, and act," the ESSMS should methodologically managing environmental and social risks and impacts in a structured way on an ongoing basis. The ESSMS appropriate to the nature and scale of the project should promote sound and sustainable environmental and social performance, and can lead to improved financial, social, and environmental outcomes.

#### The objectives of the standard are:

- To identify and evaluate environmental and social risks and impacts of a project
- To adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize, and, where residual impacts remain, compensate/offset for risks and impacts to workers, Affected Communities, and the environment
- To promote improved environmental and social performance of clients through the effective use of management systems
- To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately
- To promote and provide means for adequate engagement with Affected Communities throughout the project cycle to ensure:
  - Issues that could potentially affect them are always known
  - Relevant environmental and social information is disclosed and disseminated to the Affected Communities

In line with this standard, IDBZ is committed to the full implementation of the Environment and Social Sustainability Policy, the resultant Environment and Social Management System and all its elements, including the provisions of the

Environment and Social Planning Framework and its outputs, including and not limited to the ESIAs for the respective projects under consideration. More detailed focus on this performance standard will be made at project basis and managed through the global ESSMS. The general standard for the ESIA and ESMP are in Appendix C.

#### ii. Performance Standard 2. Labor and Working Conditions

Performance Standard 2 recognizes that the pursuit of economic growth through employment creation and income generation should be accompanied by protection of the fundamental rights of workers. For any business, the workforce is a valuable asset, and a sound worker- management relationship is a key ingredient in the sustainability of a company. Failure to establish and foster a sound worker-management relationship can undermine worker commitment and retention and can jeopardize a project. Conversely, through a constructive worker-management relationship, and by treating the workers fairly and providing them with safe and healthy working conditions, clients may create tangible benefits, such as enhancement of the efficiency and productivity of their operations. The requirements set out in this Performance Standard have been in part guided by several international conventions and instruments, including those of the International Labor Organization ('ILO') and the United Nations ('UN').

The objectives of the standard are:

- To promote the fair treatment, non-discrimination, and equal opportunity of workers
- To establish, maintain, and improve the worker-management relationship
- To promote compliance with national employment and labor laws
- To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain
- To promote safe and healthy working conditions, and the health of workers
- To avoid the use of forced labor

IDBZ complies with this standard through adherence to the national labour legislation and implementation of its Human Resources Policy.. In this respect, IDBZ has a Works Council Forum which is composed of an equal number of representatives of the employer and representatives drawn from members of a

workers committee to ensure fair and equitable treatment of the employees in all aspects of their work including and not limited to collective bargaining and employees' welfare.

IDBZ and project implementing entities will adopt and implement human resources policies and procedures appropriate to its size and workforce that set out its approach to managing workers consistent with the requirements of IFC Performance Standard 2 and Zimbabwean law ensuring (among other measures): non-discrimination (including for gender), equal opportunity (including for gender) and a grievance mechanism.

- 1. Project implementers and IDBZ will provide workers with documented information that is clear and understandable, regarding their rights under national labour and employment law and any applicable collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits upon beginning the working relationship and when any material changes occur.
- 2. IDBZ and project promoters will comply with national law on workers' rights to form and to join workers' organizations of their choosing without interference and to bargain collectively. IDBZ and project promoters will not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment nor will they seek to influence or control these mechanisms.
- 3. IDBZ and project implementers will provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The Bank and project implementers will inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them. The mechanism involves an appropriate level of management and addresses concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism allows for anonymous complaints to be raised and addressed. The mechanism does not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

- 4. No project implementers will employ children in any manner that is economically exploitative or is likely to be hazardous 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. IDBZ and project implementers will identify the presence of all persons under the age of 18 and ensure that they are not engaged without their consent.
- 5. IDBZ and project promoters will not employ forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labour, such as indentured labour, bonded labour, or similar labour-contracting arrangements. IDBZ and project promoters will not employ trafficked persons.
- 6. IDBZ and project promoters will (i) identify potential hazards to workers, particularly those that may be life-threatening; (ii) provide preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (iii) document and report occupational accidents, diseases, and incidents; and (v) make emergency prevention, preparedness, and response arrangements.
- 7. IDBZ and project promoters will identify risks of child or forced labour in the primary supply chain if there is a high risk of such phenomena. If child labour or forced labour cases are identified, IDBZ and project promoters will take appropriate steps to remedy them. IDBZ and project promoters will monitor their primary supply chains on an ongoing basis in order to identify any significant changes and if new risks or incidents of child and/or forced labour are identified, the client will take appropriate steps to remedy them.
- 8. Additionally, where there is a high risk of significant safety issues related to supply chain workers, IDBZ and/or project promoters will introduce procedures and mitigation measures to ensure that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations.
- 9. The ability of IDBZ and project promoters to fully address these risks will depend upon their levels of management control or

influence over their primary suppliers. Where remedy is not possible, IDBZ and project promoters will shift the project's primary supply chain over time to suppliers that can demonstrate that they are complying with IFC Performance Standard 2.

#### iii. Performance Standard 3. Resource Efficiency and Pollution Prevention

Performance Standard 3 recognizes that increased economic activity and urbanization often generate increased levels of pollution to air, water, and land, and consume finite resources in a manner that may threaten people and the environment at the local, regional, and global levels. There is also a growing global consensus that the current and projected atmospheric concentration of greenhouse gases ('GHG') threatens the public health and welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention, GHG emission avoidance and mitigation technologies and practices have become more accessible and achievable in virtually all parts of the world. This Performance Standard outlines a project-level approach to resource efficiency and pollution prevention and control in line with internationally disseminated technologies and practices. In addition, this Performance Standard promotes the ability of private sector companies to adopt such technologies and practices as far as their use is feasible in the context of a project that relies on commercially available skills and resources.

The objectives of the standard are:

- To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities
- To promote more sustainable use of resources, including energy and water
- To reduce project-related GHG emissions

IDBZ's infrastructure development operations are subject to related local legislation that aims to prevent environmental pollution and degradation. The local legislation includes and not limited to the Environmental Management Act and its related regulations as highlighted further in the respective local legislation reviews. Where appropriate, IDBZ will be issued with water abstraction permits, energy consumption billing and environmental licenses as part of the regulatory requirements that link with this Performance Standard.

#### iv. Performance Standard 4. Community Health, Safety and Security

Performance Standard 4 recognizes that project activities, equipment, and

infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration and/or intensification of impacts due to project activities. While acknowledging the public authorities' role in promoting the health, safety, and security of the public, this Performance Standard addresses the client's responsibility to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project related-activities, with particular attention to vulnerable groups. In conflict and post-conflict areas, the level of risks and impacts described in this Performance Standard may be greater. The risks that a project could exacerbate an already sensitive local situation and stress scarce local resources should not be overlooked as it may lead to further conflict.

The objectives of the standard are:

- To anticipate and avoid adverse impacts on the health and safety of the Affected Community during the project life from both routine and non-routine circumstances.
- To ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the Affected Communities.

IDBZ has a specific department (Safety, Health and Environment) within the Compliance Department that deals with community safety and health issues on an ongoing basis and during project specific times. This department liaises with the communities in the project planning, implementation and review. Health and safety issues are taken care of by the Health and Safety Officers during both the construction and operation phases. These officers are directly in charge of educating staff and the general public on related safety and health issues through appropriate communication mediums. Community Safety and Health is also administered at project levels through the use of signage, road shows and reflective liners on barricading at project specific sites.

#### v. Performance Standard 5. Land Acquisition and Involuntary Resettlement

Performance Standard 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) as a result of project-related land acquisition and/or restrictions on land use.

Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement. This occurs in cases of:

- (i) Lawful expropriation or temporary or permanent restrictions on land use
- (ii) Negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail.

Unless properly managed, involuntary resettlement may result in long-term hardship and impoverishment for the affected communities and project affected persons, as well as environmental damage and adverse socio-economic impacts in areas to which they have been displaced. For these reasons, involuntary resettlement should be avoided. However, where involuntary resettlement is unavoidable, it should be minimized and appropriate measures to mitigate adverse impacts on displaced persons and host communities should be carefully planned and implemented. The government often plays a central role in the land acquisition and resettlement process, including the determination of compensation, and is therefore an important third party in many situations. Experience demonstrates that the direct involvement of the client in resettlement activities can result in more cost-effective, efficient, and timely implementation of those activities, as well as in the introduction of innovative approaches to improving the livelihoods of those affected by resettlement.

To help avoid expropriation and eliminate the need to use governmental authority to enforce relocation, clients are encouraged to use negotiated settlements meeting the requirements of this Performance Standard, even if they have the legal means to acquire land without the seller's consent.

The objectives of the standard are:

- To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs
- To avoid forced eviction
- To anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use by:
  - i. Providing compensation for loss of assets at replacement cost
- ii. Ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.
- To improve, or restore, the livelihoods and standards of living of displaced

persons and

• To improve living conditions among physically displaced persons through the provision of adequate housing with security of tenures at resettlement sites.

IDBZ complies with this performance standard through a project specific Resettlement Action Plan (RAP) and projects will not commence until the RAP has been fully implemented and audited by a responsible regulatory body including and not limited to the Environment Management Agency, District Administrator, Local Authority and Project Affected Peoples (PAPs) representatives. The general standard for a RAP is in Appendix D

#### vi. Performance Standard 6. Biodiversity Conservation and Sustainable Management of Living Natural Resources

Performance Standard 6 recognizes that protecting and conserving biodiversity, maintaining ecosystem services and sustainably managing living natural resources are fundamental to sustainable development. The requirements set out in this Performance Standard have been guided by the Convention on Biological Diversity, which defines biodiversity as "the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems." Ecosystem services are the benefits that people, including businesses, derive from ecosystems. Ecosystem services are organized into four types namely:

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

Ecosystem services valued by humans are often underpinned by biodiversity. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services.

This Performance Standard addresses how clients can sustainably manage and mitigate impacts on biodiversity and ecosystem services throughout the project's

#### lifecycle.

The objectives of the standard are:

- To protect and conserve biodiversity
- To maintain the benefits from ecosystem services
- To promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities.

IDBZ complies with this performance standard at project levels through detailed ecological assessment conducted and implemented as part of the ESIA process. During the ESIA formulation and implementation, liaison with the Forestry Departments and the National Parks and Wildlife Management Authority will be maintained throughout the project life as a means to ensure IDBZ gets guidance from other biodiversity related organizations in Zimbabwe.

#### vii. Performance Standard 7 Indigenous Peoples

Performance Standard 7 recognizes that Indigenous Peoples, as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and vulnerable segments of the population. In many cases, their economic, social, and legal status limits their capacity to defend their rights to, and interests in, lands and natural and cultural resources, and may restrict their ability to participate in and benefit from development. Indigenous Peoples are particularly vulnerable if their lands and resources are transformed, encroached upon, or significantly degraded. Their languages, cultures, religions, spiritual beliefs, and institutions may also come under threat. As a consequence, Indigenous Peoples may be more vulnerable to the adverse impacts associated with project development than non-indigenous communities. This vulnerability may include loss of identity, culture, and natural resource-based livelihoods, as well as exposure to impoverishment and diseases.

Private sector projects can create opportunities for Indigenous Peoples to participate in, and benefit from project-related activities that may help them fulfil their aspiration for economic and social development. Furthermore, Indigenous Peoples may play a role in sustainable development by promoting and managing activities and enterprises as partners in development. Government often plays a central role in the management of Indigenous Peoples' issues, and clients should collaborate with the responsible authorities in managing the risks

and impacts of their activities.

The objectives of the standard are:

- To ensure that the development process fosters full respect for the human rights, dignity, aspirations, culture, and natural resource-based livelihoods of Indigenous Peoples
- To anticipate and avoid adverse impacts of projects on communities of Indigenous Peoples, or when avoidance is not possible, to minimize and/or compensate for such impacts
- To promote sustainable development benefits and opportunities for Indigenous Peoples in a culturally appropriate manner
- To establish and maintain an ongoing relationship based on Informed Consultation and Participation ('ICP') with the Indigenous Peoples affected by a project throughout the project's life-cycle
- To ensure the Free, Prior, and Informed Consent ('FPIC') of the Affected Communities of Indigenous Peoples when the circumstances described in this Performance Standard are present and
- To respect and preserve the culture, knowledge, and practices of Indigenous Peoples.

In Zimbabwe, the most common cluster of communities that qualify to be in the Indigenous People category include the Koi San community in Matabeleland North, bordering Botswana. IDBZ will comply with this performance standard through ensuring that all projects that are implemented in areas with the Indigenous Peoples, Indigenous Peoples Management Plan (IPMP) is formulated and implemented with the full participation of the PAPs as special component of the ESIA. General standard for the Indigenous People Management Plan is in appendix bb

#### viii. Performance Standard 8. Cultural Heritage

Performance Standard 8 recognizes the importance of cultural heritage for current and future generations. Consistent with the Convention Concerning the Protection of the World Cultural and Natural Heritage, this Performance Standard aims to ensure that clients protect cultural heritage in the course of their project activities. In addition, the requirements of this Performance Standard on a project's use of cultural heritage are based in part on standards set by the Convention on Biological Diversity.

The objectives of the standard are:

- To protect cultural heritage from the adverse impacts of project activities and support its preservation
- To promote the equitable sharing of benefits from the use of cultural heritage

In Zimbabwe, some physical cultural resources include graves, cultural shrines, monuments other artefacts. In line with the requirements of the performance standard and based on the project screening results, the National Museums and Monuments of Zimbabwe ('NMMZ') and environmental and social baseline, an Archaeological Impact Assessment ('AIA') will be conducted in accordance with the National Museums and Monuments of Zimbabwe as part of the ESIA to ensure that all the physical cultural resources within the project area are identified, assessed and measures implemented to protect and preserve them. The NMMZ will review the AIA as part of the EMA review to ensure integrity in the AIA. Where the screening results indicate no need for a full AIA, a Chance Finds Procedure will always be part of the ESIA. The Chance Finds Procedure is in Appendix E.

#### 3.0 International Environmental Conventions

#### a. United Nations Framework Convention on Climate Change (UNFCCC)

The Convention encourages parties to promote the sustainable management and conservation of carbon sinks and reservoirs of greenhouse gases i.e. biomass, forests as well as terrestrial ecosystems which are important in the absorption of greenhouse gases. The Convention actively promotes the use of renewable energy. The UNFCCC objective is to "stabilize greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system". The framework sets non-binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to specify further action towards the objective of the UNFCCC.

#### i. Intended Nationally Determined Contributions

At the 19th session of the Conference of the Parties in Warsaw in 2013, the UNFCCC created a mechanism for Intended Nationally Determined Contributions (INDCs) to be submitted in the run up to the 21st session of the Conference of the Parties in Paris (COP21) in 2015. Countries were given freedom and flexibility to ensure these climate change mitigation and adaptation plans were nationally appropriate; this flexibility, especially regarding the types

of actions to be undertook, allowed for developing countries to tailor their plans to their specific adaptation and mitigation needs, as well as towards other needs. In the aftermath of COP21, these INDCs became Nationally Determined Contributions (NDCs) when a country ratified the Paris Agreement, unless a new NDC was submitted to the UNFCCC at the same time. The 22nd session of the Conference of the Parties (COP22) in Marrakesh focused on these Nationally Determined Contributions and their implementation, after the Paris Agreement entered into force on 4 November 2016. The Climate and Development Knowledge Network (CDKN) created a guide for NDC implementation, for the use of decision makers in Less Developed Countries. In this guide, CDKN identified a series of common challenges countries face in NDC implementation, including how to:

- build awareness of the need for, and benefits of, action among stakeholders, including key government ministries
- mainstream and integrate climate change into national planning and development processes
- strengthen the links between subnational and national government plans on climate change
- build capacity to analyse, develop and implement climate policy
- establish a mandate for coordinating actions around NDCs and driving their implementation
- address resource constraints for developing and implementing climate change policy

Zimbabwe signed the Paris Agreement on the 22nd of April 2016 and pledged commitment to formally consent to the treaty. Therefore, Zimbabwe submitted its Intended Nationally Determined Contribution (INDC) towards reducing gas emissions to the UNFCCC in 2015. Zimbabwe aims to reduce its greenhouse gas emissions by 33% below the projected business as usual energy emissions per capita by 2020. To ensure compliance, Zimbabwe established a High-Level Committee, to be chaired by the Office of the President and it will ensure the coordinated implementation and monitoring of the NDCs. The Ministry of Environment, Water and Climate is responsible for the development, implementation and monitoring of issues on climate change and legislation for sustainable development. The Ministry also coordinates and mainstream ratified environmental multilateral and agreements into our national laws. IDBZ will liaise with the Ministry of Environment, Water and Climate in all its Climate Change related endeavours and contribute to the national objectives on Climate

Change. In line with this initiative, IDBZ will deliberately mainstream Climate Change adaptation and mitigation in all its projects designs, technology selection and implementation.

#### **b.** Other International Conventions

In line with the International Law and its binding requirements on the national laws and IDBZ operations, IDBZ will also uphold the provisions of the following International Conventions;

#### i. United Nations Convention on Desertification ('UNCD')

This Convention aims at fostering international co-operation and national and regional initiatives towards combating desertification and mitigating the impacts of drought, particularly in Africa. The Convention's regional implementation annex for Africa emphasizes the need for African countries to focus on improving the economic environment with a view to eradicating poverty, developing measures to conserve natural resources and monitoring and assessing the effects of droughts.

## ii. The Stockholm Convention on Persistent Organic Pollutants ('POPs')

POPs pose major and increasing threats to human health and the environment. Among the POPs that are earmarked for phasing out include Poly Chlorinated Biphenyls ('PCBs') which are still widely used in transformer oils and refrigerants. There is need to bear in mind that according to the Stockholm Convention, PCBs should be phased out by 2025 while SADC took a position to phase them out by 2015.

- iii. Minamata Convention
- iv. Ramsar Convention
- v. Convention on International Trade on Endangered Species (CITIES)
- vi. Basel and Bamako convention
- vii. Occupational Health and Safety Convention
- viii. Geneva Convention
- ix. Convention on Biodiversity
- x. ESPOO Convention

#### 4.0 National Environmental Legislation and Policies

This section reviews the national legislation and policies that are potentially applicable to the sustainable formulation, implementation and monitoring of IDBZ projects.

#### i. National Environmental Policy and Strategies (2009)

The vision of the National Environmental Policy of Zimbabwe is to alleviate poverty and improve quality of life of the people of Zimbabwe. The goal of this policy is to avoid irreversible environmental damage, maintain essential environmental processes and preserve the broad spectrum of biological diversity so as to sustain the long-term ability of natural resources to meet the basic needs of people, enhance food security, reduce poverty, and improve the standard of living of Zimbabweans through long term economic growth and creation of employment. Some of the specific objectives of the policy include enhancing sustainable development by optimizing the use of resources and energy, and minimizing irreversible environmental damage, waste production and pollution through incorporating provisions for environmental assessments and management in all economic development activities.

In the implementation of its projects, IDBZ will reflect on the principle of the policy and ensure there is consistency between the project facets and the national environmental policy and strategies.

#### ii. Environmental Impact Assessment Policy (1997)

This is the policy framework guiding the undertaking of ESIA studies in Zimbabwe. It is premised on the following key issues:

- Encouraging environmentally responsible investment and development in Zimbabwe
- Maintaining the long-term ability of natural resources to support human, plant and animal life
- Avoiding irreversible environmental damage and minimizing such environmental damage where it cannot be avoided
- Conserving a broad diversity of plants, animals and ecosystems and the natural processes that they depend upon
- Conserving the social, historical and cultural values of people and their communities
- Meeting the basic needs of people affected or likely to be affected by a development proposal, including food, water, shelter; health and sanitation.

#### iii. Environmental Management Act [Chapter 20:27]

The main legislation governing environmental management is the Environmental Management Act [Chapter 20:27] which was enacted in 2003.

The Act is operationalized by the following statutory instruments

## a. Environmental Management (Effluent and Solid Waste Disposal) Regulations, [SI 6:2007].

This statutory instrument illuminates sections (60-62, 69-70) of the Environment Management Act [CAP 20:27]. It sets minimum requirements for the granting of an effluent and solid waste disposal license as well as the conditions for the validity of the license. It provides for the categorization of waste into four classes depending on quality and outlines requirements for licensing of disposal. Part V, section 17, subsection (1)-(3) states that every authority operating or proposing to operate a waste collection, relocate or alter any premises for the purpose of a waste management should apply for a waste management license from EMA.

# b. Environmental Management (Environmental Impact Assessment and Ecosystems Protection) Regulations [SI 7: 2007].

These regulations are premised on Sections (97 to 104) of the EMA. It sets procedures for conducting ESIAs, the registration of persons engaged in ESIA consultation and the conditions for the awarding, amendment, suspension or cancellation of an ESIA certificate. The regulations also stipulate specific conditions for abstraction of sand and dealing with other sensitive ecosystems like wetlands.

# c. Environmental Management (Hazardous Substances, Pesticides and Other Toxic Substances) Regulations, (SI 12: 2007) and Hazardous Waste Regulations (SI 10 of 2007).

The hazardous substances regulations provide for the classification of hazardous substances and the procedure for licensing of the storage, use and/or transportation of hazardous substances, pesticides and other toxic substances. The hazardous waste regulations provide for the classification and issuance for hazardous waste disposal licenses.

## d. Environmental Management (Atmospheric Pollution Control) Regulations (S.I 72 of 2009).

This set of regulations pertains to air pollution management and calls for the registration of all stake emissions, industrial generators and servicing of vehicles. It sets the minimum standards for such emissions.

# e. Environmental and Natural Resources Management (ESIA & Ecology Protection) (Amendment) Regulations. (S.I 3 of 2011).

This amendment of S.I 7 of 2007 has section 3 (1) illustrating that no person shall excavate, remove, possess, transport or license the removal of clay or sand deposits in excess of one tonne or for commercial purposes without a license issued by Environment Management Agency (EMA). Also, sand removal from undesignated site or point is not allowed without the license.

#### 5.0 Other National Legislation Potentially applicable to IDBZ projects

- i. National Social Security Authority SI 68 of 1990 (Accident Prevention and Worker's Compensation Scheme). This Act regulates occupational safety and health. In line with this Act, IDBZ will need to uphold descent occupational safety and health standards, including and not limited to accident preventions, use of personal protective equipment, accident investigation and reporting, work nutrition, water and sanitation requirements at construction sites. The Act also provides for compensation and pension schemes for employees in case of work-related injuries and retirement respectively.
- ii. Regional, Town and Country Planning Act [Cap: 29; 12] and Rural District Councils Act [Chapter 29:13]. In line with this Act all IDBZ infrastructural developments should be approved by the planning departments of the local authorities and the Act gives the local authorities powers to deal with environmental issues within their areas of jurisdiction. The infrastructure should be inspected and pass minimum technical requirements.
- iii. Public Health Act [Chapter 15:09]. The Act provides for minimum requirements for avoiding a nuisance at workplaces including waste management, water and sewerage provisions. IDBZ construction site will need to provide safe water and sanitation at all worksites.

- iv. Forestry Act [Chapter 19:05 Revised 1996]. The Act provides for protection of forests and IDBZ needs to seek Forestry Commission's clearance for projects that include destruction of forests and habitat.
- v. Road Act [Chapter 13:12].
- vi. Road Traffic Construction, Equipment and Use, Axel Regulation. The Act provides for safe usage of the road and IDBZ logisticians need to observe the maximum permissible tonnage that can be transported by road.
- vii. Labor Relations Act [Chapter 28:01] Revised Edition 1996 and Labor Relations (General) Regulations, 1985. These two provide for the employee rights to negotiate with the employers through works council and also subscribe to the related workers union of the choice.
- viii. Water Act [Chapter 15:09]. The Act regulates access to and management of both ground water and surface water. IDBZ needs to liaise with ZINWA whenever there is a project that involves abstraction of water.
  - ix. Parks and Wildlife Act [Chapter 20:14]. For projects that has a bearing on wildlife management, IDBZ needs to seek clearance and guidance of the Wild Life Management Authority of Zimbabwe.
  - x. Electricity Act [Chapter 13:19]. Projects that require connection to main electricity grid needs IDBZ collaboration with ZESA.
  - xi. National Museums and Monuments of Zimbabwe Act [Chapter 25:11]. In all projects that has potential to affect cultural heritage and artefacts IDBZ will need collaboration with the NMMZ and the ESIA has to reflect consultation with the NMMZ.
- xii. Money Laundering and Proceeds of Crime Act [Chapter 9:24]. As part of the risk assessment process of new projects, money laundering and terrorist finance risk assessments should be included to comply with the Act.

#### 5.1 Link with the environment and social sustainability planning

The policies and legislation discussed above form the basis of legal and other compliance requirements that will be presented as one of the key objectives of the environment and social management plan of every project ESIA or ESMP.

#### **Appendix H: Grievance Redress Mechanism**

Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the levels of risks and adverse impacts of the project and have Affected Communities as its primary user. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism during the stakeholder engagement process.

In addition, when a project involves specifically identified physical elements, aspects and facilities that are likely to generate adverse environmental and social impacts on Affected Communities, IDBZ will establish a procedure at the project level that is readily accessible to those communities, and that allows for receiving, addressing, and recording/documenting complaints and communications from external stakeholders for own projects and also requires such a procedure from borrowers/investees when there are physical impacts on a community. Confidentiality of the persons raising the complaint must be protected. The procedure will be easily accessible, understandable and its availability communicated to Affected Communities. In some cases, IDBZ may wish to seek solutions to complaints in a collaborative manner with the involvement of the Affected Communities. If the project is unable to solve a complaint, it may be appropriate to enable complainants to have recourse to external experts or neutral parties. IDBZ is aware of judicial and administrative mechanisms available in the country for resolution of disputes as outlined earlier in this Manual and will not impede access to these mechanisms. Communications and grievances received and responses provided will be documented (such as the name of the individual or organization; the date and nature of the complaint; any follow up actions taken; the final decision on the complaint; how and when a relevant project decision was communicated to the complainant; and whether management action has been taken to avoid recurrence of stakeholder concerns in the future), and reported back to the Affected Communities periodically (while protecting the anonymity of complainants).

In addition to the requirements in Performance Standard 1, specific requirements for grievance mechanisms can be found in Performance Standards 2, 4, 5, and 7. For additional guidance on grievance mechanisms, see IFC's publications: Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (IFC, 2007) and Addressing Grievances from Project-Affected Communities (IFC, 2009). Also see A Guide to Designing and Implementing Grievance Mechanisms for Development Projects (CAO, 2008).

In the case of large projects with potentially complex issues, a robust grievance mechanism should be established and maintained from the beginning of the assessment process onwards. This mechanism should be communicated to Affected Communities and designed in a way that is appropriate for them, easy to understand and adapted to the communications challenge they may face (e.g., language, literacy levels, level of access to technology). Complaints should be investigated to determine appropriate response and course of action. The responsibility for receiving and responding to grievances should be handled by experienced and qualified personnel within the client organization, separate from the personnel in charge of management of the business activities. In addition, suggestion boxes and periodic community meetings and other communication methods to receive feedback may be helpful. The grievance mechanism should be an integral part of the project's ESSMS. In some cases, due to project-specific circumstances, IDBZ or a borrower/investee may need to involve an independent third party as part of its grievance redress process.

#### **Ongoing Reporting to Affected Communities**

IDBZ or borrower/investee will provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. If the management program results in material changes in or additions to the mitigation measures or actions described in the Action Plans on issues of concern to the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.

External financiers, such as GCF, may also have complaints mechanisms that are available to communities affected by projects they have financed.<sup>35</sup>

For additional guidance on grievance mechanisms, see IFC's publications: Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (IFC, 2007) and Addressing Grievances from Project-Affected Communities (IFC, 2009). Also see A Guide to Designing and Implementing Grievance Mechanisms for Development Projects (CAO, 2008).

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<sup>&</sup>lt;sup>35</sup> IFC, Guidance Note 1 Assessment and Management of Environmental and Social Risks and Impacts (2012), p 37.

#### **Appendix I: Emergency Preparedness and Response**

When IDBZ finances operations involving activities and facilities that are likely to generate impacts, Performance Standard 1 requires it to establish and maintain an emergency preparedness and response system to respond to accidental and emergency situations.

This means that IDBZ will ensure that the necessary emergency preparedness and response plans are in place within its premises to protect the health and safety of its employees as well as that of visitors. The system will identify responsibilities and procedures for communicating different types of emergencies (e.g., fire, earthquake or robbery) to the appropriate authorities and for safe evacuation. The plans also include specific training and practice requirements (i.e., simulations and drills). Indeed, IDBZ is currently developing its Disaster Recovery and Business Continuity Plan.

For borrowers/investee operations areas where accidents and emergency situations may occur and communities and individuals that may be impacted will be identified, response procedures, provision of equipment and resources, designation of responsibilities, communication, including that with potentially Affected Communities and periodic training to ensure effective response will be established and take place.

Buildings that are owned or rented/leased by IDBZ that are accessible to the public will be designed, constructed, and operated in full compliance with local building codes, local fire department regulations, local legal/insurance requirements, and in accordance with internationally accepted life and fire safety standards.<sup>36</sup>

The emergency preparedness and response activities will be periodically reviewed and revised, as necessary, to reflect changing conditions.

Where applicable, IDBZ and/or borrowers/investees will also assist and collaborate with the potentially Affected Communities (see Performance Standard 4) and the local government agencies in their preparations to respond effectively to emergency situations, especially when their participation and collaboration are necessary to ensure effective response. If local government

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<sup>&</sup>lt;sup>36</sup> IFC, Interpretation Note on Financial Intermediaries (2012), p 10.

agencies have little or no capacity to respond effectively, IDBZ and/or borrowers/investees will play an active role in preparing for and responding to emergencies associated with the project. IDBZ and/or borrowers/investees will document their emergency preparedness and response activities, resources, and responsibilities, and will provide appropriate information to potentially Affected Community and relevant government agencies.<sup>37</sup>

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<sup>&</sup>lt;sup>37</sup> PS1, *IFC Performance Standards on Environmental and Social Sustainability*, (2012), <u>www.ifc.org/performancestandards</u>, accessed June 29, 2018, p 6.

#### **Appendix J: Biodiversity Arrangements**

As a matter of priority and in accordance with Performance Standard 6, IDBZ will seek to avoid impacts on biodiversity and ecosystem services. When avoidance of impacts is not possible, measures to minimize impacts and restore biodiversity and ecosystem services will be implemented. Given the complexity in predicting project impacts on biodiversity and ecosystem services over the long term, IDBZ/borrowers/investees will adopt a practice of adaptive management in which the implementation of mitigation and management measures are responsive to changing conditions and the results of monitoring throughout a project's lifecycle.

#### Natural Habitats

When a project will impact natural habitats<sup>38</sup>, IDBZ/borrowers/investees (whichever is most appropriate) will retain competent professionals to assist in conducting the risks and impacts identification process.

IDBZ/borrowers/investees will not significantly convert or degrade<sup>39</sup> natural habitats, unless all the following are demonstrated:

- No other viable alternatives within the region exist for development of the project on modified habitat;
- Consultation has established the views of stakeholders, including Affected Communities, with respect to the extent of conversion and degradation;<sup>40</sup> and
- Any conversion or degradation is mitigated according to the mitigation hierarchy.

In areas of natural habitat, mitigation measures will be designed to achieve no net loss<sup>41</sup> of biodiversity where feasible. Appropriate actions include:

<sup>&</sup>lt;sup>38</sup> Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition.

<sup>&</sup>lt;sup>39</sup> Significant conversion or degradation is (i) the elimination or severe diminution of the integrity of a habitat caused by a major and/or long-term change in land or water use; or (ii) a modification that substantially minimizes the habitat's ability to maintain viable populations of its native species.

 $<sup>^{40}</sup>$  Conducted as part of the stakeholder engagement and consultation process, as described in Performance Standard 1.

<sup>&</sup>lt;sup>41</sup> No net loss is defined as the point at which project-related impacts on biodiversity are balanced by measures taken to avoid and minimize the project's impacts, to undertake on-site restoration and finally to offset significant residual impacts, if any, on an appropriate geographic scale (e.g., local, landscape-level, national, regional).

- Avoiding impacts on biodiversity through the identification and protection of set-asides;<sup>42</sup>
- Implementing measures to minimize habitat fragmentation, such as biological corridors;
- Restoring habitats during operations and/or after operations; and
- Implementing biodiversity offsets<sup>43</sup>.

#### **Critical Habitats**

When critical habitats<sup>44</sup> are impacted, IDBZ/borrowers/investees (whichever is most appropriate) will retain external experts with appropriate regional experience to assist in the development of a mitigation hierarchy that complies with Performance Standard 6 and to verify the implementation of those measures." Endangered and critically endangered species are those listed on the International Union for the Conservation of Nature (IUCN) Red List of Threatened Species. The determination of critical habitat based on other listings is as follows: (i) If the species is listed nationally / regionally as critically endangered or endangered, in countries that have adhered to IUCN guidance, the critical habitat determination will be made on a project by project basis in consultation with competent professionals; and (ii) in instances where nationally or regionally listed species' categorizations do not correspond well to those of the IUCN (e.g., some countries more generally list species as "protected" or "restricted"), an assessment will be conducted to determine the rationale and purpose of the listing. In this case, the critical habitat determination will be based on such an assessment.

In areas of critical habitat, the client will not implement any project activities unless all the following are demonstrated:

• No other viable alternatives within the region exist for development of the project on modified or natural habitats that are not critical;

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<sup>&</sup>lt;sup>42</sup> Set-asides are land areas within the project site, or areas over which the client has management control, that are excluded from development and are targeted for the implementation of conservation enhancement measures. Set-asides will likely contain significant biodiversity values and/or provide ecosystem services of significance at the local, national and/or regional level. Set-asides should be defined using internationally recognized approaches or methodologies (e.g., High Conservation Value, systematic conservation planning).

<sup>&</sup>lt;sup>43</sup> Biodiversity offsets are measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts arising from project development and persisting after appropriate avoidance, minimization and restoration measures have been taken.

<sup>44</sup> Critical habitats are areas with high biodiversity value, including (i) habitat of significant importance to Critically Endangered and/or Endangered11 species; (ii) habitat of significant importance to endemic and/or restricted-range species; (iii) habitat supporting globally significant concentrations of migratory species and/or congregatory species; (iv) highly threatened and/or unique ecosystems; and/or (v) areas associated with key evolutionary processes.

- The project does not lead to measurable adverse impacts on those biodiversity values for which the critical habitat was designated, and on the ecological processes supporting those biodiversity values;<sup>45</sup>
- The project does not lead to a net reduction in the global and/or national/regional population<sup>46</sup> of any Critically Endangered or Endangered species over a reasonable period;<sup>47</sup> and
- A robust, appropriately designed, and long-term biodiversity monitoring and evaluation program is integrated into the client's management program.

In such cases where IDBZ/borrower/investee can meet the requirements defined of paragraph 17 in Performance Standard 6, the project's mitigation strategy will be described in a Biodiversity Action Plan and will be designed to achieve net gains<sup>48</sup> of those biodiversity values for which the critical habitat was designated.

In instances where biodiversity offsets are proposed as part of the mitigation strategy, IDBZ/borrower/investees will demonstrate through an assessment that the project's significant residual impacts on biodiversity will be adequately mitigated to meet the requirements of paragraph 17 in Performance Standard 6.

#### Legally Protected and Internationally Recognized Areas

In circumstances where a proposed project is located within a legally protected area<sup>49</sup> or an internationally recognized area,<sup>50</sup> the client will meet the requirements of paragraphs 13 through 19 of Performance Standard 6, as applicable. In addition, IDBZ/borrower/investee will:

<sup>46</sup> Net reduction is a singular or cumulative loss of individuals that impacts on the species' ability to persist at the global and/or regional/national scales for many generations or over a long period of time. The scale (i.e., global and/or regional/national) of the potential net reduction is determined based on the species' listing on either the (global) IUCN Red List and/or on regional/national lists. For species listed on both the (global) IUCN Red List and the national/regional lists, the net reduction will be based on the national/regional population.

<sup>47</sup> The timeforms to demonstrate "no net reduction" of Critically Endangered and Endangered species will be determined on a case by case

<sup>&</sup>lt;sup>45</sup> Biodiversity values and their supporting ecological processes will be determined on an ecologically relevant scale.

<sup>&</sup>lt;sup>47</sup> The timeframe to demonstrate "no net reduction" of Critically Endangered and Endangered species will be determined on a case-by-case basis in consultation with external experts.

<sup>&</sup>lt;sup>48</sup> Net gains are additional conservation outcomes that can be achieved for the biodiversity values for which the critical habitat was designated. Net gains may be achieved through the development of a biodiversity offset and/or, in instances where the client could meet the requirements of paragraph 17 of this Performance Standard without a biodiversity offset, the client should achieve net gains through the implementation of programs that could be implemented in situ (on-the-ground) to enhance habitat, and protect and conserve biodiversity.

<sup>&</sup>lt;sup>49</sup> Performance Standard 6 recognizes legally protected areas that meet the IUCN definition: "A clearly defined geographical space, recognized, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values." For the purposes of this Performance Standard, this includes areas proposed by governments for such designation.

<sup>&</sup>lt;sup>50</sup> Exclusively defined as UNESCO Natural World Heritage Sites, UNESCO Man and the Biosphere Reserves, Key Biodiversity Areas, and wetlands designated under the Convention on Wetlands of International Importance (the Ramsar Convention).

- Demonstrate that the proposed development in such areas is legally permitted;
- Act in a manner consistent with any government recognized management plans for such areas;
- Consult protected area sponsors and managers, Affected Communities, Indigenous Peoples and other stakeholders on the proposed project, as appropriate; and
- Implement additional programs, as appropriate, to promote and enhance the conservation aims and effective management of the area.<sup>5152</sup>

IDBZ/borrowers/investees will comply with guidance on Invasive Alien Species, ecosystem services and Supply Chain issues as well as others in Performance Standard 6.

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<sup>&</sup>lt;sup>51</sup> Implementing additional programs may not be necessary for projects that do not create a new footprint.

<sup>&</sup>lt;sup>52</sup> PS7, *IFC Performance Standards on Environmental and Social Sustainability* (2012), <u>www.ifc.org/performancestandards</u>, accessed July 9, 2018, p 5.

#### **Appendix K: Labour and Working Conditions Requirements**

The E&S risks associated with the internal operations of an FI like IDBZ are typically limited to managing aspects related to labour and working conditions of employees. PS 2 provisions will be applied to IDBZ and its FI investees/borrowers. IDBZ ensures the safety of employees and visitors within its premises in accordance with national law and the Labour and Working Conditions Requirements of the IFC Performance Standards. IDBZ commits to the fair treatment, non-discrimination and equal opportunity of employees and to maintain or improve employee-management relationships as documented in its HR Policy. In accordance with PS 2, these same rights are also extended to certain third-party (contracted) employees. IDBZ borrower/investees will also apply PS 2.

IDBZ (i) maintains good working conditions and employee relationships through the adoption and implementation of clear and transparent human resources policies and procedures as mentioned above; (ii) maintains reasonable conditions of employment (including non-discrimination); (iii) allows freedom of association among employees; (iv) manages a grievance process to learn about employees' concerns and suggestions; and (v) in cases when collective dismissal of employees is unavoidable, will develop a fair retrenchment plan.

#### 1.0 Human Resources Policies and Procedures

IDBZ's HR Policy documents its policies and procedures and states its approach for managing employees consistent with the requirements of Performance Standard 2 and national law.

The HR Policy is a live document which is readily available to staff through the Bank's intranet. Whenever there are new policies or updated policies they are uploaded on the intranet and staff are notified. New staff is oriented on the HR policy during induction. Currently the Bank is developing a staff rules handbook manual which summarizes all HR policies and procedures and each staff member will be allocated a physical copy.

All IDBZ employees have contract of employment letters which state employment conditions and refer to relevant policies, procedures and labour regulations. The HR and Procedures Manual reflects the current labour legislation.

The IDBZ's human resources policy addresses employees' rights to privacy. Staff have access to their employment records once they receive formal approval from the HR Division who is the custodian of such documents. The Constitution of Zimbabwe empowers staff to have access to their records whenever they want. The Bank will procure a Human Resources Management System which, when implemented, will allow staff to access some of their employment records whilst the other information will be upon request for access rights due to the nature of their confidentiality.

Bank employees are not generally under camera/surveillance and voice recording however in line with Banking standard practice, certain categories of staff e.g Banking and Exchange Control Division are under camera surveillance and voice recording for security reasons and they are fully informed and aware. The Bank premises has some areas under camera surveilence for security reasons e.g. parking area.

IDBZ does not tolerate any kind of harassment of its employees, including sexual harassment or mistreatment within the workplace. The human resources policy and procedures outlines the necessary measures for preventing this type of behavior and provides a mechanism for reporting and addressing inappropriate behavior.

#### 1.1 Working Conditions and Terms of Employment

IDBZ provides reasonable working conditions for all employees including conditions and terms of employment that, comply with national law and Performance Standard 2. In addition to salary, this includes a safe work environment free of discrimination or harassment; maximum working hours and payment for overtime work for applicable employees/job types; health insurance; pension; and leave time for holidays, illnesses/injuries, and maternity.

IDBZ will verify that any future collective bargaining agreements are in compliance with PS2 and provide conditions and terms of employment in line with these agreements. Where some employees are covered by collective bargaining agreements and others are not, the terms and conditions of employment as well as benefits of all employees in similar positions will be substantially aligned to achieve equity.

#### 1.2 Employees' Organizations

As was already mentioned under the description of PS2, IDBZ has the Works Council which is established in terms of the national law.

The functions of a works council shall be:

- (a) to focus the best interests of the establishment and employees on the best possible use of its human, capital, equipment and other resources, so that maximum productivity and optimum employment standards may be maintained; and
- (b) to foster, encourage and maintain good relations between the employer and employees at all levels, and to understand and seek solutions to their common problems; and
- (c) to promote the general and common interest, including the health, safety and welfare of both the establishment and its workers; and
- (d) in general, to promote and maintain the effective participation of employees in the establishment, and to secure the mutual co-operation and trust of employees, the employer and any registered trade union representing employees in the establishment, in the interests of industrial harmony.

#### 1.3 Non-Discrimination and Equal Opportunity

IDBZ does not make employment decisions on the basis of personal characteristics unrelated to job requirements therefore it applies the principles of equal opportunity and non-discrimination by basing all employment decisions (such as recruitment, hiring, working conditions, and terms of employment) on the ability of a person to perform their job duties.

#### 1.4 Retrenchment

In an event that there is restructuring or staff are laid, the Bank will follow nationa labour laws. IDBZ will develop and implement retrenchment plans to reduce the adverse impacts on affected employees. In addition to complying with regulatory requirements to notify or consult public authorities and others, the retrenchment plan would be based on the principle of non-discrimination and consider the outcomes of consultations with employees, their organizations, and, where appropriate, the government as well as any specific requirements that may be stipulated in collective bargaining agreements.

Any retrenchment plan would include an analysis of potential alternatives (options considered, number of positions saved, and a cost analysis). This process

would (i) include consultations with employees under the framework of the Works Council to consider their concerns and ideas on adopting other measures (such as collective reductions in hours and salary) to avoid or minimize layoffs; (ii) communicate criteria for selection (which would be objective, fair, and transparent, and not based on personal characteristics unrelated to job requirements); and (iii) present compensation payments. IDBZ would also use its already existing employee grievance mechanism to address any potential claims that the retrenchment plan was not followed appropriately.

In cases where retrenchment cannot be avoided, IDBZ would pay any outstanding back pay and benefits, as well as severance payments mandated by national law and/or collective agreements. If IDBZ is required to make payments for the employees' benefit to specific third-party institutions such as pension funds or health funds, it would provide evidence of such payments to employees. Where payments can be made either to third-party institutions or as a direct cash payment to employees, IDBZ will defer to the employee's preference.

### 1.5 Grievance and Complaints Mechanisms a. Grievance Mechanism for Employees

IDBZ already provides a mechanism for employees to raise workplace concerns and provide feedback. This mechanism is clearly communicated to employees and allows for anonymous complaints to be raised and addressed and it is well articulated in the Human Resources Policy.

IDBZ/investees/borrowers will abide by any grievance mechanisms provided in any collective bargaining agreements and follow the process for covered employees as long as the mechanism meets the requirements of Performance Standard 2.

The IDBZ Employee Grievance Handing Procedure is based on the Collective Bargaining Agreement for the Banking Undertaking (Statutory Instruments 273 of 2000) as amplified in the IDBZ Human Resources Policy and Procedures.

#### b. The Complaint Management Policy

The above policies sit under the Marketing and Public Relations Department. The complaints handling procedure is the step by step process detailing who receives the complaints, investigation, record keeping, acknowledgement, feedback and

closure. The Management Policy details the processes and reasons for assigning different units, departments as well as the Board to ensure effectiveness and efficiency. These policies are for clients and outside stakeholders.

Internally the complaints are directed through the Human Resources Division that ensures they are resolved in line with the respective legal instruments applicable. The Human Resources Division ensures the process is handled with confidentiality and ensures there is no retribution. Appropriate feedback and counselling are provided by the Human Resources Division and all records are kept under the custody of the Human Resources Division.

The Bank further subscribes to the Deloitte Tip Offs Anonymous Services which is an anonymous reporting channel for unethical practices such as detection mechanisms for combating fraud, corruption and grievances. The HR Division will ensure investigations are carried out before the grievance procedure is followed through. Feedback is given through Deloitte and this service is for staff, clients and all other stakeholders.

#### 1.6 **Workers Engaged by Third Parties**

IDBZ and its borrowers/investees will take reasonable efforts to ensure that third parties that provide contract workers are reputable and legitimate enterprises and have appropriate labour practices. This means that contractors hired for core functions<sup>53</sup> have the same rights and benefits as regular employees subject to the requirements of local legislation and that which is contained in the signed consultancy agreement (s). For non-core functions,54 the IDBZ will place sufficient terms and conditions in the outsourcing agreements as will oblige third-party employers to ensure that their labour practices are consistent with the requirements of Performance Standard 2.

IDBZ and its borrowers/investees will ensure that their contracted workers have access to a grievance mechanism. IDBZ will equire that borrowers/investees without inhouse grievance mechanisms utilise those mechanisms applicable to their industry per their respenctive Collective Bargaining Agreements.

#### 1.7 **Armed Security**

If IDBZ requires armed security during its operations, it will follow safety standards and guidelines when hiring security companies. Standards and

<sup>&</sup>lt;sup>53</sup> Examples of core functions include tellers and secretaries.

<sup>&</sup>lt;sup>54</sup> Examples of non-core functions include cleaning and security.

guidelines would include appropriate training; a code of conduct for the use of force with or without firearms; ways to prevent and resolve conflicts without using force; grievance mechanisms related to possible abuses in the use of force; audit and internal assessment systems to review the performance of private security companies.<sup>55</sup>

#### **Occupational Health and Safety**

IDBZ and its investees/borrowers provide safe and healthy work environments, considering inherent risks in particular sectors and specific classes of hazards in work areas, including physical, chemical, biological, and radiological hazards, and specific threats to women. IDBZ/borrowers/investees will take steps to prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimizing, as far as reasonably practicable, the causes of hazards. In a manner consistent with good international industry practice, <sup>56</sup> as reflected in various internationally recognized sources including the World Bank Group Environmental, Health and Safety Guidelines, IDBZ/borrowers/investees will address areas that include the (i) identification of potential hazards to workers, particularly those that may be life-threatening; (ii) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (iii) training of workers; (iv) documentation and reporting of occupational accidents, diseases, and incidents; and (v) emergency prevention, preparedness, and response arrangements. Additional information related to emergency preparedness and response is in Performance Standard 1.

#### **Protecting the Work Force**

Child Labour

Neither IDBZ nor any of the borrowers/investees will employ children in any manner that is economically exploitative or is likely to be hazardous 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. IDBZ will identify the presence of all persons under the age of 18. Where Zimbabwe's laws have provisions for the employment of minors, IDBZ will follow those laws applicable to its circumstances. Children under the age of 18 will not be employed in

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<sup>&</sup>lt;sup>55</sup> IFC, Interpretation Note on Financial Intermediaries (2012), pp10-14.

<sup>&</sup>lt;sup>56</sup> Defined as the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances, globally or regionally.

hazardous work.<sup>57</sup> All work of persons under the age of 18 will be subject to an appropriate risk assessment and regular monitoring of health, working conditions, and hours of work.

#### Forced Labour

IDBZ will not employ forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labour, such as indentured labour, bonded labour, or similar labour-contracting arrangements. IDBZ will not employ trafficked persons.<sup>58</sup>

#### Supply Chain

Where there is a high risk of child labour or forced labour<sup>59</sup> in the primary supply chain of a project, IDBZ will identify those risks consistent with paragraphs 21 and 22 in PS2. If child labour or forced labour cases are identified, IDBZ will take appropriate steps to remedy them. IDBZ will monitor its primary supply chain on an ongoing basis in order to identify any significant changes in its supply chain and if new risks or incidents of child and/or forced labour are identified, the IDBZ will take appropriate steps to remedy them.

Additionally, where there is a high risk of significant safety issues related to supply chain workers, IDBZ will introduce procedures and mitigation measures to ensure that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations. The ability of IDBZ to fully address these risks will depend upon the client's level of management control or influence over its primary suppliers. Where remedy is not possible, IDBZ will shift the relevant activities primary supply chain over time to suppliers that can demonstrate that they are complying with Performance Standard 2.<sup>60</sup>

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<sup>&</sup>lt;sup>57</sup> Examples of hazardous work activities include work (i) with exposure to physical, psychological, or sexual abuse; (ii) underground, underwater, working at heights, or in confined spaces; (iii) with dangerous machinery, equipment, or tools, or involving handling of heavy loads; (iv) in unhealthy environments exposing the worker to hazardous substances, agents, processes, temperatures, noise, or vibration damaging to health; or (v) under difficult conditions such as long hours, late night, or confinement by employer.

<sup>&</sup>lt;sup>58</sup> Trafficking in persons is defined as the recruitment, transportation, transfer, harboring, or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Women and children are particularly vulnerable to trafficking practices.

<sup>&</sup>lt;sup>59</sup> The potential risk of child labour and forced labour will be determined during the risks and impacts identification process as required in Performance Standard 1.

<sup>&</sup>lt;sup>60</sup> PS2, *IFC Performance Standards on Environmental and Social Sustainability*, (2012), <u>www.ifc.org/performancestandards</u>, accessed July 12, 2018, p 14.

#### **Appendix L: ESSMS Checklist for Senior Management Approval**

IDBZ Environmental & Social Management System (ESSMS) Checklist		
Name(s) of Senior Managers:		
Approval date:		
ESSMS policy and management commitment—check all that apply:		
<ul> <li>□ Policy regarding Environmental and Social (E&amp;S) risk management</li> <li>□ ESSMS policy approved by Senior Management</li> <li>□ ESSMS specifies types of investments/loans and activities it applies to (e.g., entire portfolio/investment type)</li> </ul>		
ESSMS process and procedures—check all that apply:		
<ul> <li>Documented process to assess Environmental and Social impacts and risks of its projects</li> <li>ESSMS specifies applicable requirements (e.g., Adopted IFC Exclusion List/national laws/IFC Performance Standards)</li> <li>E&amp;S due diligence process integrated with risk assessment procedures</li> <li>Project site visits conducted as part of risk assessment procedures</li> <li>Review of borrower's applicable environment, health and safety permits</li> <li>Loan agreements contain covenants requiring ongoing compliance with applicable requirements (e.g., national laws)</li> </ul>		
E&S monitoring and record keeping—check all that apply:		
<ul> <li>□ Process for monitoring ongoing compliance with applicable requirements</li> <li>□ Borrowers required to report accidents/incidents within reasonable timeframe</li> <li>□ Borrowers required to provide periodic reports pertaining to E&amp;S performance of projects</li> </ul>		
ESSMS internal feedback and continuous improvement—check all that		
apply:		
<ul> <li>□ Process for periodically reporting Environmental and Social performance information internally to senior management</li> <li>□ Continuous improvement process in place to revise and update ESSMS (e.g., changes in national law/international best practices)</li> </ul>		
E&S external reporting—check all that apply:		

	Annual reporting on E&S performance to _ [INSERT Entity name]
ESSN	MS roles and responsibilities—check all that apply:
	Designated ESSMS Officer
	Designated ESSMS Environmental Coordinator(s)
	Description of ESSMS responsibilities of different roles
ESSN	AS capacity and resources—check all that apply:
	Process for communicating ESSMS policy and procedures across
	Financial Institution
	ESSMS includes tools (e.g., checklists/guidance notes) for its
	implementation
	Budget allocated for ESSMS training
	Training plan for ESSMS implementation

# Appendix M: Supervision Form for Project Environmental and Social Issues Project/Activity Name Date Prepared By \_\_\_\_\_ Project Contact Name, Phone Number, Email Address Mitigation E/S Issue or Status Notes Risk Measure 1. 2. 3. 4. 5.

6.					
7.					
Overall Comments:					

## **Appendix N: Gender Policy**



# **Infrastructural Development Bank of Zimbabwe**

## **Gender Policy**

### 1.0 Gender Policy:

Level: Bank Wide

**Type:** Operations Management

**Policy Owner:** Resources Mobilisation and Climate Finance

**Reviewed by:** Corporate Governance Committee

**Approval by:** Board of Directors

**Policy Number:** RMCF – 002/001

#### **Definition of Terms**

Gender: a concept referring to the comparative or differential roles, responsibilities and opportunities (all socially constructed) of women and men in a given society.

*Gender analysis:* An approach which explores the inequalities in the relations between women and men in a given society (as well as the inequalities between women according to age, class, etc.) and assesses the disadvantages that women themselves identify as a cause for concern. In this approach, data are separated ('disaggregated') by sex, and the ways in which labour, roles, needs, and participation are divided and valued according to sex are examined.

*Gender balance:* The participation of an equal number of women and men within an activity or organisation, such as representation on committees or in decision-making

Gender equality: identical treatment of women and men in laws and policies and access to resources.

Gender equity: a broader term, indicating general fairness of treatment for women and men according to their respective needs.

Gender mainstreaming: a process of assessing the implications for women and men of any planned action, including legislation, policies or programmes in all areas and at all levels and is a strategy for making women's as well as men's concerns and experiences an integral dimension of the design, implementation, monitoring and evaluation of policies and programmes and/ or projects.

Gender relations: ways in which power, rights, roles, responsibilities, and identities are ascribed to women and men in relation to each other.

Gender sensitive: Refers to the understanding of the ways in which people think about gender and the sociocultural factors underlying gender inequality, and how they might be addressed. Gender sensitivity implies a consideration of the potential contribution of women and men to societal changes as well as the methods and tools used to: promote gender equity, reduce gender disparities, and measure the impact of climate change and other development activities on men and women.

*Gender specific:* targeted only at the needs and interest of either women/girls or men/boys as special categories, within existing gender divisions.

*Gender and Development Intersections:* the complex of reciprocal attachments and sometimes polarizing conflicts that confront both individuals and movements as they seek to "navigate" among the raced, gendered, and class-based dimensions of social and political life.

*Gender disaggregated data:* data collected about males and females separately in relation to all aspects of their functioning – ethnicity, class, caste, age, location, etc.

Sex disaggregated data: information presented according to numbers of males and females in a given population.

*Vulnerability:* the quality or state of being exposed to the possibility of being attacked or harmed, either physically or emotionally.

#### Version: 1.0

#### 1.1 Policy Statement

In line with the obligations set out by the Constitution of Zimbabwe Act no 20 of 2013; which are binding on every person, natural or juristic, including the State and all executive, legislative and judicial institutions and agencies of government at every level with gender equality and equality of all human beings as key founding values and principles. The same obligations arise from Constitutional national objectives of which the Bank at every level must endeavour; to facilitate rapid and equitable development, and must take measures to:

- Protect and enhance the right of the people, particularly women, to equal opportunities in development.
- Facilitate that local communities benefit from the resources in their areas. Endeavour to enable and take measures to empower, through appropriate, transparent, fair and just affirmative action, all marginalised persons, groups and communities in Zimbabwe.
- Ensure that appropriate and adequate measures are undertaken to create employment for all Zimbabweans, especially women and youths
- Support both genders to be equally represented at every level
- Ensure women constitute at least half of the membership of the Bank which is a governmental body established by an Act of Parliament;
- facilitate that women have access to resources, including land, based on equality with men.
- Identify gender discrimination and imbalances resulting from past practices and policies

In support of the Sustainable Development Goals specifically goal five on the policy will adopt a dual approach of "gender mainstreaming" and selective strategic initiatives directed at tackling evident gender disparities, or in certain social and cultural circumstances that require separate stand-alone interventions. To realize its mission of championing sustainable infrastructure while supporting inclusive socio-economic development, the IDBZ is committed to the fulfilment of this Gender Policy both at an Institutional and programming level

**Gender** is defined as the social relationship between women and men. mainstreaming as a process of assessing the implication on women and men based on their various intersections of any planned action including legislation, policies or programmes in all areas and at all levels. **Gender mainstreaming** is a strategy which aims to bring about gender equality by advancing women's rights by infusing gender analysis, gender sensitivity, women perspectives and gender equality goals into mainstream policies, projects and institution.

The Government of Zimbabwe first came up with a National Gender Policy in 2004 which was subsequently replaced by the 2013-2017 National Gender Policy, which seeks to achieve a gender just society where women and men enjoy equality and equity and participate as equal partners in the development process of the country. In line with the SDGs (Goal number 5: Achieve gender equality and empower all women and girls) and the Zimbabwe National Gender Policy, the Bank seeks to create a platform or a framework that provides equal opportunities to all women and men to access all the Bank products and services and enhance

women participation in infrastructure development, the need to engage a broad range of stakeholders at global, regional, national and local levels, be they government, including subnational and local government, private business or civil society, including the youth and persons with disability, persons living with HIV/AIDS and the chronically ill that gender equality and the effective participation of women and indigenous peoples are important for effective action on all aspects of climate change. In this regard the bank recognises unpaid care work which results in Time Poverty among social constructions of women and girls' role in the domestic and personal sphere. It will aim to reduce and where possible redistribute through its programs and institutional environment. IDBZ therefore seeks to promote gender equality and equity, protect vulnerable groups from further harm and have them participate in decision making processes from an informed consent perspective.

All employees of the Bank are mandated to abide by this Policy always. The Bank will consistently conduct regular management review of the policy to ensure continual improvement of gender integration in the Bank's operations. The Climate Finance and Sustainability Division will receive feedback from internal and external stakeholders of the ESSMS/Gender Action Plan and initiate timely policy recommendations for consideration by the Management. The Management will be responsible for recommending final policy review to the IDBZ Board for approval.

#### c) Overview

IDBZ envisions a Zimbabwe with robust, inclusive and sustainable growth and development. The Bank exists to champion sustainable infrastructural development in Zimbabwe. IDBZ recognises that gender relations and inequalities are fundamental causes of poverty it is therefore committed to establishing an environment that allows for gender equality and equity to promote inclusive socio-economic development in all its operations, advancing women and girl child's rights through infusion of gender analysis, gender sensitivity, women perspectives and gender equality goals into mainstream policies, projects and related institutions and activities. The Bank's gender focus is in line with the National vision "A gender-just society in which men and women enjoy equity, contribute and benefit as equal partners in the development of the country".

#### 1.3 IDBZ Goal

To assist in the development of a gender-just society through a gender mainstreaming and gender-sensitive approach, that will achieve greater, more effective, sustainable, and equitable results, outcomes and impacts, in an efficient and comprehensive manner in both internal and external procedures and activities

#### 1.3.1 Objectives of the Policy

- i. To build equally women and men's resilience to, and ability to address climate change, and to ensure that women and men will equally contribute to, and benefit from activities supported by the Bank;
- ii. Pursue affirmative action, quotas, for more rapid and efficient progress towards redressing gender inequality;

- iii. Ensure that the projects that the Bank is involved mainstream gender, promote equality and equity in access to economic opportunities for men, women, and socially excluded groups including those with disability;
- iv. Establish capacity building and knowledge sharing programmes on Gender and social inclusion for all staff members;
- v. To provide a guideline for all IDBZ staff in work and activities involved (e.g. program design and implementation, staff relations, organizational culture), in a gender-sensitive manner; and
- vi. To create a congenial work environment within IDBZ which enables women and men to work together in an equitable, effective and mutually respectful manner.

#### 1.4 Principles of the Gender policy

- I. Gender equality and equity are central to IDBZ.
- II. The empowerment of women and girls is recognised as fundamental to our mission;
- III. Every individual understands and demonstrates attitudes and behaviours that promote gender equality and equity;
- IV. Allocate resources to support gender work;
- V. All work is continuously monitored against gender indicators where relevant;
- VI. Gender equality and equity are cross-cutting and should be given due recognition.

#### 1.5 Purpose

#### In pursuit of this policy, IDBZ commits to undertake the following:

- Capacitate IDBZ operational staff, project managers and project implementing/executing partners to effect gender screening in all operations and projects, gender sensitive capacity building and knowledge-sharing programmes within IDBZ and its key stakeholders.
- ii. To reach gender balance in the staffing of the Bank at all levels, including key advisory and decision-making levels.
- iii. In the loaning and investments process, entities will be encouraged to adopt policies, procedures and competencies in place to implement the standard gender policy at the Bank through development of adequate gender checklists.
- iv. Ensure equality and equity in accessing the Bank's resources and employment opportunities by women and men through timely dissemination of gender sensitive information to all potential beneficiaries within the Bank or amongst the Bank's stakeholders.
- v. Develop strategies for family friendly and flexible working policies to allow staff to fulfil caring responsibilities.
- vi. Mainstream gender in all Bank's operations and projects through early gender analysis and develop objective gender action plans as necessary to close any identified gender gaps throughout the project life cycle.
- vii. Prioritise investment in infrastructure projects that maximize benefits to the people including women and the girl child, while at the same time discouraging investment in infrastructural projects that have significant negative environmental and social impacts to women and the girl child.

- viii. Mainstreaming gender climate responsive policies throughout project design and implementation, incorporating innovative technologies that enhance mitigation and adaptation to climate change.
  - ix. Ensure compliance with all applicable gender related national legislation (Zimbabwe Constitution, National Gender Policy, and Zimbabwe Gender Commission Act [Chapter 10:31]), national obligations under international law as well as international priorities such as Sustainable Development Goal 5: 'Achieve gender equality and empower all women and girls.
  - x. Develop, promote and use creative ways of engaging men and boys as agents of change in pursuit of gender equality
  - xi. Promote women and girls' independent access to and control over resources, services and institutions, including their ability to exercise rights over their own bodies and find protection against violence.
- xii. Achieve the aspirations of this policy through the formulation, implementation and review of a documented gender inclusive Environment and Social Management System (ESSMS). The gender inclusive ESSMS will include the following key elements:
  - a. Environment and Social Sustainability Planning Framework
    - Identification of key environment and social aspects that pertain to women, men, boys and girls
    - Identification, analysis and mitigation of negative environment and social impacts, including those that are specific to women and girls, while maximizing the potential benefits.
    - Framework for setting gender related objectives, targets and programs
    - Commitment to gender-equitable stakeholder consultations and public disclosure of required gender-related information as part of project gender assessment and social analysis.
  - b. Gender action plan implementation arrangements
  - c. Gender monitoring mechanisms
  - d. Gender management review framework
- xiii. Ensuring adequate resource allocation through gender sensitive budgeting within the Bank's various Departments, specific projects and in related institutional activities. The gender action plan will have a specific budget to ensure effective implementation.

#### 1.6 Scope of the Policy

This policy covers all IDBZ operations. IDBZ-related infrastructural development projects categories will include:

- i. **IDBZ institutional arrangements.** These refer to the day to day running of IDBZ through its Human Resources. All the different units as well as policies which relate to the everyday running of the Bank are expected to be gender sensitive. Gender mainstreaming should be done at all levels.
- ii. **IDBZ's operations and internal infrastructural development projects.** These are Banks's functions across different Departments and Units as well as projects

that are supported by IDBZ and may have potential to generate gender related environmental and social risks and impacts.

- iii. **IDBZ intermediary projects.** These are projects where IDBZ is the financial intermediary through which other implementing agents access investment capital from International Financiers such as the Green Climate Fund, African Development Bank and the World Bank. In this case IDBZ will ensure that the implementing agency/executing entity complies with the gender requirements of both the national and relevant International Financiers through this policy.
- iv. **Joint financing with partner institutions.** These are projects where funding is jointly provided by IDBZ and other institutions, such as the Joint Venture Arrangement, Public Private Partnerships and Special Purpose Vehicles. In this case, the Bank will have to be satisfied that the partner institution's Environment and Social Impact Assessment (ESIA), Gender Action Plan, Environment and Social Management System (ESSMS) and/or specific requirements for funding of the project are consistent with this Policy and that appropriate monitoring modalities are foreseen. On a case by case basis, the Bank will decide whether to rely on the partner institution's assessment of compliance with the applied policies and procedures.
- v. **Integrated Project Life Cycle.** This policy will apply to all project phases, ensuring that the gender related environmental and social risks and impacts are identified, assessed, evaluated, mitigated, managed and compensated during the following phases:
  - Project Identification
  - Project Appraisal
  - Project Implementation
  - Project Completion

The gender friendly environmental and social sustainability management cycle will be synchronized with the IDBZ project life cycle and the two will be integrated to ensure that the gender assessments add value to the conventional project life cycle approach. In line with the compliance requirements, the Gender Expert and relevant teams will ensure that the gender mainstreaming processes do not lag among the other aspects (environmental, social, technical, financial) of the project life cycle and ensure that well designed gender elements and implementation arrangements are taken on board. The integrated project life cycle applies to both IDBZ implemented projects and those implemented by other implementers where IDBZ is the financial intermediary. Through integration, gender assessment will be undertaken at the project identification stage and the gender assessment report will be part of the environmental and social assessment report that will be undertaken during project preparation stage. The synchronization follows through to project approval, project implementation, project monitoring and post implementation evaluation as guided by the gender inclusive ESSMS.

#### 1.7 Related Policies and Manuals

The Gender Policy will be integrated with other complementary existing IDBZ policies and manuals, including and not limited to;

- Human Resources Policy
- Operations Manual
- Procurement Policy
- Risk Management Policy
- Lending and Investment Policy
- Information Disclosure Policy
- Environmental and Social Sustainability Policy
- HIV and AIDS Policy
- ICT Policy
- Compliance Policy

#### 1.7.1 Operational principles

The Bank will endeavour to capacitate relevant officers to adequately discharge their duties, including and not limited to conducting gender assessments, developing objective gender action plans, implementing and monitoring progress on gender mainstreaming in IDBZ projects, programs and operations. The integration with the Environmental and Social Sustainability Management System for effective mainstreaming will be conducted through; clear job description for internal IDBZ staff, gender targeting Terms of References for environment and social impact assessments, gender sensitive terms and conditions for suppliers or contractors and gender fulfilling financing conditions where IDBZ is the financial intermediary including and not limited to gender statistics and reporting for targeted investments.

#### 1.7.2 Sustainable Development

The Gender Policy is premised on the conviction that economic empowerment of women and the girl child is key to sustainable development, as guided by Sustainable Development Goal 5 'to achieve gender equality and empower all women and girls. Pursuant to this principle, affirmative action for more rapid and efficient progress towards redressing gender inequality will be administered as much as possible in all IDBZ operations, projects and related implementing partners projects. The affirmative action will include but not limited to women friendly qualifying requirements to achieve gender balance in its employed staff. The Bank will also thrive to ensure significant participation of women in infrastructural investment benefits such as allocation of housing infrastructure or loan facilities as the Bank moves towards gender equality.

#### 1.7.3 Environment and Climate Change Impacts

IDBZ upholds and is guided by the realisation that environmental and climate change impacts are not gender neutral, hence relevant actions will be considered to address the needs, roles and relations of both women and men without perpetuating discrimination and stereotypes.

#### 1.7.4 Priority Areas

In its quest to achieve gender equality and equity, IDBZ is aware that there are some challenges that make it difficult to implement this policy. The challenges include and are not limited to lack of appropriate infrastructure supportive of economic productivity, increasing poverty levels, the general economic performance and lack of appropriate skills. During the gender assessment for each project, IDBZ will particularly identify any such gender challenges and draft a comprehensive action plan to mitigate against such challenges for the smooth mainstreaming of gender in all IDBZ operations, projects and financial intermediary beneficiaries.

This gender policy targets to prioritize the following areas;

At an Institutional and Operational Level

- i. Promotion of inclusive economic growth and gender equality.
- ii. Prioritisation of a gender sensitive culture which includes training and regular assessment and ensuring equal pay for equal work
- iii. Development of socio-economic infrastructure that serves the marginalised areas focusing on emancipation of women and the girl child.
- iv. Promotion of gender equality and equal employment opportunities in the Bank.
- v. Encourage women participation in infrastructure development through Joint Ventures and any other forms of participation.
- vi. Target women and other disadvantaged groups in the Bank's capacity building programmes with the understanding that women can be influential and effective agents of change in sustainable development.
- vii. Development and implementation of a framework to analyse gender disparities in all Bank projects and gender sensitive impact analysis.
- viii. Implementation of gender-responsive climate and environmental policies.
  - ix. Promote gender sensitive procurement.
  - x. Reduced time poverty of women and enhance women's resilience to external shocks.
  - xi. increased attention to generating employment and entrepreneurship opportunities for women.
- xii. Enable women's access to quality jobs in non-traditional, higher-paying sectors.
- xiii. Support inclusive, diverse and resilient designs of urban and rural infrastructure.

#### 1.8 Policy Review

IDBZ will conduct periodic management review of the policy to ensure continual improvement of the gender inclusive ESSMS. the Fund will be able to adjust its policies, processes, procedures, and project and programme design. In the light of this, the Bank will have a mandatory review of this policy after three years from the time of operation. In the event that key Constitutional or gender progression best practices are necessary before the lapse of the three years, a special resolution shall be passed at the behest. The Climate Finance and Sustanability Division/Compliance Department shall receive feedback from internal and external stakeholders on the gender inclusive ESSMS and propose timely policy recommendations for consideration by the Management who recommends final policy review to the IDBZ Board for approval.

#### 1.9 Resources for the implementation of gender policy and strategies

IDBZ will ensure that resources are allocated to gender work through the Bank's Programme and Budget. The Bank will also maintain and update annually qualitative and quantitative information on gender-related expenditure and outcomes.

#### 1.10 Conclusion

The Bank's Gender Policy seeks to promote the mainstreaming of gender in all the Bank's operations. In pursuit of sustainable and inclusive economic development infusion of gender analysis and gender sensitivity is of paramount importance. The policy supports the national and the international initiatives that seek to enhance women participation in the development process particularly in infrastructure development, capacity building and knowledge generation and sharing. Mainstreaming and integrating gender considerations in the Bank's institutional processes and projects improves quality of life among women and men, girls and boys and contribute to sustainable development. The Bank shall thrive to ensure that necessary plans and actions are put in place to achieve gender equality and equity.

# **Appendix O: Gender Implementation Arrangements, Gender Assessment Template and Gender Action Plan Template**

#### 1.0 During the Project Cycle

During the Project Cycle, relevant gender aspects of the project or activity will be identified through the screening process and the environmental and social analysis. During the environmental and social analysis, IDBZ and any other project proponents will endeavour to understand the socio-cultural factors underlying climate change-exacerbated gender inequalities. The project components will consider the different roles of men and women in advancing resilient livelihoods at multiple scales, and response to the unique interests, priorities and needs of women and men in order to close gender gaps. Potential project risks for women and men associated with adaptation and mitigation activities will be assessed. Women and men at all levels of project cycles will be involved as key actors in the assessment, design, implementation, monitoring and evaluation of interventions. Both women and men need to benefit from a gender approach that reinforces their joint participation and equitable benefit through participatory, inclusive approaches, including actions designing, implementing, and strengthening guidelines gender perspectives in the projects to better measure direct and indirect beneficiaries.

#### 1.1 Impact Identification

IDBZ and project proponents will undertake a mandatory initial socioeconomic and gender assessment for all projects in order to collect baseline data, and to:

- (i) Determine how the project/programme can respond to the specific needs and preferences of women and men in view of the specific project issues (for example, in the context of climate change, women will typically be more likely to be negatively affected by the impacts of climate change as they are more reliant on natural resources for their livelihoods but have fewer resources (natural, physical, social capital) to cope and adapt to climate shocks in comparison to men); (ii) Identify the drivers of change and the gender dynamics in order to achieve the project/programme climate change adaptation or mitigation goals if applicable;
- (iii) Identify and design the specific gender elements to be included in the project/programme activities:
- (iv) Estimate the implementation budgets for designed gender elements to be included project/programme activities
- (v) Select gender related output, outcome and impact indicators (among others) as necessary and appropriate (including outcomes and impacts of project activities on women and men's resilience to climate change for climate change related projects); a
- (vi) Design project/programme implementation and monitoring institutional arrangements to address gender-related impacts including building women and men's resilience to, and ability to address climate change and benefit equally from proposed interventions;
- (vii) Identify capacity strengthening needs of implementation institutions (for example, provide training and refreshers) to ensure equitable benefits to women and men;(viii) Identify capacity building and training needs for partners and implementers on collecting and analysis of sex-disaggregated information; and

(ix) Consider any adverse impacts or risks that may affect the equal access, equal participation or equal benefit from project activities for men and women (for example, identify if there are any cultural/religious/legal constraints that do not allow women and men to access or equally participate in project activities).

#### 1.2 Gender Analysis/Assessment: Template (Project/Program Level)<sup>61</sup>

#### 1.2.1 What is a gender analysis/assessment?

Gender analysis/assessment refers to methods used to understand relationships between men and women, their access to resources, their activities, and the constraints they face relative to each other. A comprehensive gender analysis/assessment entails the examination of the different roles, rights, needs, and opportunities of women and men, boys and girls in a given project/program context. It is a tool that helps to promote gender – relevant entry points, policies and identify opportunities for enhancing gender equality in a particular project/program. In the case of climate change projects/programs, a well-done gender analysis/assessment helps to identify multiple causes of vulnerability, including gender inequality. It also helps to identify and build on the diverse knowledge and capacities within communities/households that can be used to make them more resilient to climate related shocks and risks.

#### 1.2.2 When is a gender analysis/assessment used?

Gender analysis needs to take place early in the planning process so that an understanding of gender roles and power relations is built into the project. All projects/programs should include an analysis of gender and include data on gender issues within the overall situation analysis. This template provides key questions to consider while developing a gender analysis/assessment for a particular project/program. Be sure to tailor these questions to the context of your project/program. Also, be certain to include quantitative data (i.e. sex – disaggregated) and qualitative data while developing the gender analysis/assessment. Gender analysis/assessment questions that need to be addressed at the project

Gender analysis/assessment questions that need to be addressed at the project planning/preparatory stage:

- What is the maternal mortality rate, infant mortality rate, educational status of girls and boys, adult literacy rate (disaggregated by sex), poverty rate, labour force participation rate (disaggregated by sex), employment rate (disaggregated by sex), unemployment rate (disaggregated by sex), political participation rate (disaggregated by sex), life expectancy (disaggregated by sex) in the country of intervention and/or the project/program footprint area?
- What is the legal status of women in the country of intervention?
- What are commonly held beliefs, perceptions, and stereotypes related to gender in the project/program footprint area or the country of intervention?
- What is the division of labour among women and men in the project/program footprint area and/or the country of intervention?
- What is the participation between women and men in the formal/informal economy in the country of intervention or in the project/program footprint area?

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<sup>&</sup>lt;sup>61</sup> GCF, https://www.greenclimate.fund/how-we-work/mainstreaming-gender, accessed August 23, 2018.

- What is the situation of women and men in the specific sector of intervention or in the project/program footprint area?
- In terms of the proposed project/program, will there be any anticipated differences in men's and women's vulnerability and adaptive capacity to climate change? If so, what are these?
- Are there existing gender inequalities that may be exacerbated by climate change impacts in the proposed project/program footprint area?
- What are some of the inequalities that exist between different social groups in the project/program footprint area? How do these inequalities affect people's capacity to adapt to climate change?
- What roles women and men are anticipated to play in the context of the project/program? What will these entail in terms of time commitment and need for mobility?
- What resources (economic, financial, physical, natural, other assets) do women and men have access to? Who manages or controls access to these resources?
- Do women and men from vulnerable communities have equal access to information and opportunities necessary to participate and benefit fully from the anticipated outcomes of the project/program?
- Do women have equal access to education, technical knowledge, and/or skill upgradation?
- Will services and technologies provided by the project/program be available and accessible to both women and men?
- To what extent do women and men from vulnerable communities participate in decision making processes? What type of decisions are made by women? What are the constrains (social, cultural, economic, political) that restrict women's active participation in household and community level decision making processes?
- Are there any opportunities to promote the leadership of women in local governance/political systems and formal/informal institutions? If not, what are some of the constrains that hinder women from assuming leadership roles?
- What are the differential needs/priorities of women and men in the context of the project/program? Will the project/program be able to address their respective needs and priorities? If so, how?
- Have the needs of specific (and vulnerable) sub-groups been taken into account by the project/program (e.g. children, girls, women and men with disabilities, the elderly, widows)?
- Has the project/program recognized the distinct vulnerabilities of women and men and developed specific response strategies for each target group?
- Are the specific knowledge and skills of women and men, especially from vulnerable groups, being utilised to contribute to project/program outcomes and solutions?
- Has the project/program identified opportunities to challenge gender stereotypes and increase positive gender relations through equitable actions? If so, what are these opportunities and actions?

#### 1.2.3 When should information from the gender analysis/assessment be considered?

The information gathered from the gender analysis/assessment should be considered in all stages of the project cycle: design, formulation, implementation, and monitoring and evaluation. In each of these stages, project/program managers should maintain a 'gender lens' approach, looking at ways the project/program can address gender inequalities that emerge from the project/program; ensure the differential needs of women and men are addressed; ensure women and men have equal access to resources, services, and capacity development; ensure equal participation of women and men in management arrangements and as beneficiaries, partners and key stakeholders; and ensure women's equal participation in decision – making processes.

#### 1.3 Project Implementation

During project implementation, IDBZ and other project proponents will;

- 1. Adopt methods and tools to promote gender equality and reduce gender disparities in (such as power differences including incidences of gender-based violence) in its projects including climate and other sectors; and
- 2. Measure the outcomes and impacts of its activities on women and men's resilience to climate change and other sectors as appropriate.<sup>62</sup>
- 3. Build capacity within the project team (and among stakeholders as necessary) to ensure gender-responsive implementation and continued integration of a gender perspective within the sector of intervention.

When the gender analysis/assessment reveals that actions need to be taken in order that both genders benefit from the project, females are not disproportionately negatively impacted or other relevant reason, a Gender and Social Inclusion Action Plan should be developed to ensure that mitigation and other project activities act to avoid, reduce or compensate for these matters.

1.4 Gender and Social Inclusion Action Plan: Template (Project/Program Level)<sup>63</sup> Certain IDBZ projects/programs will require the development of a gender and social inclusion action plan (GAP). A project/program-specific GAP is a tool used to ensure gender mainstreaming is clearly visible in project/program design and implementation. The project/program GAP is not a separate component. It mirrors the logical framework of the project and is an integral part of project/program design. GAPs include clear targets, gender design features and measurable performance indicators to ensure women's participation and benefits. Key aspects of the GAP are incorporated into project/program assurances to encourage buy-in from AEs and other partners.

The GAP presents:

• Work undertaken to address gender issues in the project/program;

<sup>62&</sup>quot;Resilience to climate change to be understood as (1) the capacity to absorb stresses and maintain function in the face of external stresses imposed upon it by climate change, and (2) adapt, reorganize and evolve into more sustainable socioeconomic behaviors, leading people to be better prepared for future climate change impacts". (See C. Folke, "Resilience: The emergence of a perspective for social-ecological systems analyses", *Global Environmental Change*, vol. 16 (2006) pp. 253–267; and Donald R. Nelson, W. Neil Adger and Katrina Brown, "Adaptation to environmental change: contributions of a resilience framework", *Annual Review of Environment and Resources* Vol. 32 (2007) pp. 395–419.). Adapted from GCF "Annex XIII: Gender Policy for the GCF," *GCF/B.09/23*, p 86, accessed 6-29-18 on https://www.greenclimate.fund/documents/20182/319135/1.8\_-\_Gender\_Policy\_and\_Action\_Plan.pdf

<sup>&</sup>lt;sup>63</sup> GCF, https://www.greenclimate.fund/how-we-work/mainstreaming-gender, accessed August 23, 2018.

- Targets and design features, included in the project/program to address gender concerns and ensures tangible benefits to women and men, especially from vulnerable communities;
- Mechanisms to ensure implementation of the gender design elements;
- Gender sensitive monitoring and evaluation indicators.

Below is a template of a GAP from the Mitigation and Adaptation and Private Sector Facility Divisions at GCF. As the following template shows, the GAP should contain impact, outcome and output statements, gender – responsive activities, gender – performance indicators and targets, timeline, responsibility lines, and approximate budgetary allocations against each activity. Guidance on what impact, outcome, output statements, gender – responsive activities, gender – performance indicators and targets should look like are provided in the GAP template.

**Activities** 

#### **Indicators and Targets**

**Timeline** 

Responsibilities

Costs

Impact Statement: Write the project/program impact statement here (Note: an impact statement briefly summarizes, in lay terms, the difference the project/program will make over time. It also states the long – term gender, social, economic, environmental impacts to which the project/program will contribute. Examples of impact statements in, say, a climate change/energy efficiency project/program: increased resilience of vulnerable communities, including women and girls, to the negative impacts of climate change; improved access to affordable, year – round clean energy services for all households, including poor and female – headed households).

**Outcome Statement:** Write the project/program outcome statement here (*Note: the outcome statement should be specific, measurable and let project managers know when project goals are achieved. An outcome statement describes specific changes in knowledge, attitude, skills, and behaviours that will occur due to actions undertaken by the project/program.* 

Example of an outcome statement in, say, a gender – responsive energy efficiency MSME project/program: **improved business opportunities for an estimated** X no./percentage of women – led/owned energy efficiency enterprises).

Output(s) Statement: Write the output statement here. In many cases, there will be more than one output for a project or program; therefore, for each output statement a separate row should be created followed by associated activities, gender – performance indicators, sex – disaggregated targets, timeline and responsibilities. (Note: an output statement highlights what the project/program intends to achieve in the short term due to project/program activities.

Example of an output statement in, say, an energy efficiency project/program is: installed meters, new and subsidized service connections and improved supply quality).

(This is the place where the project/program team inserts a brief list of activities. Activities are those that tell us what the project/program will do; sometimes referred to as interventions. Examples of activities associated with the above output are):

- (i) Poor and socially excluded female headed households (FHH) provided new meters
- (ii) Poor and vulnerable FHHs provided with new service connections
- (iii) Increase in female-headed, start-up, energy-based microenterprises
- (iv) Women self help groups (SHGs) trained as trainers for the implementation of gendersensitive energy user awareness programs

Outline the indicators and targets here (Note: A good indicator should be able to measure the quantity, quality and timeliness of products (goods or services) that are the result of an activity, project or program. On the other hand, a *target should – in the case of* the GAP – be disaggregated by sex. Targets, disaggregated by sex, is an effective way to measure quantifiable [and differentiall results for women. men, girls and boys. Examples of gender – performance indicators and sex – disaggregated targets are): • X% FHHs and X% of

• • X% FHHs and X% of other vulnerable HHs (e.g. widowed, minorities, differently – abled, the elderly) in project areas (This is the place where the project/program team inserts the timeline for each of the indicators/targets. Examples are shown below):

By X year

By X year

(Highlight here which party/organization/entity/par tner will be responsible for ensuring the achievement of targets, as outlined in the indicator and targets column. Examples are provided below): Accredited Entity/Executing Agency

(This is the column to insert the approximate budgetary allocation for undertaking each activity. Examples are provided below):
US\$ X
US\$ X

- (v) Public awareness program implemented, targeting women's spaces and men, to include information on:
- provision of concessionary/subsidized rates for households below the poverty line
- • support for metering and easy payment systems

• • X% of poor and vulnerable FHHs in

#### 1.5 Consultations

Stakeholders' consultations will be gender balanced and ensure equitable women's participation in planning and decision making at all project stages in whatever ways are most effective and meaningful (for example, identify and consult with women/gender groups, associations or stakeholders on project formulation)Through the consideration of female input, projects will include the perspectives of men and women in the application of the mandatory project/programme social and environmental safeguards in line with Zimbabwe, IDBZ and GCF Gender Policies.

#### 1.6 Grievance Redress Mechanism

The project specific GRM will process any gender related complaints.

### **Appendix P: Further Resources**

#### Good resources include

- a. The <u>IFC Sustainability Webinar Series</u> offers IFC expertise and thought leadership on sustainability issues. Recorded sessions and presentations are available on IFC's website
- b. <u>FIRST (Financial Institutions: Resources Solutions and Tools) for Sustainability</u>
- c. The GCF Toolkit for Mainstreaming Gender found at https://www.greenclimate.fund/how-we-work/mainstreaming-gender