



## Safeguard Policy Filter Report

### Operation Information

Operation		
EC-L1111 Quito Metropolitan Urban Transport System		
Environmental and Social Impact Category	High Risk Rating	
A	High Risk	
Country	Executing Agency	
ECUADOR	EC-EPMMQ - EMPRESA PUBLICA METROPOLITANA DEL METRO DE QUITO (EPMQ)) - EC-EPMMQ - EMPRESA PUBLICA METROPOLITANA DEL METRO DE QUITO (EPMQ))	
Organizational Unit	IDB Sector/Subsector	
Environmental Safeguards	PUBLIC TRANSPORT (BUS / TRAIN / CABLE). INFRASTRUCTURE AND EQUIPMENT	
Team Leader	ESG Primary Team Member	
CARLOS HERNAN MOJICA	JOSE LUIS DE LA BASTIDA	
Type of Operation	Original IDB Amount	% Disbursed
Loan Operation	\$100,000,000	94.000 %
Assessment Date	Author	
2 Apr 2018	josedb ESG Primary Team Member	
Operation Cycle Stage	Completion Date	
ERM (Estimated)	20 Apr 2012	
QRR (Estimated)	11 Oct 2012	
Board Approval (Estimated)		
Safeguard Performance Rating		
Partially Unsatisfactory		
Rationale		
A pesar de los importantes beneficios del proyecto para la población del área metropolitana de Quito, esta operación fue clasificada “categoría A” en base a lo establecido por la Política Cumplimiento de Salvaguardas (OP-703), por los potenciales impactos negativos y riesgos socioambientales para la población ubicada a lo largo del trazado del proyecto, las áreas de incidencia a los frentes de obra y facilidades asociadas. En atención a los riesgos e impactos que han determinado la clasificación de la operación, el Banco ha supervisado de cerca el cumplimiento de las salvaguardas ambientales en coordinación con los otros financiadores del proyecto.		

Plan de Acción Correctivo: Dado que la operación está en proceso de ejecución, durante la preparación de esta reformulación se evaluaron los impactos y riesgos según lo definido en las políticas y directrices que aplican. Esto incluyó verificar el grado de cumplimiento de las salvaguardas socioambientales producto de la revisión y análisis de las actividades del Proyecto ejecutadas hasta la fecha. Esto fue documentado en el Plan de Acción Correctivo (PAC). El PAC define acciones específicas de mitigación y control para subsanar pasivos existentes y mitigar otros riesgos. Dentro de los principales retos de gestión social y ambiental identificados en el PAC está la gestión de escombreras, el manejo de la accidentalidad vial, la mitigación de pasivos socioambientales y el manejo de suelos contaminados. Con base en el PAC, se elaboraron planes de acción que detallan actividades de mitigación, financiamiento y calendarización, el fortalecimiento de capacidades, procedimientos y protocolos que aseguren el cumplimiento de las salvaguardias ambientales y sociales del Banco. El PAC ha sido incorporado como una de las metas de EPMMQ y al mes de marzo de 2018 presenta un cumplimiento del 90%.

Otras actividades realizadas durante la preparación de esta reformulación incluyen: (i) asegurar el cumplimiento de las políticas y directrices activadas para el proceso de preparación de la reformulación del Proyecto: Política de Reasentamiento Involuntario (OP-710) por impactos permanentes debido a expropiaciones de predios, así como, por desplazamiento económico temporal. Política de Pueblos Indígenas (OP-765) por potenciales impactos adversos en nuevos sitios de disposición de material de excavación que pudieran estar ubicados en áreas de comunidades indígenas, y por impactos identificados en la Escombrera de Oyacoto; (ii) revisar el nivel de evaluación de riesgos de desastres para acciones de mitigación en facilidades asociadas (escombreras); y (iii) finalmente, con las medidas de mitigación recomendadas en el PAC se actualizaron el Plan de Gestión Ambiental y Social (PGASS-H), y el Plan de Manejo Ambiental (PMA).

Riesgos ambientales y sociales (alto). Los principales riesgos identificados que se pueden presentar durante la actual etapa de construcción son los siguientes: (i) demoras en la identificación de escombreras adecuadas para el tratamiento y disposición final del material/lodo de excavación generado por la construcción del túnel y estaciones. (ii) incrementos en la frecuencia de accidentes relacionados con actividades del proyecto. (iii) demoras en la mitigación de pasivos ambientales y sociales en las escombreras de Oyacoto y Troje IV; (iv) demoras en la compensación para propietarios de negocios/comercios en los distintos frentes de obra, y (v) potencial contaminación al medio ambiente resultado del suelo contaminado.

La cercana supervisión del Banco ha permitido tomar acciones tempranas sobre elementos del proyecto que están fortaleciendo los procesos de cumplimiento de las salvaguardias. Entre ellos, la definición de un marco de gastos para la implementación de la gestión ambiental y social del proyecto, incluyendo el cumplimiento de las acciones del PAC para mitigar eventuales pasivos existentes. Lo anterior facilitará la implementación de las medidas de mitigación recomendadas a continuación.

Medidas de mitigación: Las medidas de mitigación y compensación que implementará el ejecutor para los riesgos identificados se listan a continuación, en el mismo orden: (i) identificar y confirmar los nuevos sitios definitivos para la disposición final de materiales y lodos de excavación. Esto incluye obtener una licencia ambiental, presentar un estudio y plan de gestión ambiental y social, realizar procesos de consulta pública y otros requerimientos de salvaguardas que apliquen. Adicionalmente, elaborar una evaluación de riesgos de desastres para cualquier sitio que sea seleccionado como escombrera; (ii) implementar las medidas de control en el plan de mejora acordado con el ejecutor para aspectos de higiene y seguridad laboral, cuyas medidas principales incluyen: capacitar operarios y conductores en materias de seguridad vial, analizar y revisar el trazado de las rutas de las volquetas, auditar la gestión en seguridad y salud

ocupacional del contratista e incrementar el monitoreo sobre tiempos de viaje y límites de velocidad; (iii) implementar las medidas del PAC para mitigar pasivos ambientales y sociales en la escombrera de Oyacoto (Comunidad Ancestral San Francisco de Oyacoto) y la escombrera Troje IV; (iv) implementar el plan de compensaciones acordado con el ejecutor el cual incluye acuerdos y procedimientos para efectuar las compensaciones; y (v) cumplir con el Plan de Gestión de Residuos Contaminados e implementar un plan de saneamiento para mitigar el pasivo remanente en el área de la Estación de la Pradera en coordinación con la Secretaría del Ambiente.

## Potential Safeguard Policy Items

[No potential issues identified]

## Safeguard Policy Items Identified

### B.1 Bank Policies (Access to Information Policy– OP-102)

The Bank will make the relevant project documents available to the public.

### B.1 Bank Policies (Disaster Risk Management Policy– OP-704)

The operation is in a geographical area exposed to [natural hazards](#) ([Type 1 Disaster Risk Scenario](#)). Climate change may increase the frequency and/or intensity of some hazards.

### B.1 Bank Policies (Disaster Risk Management Policy– OP-704)

The sector of the operation is vulnerable to natural hazards. Climate change may increase the frequency and/or intensity of some hazards.

### B.1 Bank Policies (Disaster Risk Management Policy– OP-704)

The operation has the potential to exacerbate risk to human life, property, the environment or cause economic disruption ([Type 2 Disaster Risk Scenario](#)).

### B.1 Bank Policies (Gender Equality Policy– OP-761)

The operation will offer opportunities to promote [gender equality](#) or [women's empowerment](#).

### B.1 Bank Policies (Indigenous People Policy– OP-765)

The operation has the potential to negatively affect indigenous people (also see [Indigenous Peoples Policy](#)).

### B.1 Bank Policies (Resettlement Policy– OP-710)

The operation has the potential to cause physical displacement of people living in the project area of influence (see also Resettlement Policy)

## B.2 Country Laws and Regulations

The operation is expected to be in compliance with laws and regulations of the country regarding specific women's rights, the environment, gender and indigenous peoples (including national obligations established under ratified multilateral environmental agreements).



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## B.3 Screening and Classification

The operation (including [associated facilities](#)) is screened and classified according to its potential environmental impacts.

## B.4 Other Risk Factors

There are [associated facilities](#) (see policy definition) related to the operation.

## B.4 Other Risk Factors

The borrower/executing agency exhibits weak institutional capacity for managing environmental and social issues.

## B.5 Environmental Assessment Requirements

An environmental assessment is required.

## B.6 Consultations

Consultations with affected parties will be performed equitably and inclusively with the views of all stakeholders taken into account, including in particular: (a) equal participation by women and men, (b) socio-culturally appropriate participation of indigenous peoples and (c) mechanisms for equitable participation by vulnerable groups.

## B.7 Supervision and Compliance

The Bank is expected to monitor the executing agency/borrower's compliance with all safeguard requirements stipulated in the loan agreement and project operating or credit regulations.

## B.9 Natural Habitats and Cultural Sites

The operation will result in the degradation or conversion of Critical Cultural Sites in the project area of influence.

## B.10. Hazardous Materials

The operation has the potential to impact the environment and occupational health and safety due to the production, procurement, use, and/or disposal of hazardous material, including organic and inorganic toxic substances, pesticides and persistent organic pollutants (POPs).

## B.11. Pollution Prevention and Abatement

The operation has the potential to pollute the environment (e.g. air, soil, water, greenhouse gases).

## B.12. Project Under Construction

The operation is already [under construction](#) by the executing agency or borrower.

## B.15. Co-financing Operations

The operation or any of its components is being co-financed.

## B.17. Procurement



## Safeguard Policy Filter Report

Suitable safeguard provisions for the procurement of goods and services in Bank financed operations may be incorporated into project-specific loan agreements, operating regulations and bidding documents, as appropriate, to ensure environmentally responsible procurement.

### Recommended Actions

Operation has triggered 1 or more Policy Directives; please refer to appropriate Directive(s). Complete Project Classification Tool. Submit Safeguard Policy Filter Report, PP (or equivalent) and Safeguard Screening Form to ESR. The project triggered the Disaster Risk Management policy (OP-704) and this should be reflected in the Project Environmental and Social Strategy. A Disaster Risk Assessment (DRA) may be required (see Directive A-2 of the DRM Policy OP-704). Next, please complete a Disaster Risk Classification along with Impact Classification. Also: if the project needs to be modified to increase resilience to climate change, consider the (i) possibility of classification as adaptation project and (ii) additional financing options. Please consult with INE/CCS adaptation group for guidance.

### Additional Comments

[No additional comments]



## Safeguard Screening Form

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## Safeguard Screening Form

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### Operation Classification Summary

Overridden Rating	Overridden Justification
Comments	

### Conditions / Recommendations

Category "A" operations require an Environmental Impact Assessment or a Strategic Environmental Assessment (see Environment Policy Guideline: Directive B.5 for EIA and SEA requirements) and at least two consultations with affected parties.

These operations will require an environmental assessment (EA), normally an Environmental Impact Assessment (EIA) for investment operations, or other environmental assessments such as a Strategic Environmental Assessment (SEA) for programs and other financial operations that involve plans and policies. Category "A" operations are considered high safeguard risk. For some high safeguard risk operations that, in the Bank's opinion raise complex and sensitive environmental, social, or health and safety concerns, the borrower should normally establish an advisory panel of experts to provide guidance for the design and/or execution of the operation on issues relevant to the EA process, including health and safety. However, these operations will also establish safeguard, or monitoring requirements to address environmental and other risks (social, disaster, cultural, health and safety etc.).

The Project Team must send to the ESR the PP (or equivalent) containing the Environmental and Social Strategy (the requirements for an ESS are described in the Environment Policy Guideline: Directive B.3) as well as the Safeguard Policy Filter and Safeguard Screening Form Reports.

### Summary of Impacts / Risks and Potential Solutions

[Moderate Greenhouse Gas Emissions](#) are predicted.



**Greenhouse Gas (GHG) Assessment:** The borrower should promote the reduction of project-related greenhouse gas emissions in a manner appropriate to the nature and scale of project operations and impacts. The borrower should quantify direct emissions from the facilities owned or controlled within the physical project boundary and indirect emissions associated with the off-site production of power used by the project. Quantification and monitoring of GHG emissions should be conducted annually in accordance with internationally recognized methodologies (i.e. IPCC - <http://www.ipcc.ch/>). In addition, the borrower should evaluate technically and financially feasible and cost-effective options for the reduction/offset of emissions that may be achieved during the design and operation of the project. The Sustainable Energy and Climate Change Initiative (SECCI) can help with this task (<http://www.iadb.org/secci/>).

In an area of exposure to [natural hazards](#) with a [moderate](#) impact severity, project activities and structures increase vulnerability of area of influence to [natural hazards](#) and exacerbates risks to property and the environment, or to the project itself.

A Disaster Risk Assessment, that includes a Disaster Risk Management Plan (DRMP), may be necessary, depending on the complexity of the project and in cases where the vulnerability of a specific project component may compromise the whole operation. The DRMP should focus on the potential for the project to exacerbate risks to people and the environment during construction and operation, and propose measures to manage or mitigate these risks. Measures should include siting and engineering options, disaster risk preparedness and response, as well as financial protection for the project. They should also take into account the country's disaster alert and prevention system, general design standards and other related regulations. Focus should be given to replacing and enhancing resilience functions, with special attention given to reefs, dunes, mangroves, marshes, flood plains, drainage paths, slope vegetation, etc.

Likely to have [minor](#) to [moderate](#) emission or discharges that would negatively affect [ambient environmental conditions](#).

**Management of Ambient Environmental Conditions:** The borrower should be required to prepare an action plan (and include it in the ESMP) that indicates how risks and impacts to ambient environmental conditions can be managed and mitigated consistent with relevant national and/or international standards. The borrower should (a) consider a number of factors, including the finite assimilative capacity of the environment, existing and future land use, existing ambient conditions, the project's proximity to ecologically sensitive or protected areas, and the potential for cumulative impacts with uncertain and irreversible consequences; and (b) promote strategies that avoid or, where avoidance is not feasible, minimize or reduce the release of pollutants, including strategies that contribute to the improvement of ambient conditions when the project has the potential to constitute a significant source of emissions in an already degraded area. The plan should be subject to review by qualified independent experts. Depending on the financial product, this information should be referenced in appropriate legal documentation (covenants, conditions of disbursement, etc.).

Project construction activities are likely to lead to impacts (such as dust, noise, traffic etc) that will affect local communities and [workers](#) and that are significant in nature.

**Construction:** The borrower should demonstrate how the construction impacts will be mitigated and if alternative solution have been studied. The borrower should develop a plan to manage construction impacts and risks.

Risk of significant impacts/damage to cultural site(s)



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**Protection of Cultural Sites:** Where impacts to cultural site are anticipated, the borrower should generally seek the advice of professional experts and a mitigation plan should be developed which includes the following basic elements: (a) demonstration that mitigation will comply with relevant legislation; (b) evidence that the borrower has the capacity/commitment to protect cultural sites ; (c) implementation of chance finds procedures; (d) establishment of consultation processes with affected communities and appropriate experts; and (e) appropriate controls on the removal of cultural sites . Additional special requirements will come into play if cultural site is likely to be affected by the investment. The legal documentations require monitoring, regular reporting and independent review of implementation. The borrower should develop an action plan that describes how cultural sites will be protected.

Safety issues associated with structural elements of the project (e.g. dams, public buildings etc), or road transport activities (heavy vehicle movement, transport of [hazardous materials](#), etc.) exist which could result in [moderate](#) health and safety [risks](#) to local communities.

**Address Community Health Risks:** The borrower should be required to provide a plan for managing risks which could be part of the ESMP; (including details of grievances and any independent audits undertaken during the year). Compliance with the plan should be monitored and reported. Requirements for independent audits should be considered if there are questions over borrower commitment or potential outstanding community concerns.

The negative impacts from production, procurement, use and disposal of [hazardous materials](#) (excluding POPs unacceptable under the Stockholm Convention or toxic pesticides) are [moderate](#) to [significant](#) and will comply with relevant national legislation, [IDB requirements on hazardous material](#) and all applicable International Standards.

**Hazardous Materials Management Plan:** The borrower should document risks relating to the use of hazardous materials and prepare a hazardous material management plan (as part of the ESMP) that indicates how hazardous materials will be managed (and community risks mitigated). The borrower will be responsible for preparing the ESMP, which should include: a management plan that will address identification, labeling, handling, storage, use and disposal of the relevant hazardous materials. The plan might include confirmation from third-party specialists that risks have been adequately assessed and managed. An action plan should be defined and requires regular monitoring, reporting and independent review of implementation; this plan should be included in legal documentation (covenants, conditions of disbursement, etc.).

The project has or will have [moderate](#) negative impacts on [Indigenous Peoples](#).

**Mitigation Framework:** In situations where Indigenous Peoples (IPs) will be directly or indirectly affected by a project, the borrower should conduct an evaluation including a socio-cultural assessment to identify the impacts and determine their level of significance in order to: (a) consider all realistic and cost-effective options that avoid impacts with adverse effects (sites, technologies, supply chains etc.); and (b) if impacts cannot be avoided: (i) conduct culturally appropriate consultation and good faith negotiations, consistent with affected IP legitimate decision-making processes and (ii) minimize, mitigate or compensate for these impacts in a culturally appropriate manner. Specialist advice should be sought. The project's proposed action should be developed with the informed participation of affected IPs through a process of good faith negotiations, and contained in a time-bound Mitigation Framework. The borrower will be required to seek professional advice in the development of a Mitigation Framework and the necessary consultation and good faith negotiation activities. The Mitigation Framework should be referenced in the legal documentation (covenants, conditions of disbursement, project completion tests, credit and operation regulations, etc.) and require monitoring, regular reporting and independent review of implementation, including participatory monitoring.

The project has the potential to negatively impact [Indigenous Peoples](#) who live in voluntary isolation, and does not include provisions to safeguard the right of these peoples to remain in voluntary isolation and to live freely according to their culture.

**Risk of Non-Compliance with OP-765. Specific Mitigation Framework Required:** Impacts on isolated indigenous peoples their lands, territories or resources create a significant risk of non-compliance with OP-765. There are likely to be significant social (and potentially reputational risks) associated with this project. Discuss with credit department, ESG and GDI specialists, and other experts before proceeding. Specific Mitigation Framework: In order to safeguard the collective and individual physical, territorial, and cultural integrity of affected Indigenous Peoples, when projects have potential impacts on these peoples, their lands and territories, or their way of life, the borrower should consult with pertinent authorities, stakeholders and experts to develop a Specific Mitigation Framework that includes the appropriate measures to recognize, respect and protect IP lands and territories, environment, health and culture, and to avoid contact. When a Project has the potential to impact isolated indigenous peoples, the borrower must verify that local conditions exist to safeguard the physical integrity of isolated peoples and protect their rights. Consultation and good faith negotiations with experts, concerned governmental authorities and IP organizations and agencies is required. The Mitigation Framework must focus on a risk management plan that : (a) complies with relevant legislation; and international good practice (b) evidences that the borrower together with local authorities and IPs has the capacity/commitment to protect the integrity of territories and resources; (c) establishes oversight processes , including an independent expert panel with participation of concerned communities and appropriate experts; and (d) provides for the implementation of appropriate controls including limiting access by outsiders. The Mitigation Framework will be referenced in the legal documentation, require regular reporting, frequent and independent monitoring, and independent review of implementation.

The project includes dangerous and hazardous [working conditions](#) where there could be [significant](#) negative impacts to [workers](#) or communities.

**Ensure that the borrower Addresses Occupational Health and Safety:** The borrower should provide details of how occupational health and safety issues will be addressed (including those found in the supply chain as appropriate) in a timely and efficient manner as a condition of disbursement and annual audits by third party experts should be considered. This should be addressed using an occupational health and safety management plan.



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The project is in an area prone to [volcanic activity](#) and the likely severity of the impacts to the project is [moderate](#).

A Disaster Risk Assessment, that includes a Disaster Risk Management Plan (DRMP), may be necessary, depending on the complexity of the project and in cases where the vulnerability of a specific project component may compromise the whole operation. The DRMP should propose measures to manage or mitigate these risks to an acceptable level. The measures should consider both the risks to the project, and the potential for the project itself to exacerbate risks to people and the environment during construction and operation. The measures should include risk reduction (siting and engineering options), disaster risk preparedness and response (contingency planning, etc.), as well as financial protection (risk transfer, retention) for the project. They should also take into account the country's disaster alert and prevention system, general design standards and other related regulations.

The project is located in an area prone to [landslides](#) and the likely severity of the impacts to the project is [moderate](#).

A Disaster Risk Assessment, that includes a Disaster Risk Management Plan (DRMP), may be necessary, depending on the complexity of the project and in cases where the vulnerability of a specific project component may compromise the whole operation. The DRMP should propose measures to manage or mitigate these risks to an acceptable level. The measures should consider both the risks to the project, and the potential for the project itself to exacerbate risks to people and the environment during construction and operation. The measures should include risk reduction (siting and engineering options), disaster risk preparedness and response (contingency planning, etc.), as well as financial protection (risk transfer, retention) for the project. They should also take into account the country's disaster alert and prevention system, general design standards and other related regulations.

The project is located in an area prone to [earthquakes](#) and the likely severity of impacts to the project is [moderate](#).

A Disaster Risk Assessment, that includes a Disaster Risk Management Plan (DRMP), may be necessary, depending on the complexity of the project and in cases where the vulnerability of a specific project component may compromise the whole operation. The DRMP should propose measures to manage or mitigate these risks to an acceptable level. The measures should consider both the risks to the project, and the potential for the project itself to exacerbate risks to people and the environment during construction and operation. The measures should include risk reduction (siting and engineering options), disaster risk preparedness and response (contingency planning, etc.), as well as financial protection (risk transfer, retention) for the project. They should also take into account the country's disaster alert and prevention system, general seismic design standards and other related regulations.

The project will or may require [involuntary resettlement](#) and/or economic displacement of a [minor](#) to [moderate](#) nature (i.e. it is a [direct](#) impact of the project) and does not affect [indigenous peoples](#) or other vulnerable land based groups.

**Develop Resettlement Plan (RP):** The borrower should be required to develop a simple RP that could be part of the ESMP and demonstrates the following attributes: (a) successful engagement with affected parties via a process of Community Participation; (b) mechanisms for delivery of compensation in a timely and efficient fashion; (c) budgeting and internal capacity (within borrower's organization) to monitor and manage resettlement activities as necessary over the course of the project; and (d) if needed, a grievance mechanism for resettled people. Depending on the financial product, the RP should be referenced in legal documentation (covenants, conditions of disbursement, project completion tests etc.), require regular (bi-annual or annual) reporting and independent review of implementation.

Transport of [hazardous materials](#) (e.g. fuel) with the potential or perceived potential to significantly affect community health and safety.

**Hazardous Materials Management:** An independent risk assessment should be commissioned and conclusions discussed with local communities (through a process of Consultation). The borrower should develop a plan to prevent or minimize the potential for community exposure to hazardous materials (as part of the ESMP). Where there is a potential for the community (including workers and their families) to be exposed to hazards, the borrower should exercise special care to avoid or minimize their exposure by modifying, substituting or eliminating the risk. Where hazardous materials are part of existing or proposed infrastructure, the borrower should develop management strategies and controls as well as design and operational systems that reduce risks to acceptable levels (as defined by competent professional). Particular care should be taken in situations where: (a) decommissioning activities are planned/anticipated; (b) transport of hazardous materials through local communities will occur (if this is the responsibility of third parties, the borrower should exercise commercially reasonable efforts to control the safety of deliveries of raw materials and transportation and disposal of wastes); and (c) communities will be at risk from pesticide (or other agrochemicals) (e.g. from aerial drift or water contamination). Regular reporting and independent review of implementation and the plan should be part of the legal documentation (covenants, conditions of disbursement, etc.).

Waste generation (excluding hazardous waste) is [significant](#) or there is no adequate waste management plan in place.

**Solid Waste Management:** The borrower should be required to prepare a Waste Management Plan (including management and organizational requirements) consistent with relevant national requirements and International Standards (as appropriate). This plan should be part of the ESMP. Specific attention should be placed on reducing and re-cycling solid wastes. As part of this an action plan should be defined and requires regular reporting and independent review of implementation; this plan should be included in legal documentation (covenants, conditions of disbursement, etc). Additionally, impacts of solid waste should be avoided in first instance (i.e. relocate or reconfigure proposed activities). If avoidance is not possible, impacts should be mitigated by management, offsetting impacts or other means. Specifically (if applicable) in the case that national legislations have no provisions for the disposal and destruction of hazardous materials, the applicable procedures established within the Rotterdam Convention, the Stockholm Convention, the Basel Convention, the WHO List on Banned Pesticides, and the Pollution Prevention and Abatement Handbook (PPAH), should be taken into consideration.

## Disaster Risk Summary

Disaster Risk Level



## Safeguard Screening Form

**A**

Disaster / Recommendations

### Disaster Summary

Details

Actions

Operation has triggered 1 or more Policy Directives; please refer to appropriate Directive(s).  
Complete Project Classification Tool. Submit Safeguard Policy Filter Report, PP (or equivalent) and  
Safeguard Screening Form to ESR.