



# Safeguard Policy Filter Report

## Operation Information

Operation		
HA-L1106 Solid Waste Management in Northern Haiti		
Environmental and Social Impact Category	High Risk Rating	
A		
Country	Executing Agency	
HAITI	HA-MEF - Ministère de l'Économie et des Finances)	
Organizational Unit	IDB Sector/Subsector	
Housing & Urban Development	WATER AND SANITATION	
Team Leader	ESG Primary Team Member	
MARIA EUGENIA DE LA PENA	DORIS MELISSA BARANDIARAN SALCEDO	
Type of Operation	Original IDB Amount	% Disbursed
Loan Operation	\$35,000,000	0.000 %
Assessment Date	Author	
14 Jun 2018	doriss ESG Primary Team Member	
Operation Cycle Stage	Completion Date	
ERM (Estimated)	7 Jul 2016	
QRR (Estimated)	4 May 2018	
Board Approval (Estimated)		
Safeguard Performance Rating		
Rationale		

## 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.



# Safeguard Policy Filter Report

## 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 (Gender Equality Policy– OP-761)

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

## 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).

## 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.4 Other Risk Factors

The operation may be of high risk due to controversial environmental and associated social issues or liabilities.

## 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.10. Hazardous Materials



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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.17. Procurement

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.

## Potential Safeguard Policy Items

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

The operation has the potential to affect negatively women or gender equality ([Negative gender impacts may include the following](#))

### B.4 Other Risk Factors

The operation [includes activities](#) to close current “adaptation deficits” or to increase the ability of society and ecological systems to adapt to a changing climate.

### 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.

## 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.

## Additional Comments

[No additional comments]



## Safeguard Policy Filter Report



## Safeguard Screening Form

### Operation Information

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### Operation Classification Summary

Overriden Rating	Overriden Justification
Comments	



## Safeguard Screening Form

### 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/>).

Conversion or degradation of natural habitat causing minor to moderate impact on species composition.

Mitigation measures presented in the Biodiversity Management Plan must be acceptable: The mitigation measures should be presented in the Biodiversity Management Plan (included in the ESMP) and should follow the mitigation hierarchy: impacts to biodiversity should be avoided in the first instance (i.e. proposed activities relocated or reconfigured); if avoidance of all impacts is not possible, those remaining should be minimized, mitigated by restoration, or compensated for. The BMP should also explain what consultation activities are planned. The BMP must define how these measures will be implemented (roles and responsibilities, monitoring, budget, etc.). Confirmation should be obtained from competent experts that they are confident that the BMP can mitigate impacts and that approval has been granted by relevant authorities. Regular (bi-annual or annual) reporting is required, in addition to independent audits of BMP. Depending on the financial product, the BMP should also be referenced in appropriate legal documentation (covenants, conditions of disbursement, project completion tests, etc.).

Conversion or [degradation](#) of natural habitat causing significant impact on [ecosystem services](#).

As there is a significant risk of non-compliance with IDB policy OP-703 directive B9, justification must be provided that the conversion is unavoidable, the cost-benefit analysis favours the project, and that mitigation measures are acceptable:

The borrower must provide evidence that: (a) there are no feasible alternatives acceptable to the Bank; (b) project benefits substantially outweigh environmental costs; and (c) mitigation and compensation measures are acceptable to the Bank.

Without this evidence, the Bank cannot support any operation that leads to significant conversion or degradation of natural habitat. The mitigation measures should be presented in the Biodiversity Management Plan (included in the ESMP) and should follow the mitigation hierarchy: impacts to biodiversity should be avoided in the first instance (i.e. proposed activities relocated or reconfigured); if avoidance of all impacts is not possible, those remaining should be minimized, mitigated by restoration, or compensated for. The BMP should also explain what consultation activities are planned. The BMP must define how these measures will be implemented (roles and responsibilities, monitoring, budget, etc.). Confirmation should be obtained from competent experts that they are confident that the BMP can mitigate impacts and that approval has been granted by relevant authorities. Regular (bi-annual or annual) reporting is required, in addition to independent audits of BMP. Depending on the financial product, the BMP should also be referenced in appropriate legal documentation (covenants, conditions of disbursement, project completion tests, etc.).

Generation of solid waste is [moderate](#) in volume, does not include [hazardous materials](#) and follows standards recognized by multilateral development banks.

**Solid Waste Management:** The borrower should monitor and report on waste reduction, management and disposal and may also need to develop a Waste Management Plan (which could be included in the ESMP). Effort should be placed on reducing and re-cycling solid wastes. 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.

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 localized and temporary impacts (such as dust, noise, traffic etc) that will affect local communities and [workers](#) but these are [minor](#) to [moderate](#) in nature.

**Construction:** The borrower should demonstrate how the construction impacts will be mitigated. Appropriate management plans and procedures should be incorporated into the ESMP. Review of implementation as well as reporting on the plan should be part of the legal documentation (covenants, conditions of disbursement, etc.).

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 is located in an area prone to [hurricanes](#) or other [tropical storms](#) 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 [inland flooding](#) 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. This must take into consideration changes in the frequency and intensity of intensive rainfall and in the patterns of snowmelt that could occur with climate change. The DRMP includes risk reduction measures (siting and engineering options), disaster risk preparedness and response (contingency planning, etc.), as well as the financial protection (risk transfer, retention) of the project. The DRM Plan takes into account existing vulnerability levels and coping capacities, the area's disaster alert and prevention system, general design standards, land use regulations and civil defense recommendations in flood prone areas. However, the options and solutions are sector- and even case-specific and are selected based on a cost analysis of equivalent alternatives.

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.

The project will result in a [minor](#) to [moderate](#) increase in community [risks](#) from disease or natural resources [risks](#).

**Manage Increased Risk of Disease:** Where a project will generate environmental health risks (such as increased risk from disease and environmental hazards), the borrower should be required to develop an environmental health risk plan (this will require input from professionally competent advisers/ consultants). There should be engagement with affected communities and compliance with the plan should be monitored and reported. Where specific diseases are endemic in communities in the investment area of influence, the borrower is encouraged to explore opportunities to reduce their incidence.

Transport of [hazardous materials](#) (e.g. fuel) with [minor](#) to [moderate](#) potential to cause impacts on community health and safety.

**Hazardous Materials Management:** The borrower should be required to develop a hazardous materials management plan; details of grievances and any independent health and safety audits undertaken during the year should also be provided. Compliance with the plan should be monitored and reported. Depending on the financial product, this information should be referenced in appropriate legal documentation (covenants, conditions of disbursement etc). Consider requirements for independent audits if there are concerns about commitment of borrower or potential outstanding community concerns.

## Disaster Risk Summary

Disaster Risk Level

**A**

Disaster / Recommendations

## Disaster Summary

Details



## Safeguard Screening Form

### 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.