



Module 7

ARMENIAN BANKS ENVIRONMENTAL and SOCIAL MANAGEMENT PLAN

MAIA C ROSSI

Meet The Trainer

MAIA C ROSSI

Maia is a sustainability professional with extensive technical expertise, a wide experience and a focus on climate change and climate finance. With a long track record in managing high-profile projects from initiation to final delivery, she is recognised for assessing climate change, environmental, socio-economic and gender impacts of large-scale development projects, design and carry out stakeholder engagement activities and managing and mentoring cross-functional teams across industries and geographies.

During her career, Maia has worked with numerous governments and companies from a variety of sectors including government agencies, intergovernmental organisations, financial services, development institutions and IFC bank, mining, oil and gas and construction across the world and in very diverse country contexts such as the UK, US, UE, the middle East and in most of the African countries.

She is currently a PhD candidate at the Business School of the University of Bath (UK). Her research project studies the intersection between the effect of climate change on organisations and careers and focuses on risks and opportunities of transition to lower carbon economy

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Agenda

Quiz time!

Takeaways and recap last session

Module 7

GCF Environmental and Social Framework: ES Policy and ESS

Project classification

GCF Requirement for accreditation

ES Project screening

Armenian Banks ESMP



Takeaways and Recap from Module 5

Quiz time!

All questions could have multiple correct answers and/or open questions!





Test your knowledge! 1/10

What standards the GCF has adopted ad interim as its ESS?



Test your knowledge! 2/10

Can you name at least three IFC Performance Standards?



Test your knowledge! 3/10

What does the acronym ESMS could stand for?



Test your knowledge! 4/10

What are the two main components of the GCF environmental and social framework?

- A. Environmental and Social policy and Environmental and Social Safeguards
- B. Environmental and Social policy and Environmental and Social Management System
- C. Environmental and Social Management System and Environmental and Social Safeguards



Test your knowledge! 5/10

If I want to know the General requirements for environmental and social risk management of the GCF, which document I need to read?

- A. GCF Environmental and Social policy
- B. GCF Environmental and Social Safeguards
- C. Both



Test your knowledge! 6/10

What are the characteristics of projects which fall under Category B for their environmental and social risks?

- A. Activities with potential significant adverse environmental and/or social risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented;
- B. Activities with minimal or no adverse environmental and/or social risks and/or impacts.
- C. None of the above

Test your knowledge! 7/10



Which ones of these projects could fall under Category A of the GCF ES risk screening?

- A. A project to reduce greenhouse gas emissions by enhancing carbon sequestration through the introduction of sustainable forest management
- B. A Small-scale rural and urban community-based projects, rural energy.
- C. This project aims to install an 85 km double-track, electric light rail transit system which will be powered by more than 98 percent renewable electricity.
- D. A project which aims to increase water security and strengthen communities' resilience to climate change. It will involve integrated water resources management and investment in water supply infrastructure in four vulnerable counties



Test your knowledge! 8/10

To which project phases do ES requirements of the GCF apply?

- A. Projects design and approval (concept note stage), Project operations
- B. Accreditation of AE, Projects concept note stage
- C. Accreditation of AE, Projects design and approval (concept note stage), Project operations

Test your knowledge! 9/10



Is the following sentence TRUE or FALSE?

The environmental and social requirements for organisation applying for accreditation with the GCF are consistent and equal for all organisations.



Test your knowledge! 10/10

What elements of a candidate organisation are verified during the GCF accreditation process?

- A. Risk assessment, capacity, track record, management system
- B. Project categorisation, capacity, track record, policies
- C. Capacity, track record, management system adequate for the risk categories the organisation has applied for
- D. Roles and responsibilities and procedure adequate for the risk categories the organisation has applied for

Answers and Recap



Test your knowledge! 1/10

What standards the GCF has adopted ad interim as its ESS?

The interim (*temporary*) Environmental and Social Safeguards of the GCF are the **International Finance Corporation's Environmental and Social Performance Standards**.

UPDATE

As part of the process to develop its own Environmental and Social Safeguards (ESS), the GCF has disseminated a [Call for Public Inputs](#), with the deadline of 2 December 2021.

<https://www.greenclimate.fund/projects/safeguards/ess>

The IFC PSs



https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards





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



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



PS2: Labour and working conditions

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





PS3: Resource efficiency and pollution prevention

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





PS4: Community health, safety and security

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



PS5: Land acquisition and involuntary resettlement



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





PS6: Biodiversity conservation and sustainable management of living natural resources

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





PS7: Indigenous peoples

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





PS8: Cultural heritage

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



Test your knowledge! 3/10



What does the acronym could ESMS stand for?

ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

Definition:

Serves ‘to integrate the rules and objectives into core business operations, through a set of clearly defined, repeatable processes.’ [The World Bank](#)

‘ISO 14001 sets out the criteria for an environmental management system and can be certified to. It maps out a framework that a company or organization can follow to set up an effective environmental management system. Designed for any type of organization, regardless of its activity or sector, it can provide assurance to company management and employees as well as external stakeholders that environmental impact is being measured and improved’. [ISO 14001](#)

“Environmental and social management system (ESMS)” refers to a set of management processes and procedures that allow an organization to identify, analyse, control and reduce the environmental and social impacts of its activities including transboundary risks and impacts, in a consistent way and to improve performance in this regard over time.

[GCF](#)



GCF Environmental and Social Framework



1. Environmental and Social Policy
<https://www.greenclimate.fund/sites/default/files/document/environment-social-policy.pdf>
2. Interim environmental and social safeguards of the Fund [Performance standards of the International Finance Corporation]
<https://www.greenclimate.fund/projects/safeguards/ess>



Test your knowledge! 4/10

What are the two main components of the GCF environmental and social framework (system)?

- A. Environmental and Social policy and Environmental and Social Safeguards
- B. Environmental and Social policy and Environmental and Social Management System
- C. Environmental and Social Management System and Environmental and Social Safeguards



Test your knowledge! 5/10

If I want to know the General requirements for environmental and social risk management of the GCF, which document I need to read?

- A. GCF Environmental and Social policy
- B. GCF Environmental and Social Safeguards
- C. Both

GCF ES policy



1. Intro & Definitions

2. Objectives and Scope

3. Guiding Principles

4. Roles and Responsibilities

5. General requirements for environmental and social risk management

- Environmental and social management system
- **Screening and risk categories**
- Environmental and social due diligence
- Environmental and social assessment
- Environmental and social management plan
- Operational changes
- Monitoring and reporting

6. Information disclosure, stakeholder engagement, and grievance redress



GCF Environmental and Social Framework (System)



1. Environmental and Social Policy
<https://www.greenclimate.fund/sites/default/files/document/environment-social-policy.pdf>
2. Interim environmental and social safeguards of the Fund [Performance standards of the International Finance Corporation]
<https://www.greenclimate.fund/projects/safeguards/ess>



Test your knowledge! 6/10

What are the characteristics of projects which fall under Category B for their environmental and social risks?

- A. Activities with potential significant adverse environmental and/or social risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented;
- B. Activities with minimal or no adverse environmental and/or social risks and/or impacts.
- C. None of the above

GCF ES risk categorisation



The GCF environmental and social safeguards system is based on project ESS risk categorisation.

Category A. Activities with potential significant adverse environmental and/or social risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented;

Category B. Activities with potential limited adverse environmental and/or social risks and impacts that, individually or cumulatively, are few, generally site-specific, largely reversible, and readily addressed through mitigation measures; and

Category C. Activities with minimal or no adverse environmental and/or social risks and/or impacts.

Test your knowledge! 7/10



Which ones of these projects could fall under Category A of the GCF ES risk screening?

- A. A project to reduce greenhouse gas emissions by enhancing carbon sequestration through the introduction of sustainable forest management (B)
- B. A Small-scale rural and urban community-based projects, rural energy.(C)
- C. This project aims to install an 85 km double-track, electric light rail transit system which will be powered by more than 98 percent renewable electricity. (A)
- D. A project which aims to increase water security and strengthen communities' resilience to climate change. It will involve integrated water resources management and investment in water supply infrastructure in four vulnerable counties (B)



Test your knowledge! 8/10

To which phases of project do ES requirements of the GCF apply to organisations?

- A. Projects design and approval (concept note stage), Project operations
- B. Accreditation of AE, Projects concept note stage
- C. Accreditation of AE, Projects design and approval (concept note stage), Project operations

Test your knowledge! 9/10



Is the following sentence TRUE or FALSE?

The environmental and social requirements for organisation applying for accreditation with the GCF are consistent and equal for all organisations.

‘The GCF applies a principle called **Scaled risk-based approach**.

The ESS standards will be implemented in a risk-based manner and not in a blunt, one-size-fits-all approach. This approach will require that environmental and social requirements and processes are commensurate with the level of risk and meeting the relevant ESS standards.’ [GCF](#)

If a programme, composed of **several component subprojects**, is being submitted for consideration of GCF funding, GCF will require that **the highest risk category of the component subproject will be considered as the overall risk category of the programme.**



Test your knowledge! 10/10

What elements of a candidate organisation are verified during the GCF accreditation process?

- A. Risk assessment, capacity, track record, management system
- B. Project categorisation, capacity, track record, policies
- C. Capacity, track record, management system adequate for the risk categories the organisation has applied for
- D. Roles and responsibilities and procedure adequate for the risk categories the organisation has applied for

ES requirements, different levels



Strategic level (entity level):

ES requirements for Accreditation

A ES MANAGEMENT SYSTEM MUST EXIST

CAPACITY – TRACK RECORD – MANAGEMENT SYSTEM

PEOPLE - EXPERIENCE - DOCUMENTATION

Screening level (entity, project level, design phase):

ES requirement for project screening

A ES SCREENING MUST BE IN APPLIED

Operative (entity w/third party, project level, operative phase):

ES requirement for managing the projects

A MANAGEMENT SYSTEM MUST BE APPLIED

ES Framework, Management System, Policies, what do they mean?



- **Environmental and Social Framework:** strategic, principles, corporate level; could be a stand-alone document and also indicate all the existing policies, procedures.
- **Environmental and Social Policy:** strategic, principles, could be very short or could be more detailed depending on the organisations.
- **Environmental and Social Management System:** a set of clearly defined, repeatable processes
- **Environmental and Social Safeguards, Standards, Procedures, Plans**
-> more detailed, more operative, they could be at corporate or project level e.g. how to handle chemical, waste management



Framework

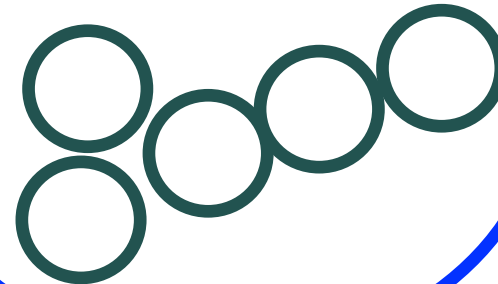
Policy/policies



Safeguards, Guidelines

Management System

Plans, Procedures





Framework

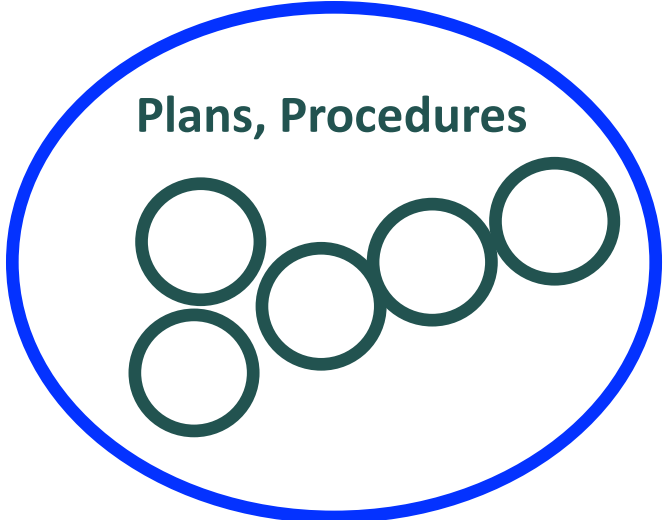
Policy/policies

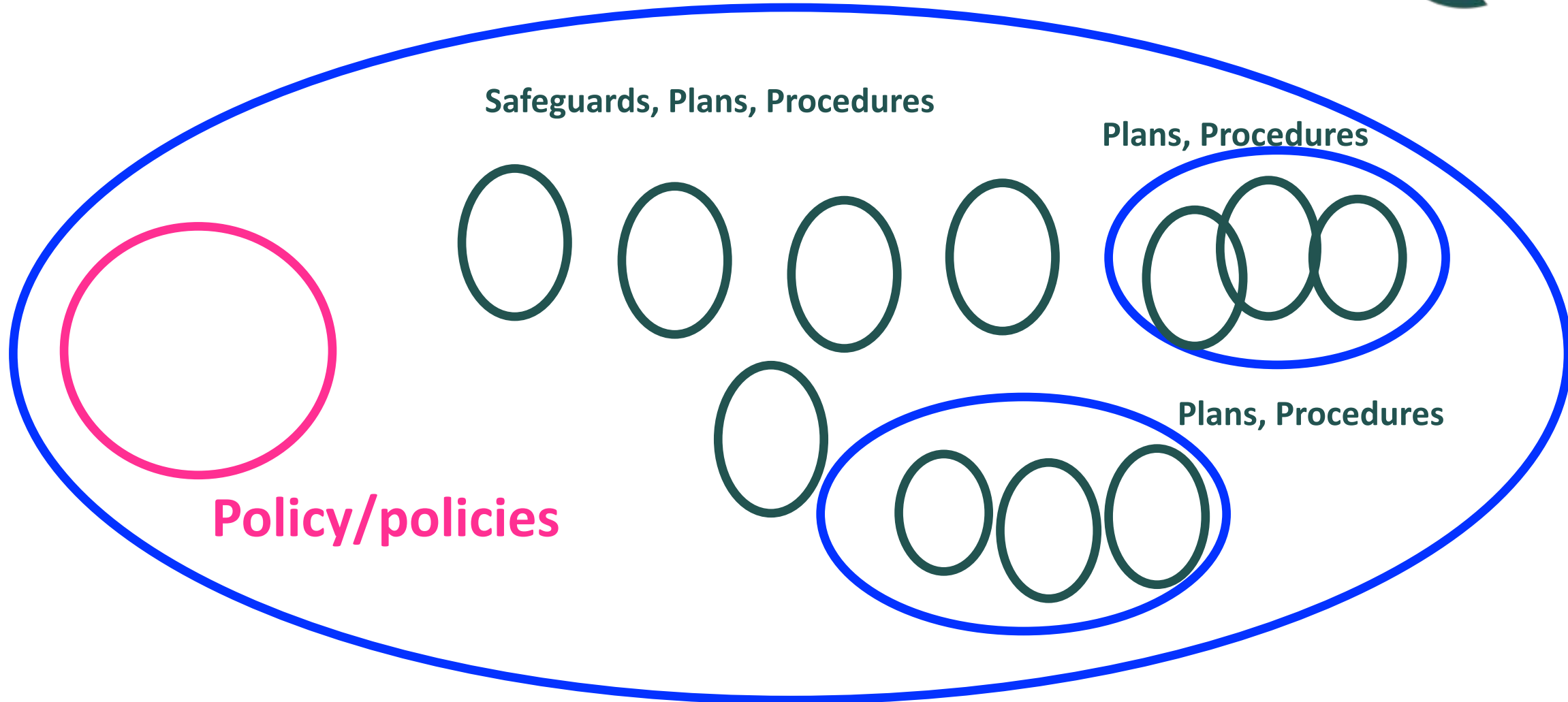


Safeguards, Guidelines

Management System

Plans, Procedures





Group Exercise!



1. Could you associate a Corporate Level and Project Level to the following figures?
2. Discuss in plenary

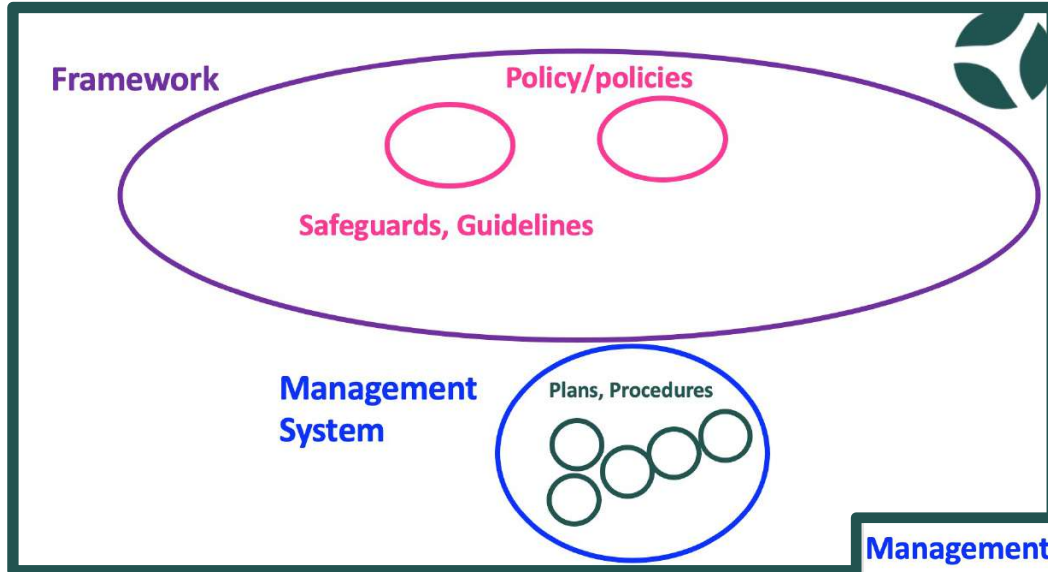


Figure A

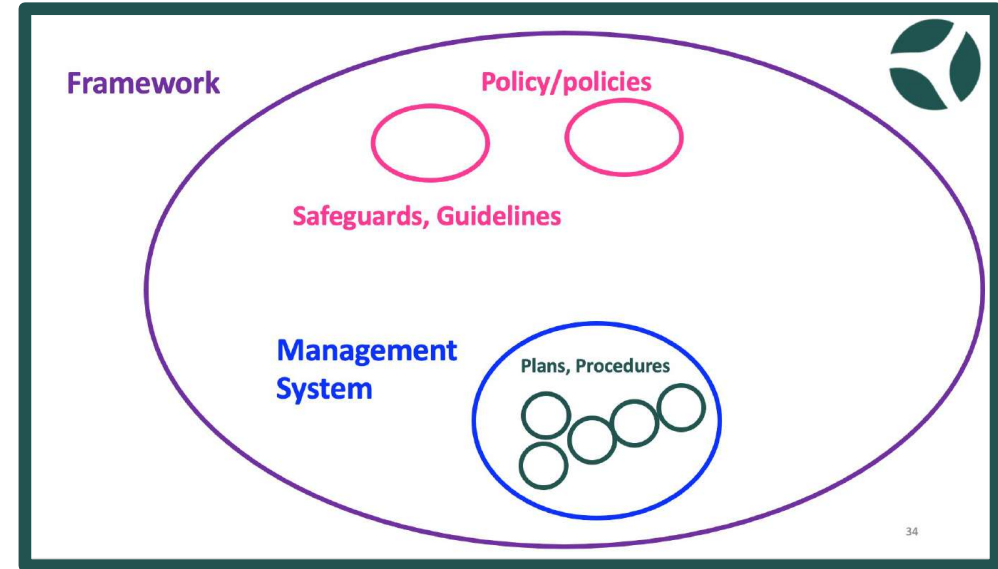


Figure C

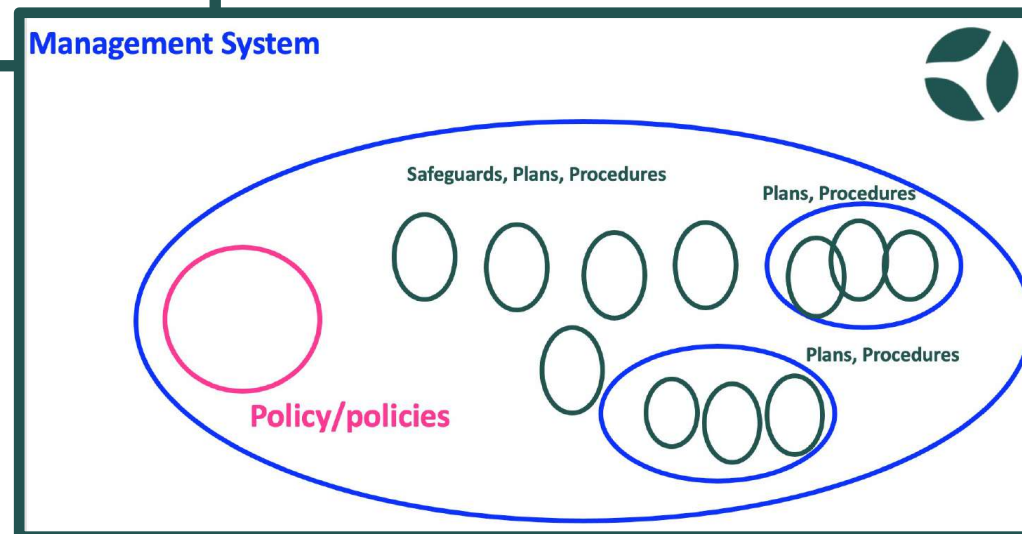


Figure B

Figure A

Corporate/strategic

Project/operative

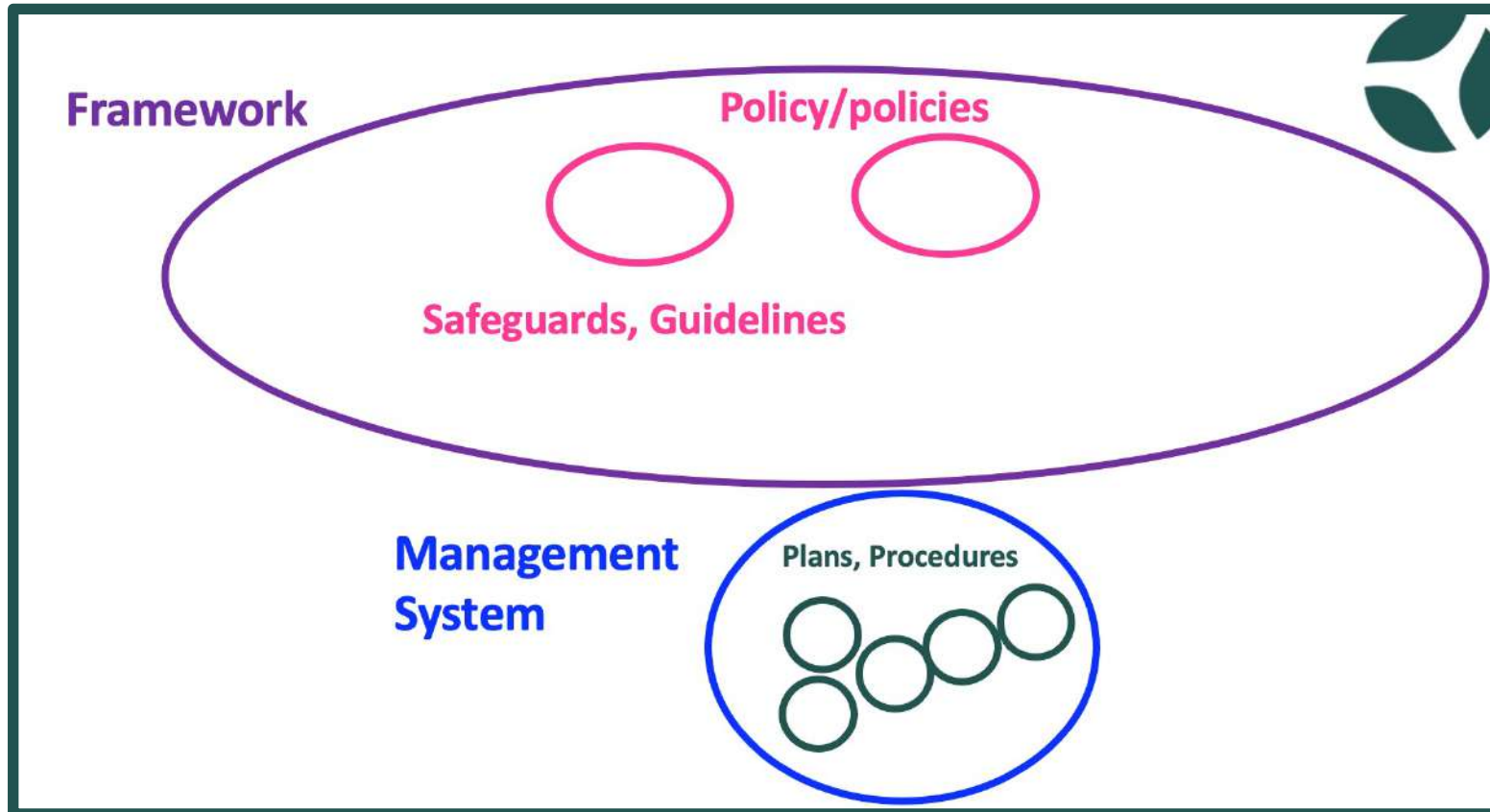
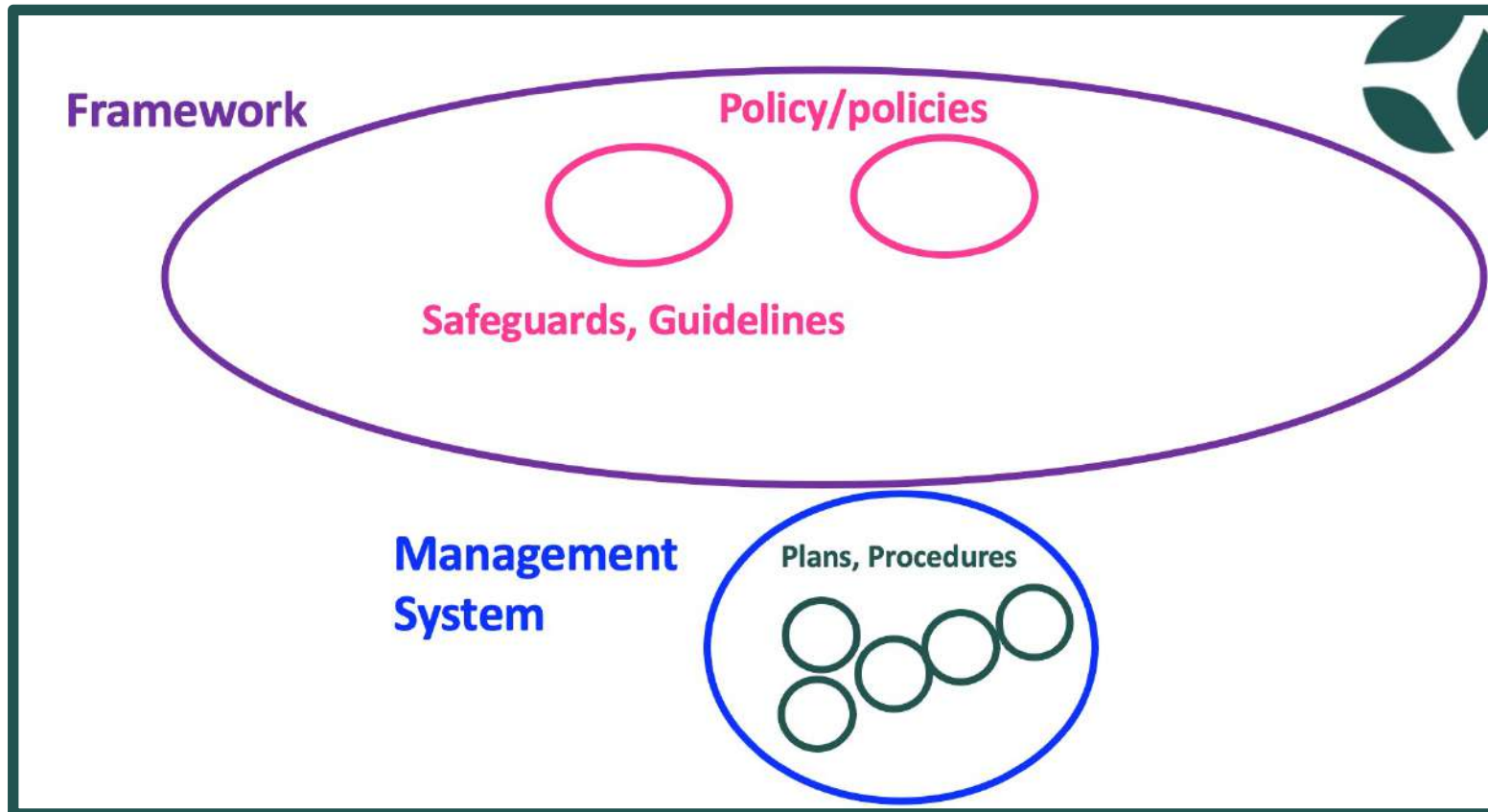


Figure A



Corporate/strategic

Project/operative



Figure B

Corporate/strategic

Project/operative

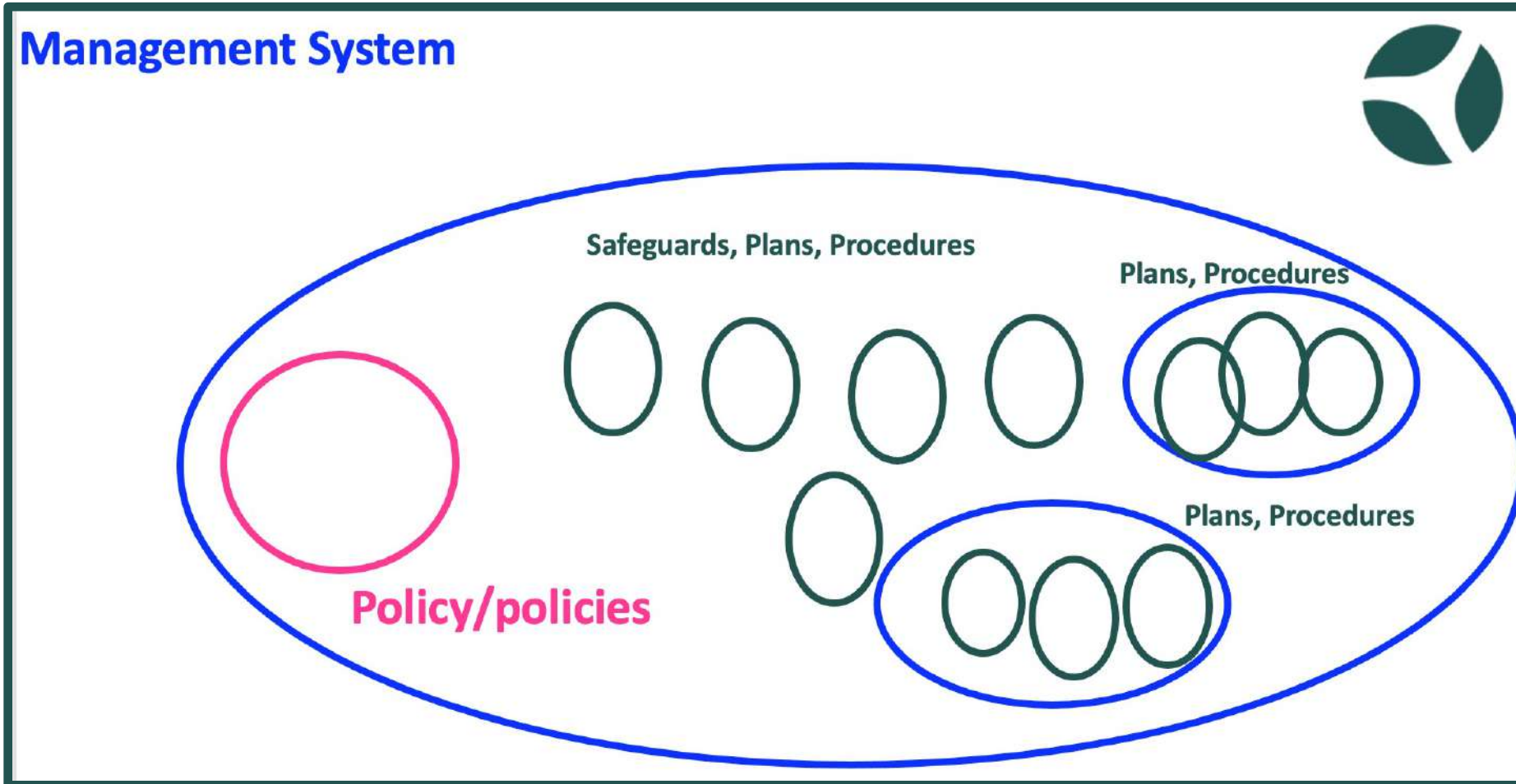




Figure B

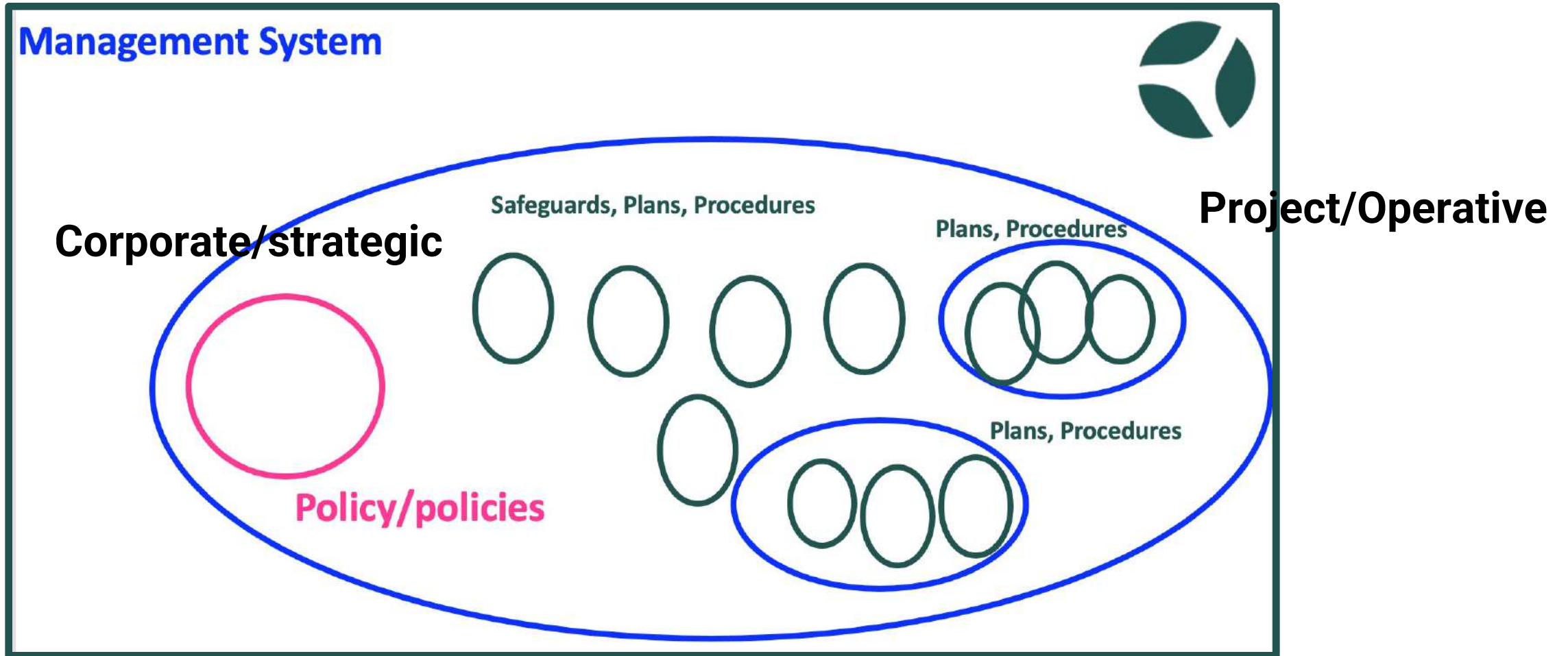




Figure C

Corporate/strategic

Project/operative

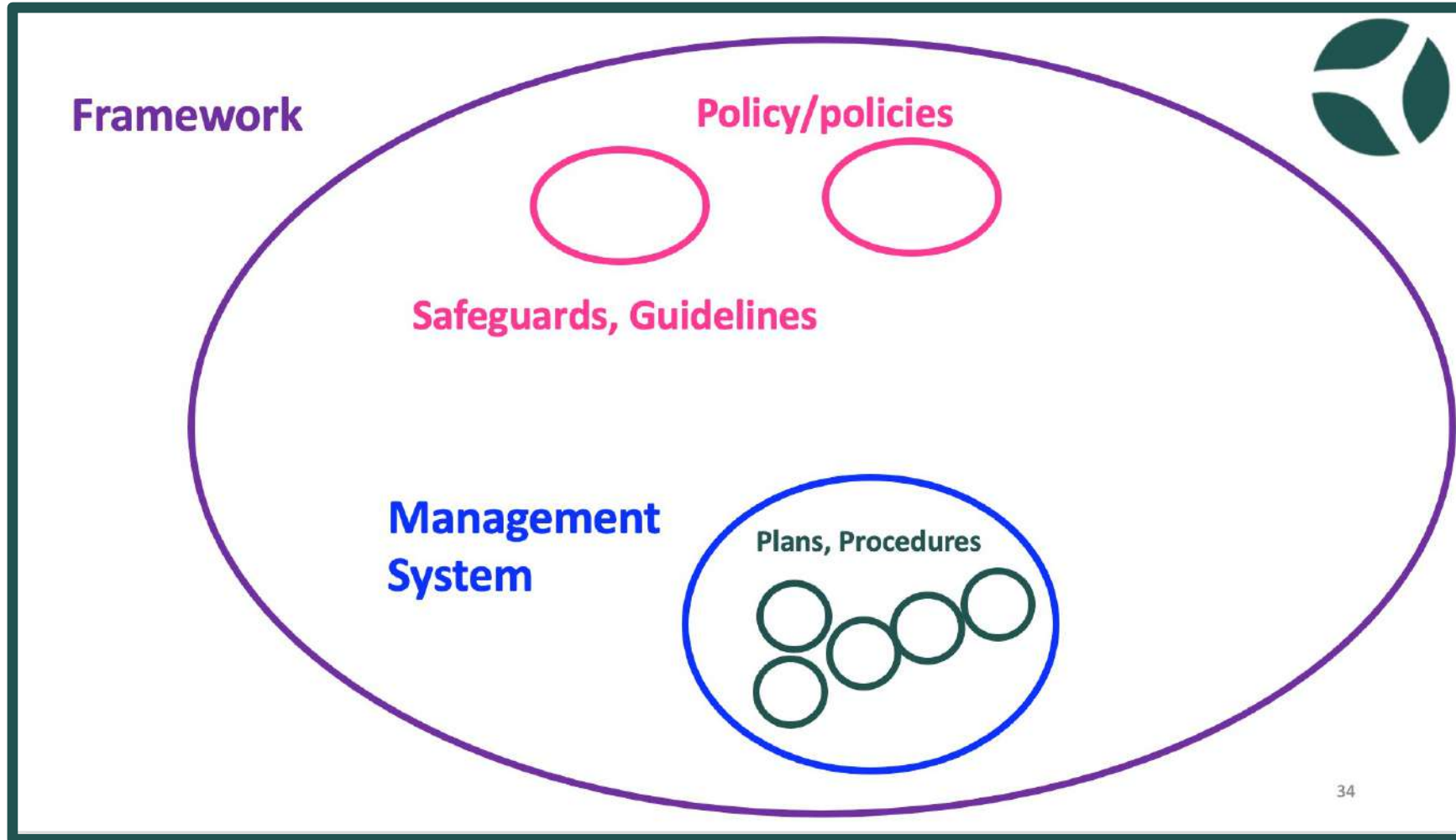
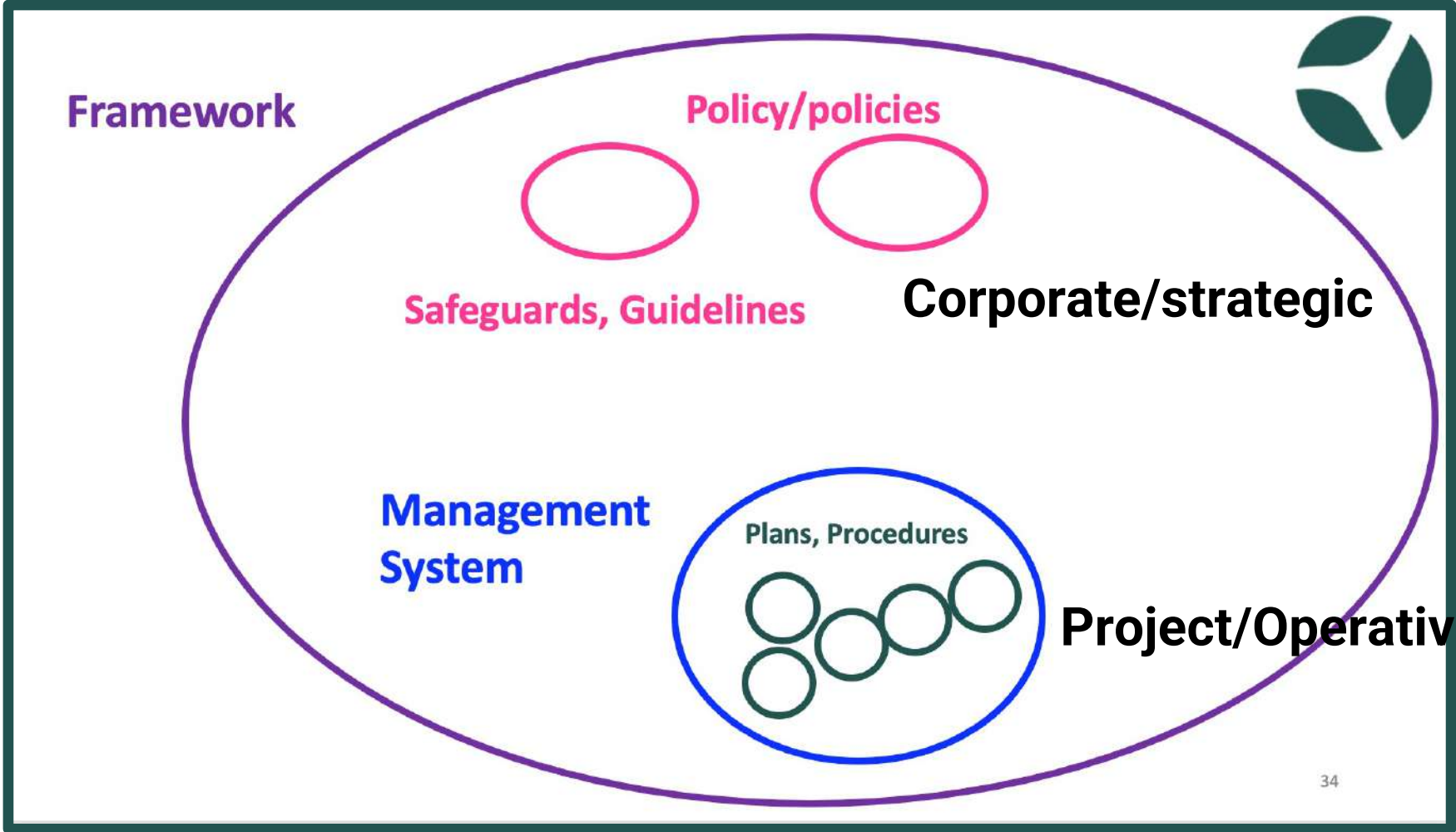




Figure C





Main takeaway

Every context and organisation are different; when you start working with a new organisation or project, spend some time at the beginning to understand the hierarchical structure of their Environmental and Social processes and how the organisation names their different documents.

WIDE OBJECTIVE is always to integrate the environmental and standards rules and objectives into core business strategy and operations, through a set of clearly defined, repeatable processes, responsibilities and documents at least to identify, assess, mitigate ES risks and impact.



GCF ES Requirements

GCF ES Requirements



ACCREDITATION

PROPOSAL
CONCEPT
NOTE

PROJECT
OPERATIONS

GCF ES Requirements



ACCREDITATION

PROPOSAL
CONCEPT
NOTE

PROJECT
OPERATIONS

ESMS

ES Policy
Identification risks &
impacts
Management Program
Organizational Capacity
Monitoring & Review
External communication

Screening
ESHIA
ESMP
Information
disclosure

ESMP
Monitoring
Grievance mechanism
Stakeholder
engagement

GCF Requirements: Accreditation



VI. General requirements for environmental and social risk management ([GCF ES Policy](#))

6.1 Accreditation

GCF operates through accredited entities, including those functioning as financial intermediaries. These entities are tasked to deliver upon the objectives of GCF through the supported activities while ensuring that the fiduciary, environmental and social standards of the GCF are met. **Accredited entities will have in place environmental and social management systems that specify their capacities, standards and processes for screening, identifying, assessing, managing, and monitoring the potential environmental and social risks and impacts pursuant to the ESS standards of GCF and this policy.**

The accreditation of entities will be conducted pursuant to the accreditation framework. Under the accreditation framework, GCF examines, in line with the ESS standards and all relevant GCF policies, the adequacy of the applicant's environmental and social management system and the track record of implementing such a system. The accreditation process will also allow the entities to access GCF support at a level commensurate to their institutional capacity to undertake the assessment and management of environmental and social risks and impacts

GCF Requirements: Accreditation



| # | Content of Accreditation Section |
|---|--|
| 1 | Background and contact information of the applicant entity |
| 2 | Information on the ways in which the institution and its intended projects/programs will contribute to furthering the objectives of the Green Climate Fund |
| 3 | Information on the scope of intended projects/programs and estimated contribution requested for an individual project or activity within a program |
| 4 | Basic fiduciary criteria |
| 5 | Applicable specialized fiduciary criteria (project management; grant award) |
| 6 | Environmental and social safeguards (ESS) |
| 7 | Gender |

GCF Requirements: Accreditation



6. Environmental and Social Management System (ESMS)

CORPORATE - STRATEGIC LEVEL

6.1 Policy

6.2 Identification of Risks and Impacts

6.3 Management Program

6.4 Organizational Capacity and Competency

6.5 Monitoring and Review

6.6 External Communications

ES Requirements: Project Screening



VI. General requirements for environmental and social risk management ([GCF ES Policy](#))

6.3 Screening and risk categories (**CORPORATE AND PROJECT LEVEL**)

GCF, pursuant to the ESS standards, requires accredited entities – whether their role is as an implementing entity or an intermediary entity – to screen activities that include programmes, projects and subprojects, and following the result of the screening, to assign appropriate risk categories consistent with their environmental and social management systems and the GCF ESS standards.

GCF Guidelines

[Guidelines for the Environmental and Social Screening of Activities Proposed under the Simplified Approval Process](#)

[Sustainability guidance note: screening and categorizing GCF-financed activities](#)

Project Screening (SAP)



The environmental and social screening report form consists of two parts:

- (a) **Part A is a screening against a set of exclusion criteria.** The exclusion criteria describe the activities that have specific risk factors that would
 - (i) raise the overall environmental and social risks of the proposed activities (for example raising to Category B or A) and
 - (ii) would require more detailed and specific assessments and management plans. The proposed activities will be deemed not eligible for SAP if these will likely generate any of the risk factors.

- b) **Part B is a screening checklist organized according to the GCF interim ESS standards** (or correspondingly, the IFC Performance Standards). The result of the Part B screening will be the basis of the Environmental and Social Action Plan (ESAP) or management plan.

ES Requirements: Project Operations



1. General requirements for environmental and social risk management ([GCF ES Policy](#))
2. Interim environmental and social safeguards of the Fund [Performance standards of the International Finance Corporation] <https://www.greenclimate.fund/projects/safeguards/ess>

If the accredited entities are acting in an intermediary function, GCF will require the accredited entity to undertake all necessary measures to ensure that the executing entities fulfil the requirements

VI. General requirements for environmental and social risk management ([GCF ES Policy](#))

6.2 Environmental and social management system (CORPORATE LEVEL – APPLICATION)

The AEs will put in place an effective environmental and social management system to assess the environmental and social risks and impacts associated with the activities and the means to subsequently manage these effectively and equitably.

ES Requirements: Project Operations



VI. General requirements for environmental and social risk management ([GCF ES Policy](#))

6.5 Environmental and social assessment (PROJECT LEVEL)

GCF will require the AEs to undertake assessment of environmental and social, including transboundary risks and impacts to ensure that the activities proposed for GCF financing meet their environmental and social safeguards pursuant to the ESS standards of GCF and this policy.

6.6 Environmental and social management plan (PROJECT LEVEL)

GCF will require and ensure that the accredited entities develop ESMPs that contain the measures to manage and mitigate the identified risks and impacts, pursuant to the ESS standards of the GCF and this policy.

- **For Category A** a full and comprehensive ESIA and ESMP will be required.
- **For Category B** a fit-for-purpose ESIA and an ESMP, with a more limited focus as may be appropriate, that describes the potential impacts, as well as appropriate mitigation, monitoring and reporting measures will be required.
- **Category C activities** should have no expected significant environmental and social impacts and therefore may not require any assessments, although a pre-assessment or screening should confirm that the activities are indeed in Category C.

6.8 Monitoring and reporting (*participatory monitoring approach*) (PROJECT LEVEL)

The AEs are responsible for monitoring and reporting to GCF on the GCF financed activities. In monitoring the environmental and social performance of activities, GCF shall require the accredited entities to undertake all necessary measures to ensure participatory monitoring through the involvement of communities, local stakeholders, indigenous peoples and civil society organizations in all the stages of the life cycle of activities.

ES Requirements: Project Operations



VII. Information disclosure, stakeholder engagement, and grievance redress ([GCF ES Policy](#))

7.1 Information disclosure

GCF will require that all additional environmental and social safeguards documents be disclosed. These documents will include a suite of assessment and management instruments, such as resettlement action plans and policy frameworks, indigenous peoples plans and planning frameworks, gender assessments and gender action plans, and environmental and social due diligence and audit reports. These documents will complement the environmental and social reports or core safeguards instruments required in all cases – ESIA, ESMP and/or operational environmental and social management system or frameworks – and will be disclosed in the same manner and time frame as the core instruments.

7.2 Stakeholder engagement

GCF will require AEs, including intermediaries, to ensure the effective engagement of communities and individuals, including transboundary, vulnerable and marginalised groups and individuals that affected or potentially affected by the activities proposed for GCF financing.

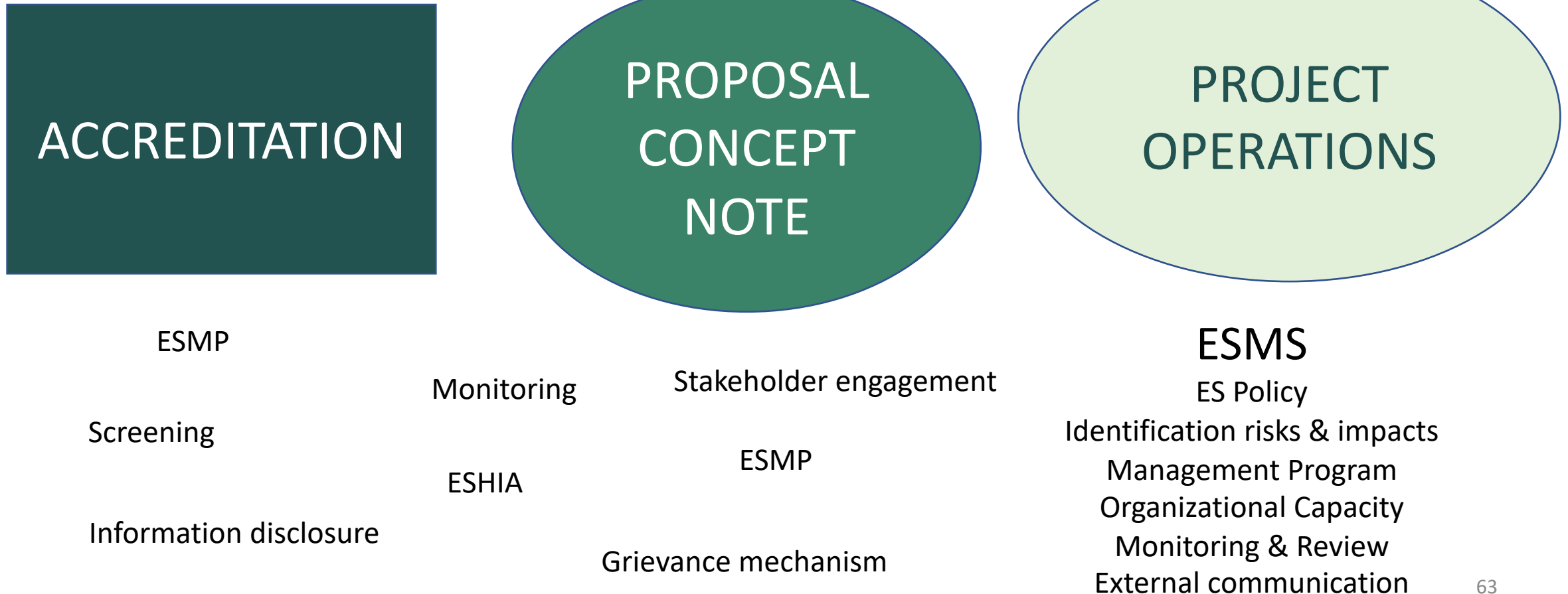
7.3 Grievance redress mechanisms

It is the responsibility of the AEs to require and ensure that their grievance mechanisms and the activities' grievance mechanisms are functioning effectively, efficiently, legitimately, and independently in a manner that is accessible, equitable, predictable, transparent, , and that allows for continuous learning.

Group Exercise!



- 1) Associate the requirement to its phase
- 2) Define which phase is at corporate and which at project level
- 3) Share in plenary



Group Exercise!



ACCREDITATION

PROPOSAL
CONCEPT
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ESMS

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GCF ES Requirements

Project Specific



ACCREDITATION

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Environmental and Social Management System (ESMS)

Template for Armenian Banks

October 12, 2021



Document structure and language

- Section 2 outlines the required **structure** of an **Environmental and Social Management System**.
- Sections 3, 4, and 5 outline the required **components of an ESMS**.
- Section 6 focuses on how **environmental and social risk should be integrated within existing bank risk management procedures**.
- Section 7 outlines the **responsibilities** of the bank's ESMS Office Holders.
- Sections 8 to 15 consist of relevant **Annexes**.

Document structure and language



Figure 1 presents a model for how an ESMS should be constructed. While there is, as yet, no formal “standard” for an ESMS, the outline presented in Figure 1 is consistent with international best practice.



Exercise!

These lay out specific thematic requirements for the design and implementation of projects, and provide guidance to both bank staff involved in project design, and a bank's clients/loan recipients who are responsible for the implementation of a project.

set of operational procedures and requirements that enable due diligence to be undertaken



This exists to elaborate a bank's commitment to integrate environmental and social issues into its decision-making and outcomes, and establish the principles, requirements, and responsibilities to deliver on these commitments. High-level environmental and social policies tend to cover objectives and principles; scope of application; and, institutional and implementation arrangements. They also tend to be passed at management-level, and become binding requirements for any project/programme activities.

Document structure and language



This exists to elaborate a bank's commitment to integrate environmental and social issues into its decision-making and outcomes, and establish the principles, requirements, and responsibilities to deliver on these commitments. High-level environmental and social policies tend to cover objectives and principles; scope of application; and, institutional and implementation arrangements. They also tend to be passed at management-level, and become binding requirements for any project/programme activities.



ES Policy



The bank does not support projects/programmes that unnecessarily harm the environment, vulnerable communities or women or contribute to poverty, social inequality or gender discrimination.

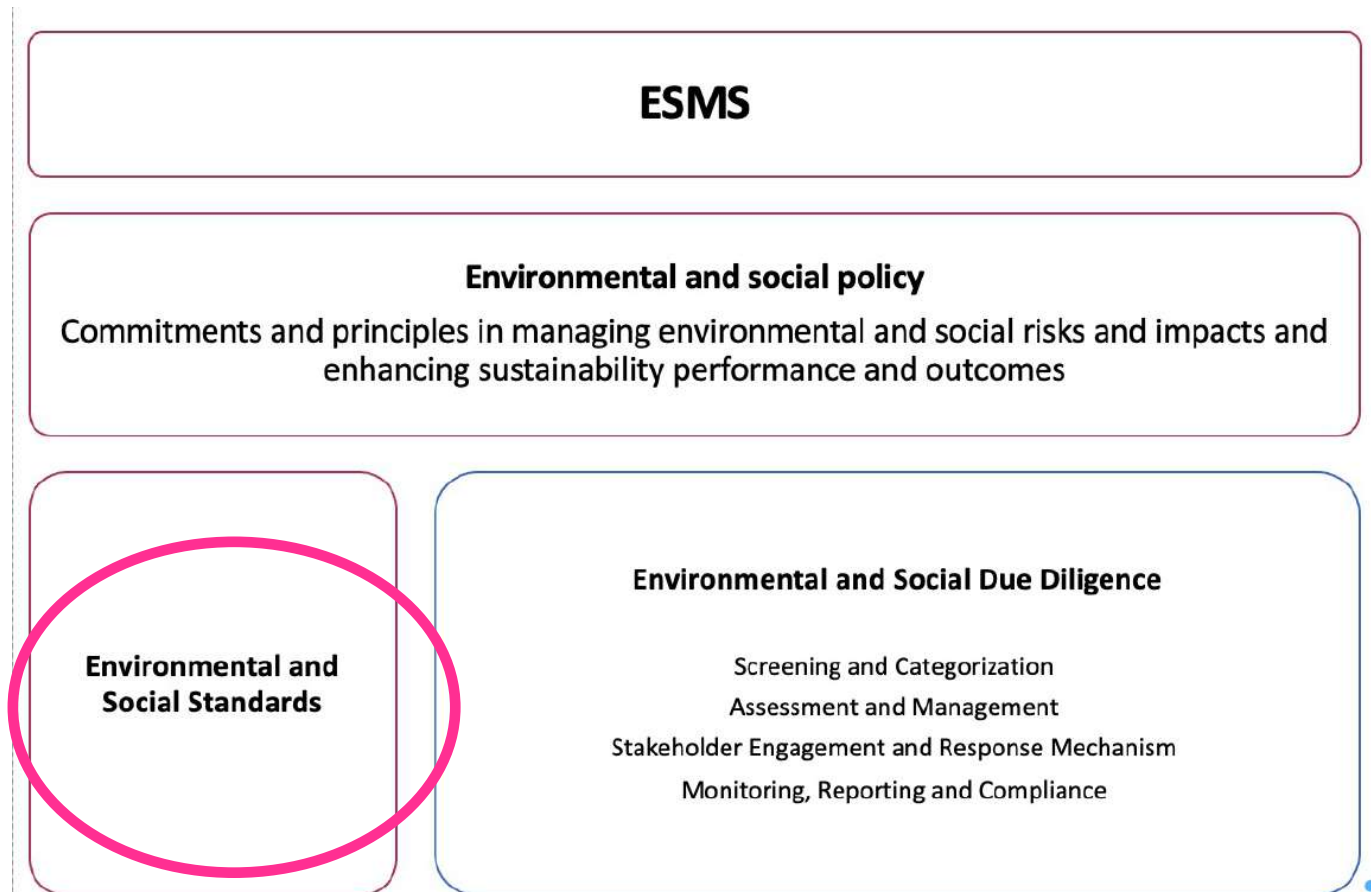
To carry out this Policy the bank shall:

- Have an environmental and social management system that ensures environmental and social risks are identified and assessed at the earliest possible stage of project/programme design;
- Avoid, reduce or limit negative environmental, social and climate impacts and improve the E&S benefits of its initiatives;
- Support the preservation and protection of biodiversity and sustainably manage natural resources;
- Avoid negative impacts on the living conditions, livelihoods and land tenure of communities;
- Ensure the health and safety at work of its own employees and require its subcontractors and executing entities to implement measures to protect the health and safety of their employees at work;
- Condemn forced labour and child labour, prohibit discrimination, prohibit and combat harassment and support the freedom of association and the right to collective bargaining of workers;
- Comply with all relevant environmental, social, health and safety as well as land acquisition policies, laws and regulations of the countries of intervention and international standards;
- Monitor the status of those mitigation measures during and at the end of implementation; and,
- Assure that adequate opportunities are provided for the informed participation of all stakeholders in the formulation and implementation of projects/programmes supported by the bank.

Document structure and language



These lay out specific thematic requirements for the design and implementation of projects, and provide guidance to both bank staff involved in project design, and a bank's clients/loan recipients who are responsible for the implementation of a project.



Document structure and language



set of operational procedures and requirements that enable due diligence to be undertaken

Initial ESMS Screening: Concept Note Stage

Final ESMS Screening Questionnaire (Full proposal)





Integrating ESMS Requirements within Existing Risks Management Procedures



Figure 2: Traditional Loan Assessment Process



Integrating ESMS Requirements within Existing Risks Management Procedures

