

**WORLDWIDE  
JICA STUDY FOR REVIEW OF  
JICA GUIDELINES FOR ENVIRONMENTAL AND  
SOCIAL CONSIDERATIONS  
FINAL REPORT**

**February 2020**

**JAPAN INTERNATIONAL COOPERATION AGENCY**

**NIPPON KOEI CO., LTD.**

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This report contains a summary and citations of other organizations' official documents including environmental and social safeguard policies. Details of the referred documents need to be confirmed with the originals. Translations as well as views and opinions expressed in the adaptations of the original works are the sole responsibility of the author of this report.

# JICA Study for Review of JICA Guidelines for Environmental and Social Considerations Final Report

## Table of Contents

CHAPTER 1	INTRODUCTION .....	1-1
1.1	Background of the Study.....	1-1
1.2	Objective of the Study.....	1-1
1.3	Scope of the Study .....	1-1
1.4	Study Methodology.....	1-7
CHAPTER 2	RESULTS OF THE REVIEW STUDY.....	2-1
2.1	Summary of Reviewed Projects .....	2-1
2.1.1	Projects by Region.....	2-1
2.1.2	Projects by JICA Project Scheme.....	2-2
2.1.3	Projects by Sector.....	2-2
2.2	Application Results of JICA GL for Environmental and Social Considerations for 100 Reviewed Projects.....	2-2
2.2.1	Review Results of "I. Basic Matters" .....	2-3
2.2.2	Review Results of "II. Process of Environmental and Social Considerations" .....	2-4
2.2.3	Review of "III. Procedures of Environmental and Social Considerations" .....	2-10
2.2.4	Appendix 1 – 6 Environmental and Social Considerations Required for the Project Proponents.....	2-16
2.2.5	Case Analysis of Ayago Hydroelectric Power Plant Development Project .....	2-51
CHAPTER 3	CHANGES AND TRENDS OF EXTERNAL ENVIRONMENT .....	3-1
3.1	Government Policies and International Aid.....	3-1
3.1.1	Development Cooperation Charter.....	3-1
3.1.2	Promoting Quality Infrastructure Investment.....	3-4
3.1.3	G7 Ise-Shima Principles for Promoting Quality Infrastructure Investment .....	3-6
3.1.4	Trends of International Aid .....	3-6
3.2	Changes after the Enforcement of Current JICA GL.....	3-9
3.2.1	Responsibility of JICA .....	3-9
3.2.2	JICA's New Assistance Program Started after the JICA GL Enforcement in 2010.....	3-12
3.3	Summary of MDBs' SGPs.....	3-20
3.3.1	Current Status and Trend of MDBs' SGPs.....	3-20
3.3.2	Comparison of WB's Previous SGPs with the New ESF.....	3-24
3.3.3	Policies of MDBs on Specific Safeguards Topics.....	3-41
3.4	Changes in Surroundings Related to the Review of JICA GL for Environmental and Social Considerations and its Process .....	3-43
3.4.1	Ruggie Principles (Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework).....	3-43
3.4.2	SGPs of WB, ADB and IFC as the Standards and Good Practices to be Referred .....	3-44
3.4.3	Quantification of Environmental and Social Costs and Benefits in Japan and MDBs' Projects .....	3-45
3.4.4	Alternative Considerations Especially for "Without Project Scenario" .....	3-46
3.4.5	Natural Disaster Aspect in the EIA for Projects in Japan and Funded in MDBs .....	3-48
3.4.6	Climate Change Issue in the ESIA under MDBs' SGP.....	3-52
3.4.7	Indivisible Projects, Derivative and Secondary Impact and Cumulative Impact under MDBs' SGP .....	3-54
3.4.8	Consideration for Protected Area, Biodiversity and Critical Natural Habitats in the ESIA .....	

	under MDBs' SGP.....	3-55
3.5	Comparison among Bilateral Donors' SGPs.....	3-62
3.6	Japan's Treaty Ratification .....	3-74
3.7	Achievements and Challenges of JICA 's Capacity Development Programs .....	3-78
CHAPTER 4	DRAFT DISCUSSION POINTS FOR REVISION OF JICA GL .....	4-1

ANNEX: RECEIVED PUBLIC COMMENTS

## **List of Tables**

Table 1-1 List of Reviewed Projects .....	1-2
Table 1-2 Field Surveys Conducted for 8 Projects .....	1-7
Table 1-3 Review Survey Item Sheet .....	1-8
Table 2-1 Review Results of Survey Item Sheet for “Chapter I. Basic Matters” .....	2-3
Table 2-2 Projects which Emergency Measures were Applied .....	2-4
Table 2-3 Example of Qualitative Without-Project Scenario .....	2-13
Table 2-4 Example of Quantitative Without-Project Scenario .....	2-13
Table 2-5 Examples of Alternatives .....	2-13
Table 2-6 Overview of the Projects which have an Indivisible Project.....	2-24
Table 2-7 Projects with Derivative or Secondary Impacts and Mitigation Measures Implemented.....	2-24
Table 2-8 Projects with Cumulative Impacts and Mitigation Measures Implemented.....	2-25
Table 2-9 Details of the Project Located in the Vicinity of the Area Designated as "Protected Areas that are Specifically Designated by Laws or Ordinances for the Conservation of Nature or Cultural Heritage" .....	2-26
Table 2-10 Grounds and Verification Results that are Considered to be Critical Natural Habitats .....	2-28
Table 2-11 Comments from the Public Consultation Meetings which were Reflected.....	2-30
Table 2-12 Projects which Lower the Resistance of the Project Site and Increases the Disaster Risk.....	2-33
Table 2-13 Outline of Good Practice for Consultations .....	2-33
Table 2-14 Example of Consultation Challenges .....	2-35
Table 2-15 Examples of Conducted Stakeholder Analysis .....	2-38
Table 2-16 Good Practices in Environmental and Social Considerations .....	2-38
Table 2-17 Issues Pointed out to the Project Proponent and/or JICA by the Third Party .....	2-39
Table 2-18 Project for which an Objection has been Filed to JICA .....	2-40
Table 2-19 Cases of Consideration for the Socially Vulnerable Groups.....	2-41
Table 2-20 Responses to Advice on Gender and Children's Rights .....	2-44
Table 2-21 Changes in the Number of PAPs in the Environmental Review and Monitoring Stages and Reasons.....	2-45
Table 2-22 Project Categorization in Power Transmission and Distribution Line Sector and Agriculture Sector.....	2-49
Table 2-23 Discussion and Situation at the Advisory Committee .....	2-51
Table 2-24 Responses to Advisory Committee’s Advices at the Implementation Stage.....	2-53
Table 3-1 Outline of Development Cooperation Charter .....	3-1
Table 3-2 Outline of PSIF and Support for SMEs and SDG Businesses.....	3-12
Table 3-3 PSIF Projects upto December 2018 .....	3-13
Table 3-4 Support for SME/SDGs Business (1) Promotion Survey (SME Support) .....	3-15
Table 3-5 Support for SME/SDGs Business (2) Feasibility Survey (SME Support) .....	3-16
Table 3-6 Support for SME/SDGs Business (3) Verification Survey (SME Support).....	3-17
Table 3-7 Previous Support Projects which are Classified as Support for SDGs.....	3-18
Table 3-8 Summary of MDBs’ SGPs .....	3-20
Table 3-9 Status of MDBs’ SGPs and Their Revision .....	3-22
Table 3-10 Major Differences between Previous SGPs and the ESF/ESS .....	3-24
Table 3-11 Category of Environmental Component Shown in the “Basic Matter”.....	3-49
Table 3-12 Projects that have Selected Parameters related to Natural Disaster in their EIA under the Japanese EIA Act.....	3-50
Table 3-13 Requirements on GHG Emission .....	3-52
Table 3-14 Analysis of Alternative Considerations on GHG Emission Reduction which is Technically and Financially Feasible and Cost Effective.....	3-54
Table 3-15 Definition of Associated Facility under MDBs’ SGP .....	3-54
Table 3-16 Definition of Indirect Impact/Secondary Impact under MDBs’ SGP .....	3-55
Table 3-17 Definition of Cumulative Impact under MDBs’ SGP .....	3-55
Table 3-18 Definition of Habitats.....	3-57
Table 3-19 Requirements for the Development Project in the Natural Habitat.....	3-58

Table 3-20 Requirements for the Development Project in the Critical Natural Habitat/Critical Habitat .....	3-59
Table 3-21 Requirements for the Protected Areas.....	3-61
Table 3-22 (1) Survey on Bilateral Donor Agencies' SGPs (France, Germany, UK).....	3-64
Table 3-22 (2) Survey on Bilateral Donor Agencies' SGPs (US, Korea, China, Thailand).....	3-68
Table 3-23 Status of Ratification of International Treaties Related to Environmental and Social Considerations .....	3-74
Table 3-24 Results of Environmental and Social Considerations Training.....	3-79
Table 4-1 Draft Discussion Points for Revision of JICA GL .....	4-2

## **List of Figures**

Figure 2-1 Reviewed Projects by Region .....	2-1
Figure 2-2 Number of Reviewed Projects by Sector .....	2-2
Figure 2-3 Percentage of SHM Participants in EIA for Category A Projects.....	2-36
Figure 2-4 Percentage of SHM Participants in RAP for Category A Projects .....	2-36
Figure 3-1 Promotion of Quality Infrastructure.....	3-6

## **List of Abbreviation**

ADB	Asian Development Bank
AFD	Agence Française de Développement
AfDB	African Development Bank
AIP	Access to Information Policy
ARAP	Abbreviated Resettlement Action Plan
ASEAN	Association of Southeast Asian Nations
AusAID	Australian Agency for International Development
BMP	Biodiversity Management Plan
BMZ	German Federal Ministry for Economic Cooperation and Development
BOD	Biochemical Oxygen Demand
BOP	Base of the Economic Pyramid
BP	Bank Procedures
C/P	Counterparts
CDC	Commonwealth Development Corporation, UK
CEXIM	Export-Import Bank of China
CO <sub>2</sub>	Carbon Dioxide
COP21	UNFCCC 21st Conference of Parties
CR	Critically Endangered
D/D	Detailed Design
DAC	Development Assistance Committee
DFID	Department for International Development, UK
DF/R	Draft Final Report
EA	Environmental Assessment
EBRD	European Bank for Reconstruction and Development
ECC	Environmental Clearance Certificate
EDCF/KEXIM	Economic Development Cooperation Fund/Export-Import Bank of Korea
EDF	European Development Fund
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EIRR	Economic Internal Rate of Return
EMoP	Environmental Monitoring Plan
EMP	Environmental Management Plan
EMU	Environmental Monitoring Unit
EN	Endangered
EP	The Equator Principles
ERP	Emergency Response Plan
E/S	Engineering Service
ESCP	Environmental and Social Commitment Plan
ESDD	Environmental and Social Due Diligence
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
EU	European Union
F/R	Final Report
F/S	Feasibility Study
FAO	Food and Agriculture Organization
FAQ	Frequently Asked Questions
FGD	Focus Group Discussion
FI	Financial Intermediary
FPIC	Free, Prior and Informed Consent / Free, Prior and Informed Consultation
GCF	Green Climate Fund
GCG	Green Credit Guidelines
GHG	Green House Gas
GIIP	Good International Industry Practice
GN	Guidance Note
GRM	Grievance Redress Mechanism
GTZ	Gesellschaft für Technische Zusammenarbeit
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immuno-Deficiency Syndrome
IBA	Important Bird Areas
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
IDB	Islamic Development Bank
IDB	Inter-American Development Bank
IEE	Initial Environmental Examination
IFC	International Finance Corporation

IFC PS	IFC Performance Standards on Environmental and Social Sustainability
ILO	International Labor Organization
IMO	International Maritime Organization
IP/SSAHUTLC	Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities
IPCC	Intergovernmental Panel on Climate Change
IPP	Indigenous Peoples Plan
IRP	Income Restoration Program
ISO	International Organization for Standardization
IUCN	International Union for Conservation of Nature
JCM	Joint Crediting Mechanism
JICA	Japan International Cooperation Agency
JICA GL	JICA Guidelines for the Environmental and Social Considerations
JIS	Japan Industrial Standard
JSP	Joint Strategic Plan
KBA	Key Biodiversity Area
KFW	Kreditanstalt für Wiederaufbau, Germany
LARAP	Land Acquisition and Resettlement Action Plan
LMP	Labour Management Procedure
MCC	Millennium Challenge Corporation, USA
MDBs	Multilateral Development Banks
MDGs	Millennium Development Goals
MIGA	Multilateral Investment Guarantee Agency
MOE	Ministry of Environment of Japan
MOFA	Ministry of Foreign Affairs of Japan
MOU	Memorandum of Understanding
M/P	Master Plan
NDC	Nationally Determined Contributions
NEDA	Neighbouring Countries Economic Development Cooperation Agency, Thailand
NEXI	Nippon Export and Investment Insurance
NGO	Non-Governmental Organizations
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
NT	Near Threatened
O&M	Operation & Maintenance
ODA	Official Development Assistance
OECD	Organisation for Economic Co-operation and Development
OHSM	Occupational Health and Safety Measure
OPIC	Overseas Private Investment Corporation, USA
OP	Operation Policy
PAH	Project Affected Household
PAP	Project Affected Person
PM <sub>2.5</sub>	Particulate Matter 2.5
PMU	Project Management Unit
PPP	Public Private Partnership
PSIF	Private Sector Investment Finance
RAP	Resettlement Action Plan
ROW	Right of Way
RPF	Resettlement Policy Framework
SDGs	Sustainable Development Goals
SEA	Strategic Environment Assessment
SEP	Stakeholder Engagement Plan
SGP	Safeguard Policy
SHM	Stakeholder Meeting
SIA	Social Impact Assessment
SME	Small and Medium-Sized Enterprise
SO <sub>x</sub>	Sulphur Oxides
SPS	ADB Safeguard Policy Statement
TOR	Terms of Reference
TSS	Total Suspended Solids
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNFCCC	United Nations Framework Convention on Climate Change
US EPA	United States Environmental Protection Agency
USAID	United States Agency for International Development
VPP	Vulnerable People's Plan
VU	Vulnerable
WB	The World Bank
WG	Working Group
WHO	World Health Organization

## **CHAPTER 1 INTRODUCTION**

### **1.1 Background of the Study**

Section 2.10.2 of the JICA Guidelines for the Environmental and Social Considerations (hereafter referred to as “JICA GL”), which were adopted in April 2010, specifies that “JICA will create a comprehensive review of the guidelines within ten years of their enforcement on the bases of its findings. Revisions will be made as needed, based upon the results mentioned above.” After the implementation of JICA GL in 2010, JICA GL have been applied to approximately 1,800 projects as of the end of JICA’s fiscal year (FY) 2016.

Over the years, the conditions surrounding the planning and implementation of JICA projects and JICA GL have been changed due to the new development, such as : (1) the international cooperation strategy of Japanese government, such as the Cabinet’s decision on the Development Cooperation Charter in February 2015, and government policy to promote quality infrastructure investment; (2) international development goals, namely the adoption of the Sustainable Development Goals (SDGs) at the UN Summit in September 2015; and (3) relevant safeguard policies (SGPs) including WB’s new Environmental and Social Framework (ESF) which was approved by the WB’s Board of Executive Directors in August 2016 and enforced from 1st October 2018.

### **1.2 Objective of the Study**

The objective of the study is to employ the following steps to identify the draft discussion points in order to comprehensively consider the revision of JICA GL in the next stage planned after FY2019:

- ✓ To review environmental and social safeguard practices under JICA GL in the past projects;
- ✓ To study changes in the conditions surrounding JICA projects;
- ✓ To identify and analyze draft discussion points for comprehensive review of JICA GL planned after FY2019, in consultation with the Advisory Committee of Environmental and Social Considerations and other external stakeholders.

### **1.3 Scope of the Study**

The reviewed projects were shortlisted from approximately 1,800 projects for which the agreements were signed by the end of JICA’s FY 2016. Among these projects, all 41 Category A projects and 59 projects selected from Categories B, C and Financial Intermediary (FI) were studied (in total 100 projects) .

The reviewed projects are listed in Table 1-1.

Table 1-1 List of Reviewed Projects

No.	Country	Project Name	Project Type	Sector	Env. Category	Field Survey
1	Uzbekistan	Navoi Thermal Power Station Modernization Project	ODA Loan	Thermal power generation	A	
2	Sri Lanka	New Bridge Construction Project over the Kelani River	ODA Loan	Road & bridge	A	
3	Uzbekistan	Turakurgan Thermal Power Station Construction Project	ODA Loan	Thermal power generation	A	
4	Myanmar	Thilawa Special Economic Zone (Class-A Area) Development Project <sup>1</sup>	Investment Project under Private Sector Investment Finance (PSIF)	Industrial development	A	
5	India	Delhi Mass Rapid Transport System Project Phase 3	ODA Loan	Railway	A	✓
6	Bangladesh	Dhaka Mass Rapid Transit Development Project (1)	ODA Loan	Railway	A	
7	Bangladesh	The Kanchpur, Meghna, and Gumti 2nd Bridges Construction and Existing Bridges Rehabilitation Project	ODA Loan	Road & bridge	A	
8	Cambodia	National Road No. 5 Improvement Project (Battambang-Sri Sophorn Section)	ODA Loan	Road & bridge	A	
9	Bangladesh	Matarbari Ultra Super Critical Coal-Fired Power Project (I)	ODA Loan	Thermal power generation	A	
10	Philippines	Central Luzon Link Expressway Project	ODA Loan	Road & bridge	A	
11	Philippines	Pasig-Marikina River Channel Improvement Project (Phase 3)	ODA Loan	River & sand erosion control	A	
12	Philippines	New Bohol Airport Construction and Sustainable Environment Protection Project	ODA Loan	Airport	A	
13	Indonesia	Indramayu Coal Fired Power Plant Project (E/S)	ODA Loan	Thermal power generation	A	✓
14	Mozambique	Mandimba-Lichinga Road Upgrading Project	ODA Loan	Road & bridge	A	
15	Egypt	Greater Cairo Metro Line No.4 Phase 1 Project	ODA Loan	Railway	A	
16	Vanuatu	Port Vila Lapetasi International Wharf Development Project	ODA Loan	Port	A	
17	Viet Nam	Hanoi City Ring Road No.3 Construction Project (Mai Dich - South Thang Long Section)	ODA Loan	Road & bridge	A	
18	Cambodia	National Road No.5 Improvement Project (Prek Kdam - Thlea Ma'am Section)(I)	ODA Loan	Road & bridge	A	
19	Tunisia	Rades Combined Cycle Power Plant Construction Project	ODA Loan	Thermal power generation	A	
20	El Salvador	San Miguel Bypass Construction Project	ODA Loan	Road & bridge	A	

<sup>1</sup> In this report, "Class A", which comes from the project name at the time of signing agreement document, is used for the project name; however, the name 'Zone A' had become generalized among the concerned parties, and now the site is also called 'Zone A'.

No.	Country	Project Name	Project Type	Sector	Env. Category	Field Survey
21	Cambodia	National Road No.5 Improvement Project (Thlea Ma'am-Battambang and Sri Sophorn-Poipet Sections) (I)	ODA Loan	Road & bridge	A	
22	Ukraine	Bortnychi Sewage Treatment Plant Modernization Project	ODA Loan	Waste management	A	
23	Bangladesh	Jamuna Railway Bridge Construction Project (E/S)	ODA Loan	Railway	A	
24	Viet Nam	North-South Expressway Construction Project (Ben Luc - Long Thanh Section)	ODA Loan	Road & bridge	A	✓
25	Uzbekistan	Electric Power Sector Capacity Development Project	ODA Loan	Thermal power generation	C	
26	India	Mumbai Metro Line 3 Project	ODA Loan	Railway	A	
27	Philippines	Flood Risk Management Project for Cagayan de Oro River	ODA Loan	River & sand erosion control	A	
28	Cameroon	Batchenga - Lena Road Project	ODA Loan	Road & bridge	A	
29	India	Rengali Irrigation Project (Phase 2)	ODA Loan	Agriculture	A	
30	Philippines	North - South Commuter Railway Project (Malolos- Tutuban)	ODA Loan	Railway	A	
31	India	Ahmedabad Metro Project (I)	ODA Loan	Railway	A	
32	India	North East Road Network Connectivity Improvement Project (Phase 1) (I)	ODA Loan	Road & bridge	A	
33	India	Mumbai Trans-Harbour Link Project (I)	ODA Loan	Road & bridge	A	
34	Indonesia	Engineering Services (E/S) for Construction of Jakarta Mass Rapid Transit East-West Line Project (Phase I)	ODA Loan	Railway	A	
35	Kenya	Olkaria V Geothermal Power Development Project	ODA Loan	Thermal power generation	A	
36	Myanmar	Infrastructure Development Project in Thilawa Area Phase I	ODA Loan	Industrial development	B	✓
37	Viet Nam	Rental Factory Development Project for SMEs	Investment Project under PSIF	Industrial development	B	✓
38	South Sudan	The Project for Construction of Nile River Bridge	Grant Aid	Road & bridge	A	
39	Cambodia	The Project for the Study on Strengthening Competitiveness and Development of Sihanoukville Port	Technical Cooperation (Master Plan)	Port	A	
40	Paraguay	The Project for Study on Integrated Development of the Adjacent Zones to the Yacyreta Dam Reservoir	Technical Cooperation (Master Plan)	Agriculture	A	
41	Costa Rica	Las Pailas II Geothermal Project (Guanacaste Geothermal Development Sector Loan)	ODA Loan	Thermal power generation	A	✓
42	Tanzania	Kenya-Tanzania Power Interconnection Project	ODA Loan	Power	A	✓
43	Latin American and Caribbean countries	Latin America and Caribbean Sustainable Energy Project	Investment Project under PSIF	Power	FI	✓
44	India	Joint Feasibility Study for Mumbai-Ahmedabad High Speed Railway Corridor	Technical Cooperation (Master Plan)	Railway	A	

No.	Country	Project Name	Project Type	Sector	Env. Category	Field Survey
45	Uganda	The Project on Irrigation Scheme Development in Central and Eastern Uganda	Technical Cooperation (Master Plan)	Agriculture	A	
46	Sri Lanka	Major Bridges Construction Project of the National Road Network	ODA Loan	Road & bridge	B	
47	Cabo Verde	Water Supply System Development Project in Santiago Island	ODA Loan	Water supply	B	
48	Laos	Southern Region Power System Development Project	ODA Loan	Power	B	
49	Myanmar	Greater Yangon Water Supply Improvement Project	ODA Loan	Water supply	B	
50	Cote d'Ivoire	Abidjan Port Cereal Berth Construction Project	ODA Loan	Port	B	
51	Egypt	Borg El Arab International Airport Extension Project	ODA Loan	Airport	B	
52	Bangladesh	Natural Gas Efficiency Project	ODA Loan	Thermal power generation	B	
53	Panama	Urban Transportation Line-3 Development Project (1)	ODA Loan	Railway	B	
54	Indonesia	Bali Beach Conservation Project (Phase 2)	ODA Loan	Beach conservation	B	
55	Indonesia	Metropolitan Sanitation Management Investment Program: Engineering Service for Sewerage System Development in DKI Jakarta	ODA Loan	Sewage	B	
56	Viet Nam	Second Transport Sector Loan for National Road Network Improvement	ODA Loan	Road & bridge	FI	
57	Bangladesh	Maternal, Neonatal and Child Health (MNCH) and Health System Improvement Project	ODA Loan	Sanitation	FI	
58	Philippines	Harnessing Agribusiness Opportunities through Robust and Vibrant Entrepreneurship Supportive of Peaceful Transformation	ODA Loan	Agriculture	FI	
59	Indonesia	Rural Settlement Infrastructure and Kabupaten Strategic Area	ODA Loan	Poverty Reduction	FI	
60	African Development Bank (AfDB)	Private Sector Assistance Loan under the Joint Initiative titled EPSA for Africa VI	ODA Loan	Private sector assistance	FI	
61	Egypt	Hurghada Photovoltaic Power Plant Project	ODA Loan	Power	C	
62	Cambodia	The Project for Flood Disaster Rehabilitation and Mitigation	Grant Aid	Disaster prevention	B	
63	Palestine	The Project for the Improvement of Solid Waste Management in the West Bank	Grant Aid	Waste management	C	
64	Laos	Mini-Hydropower Development Project	Grant Aid	Power	B	
65	Paraguay	el Proyecto de Mejoramiento del Sistema de Suministro de Agua en Coronel Oviedo	Grant Aid	Water supply	B	
66	Tajikistan	The Project for Improvement of Dushanbe International Airport	Grant Aid	Airport	B	
67	Kyrgyzstan	The Project for Avalanche Protection on Bishkek-Osh Road	Grant Aid	Road & bridge	B	
68	Bangladesh	Poverty Reduction Efforts	Grant Aid	Education	B	
69	Papua New Guinea	The Project for Reconstruction of Bridges on New Britain Highway	Grant Aid	Road & bridge	B	
70	Solomon Islands	The Project for Upgrading of Kukum Highway	Grant Aid	Road & bridge	B	

No.	Country	Project Name	Project Type	Sector	Env. Category	Field Survey
71	Morocco	The Project for Construction of Shellfish Aquaculture Technology Research Center	Grant Aid	Fishery	B	
72	Ghana	The Project for Reinforcement of Power Supply to Accra Central	Grant Aid	Power	B	
73	Uganda	The Project for Improvement of Gulu Municipal Council Roads in Northern Uganda	Grant Aid	Road & bridge	B	
74	Nepal	The Program for Rehabilitation and Recovery from Nepal Earthquake	Grant Aid	Disaster recovery	B	
75	Mauritania	The Project for the Expansion of Fishing Port in Nouadhibou	Grant Aid	Port	B	
76	Afghanistan	The Project for Strengthening Security in Kabul International Airport	Grant Aid	Airport	B	
77	Cambodia	The Project for Expansion of Water Supply System in Kampot	Grant Aid	Water supply	B	
78	Senegal	le Projet de Réhabilitation du Môle 3 du Port de Dakar	Grant Aid	Port	B	
79	Kenya	The Project for Augmentation of Water Supply System in Narok	Grant Aid	Water supply	B	
80	Rwanda	The Project for Rehabilitation of Irrigation Facilities in Rwamagana District	Grant Aid	Agriculture	B	
81	Philippines	The Programme for Rehabilitation and Recovery from Typhoon Yolanda	Grant Aid	Disaster recovery	FI	
82	Nigeria	The Project for Emergency Improvement of Electricity Supply Facilities in Abuja	Grant Aid	Power	C	
83	Mozambique	Support for Agricultural Development Master Plan for Nacala Corridor in Mozambique	Technical Cooperation (Master Plan)	Agriculture	B	
84	Angola	The Project for Power Development Master Plan	Technical Cooperation (Master Plan)	Power	B	
85	Jordan	Project for formulating Water Supply Plan for the Host Communities of Syrian Refugees	Technical Cooperation (Master Plan)	Water supply	B	
86	El Salvador	The Project for Capacity Development of the Department of Climate Change Adaptation and Strategic Risk Management for Strengthening of Public Infrastructure, Phase 2	Technical Cooperation	Climate change	B	
87	Bangladesh	Capacity Development Project for Participatory Water Resources Management through Integrated Rural Development	Technical Cooperation	Water Supply	B	
88	Gabon	The Project for Establishment of Laboratory Surveillance System for Viral Diseases of Public Health Concern	Technical Cooperation	Sanitation	B	
89	Namibia	Northern Crop and Livestock Development Master Plan Study	Technical Cooperation (Master Plan)	Agriculture	C	
90	Thailand	Project for Strengthening Institutional Capacity for the Implementation of Bangkok Master Plan on Climate Change 2013-2023	Technical Cooperation	Climate change	C	
91	Mongolia	Project for Improvement for Planning and Implementation Skills of	Technical Cooperation	Urban planning	C	

No.	Country	Project Name	Project Type	Sector	Env. Category	Field Survey
		Ulaanbaatar Master Plan				
92	Thailand	Feasibility Survey for Appropriate Medical Waste Disposals by Next-Generation Incinerators	SME Promotion under PSIF	Waste management	B	
93	Viet Nam	Feasibility Survey for logistics services for the Cai Mep port activation	SME Promotion under PSIF	Port	B	
94	Viet Nam	Pilot Survey for Disseminating Small and Medium Enterprises Technologies for SF Double Shell Tank for Avoiding Leakage of Hazardous Objects	SME Promotion under PSIF	Hazardous material	B	
95	Sri Lanka	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Recycling Project of Organic Garbage and Agricultural Waste by Screw Type Composting Plant	SME Promotion under PSIF	Waste management	B	
96	Indonesia	Pilot Survey for Disseminating SME's Technologies for Disaster Prevention and Environmental Regeneration	SME Promotion under PSIF	Disaster prevention	C	
97	Myanmar	Verification Survey with the Private Sector for Disseminating Japanese Technologies for a Container Barge for Shallow Water on Ayeyarwaddy River	SME Promotion under PSIF	Transportation	C	
98	Zambia	Collaboration Program with the Private Sector for Disseminating Japanese Technologies for KANSAI Anti Mosquito and SHIQUY Anti-Microbial Paints	Others under PSIF	Sanitation	B	
99	Indonesia	Preparatory Survey on BOP Business on Egg Farming and Sales Marketing	Others under PSIF	Livestock	B	
100	Tonga	Collaboration Program with the Private Sector for Disseminating Japanese Technologies for the Natural Disaster Proof Okinawan Tilttable Wind Turbine System	Others under PSIF	Power	C	

Note: BOP: Base of the Economic Pyramid; ODA: Official Development Aid; and SME: Small and Medium-sized Enterprise

Source : JICA Study Team

Out of 100 reviewed projects, field surveys were conducted on 8 projects. The target projects were determined based on the relevance to survey items, categories, number of projects by country/region, project progress, assistance schemes, and sectors as shown Table 1-2.

#### Selection Criteria:

1. Projects with large scale of involuntary resettlement;
2. Projects located in or near the protected areas;
3. Projects which received enquiries from the stakeholders;
4. Projects in the construction or operation stage;
5. Private Sector Investment Finance projects; and
6. Co-financed projects.

**Table 1-2 Field Surveys Conducted for 8 Projects**

Country	Scheme	Env. Category	Project Name	Relevant Criteria
Myanmar	ODA Loan	B	No.36 Infrastructure Development Project in Thilawa Area Phase I	3, 4
India	ODA Loan	A	No.05 Delhi Mass Rapid Transport System Project Phase 3	1, 4
Viet Nam	ODA Loan (Co-financing with ADB)	A	No.24 North-South Expressway Construction Project (Ben Luc - Long Thanh Section)	1, 2, 4, 6
	Investment under PSIF	B	No.37 Rental Factory Development Project for SMEs	4, 5
Indonesia	ODA Loan	A	No.13 Indramayu Coal Fired Power Plant Project (E/S)	3
Costa Rica	ODA Loan	A	No.41 Las Pailas II Geothermal Project (Guanacaste Geothermal Development Sector Loan)	2, 4, 6
	Investment under PSIF	FI	No.43 Latin America and Caribbean Sustainable Energy Project (one of subprojects in Costa Rica was reviewed)	4, 5, 6
Tanzania	ODA Loan (Co-financing with AfDB)	A	No.42 Kenya-Tanzania Power Interconnection Project	1, 2, 4, 6

Source : JICA Study Team

A total of 5 projects were selected from Asia, namely Indonesia, Myanmar, Viet Nam (2 projects) and India; and a total of 3 projects from Africa, Latin America and the Middle East, namely Tanzania and Costa Rica (2 projects).

Projects which proceeded to the Objection Procedures based on the JICA GL were not subject to field survey, however, a desk review was conducted with the existing investigation reports prepared by the Examiners during the Objection Procedures, environmental review documents (a part of the project appraisal documents) and environmental and social monitoring reports.

## 1.4 Study Methodology

The methodology of the review study was as follows:

1. The survey items on environmental and social considerations were presented by JICA to the Advisory Committee, and comments given in the Advisory Committee for Environmental and Social Considerations on September 1 and October 13, 2017 were incorporated in the survey items shown in Table 1-3;
2. The safeguard practices of the target projects were studied from the viewpoint of for various review survey items listed in Table 1-3, and the draft review results sheet for each project was prepared based on the findings;
3. Separately, changes in the external and internal conditions surrounding the JICA GL were studied by literature review of relevant Japanese government public documents and the SGPs of Multilateral Development Banks (MDBs); and

Study findings and collected information through above-mentioned 2 and 3 were analyzed to identify draft discussion points for further considerations on the revision of the JICA GL.

**Table 1-3 Review Survey Item Sheet**

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
Preface		
1. Basic Matters		
1.1 Policy	<ul style="list-style-type: none"> <li>Summarize the Japanese Government's policies such as "Cabinet decision on the Development Cooperation Charter" and trend of international development such as SDGs.</li> </ul>	
1.2 Objectives		
1.3 Definitions		
1.4 Basic Principles Regarding Environmental and Social Considerations		
1.5 Responsibility of JICA	<ul style="list-style-type: none"> <li>Confirm the responsibility of other donors such as International Finance Corporation (IFC), Asian Development Bank (ADB), etc. for their investment project financing.</li> </ul>	
1.6 Requirements of project proponents etc.	(To be confirmed through the review for Appendix 1 of JICA GL)	
1.7 Covered Schemes	<ul style="list-style-type: none"> <li>Summarize JICA's cooperation project schemes such as Private Sector Investment Finance (PSIF), SME promotion, etc., which were increased after enforcement of the current JICA GL.</li> <li>Summarize change of the business environment such as promotion and speedup of infrastructure export, increase of co-financing with international financial institutions, etc., after enforcement of the current JICA GL.</li> </ul>	<p>Recommendation from the 3rd working group (WG) meeting for reexamination of JICA GL Operation  <b>【Applicability of JICA GL to feasibility study (F/S) and other study for Public Private Partnership (PPP) projects】</b></p> <ul style="list-style-type: none"> <li>As for the Preparatory Survey for PPP infrastructure project and SME promotion assistance for overseas investment, summarize the scheme contents and its relevance to the JICA GL.</li> <li>To clearly mention that the SME promotion survey is not subject to the JICA GL in practice since the main purpose of the survey is to collect the information. In addition, as for the SME feasibility survey and the verification survey, to clearly indicate that the projects that would have significant negative environmental and social impacts, that means Category A projects, will not be implemented.</li> </ul>
1.8 Measures Taken in an Emergency	<ul style="list-style-type: none"> <li>Summarize cases which applied "measures taken in an emergency" (Categorization, judgement criteria of "emergency," measure on involvement of the advisory committee, information disclosure, monitoring, follow-up activity, etc.)</li> </ul>	<p>Recommendation from the 9th WG meeting for reexamination of JICA GL Operation  <b>【Confirmation of environmental and social considerations in case of emergency】</b></p> <ul style="list-style-type: none"> <li>It is desirable that Category A projects are not applicable to "Emergency Measures" described in Section 1.8 under the JICA GL unless life-saving or humanitarian assistance is urgently needed.</li> <li>In the section 1.8 of the JICA GL, it is stated that "an emergency means a case that must be dealt with immediately, such as restoration after natural disasters or post-conflict restoration, when it is clear that there is no time to follow the procedures of environmental and social considerations mentioned in the guidelines". It is desirable that</li> </ul>

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
		<p>classification criteria are clarified by describing which projects were classified as emergency projects so far.</p> <ul style="list-style-type: none"> <li>● In the past operation, Section 1.8 of the JICA GL has been applied to the Technical Cooperation (Master Plan: M/P) projects for natural disasters. In case that it is applied to the other project scheme, it is desirable to explain the procedure to be implemented to the Advisory Committee.</li> <li>● If environmental and social considerations are simplified for an emergency response, post-project monitoring or any follow-up measure needs to be taken appropriately.</li> </ul>
1.9 Dissemination	<ul style="list-style-type: none"> <li>● Summarize records which JICA explained about the JICA GL to project proponents etc. and its contents.</li> </ul>	
1.10 Advisory Committee of Environmental and Social Considerations	- (To be confirmed through the review for “2.7 Advice of the Advisory Committee for Environmental and Social Considerations”)	
<b>2. Process of Environmental and Social Considerations</b>		
2.1 Information Disclosure	<ul style="list-style-type: none"> <li>● Confirm status of information disclosure by JICA (Categorization, final report, environmental and social considerations reports, results of environmental review, monitoring result)</li> <li>● Confirm status of information disclosure by project proponent etc. (Disclosure place, term, language, etc. on environmental and social consideration reports and monitoring results)</li> <li>● Confirm status which JICA encouraged project proponents etc. to disclose the information.</li> <li>● Confirm if the third party requested information disclosure and its correspondence</li> <li>● Confirm correspondence to the information which is prohibited to disclose</li> </ul>	
2.2 Categorization	<ul style="list-style-type: none"> <li>● Summarize results of environmental categorization and its reason.</li> <li>● Summarize the recategorized project and its reason</li> <li>● Summarize categorization justification in case there was a doubt on the categorization from the third party.</li> <li>● Confirm the submission status of the screening format.</li> </ul>	
2.3 Impacts to be assessed	(To be confirmed through the review for Appendix 1 of the JICA GL.)	
2.4 Consultation with Local Stakeholders	<ul style="list-style-type: none"> <li>● Confirm records of consultation between JICA and project proponents etc.</li> <li>● (Record of consultation other than the above will be confirmed through the review of Appendix1, Social Acceptability of the JICA GL.)</li> </ul>	

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
2.5 Concern about Social Environment and Human Rights	<ul style="list-style-type: none"> <li>Confirm any special consideration on information disclosure and consultation with local stakeholders taken for cooperation projects in the countries and areas affected by conflict or where basic freedoms, including freedom of expression and the right to receive legal remedy, are restricted.</li> <li>Confirm any special attention paid to human rights of socially vulnerable groups</li> </ul>	
2.6 Laws, Regulations and Standards of Reference	<ul style="list-style-type: none"> <li>Whether national legislation on Environmental Impact Assessment (EIA) and Resettlement Action Plan (RAP) are complied.</li> <li>Whether there is any gap between projects and the international standards such as WB SGP.</li> <li>Summarize the changes from WB SGP (Operation Policies: OPs) to ESF.</li> <li>Summarize the gap between WB ESF and the current JICA GL</li> <li>Summarize the standards and good practices in the safeguard policies of ADB and IFC which can be referred by JICA projects.</li> </ul>	
2.7 Advice of Advisory Committee for Environmental and Social Considerations	<ul style="list-style-type: none"> <li>Summarize records of advisory committee meetings. (including improvements in its operation and information disclosure.)</li> <li>Confirm how advices from the advisory committee at the environmental review stage were incorporated in the projects.</li> </ul>	
2.8 Decision-making by JICA	<ul style="list-style-type: none"> <li>Confirm the status of agreement documents.</li> <li>Whether any cooperation project was suspended based on agreement documents.</li> </ul>	
2.9 Ensuring Appropriate Implementation of and Compliance with the Guidelines	- (To be confirmed separately through the review of objection procedures.)	
2.10 Implementation and Review of the Guidelines	Not applicable.	
<b>3. Procedures of Environmental and Social Considerations</b>		
3.1 Preparatory Study	<ul style="list-style-type: none"> <li>Summarize practices of alternative analyses including “without project” scenarios</li> <li>Confirm implementation records of each procedure in the preparatory study, such as scoping, EIA/Initial Environment Examination (IEE) study, information disclosure, stakeholder meetings etc.</li> </ul>	<p>Recommendation from the 5th WG meeting for reexamination of JICA GL Operation</p> <p><b>【Alternative analysis】</b></p> <ul style="list-style-type: none"> <li>It is necessary to clarify interpretations of “without project” scenarios under the JICA GL.</li> </ul>
3.2 Loan Aid, Grant Aid (excluding projects executed through	<ul style="list-style-type: none"> <li>Confirm implementation of environmental review and information disclosure in accordance with categorization.</li> </ul>	Recommendation from the 11th working group meeting for reexamination of JICA GL Operation

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
international organizations) and Technical Cooperation Projects	<ul style="list-style-type: none"> <li>- Preparation of the environmental checklist</li> <li>- Approval and disclosure of EIA, Environmental Clearance Certificate (ECC), RAP and Indigenous Peoples Plan (IPP) and disclosure</li> <li>- In case cooperation projects fall under category Financial Intermediary (FI), confirmation records of FI's capacity on environmental and social considerations, and records of environmental review for category "A" sub-projects (if any) <ul style="list-style-type: none"> <li>● In case of Engineering Service (E/S) loan projects, summarize the records of environmental review.</li> <li>● In case of E/S loan projects, confirm status of environmental and social considerations by project proponents etc. during the E/S stage</li> <li>● Confirm status of receipt and disclosure of monitoring results.</li> <li>● Confirm correspondence to a request on disclosure of monitoring results from the third party.</li> <li>● Confirm if there was any differences between environmental review results and monitoring results and its reason (e.g. a need for more detailed descriptions in the JICA GL, an interpretation problem of the JICA GL, a capability/manpower/resource problem, etc.).</li> <li>● Any project which JICA requested project proponents etc. to take appropriate actions in accordance with agreement documents and suspend loan disbursement (if any).</li> <li>● Confirm whether the JICA's procedure for the project with significant changes was applied.</li> </ul> </li> </ul>	<p>【E/S loan projects】</p> <ul style="list-style-type: none"> <li>● If the project falls under para 2 of Section 3.2.1. (5) "Engineering Service Loan" in the JICA GL, instead of consulting with the Advisory Committee for the first time at the environmental review stage, there should be an opportunity to discuss at the Advisory Committee meeting from the earlier stage, namely the scoping stage of environmental and social considerations which are conducted by project proponents etc. in the E/S loan project.</li> </ul>
3.3 Preliminary Studies of Grant Aid undertaken by MOFA	<ul style="list-style-type: none"> <li>● Whether JICA recommended the Ministry of Foreign Affairs (MOFA) to suspend the cooperation project.</li> </ul>	
3.4 Technical Cooperation for Development Planning	<ul style="list-style-type: none"> <li>● Confirm implementation of environmental and social considerations procedures at each stage in accordance with categorization <ul style="list-style-type: none"> <li>- Screening</li> <li>- Scoping</li> <li>- Consultation between JICA and project proponents etc.</li> <li>- Information disclosure of agreement documents and/or reports</li> </ul> </li> <li>● Confirm implementation record of stakeholder meetings during SEA stage.</li> <li>● Experience which unexpected environmental and social impacts were caused after completion of Technical Cooperation for Development Planning, and its</li> </ul>	<p>Recommendation from the 5th WG meeting for reexamination of JICA GL Operation</p> <p>【Strategic Environment Assessment (SEA)】</p> <ul style="list-style-type: none"> <li>● It is necessary to consider how to conduct the stakeholder meeting at the SEA stage.</li> <li>● It should be noted that EIA will be implemented at the project level in consideration of the contents of the study, consultation records and information at the SEA stage. (i.e. utilization of previous evaluation results, "Tiering")</li> </ul>

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
	correspondence.	
<b>Appendix</b>		
Appendix 1. Environmental and Social Considerations Required for Intended Projects	<ul style="list-style-type: none"> <li>● Confirm methodology for quantifying cost and benefit related to environmental and social considerations in Japan and other donors.</li> <li>● Confirm methodology for environmental impact assessment of disasters in Japan and other donors.</li> </ul>	<p>Recommendation from the 8th working group meeting for reexamination of JICA GL Operation</p> <p><b>【Environmental and social costs and benefits in project evaluation】</b></p> <ul style="list-style-type: none"> <li>● Generally, it is said that quantification of environmental and social costs and benefits has challenges in the scope and methodology. However, it is important to have a common understanding in the Advisory Committee on to what extent and how this quantification needs to be handled in JICA's cooperation projects.</li> <li>● On the other hand, it is desirable to consider the following points when examining the specific approach in the future, taking into consideration the JICA GL which say, “to endeavor to include an analysis of environmental and social costs and benefits in the most quantitative terms possible”.</li> <li>● For the environmental and social costs and benefits, it is also necessary to consider the quantification of costs, while quantification of benefits has been discussed in the past.</li> <li>● Additionally, it is important to consider the necessity of "quantitative evaluation" and "economic evaluation" related to environment and society.</li> <li>● It is good to note that “internalization of various environmental and social costs associated with development into development costs” is not limited to the quantification of environmental and social costs and benefits at the study phase, and it could be broadly applied to the operation stage by including mitigation measures in the Environmental Management Plan (EMP).</li> <li>● It is desirable to refer to other aid agencies’ practices (e.g. by reviewing the WB’s appraisal documents and other documents)</li> <li>● With regard to quantification of environmental and social costs and benefits, it is necessary to discuss specifically by accumulating actual practices in the projects.</li> </ul> <p>Recommendation from the 7th WG meeting for reexamination of JICA GL Operation</p> <p><b>【Impacts of a disaster on the project and responses to accidents at the operation stage】</b></p> <ul style="list-style-type: none"> <li>● JICA has proposed, “since disasters such as earthquakes are different from environmental and social impacts caused by the project, it is considered that disasters are not subject to the EIA.” However, it is not desirable to exclude disasters from the scope of “environmental impact</li> </ul>

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
		<p>assessment” because the following cases may be considered.</p> <ul style="list-style-type: none"> <li>✓ Cases that the project lowers the resilience of the project site and increases disaster risks;</li> <li>✓ Cases that the project may directly trigger disasters (e.g. construction of a dam might induce earthquakes); and</li> <li>✓ Cases that the project may indirectly trigger disasters (e.g. construction of a power plant might contribute to global warming).</li> <li>● If the cases above are subject to EIA, it should be discussed either of the following two ways is appropriate: to add “disaster” as an item of environmental and social considerations, or to evaluate for disasters in the environmental existing checklists of the JICA GL (i.e. geography, geology, etc.), which needs to be discussed.</li> <li>● If the cases above are subject to EIA, the responsible agency of disaster prevention such as earthquakes should be clarified at the construction and operation stages in addition to the detailed design (D/D) stage (same as the responsible agency for accident prevention).</li> <li>● It is desirable to define and differentiate the concept of disasters and accidents.</li> </ul>
Underlying Principles	<ul style="list-style-type: none"> <li>● Confirm status of investigation and examination on environmental and social impacts at the planning stage.</li> <li>● Confirm status of examination on alternatives and mitigation measures to avoid and minimize environmental and social impacts.</li> <li>● Confirm if the above-mentioned examination results were reflected in the project plan.</li> <li>● Confirm if costs and benefits related to environmental and social considerations were tried to be evaluated quantitatively and evaluated qualitatively.</li> <li>● Confirm if costs and benefits related to environmental and social considerations were closely harmonized with economic, financial, institutional, social and technical analyses of the project.</li> <li>● Confirm if results of environmental and social considerations study including examination on alternatives and mitigation measures were specified in a separate document or part of other documents.</li> <li>● Confirm if an environmental impact assessment report was prepared for projects especially with significant environmental and social impacts.</li> <li>● Confirm if experts committee was established for projects with especially significant environmental and social impacts and arguable projects.</li> </ul>	

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
Examination of Measures	<ul style="list-style-type: none"> <li>● Confirm if appropriate plan and structure for follow-ups, such as environmental management plan and monitoring plan are prepared, and its cost and procurement method are examined.</li> <li>● (Other items will be confirmed through the review of Section 2.8.)</li> </ul>	
Scope of Impacts to Be Assessed	<ul style="list-style-type: none"> <li>● Confirm if appropriate scoping was fully conducted as per the JICA GL.</li> <li>● Confirm if the amount of Green House Gas (GHG) emission by the project was calculated and evaluated.</li> <li>● Confirm practices of multilateral and bilateral donors on climate change (GHG emission) and pollution control</li> <li>● Summarize practices on examination and assessment of derivative, secondary, and cumulative impacts as well as the impacts of indivisible projects</li> <li>● Summarize practice of WB, ADB and IFC on examination and assessment of derivative, secondary, and cumulative impacts as well as the impacts of indivisible projects.</li> </ul>	<p>Recommendation from the 4th WG meeting for reexamination of JICA GL Operation 【Climate change】</p> <ul style="list-style-type: none"> <li>● Although there are some challenges on climate change which are beyond the scope of reexamination of JICA GL operations, the following points can be considered as the issues to be discussed in the future. <ul style="list-style-type: none"> <li>✓ The overall carbon management strategy of JICA needs to be clarified at the earliest.</li> <li>✓ Not only for projects in which is expected to reduce GHG emissions, but also for projects in which would not reduce GHG emissions, GHG emissions should be calculated to grasp total GHG emissions from entire JICA projects.</li> <li>✓ The impacts of climate change should be evaluated by measurement of emissions, not by emission reduction.</li> </ul> </li> <li>● As environmental items for scoping, “climate change (GHG emission)” is suitable rather than “global warming.”</li> <li>● In order to grasp the GHG emissions from the entire JICA projects, it is suggested that in principle, GHG emissions during the construction phase should be also evaluated, except only the case where the GHG emissions are particularly negligible compared to the operation phase.</li> <li>● It is desired that the assessment of GHG emissions for the supply chain is also taken into consideration in the future. For example, as for large-scale development projects of the road or railway sector, it is assumed that a large amount of CO2 is generated at the time of production of cement. Therefore, it is necessary to consider whether (1) evaluation of GHG emissions associated with production of the raw materials and (2) management and recording of cement consumption could be required.</li> </ul> <p>Recommendation from the 5th working group meeting for reexamination of JICA GL Operation 【Climate change】</p> <ul style="list-style-type: none"> <li>● As for climate change (GHG emissions) at the scoping stage, a baseline is set in accordance with a certain methodology such as JICA's Climate Finance Impact Tool for Mitigation (JICA Climate FIT (Mitigation)), and the mitigation effect is evaluated by comparing with that baseline. However, just like other impact items, it might be possible to evaluate</li> </ul>

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
		<p>the impact of climate change (GHG emissions), compared with the current status as a reference point.</p> <p>Recommendation from the 1st WG meeting for reexamination of JICA GL Operation</p> <p>【Indivisible Projects】</p> <ul style="list-style-type: none"> <li>● Regarding the scope of “the extent that is reasonably predictable”, it is necessary to clarify it by accumulating precedents.</li> <li>● In dealing with the indivisible projects, it should be clearly stated that “appropriate environmental and social considerations documents” of the indivisible projects means that JICA needs to confirm whether environmental and social considerations documents of the indivisible projects comply with the JICA GL.</li> <li>● Although “the indivisible projects” are specified as one of the “Impacts to be assessed” in the JICA GL, it seems somewhat difficult to study and consider the impacts of the indivisible projects which are not financed by JICA.</li> <li>● In order to clarify the contents of “the indivisible projects”, major examples/precedents should be presented.</li> <li>● Since it is necessary to mention that there are various “indivisible projects,” these examples should be described in the Frequently Asked Questions (FAQ) of the JICA GL in the future.</li> </ul> <p>【Derivative impacts, secondary impacts】</p> <ul style="list-style-type: none"> <li>● Regarding the scope of “the extent that is reasonably predictable”, it is necessary to clarify it by accumulating precedents.</li> <li>● IFC Performance Standards (IFC PS) defines them as “(ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities’ livelihoods are dependent.”. As for (iii), only the impact on the ecosystem is discussed, giving an impression that the impact on the social aspect is not considered. Therefore, (iii) should be deleted to avoid misunderstanding, if the social aspect is also considered in (ii).</li> <li>● In order to clarify the contents of “derivative and secondary impacts”, major examples/precedents should be presented.</li> <li>● Whether the project has “derivative and secondary impacts” and its contents should be explained to the advisory committee in the early stage by utilizing the opportunity when the project summary is explained at the general meeting of the advisory committee.</li> <li>● “Unplanned but predictable development” includes a wide range of factors including expansion.</li> </ul>

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
		<p>【Cumulative impacts】</p> <ul style="list-style-type: none"> <li>● Regarding the scope of “the extent that is reasonably predictable”, it is necessary to clarify it by accumulating precedents.</li> <li>● In order to make the contents of "cumulative impacts" clearer, the major examples/precedents should be presented.</li> <li>● There are various international discussions on "cumulative impacts", so there is no need to rush to define the definition and scope, but to reconsider them based on international trends.</li> <li>● Whether the project has “cumulative impacts” should be explained in the early stage by utilizing the opportunity when the project summary is explained at the general meeting of the advisory committee.</li> <li>● The “cumulative impact” should include impacts of “individuals’ activities”.</li> </ul>
Compliance with Laws, Standards, and Plans	<ul style="list-style-type: none"> <li>● Summarize cases of which project area was in “protected areas that are specifically designated for the conservation of nature or cultural heritage.”</li> <li>● Summarize practice of WB, ADB and IFC on cases of which project area was in “protected areas that are specifically designated for the conservation of nature or cultural heritage.”</li> <li>● (Other items will be confirmed through the review of Section 2.6.)</li> </ul>	<p>Recommendation from the 2nd and 6th WG meeting for reexamination of JICA GL Operation</p> <p>【Protected areas specifically designated by laws or ordinances for the conservation of nature or cultural heritage】</p> <ul style="list-style-type: none"> <li>● As the FAQ of the JICA GL explains the "conditions" to be "specifically designated area," it is suggested that specific examples should be described in the FAQ for better understanding.</li> <li>● First, the protected areas need to be identified by the national legislations of the borrower government. If such a legislation is not available, it should be discussed whether International Union for Conservation of Nature (IUCN) rules can be applicable. In addition, whether the protected areas need to be identified by IUCN rules should be described.</li> <li>● Not only the protected areas designated by the central government’s legislation, but also the designated areas by the ordinance or others of the local governments should be considered as "protected areas".</li> <li>● It is necessary to judge rationally whether and to what extent the protected area can be developed for each project in accordance with the conditions specified by the national legislation of the borrower’s country.</li> </ul> <p>【Project implementation conditions in "area designated specially for nature protection and cultural heritage protection"】</p> <ul style="list-style-type: none"> <li>● In consideration of the provision, “[p]rojects must, in principle, be undertaken outside of protected areas that are specifically designated by laws or ordinances for the conservation of nature or cultural heritage” (hereafter called the designated area) under the JICA GL, it is necessary</li> </ul>

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
		<p>to explain that in principle, the project implementation in the designated area is not envisaged.</p> <ul style="list-style-type: none"> <li>● However, it is also important to enable project formation, if JICA can justify the background and reasons for implementing the project in the designated area.</li> <li>● Although the JICA GL define the protected areas mean “the protected area that are specially designated by laws or ordinances for the conservation of nature or cultural heritage”, but it is necessary to consider that there are different contents of the laws and institutions for the protected area management in countries (For example, some countries have the legislation that allows a certain development in the designated areas, such as buffer zones or places where the degree of protection is not high, if the project meets the criteria).</li> <li>● There are some issues raised at the international conferences, etc. that the borrower government changed the designated areas so that the project can be implemented in “the area designated as such by the country and/or local governments by laws and/or ordinances to protect nature and cultural heritage”. Therefore, it is necessary to take a careful response recognizing the issue.</li> </ul>
Social Acceptability	<ul style="list-style-type: none"> <li>● Confirmation of records of stakeholder meetings               <ol style="list-style-type: none"> <li>1) Dates of announcement and implementation</li> <li>2) Place</li> <li>3) Method of consultation (community assemble, individual interview, language)</li> <li>4) Considerations for socially vulnerable groups</li> <li>5) Method of announcement</li> <li>6) Participants (the number of people, percentage of affected people, affiliation, gender, etc.)</li> <li>7) Contents of discussions (project area, project plan, issues and needs from local residents, etc.)</li> <li>8) Comments from participants</li> <li>9) Reply by project proponents etc.</li> <li>10) Result of reflection of received comments to the plan and project</li> <li>11) Preparation of Minutes of Meeting</li> </ol> </li> <li>● Confirm if any third party raise an issue on the project in terms of social acceptability and its reason (e.g. a need for more detailed descriptions in the JICA GL, an interpretation problem of the JICA GL, a capability/manpower/resource problem, etc.).</li> <li>● Summarize considerations for socially vulnerable groups.</li> </ul>	<p>Recommendation from the 4th WG meeting for reexamination of JICA GL Operation</p> <p><b>【Stakeholder consultation in consideration of socially vulnerable groups】</b></p> <ul style="list-style-type: none"> <li>● It is suggested to consider more specific measures in conducting stakeholder consultation with socially vulnerable groups as the future agenda (following specific points were proposed).               <ul style="list-style-type: none"> <li>✓ To consider a mechanism to bring in people who could not attend the stakeholder consultation and to explain remaining issues that could not discussed in the stakeholder consultation.</li> <li>✓ To set the expected maximum number of participants per meeting to ensure meaningful participation if the number of stakeholders is large.</li> <li>✓ To pay attention when stakeholders who have different interests are invited together because it might fail to elicit frank opinions from stakeholders in such a situation.</li> </ul> </li> </ul>
Ecosystem and Biota	<ul style="list-style-type: none"> <li>● Summarize practices of the project which was implemented</li> </ul>	Recommendation from the 2nd & 6th working group meeting for

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
	<p>in the critical natural habitats. (including justification, any projects in the critical natural habitats other than forests, consideration status on biodiversity conservation areas, impact on the local community and impact on natural habitat caused by the local community, impact on social environment and impact on natural habitat caused by social environment)</p> <ul style="list-style-type: none"> <li>● Summarize practices of the project which was implemented in accordance with “conditions of project implementation in critical natural habitats”</li> <li>● Summarize practice of WB, ADB and IFC on projects which involves “critical natural habitats” and “significant conversion or significant degradation”</li> <li>● Confirm if any illegal logging of the forest was practiced.</li> </ul>	<p>reexamination of JICA GL Operation</p> <p>【Critical natural habitats】 【Natural habitats】</p> <ul style="list-style-type: none"> <li>● As for “Critical natural habitats”, specific examples should be described for better understanding.</li> <li>● In the JICA GL, although "critical forests" are listed together with "critical natural habitats", environmental and social impacts on areas other than forests such as the “ocean” and “highlands” should also be taken into consideration.</li> <li>● “Critical natural habitats” are defined in the “Ecosystems and Biota” in the JICA GL; however, it should be considered from the aspects of “local communities” and “social environment”.</li> <li>● The “Key Biodiversity Area (KBA)” which was developed with reference to the IUCN Red List can be used as a list showing critical natural habitats.</li> </ul> <p>【Significant conversion and significant degradation】</p> <ul style="list-style-type: none"> <li>● JICA’s interpretation should be taken into account that “conversion” represents a negative impact from an aerial point of view, while “degradation” represents a negative impact from a qualitative point of view.</li> <li>● As it is specified in the WB’s OP 4.04 Annex A, “significant conversion may include, for example, land clearing; replacement of natural vegetation, permanent flooding such as by dam, drainage, dredging, filling, or channelization of wetlands, or surface mining,” some examples should be described in the FAQ of the JICA GL. In addition, it includes the "significant conversion" of "ecosystems not only in land areas but also in water areas" due to serious pollution and others.</li> <li>● It is necessary to judge rationally whether the project will cause "significant conversion" or "significant degradation" from the background and the contents of each project.</li> </ul> <p>Recommendation from the 6th WG meeting for reexamination of JICA GL Operation</p> <p>【Conditions for project implementation in “Critical natural habitats”】</p> <ul style="list-style-type: none"> <li>● In consideration of the stipulation in the JICA GL that “[p]rojects must not involve significant conversion or significant degradation of critical natural habitats and critical forests”, it is necessary to explain that in principle, the project implementation in the critical natural habitat is not envisaged.</li> <li>● However, it needs to be carefully examined whether the JICA GL have requirements which make JICA’s project implementation impossible in the critical natural habitats in practice.</li> </ul>

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
		<ul style="list-style-type: none"> <li>It is necessary to carefully examine whether the JICA GL include “Endangered species II (Vulnerable: VU)” and “Near Threatened: NT” which are classified as per the category of Japanese Ministry of Environment in endangered species, in addition to “Endangered species IA/IB (Critically Endangered: CR and Endangered: EN)” as for the JICA GL’s stipulation of “the list of endangered species in which projects shall not cause net reduction over a reasonable period”. It is important to ensure that the effort of the study and project does not increase and practical measures are taken in implementing mitigation measures and monitoring.</li> </ul>
Involuntary Resettlement	<ul style="list-style-type: none"> <li>Confirm preparation and disclosure status of RAP and records of consultation meetings (including the meeting contents, language, mode of the consultation)</li> <li>Confirm if involuntary resettlement and loss of means of livelihood were avoided and minimized, and effective measures were taken on agreement with affected people in documents.</li> <li>Confirm the expected number of project affected people at the environmental review stage.</li> <li>Confirm the number of actual project affected people at the monitoring stage.</li> <li>Contents of compensation at the environmental review stage. (Timing of compensation, calculation method of compensation rate including full replacement cost, measures for recovering livelihood and other supports.)</li> <li>- (Only for the projects subject to the field survey)</li> <li>Confirm if resettled people have improved their standards of living, income opportunities, and production levels or at least restored these to pre-project levels.</li> <li>Confirm status of establishment of Grievance Redress Mechanism (GRM).</li> </ul>	
Indigenous Peoples	<ul style="list-style-type: none"> <li>Confirm if there were adverse impacts on indigenous people.</li> <li>Confirm if measures to avoid and minimize adverse impacts were examined.</li> <li>Confirm if indigenous peoples plan was prepared and disclosed.</li> <li>Confirm if Free, Prior and Informed Consultation/Consent (FPIC) process was implemented.</li> </ul>	
Monitoring	<ul style="list-style-type: none"> <li>Confirm if the monitoring plan was prepared.</li> <li>(Other items will be confirmed through the review of Section 3.2.)</li> </ul>	
Appendix 2. EIA Reports for	<ul style="list-style-type: none"> <li>Confirm status of EIA approval, language, information</li> </ul>	

Items of Current JICA GL	Survey Items	Reference: Results of Reexamining its JICA GL Operation (April 2015)
Category A Projects	<p>disclosure in the borrower's country, and permission of copying</p> <ul style="list-style-type: none"> <li>● Confirm if the EIA report includes the items specified in the JICA GL.</li> <li>● Confirm whether EIA was prepared for projects that were categorized as "Category A" because of large-scale involuntary resettlement as per the JICA GL (not due to the expected environmental impacts).</li> </ul>	
Appendix 3. Illustrative List of Sensitive Sectors, Characteristics, and Areas	<ul style="list-style-type: none"> <li>● Confirm justification of "Sensitive Sectors" (especially, the scale of impacts of the project in power distribution, water supply and agriculture sectors which usually do not have significant negative impacts if the project does not have sector-related sensitive characteristics or located in a sensitive area)</li> </ul>	
Appendix 4. Screening Format	<ul style="list-style-type: none"> <li>● (Screening form will be reviewed when the JICA GL are reviewed)</li> </ul>	
Appendix 5. Categories and Items in Checklist	<ul style="list-style-type: none"> <li>● (Environmental checklist will be reviewed when the JICA GL are reviewed)</li> </ul>	
Appendix 6. Items Requiring Monitoring	<ul style="list-style-type: none"> <li>● Confirm justification of monitoring items, reference standards, preparation of the monitoring plan for construction and operation phases.</li> </ul>	
Others		

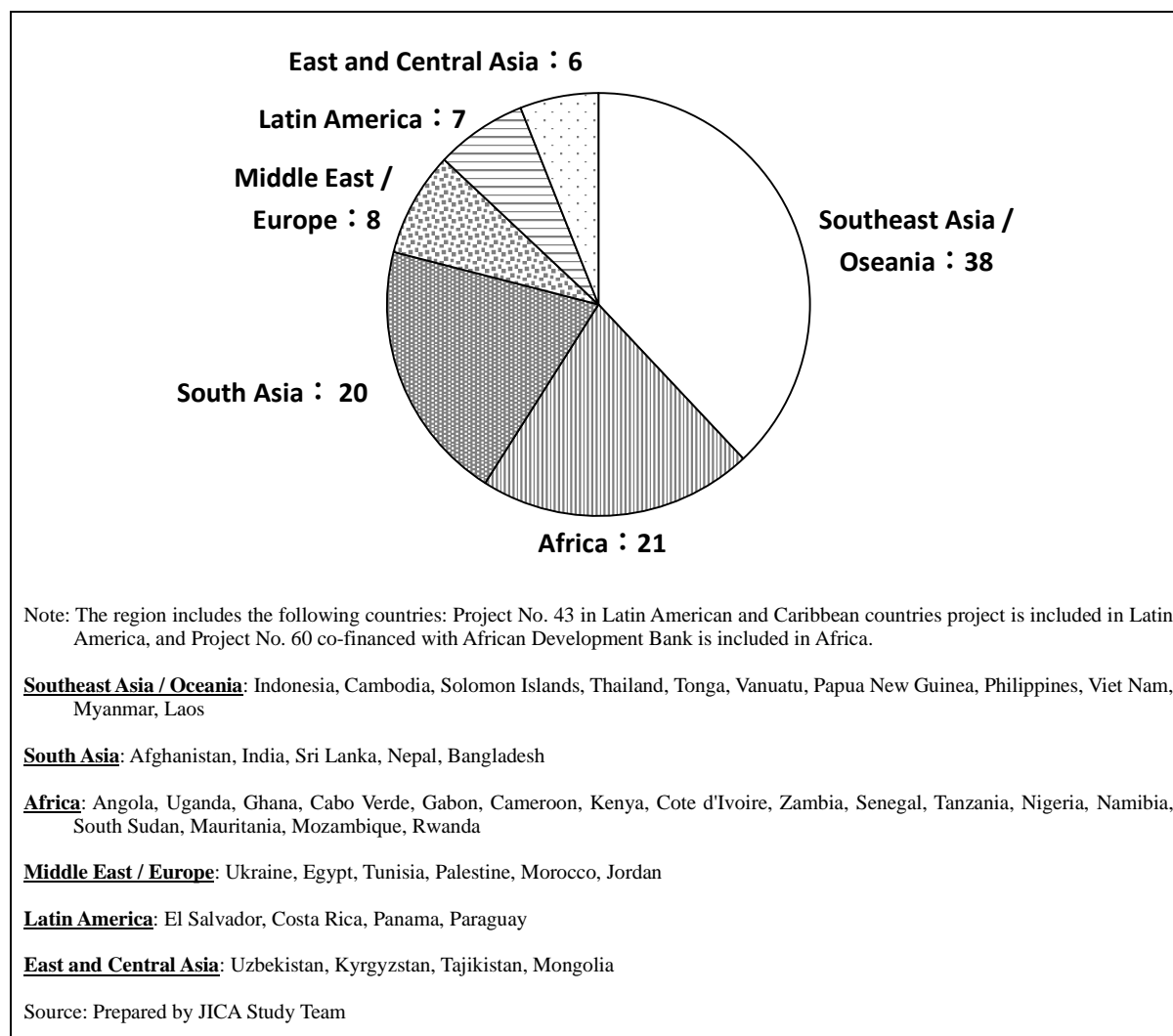
## CHAPTER 2 RESULTS OF THE REVIEW STUDY

### 2.1 Summary of Reviewed Projects

#### 2.1.1 Projects by Region

In order to obtain an overview of the 100 reviewed projects, Figure 2-1 shows the number of projects by region. The features are as follows.

- 100 reviewed projects cover 47 countries in 6 regions.
- By region, there are 38 projects in Southeast Asia and the Pacific, followed by 21 in Africa, 20 in South Asia, 8 in the Middle East and Europe, 7 in Latin America, and 6 in East / Central Asia.



**Figure 2-1 Reviewed Projects by Region**

### 2.1.2 Projects by JICA Project Scheme

Among the 100 reviewed projects, there are 56 Japanese ODA Loan Projects (of which 3 are PSIF Private-Sector Investment Finance), followed by 22 Grant Aid Projects and 13 Technical Cooperation Projects (of which 8 are Technical Cooperation for Development Planning). In addition, there are 6 projects for Verification Survey/Feasibility Survey with the Private Sector for Disseminating Japanese Technologies, 2 projects for Promoting Private Sector Cooperation and 1 project for BOP Business Collaboration.

### 2.1.3 Projects by Sector

The number of projects by sector is shown in Figure 2-2. The features are as follows:

- The 100 reviewed projects cover 25 sectors.
- There are 20 projects under the road and bridge sector, 10 projects under the railway sector, 9 projects each under the thermal power and non-thermal power sectors, 7 projects each under the water supply and agricultural sectors, 6 projects under the port sector, 4 projects each in the airport and waste sectors.

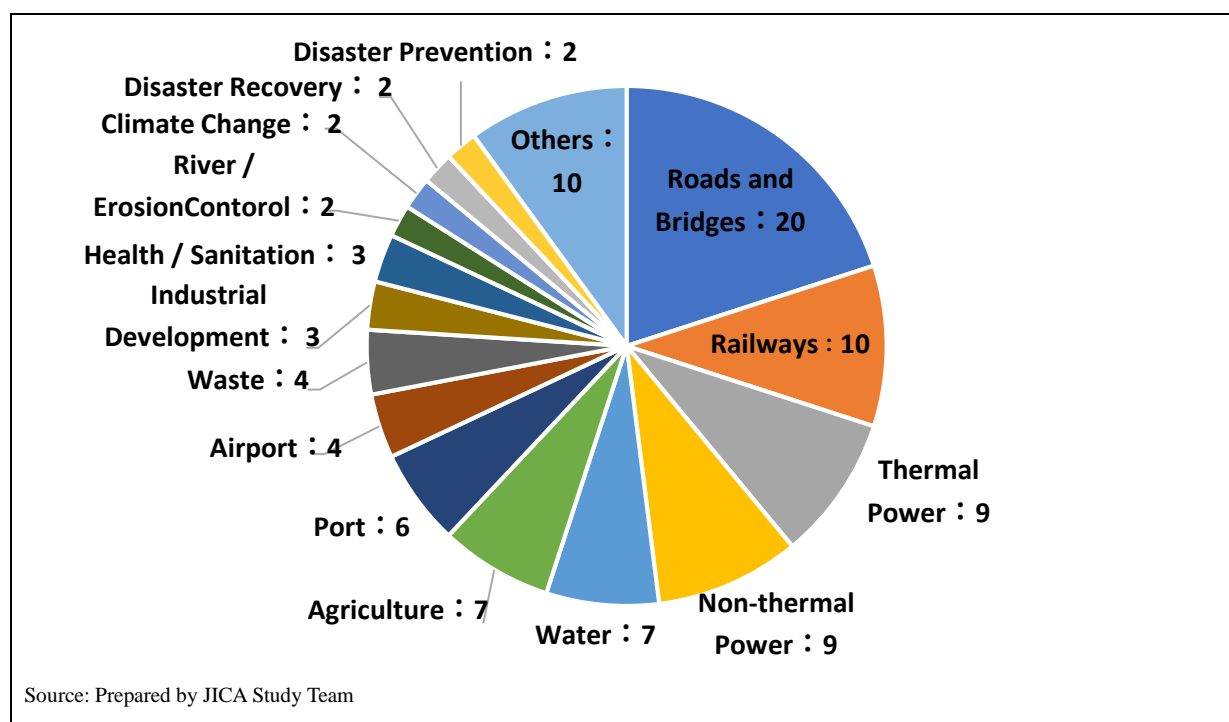


Figure 2-2 Number of Reviewed Projects by Sector

## 2.2 Application Results of JICA GL for Environmental and Social Considerations for 100 Reviewed Projects

The JICA GL consist of 3 chapters and 6 appendixes. Chapter 1 Basic Matters, Chapter 2 Process of Environmental and Social Considerations and Chapter 3 Procedures of Environmental and Social Considerations discuss the requirements and procedure for JICA, and 6 Appendixes describe

requirements for project proponents etc. and the project. In this study, project's environmental and social performance and their compliance with the JICA GL were reviewed.

## 2.2.1 Review Results of "I. Basic Matters"

Table 2-1 shows the review results as to "Chapter 1. Basic Matters" in JICA GL.

**Table 2-1 Review Results of Survey Item Sheet for "Chapter I. Basic Matters"**

Items in JICA GL	Reference Number	Survey Item
1.1 Policy	1	<ul style="list-style-type: none"> <li>Summarize the Japanese Government's policies such as "Cabinet decision on the Development Cooperation Charter" and trend of international development such as SDGs</li> </ul>
1.2 Objectives		
1.3 Definitions		
1.4 Basic Principles Regarding Environmental and Social Considerations		
1.5 Responsibility of JICA	2	<ul style="list-style-type: none"> <li>Confirm the responsibility of other donors such as IFC, ADB, etc. for their investment project financings.</li> </ul>
1.6 Requirement of Project Proponents etc.	3	(Review through the Appendix 1)
1.7 Covered Schemes	4	<ul style="list-style-type: none"> <li>Summarize JICA's cooperation project schemes such as PSIF, SME promotion, etc., which were increased after enforcement of the current JICA GL.</li> </ul>
	5	<ul style="list-style-type: none"> <li>Summarize changes in business environment such as introduction of speedup of infrastructure export, increase of co-financing with international financial institutions, etc., after enforcement of the current JICA GL).</li> </ul>
1.8 Measures Taken in an Emergency	6	<ul style="list-style-type: none"> <li>Summarize cases to which "measures taken in an emergency" were applied</li> </ul>
1.9 Dissemination	7	<ul style="list-style-type: none"> <li>Records of explanation to project proponents etc.</li> </ul>
1.10 Advisory Committee of Environmental and Social Considerations	8	(Confirmed through the review for Section 2.7 "Advice of Advisory Committee for Environmental and Social Considerations")

Source: Prepared by JICA Study Team

The review results are summarized as follows.

For "1.1 Policy", "1.2 Objectives", "1.3 Definitions", "1.4 Basic Principles Regarding Environmental and Social Considerations", "1.5 Responsibility of JICA", "1.6. Requirements of Project Proponents etc.", "1.7 Covered Schemes" and "1.10 Advisory Committee for Environmental and Social Considerations" stated in "1. Basic Matters" of JICA GL, since those items apply to all projects equally and not discussed for each individual projects, all of them are compiled in "Chapter 4 Draft Discussion Points for Revision of JICA GL for Environmental and Social Considerations" of this report.

"1.8 Measures Taken in an Emergency" was taken up as an issue of the WG meeting for reexamination of JICA GL Operation, and this review investigated how the clause 1.8 "Measures taken in an emergency" has been implemented. However, none of the review study projects fall under this category. On the other hand, when the projects other than the reviewed projects were

taken into consideration, a total of seven projects (Technical Cooperation for Development Planning) were confirmed to which emergency measures were applied after the enforcement of JICA GL. In all the projects, the Detailed Planning Survey, in which JICA finalizes the scope of the project in consultation with project proponents, etc. during JICA team's mission(s), was skipped. However, it was confirmed that preliminary scoping (which is usually included in the Detailed Planning Survey) was carried out in the main JICA study. In all cases, the application of measures taken in emergency was reported to the Advisory Committee for Environmental and Social Considerations before the main JICA survey started.

**Table 2-2 Projects which Emergency Measures were Applied**

Project Name	Environmental Category	Cooperation Scheme
Project for Comprehensive Flood Management Plan for the Chao Phraya River Basin (Thailand)	B	Technical Cooperation for Development Planning
Jarar valley and Shebele Sub-basin Water Supply Development Plan, and Emergency Water Supply (Ethiopia)	B	Technical Cooperation for Development Planning
The Project for Enhancing Community Resilience against Drought in Northern Kenya (Kenya)	B	Technical Cooperation for Development Planning
Rural Resilience Enhancement Project (Ethiopia)	B	Technical Cooperation for Development Planning
Sustainable Smallholder Irrigation Development and Management in Semi-Arid Lands Project (Kenya)	B	Technical Cooperation for Development Planning
Project on Rehabilitation and Recovery from Nepal Earthquake (Nepal)	B	Technical Cooperation for Development Planning
Project for Regional Disaster Risk Resilience Plan in Central Sulawesi (Indonesia)	B	Technical Cooperation for Development Planning

Source: JICA website

- As for the “**1.9 Dissemination**”, it was investigated whether the contents of JICA GL were explained to project proponents etc., and in all the reviewed projects, it was confirmed that JICA GL were explained to project proponents etc. at the time of appraisal and they all agreed on the compliance with JICA GL.

## 2.2.2 Review Results of "II. Process of Environmental and Social Considerations"

### (1) Findings

The findings are summarized as follows.

- Regarding “**2.1 Information Disclosure**” of JICA, all the defined relevant materials such as Category Classification, Preparatory Study Report, Environmental and Social Consideration Documents (e.g. EIA, RAP, IPP and/or others) are published on JICA's website. (Regarding

disclosure of the final report, the project for promotion and dissemination of private sector cooperation was excluded since the project does not carry out a preliminary survey.)

- Monitoring results disclosure on JICA's website and in the host countries will be described later (Please refer to Section 2.2.3 (5)).
- Regarding the disclosure of environmental and social considerations documents (excluding monitoring results) in host countries, JICA facilitated project proponents, etc., through the project formulation stage, to disclose information on environmental and social considerations of the project to local stakeholders. As for 41 Category A projects, excluding 1 E/S loan project which environmental and social considerations documents are to be prepared in that project, and 4 projects for Technical Cooperation for Development Planning, it was confirmed that environmental and social considerations documents were disclosed in all 36 projects by the project proponents etc. With regard to disclosure means, these documents are mostly disclosed at project proponent's offices or which copies are provided (36 projects), and disclosed on the project proponent's website (14 projects). As for the used language, when the main document is written in English, the executive summary was often prepared in a local language. Regarding 42 Category B projects, most projects had no agreement on disclosure between JICA and project proponents and etc., or there was no country regulation which requires project proponents and etc. to prepare environmental and social considerations documents, excluding 4 projects in which the project proponent disclosed their environmental and social documents. However, when projects consult with stakeholders and environmental and social considerations documents were prepared for the projects, these documents were disclosed at the stakeholder meeting.
- Regarding disclosure of the environmental and social monitoring results in host countries, environmental monitoring results have been disclosed in 28 out of 29 projects which are in the monitoring implementation stage and for which project proponents etc. agreed on disclosure (except Project No. 38 which is suspended due to a security reason in the project site). Social monitoring results have been disclosed for 9 out of 10 projects which are in the monitoring implementation stage and for which project proponents etc. agreed on disclosure (except Project No. 38 due to the same security reason).
- For projects that could not reach an agreement on disclosure of safeguard monitoring results, it is thought that project proponents, etc. did not disclose them mainly due to not being required to disclose them under the national legislation and policy. However, the increasing number of projects have reached an agreement on disclosure of monitoring results after the enforcement of JICA GL since 2010. Out of the projects for which the loan agreement was concluded in fiscal year (FY) 2010, 4 projects agreed to disclose environmental monitoring results out of 36 projects which were subject to environmental monitoring. On the other hand, 4 projects agreed with information disclosure of social monitoring out of 15 loan projects which were subject to social monitoring. In contrast, in FY 2017, 20 projects agreed with disclosure of environmental monitoring out of 38 projects which are subject to environmental monitoring, and 12 projects agreed out of 14 projects which are subject to social monitoring.

- Among the reviewed projects, two projects (Nos.4, 83) received a request for information provision from the third party, and they are the projects proceed to the objection procedure based on the JICA GL.
- Regarding handling of information that is prohibited from public disclosure, it was confirmed that JICA has not disclosed such information mistakenly and obtained the consent from project proponents etc. in advance when disclosing related information.
- Regarding “**2.2 Category Classification**”, no particular discrepancy was identified between the categorization results and justifications for all the 100 projects.
- It was confirmed that the environmental categorization result was questioned by the third parties for Infrastructure Development Project in Thilawa Area Phase I in Myanmar (No.36) and Support for Agricultural Development Master Plan for Nacala Corridor in Mozambique (No.83). As for Project No.36, a letter was submitted from NGOs to JICA on May 24, 2013 and August 28, 2017 requesting that the impacts caused by Thilawa Special Economic Zone (Class-A Area) Development Project in Myanmar (No.4) be taken into consideration when determining the categorization of Project No. 36 as it is argued to be an associated facility of Project No. 36. As for Project No.83, NGOs questioned the conclusion of categorization by JICA, however, JICA recognizes that the Category B was appropriate considering the likely impacts of priority projects identified in the early stages of the M/P based on the JICA GL.
- It was confirmed that changes of the environmental categorization have been made in three projects (Nos. 25, 27, 63). The reasons for the category change are explained in section 2.2.2 (3.1) in detail.
- Among the reviewed projects, 42 Category B projects consists of 12 loan projects, 18 grant projects, 3 technical cooperation projects, 3 technical cooperation projects for development planning, and 6 projects for collaboration with SMEs (verification survey/feasibility survey with the private sector for disseminating Japanese technologies). For the 9 projects of technical cooperation and collaboration with SMEs and others, the environmental and social impact was limited as they are small-scale with dispatching the experts and procurement/installation of equipment. For the technical cooperation projects for development planning, the project scale and its environmental and social impact vary but within the limited scale since the M/P is higher level planning. On the other hand, 12 loan projects under the category B such as road and airport rehabilitation, the project scale are relatively large with the average project cost at around 15 billion Yen and the involuntary resettlement occurs in some projects. For 18 grant projects, the average project cost is around 2.5 billion Yen which is lower than that in the loan project, therefore, the environmental and social impact is smaller than that in the loan project in general. Thus, it was seen that the projects under category B include different scales of the projects with various ranges of the project types, and risks of the environmental impacts.
- It was confirmed that all the projects were categorized considering relevant information obtained from project proponents etc., but not necessarily through the screening form (Appendix 4 of the JICA GL).

- **"2.3 Impacts to be Assessed"**  
⇒ Investigated together with provisions of JICA GL Appendix 1
- **"2.4 Consultation with Local Stakeholders"**  
⇒ Investigated together with provisions of JICA GL Appendix 1
- Regarding the **"2.5 Concern about Social Environment and Human Rights"**, among 100 reviewed projects, no project was found which was implemented in the countries and areas in conflict or areas where the right to basic freedom (e.g. freedom of expression) and legal remedies are restricted.
- According to the Office of the United Nations High Commissioner for Human Rights, etc., threats and attacks to persons who advocate for defending human rights are becoming international concerns.
- With respect to **"2.6 Laws, Regulations and Standards of Reference"**, an EIA needed to be approved by an environmental authority for 50 projects, among which 30 projects were Category A, and 20 projects were Category B.
- Among the Category B projects, the EIA was approved for 20 projects at the environmental review stage.
- Among the Category A projects, it was confirmed that preparation of EIA nor the approval by authorities were not required under national laws for 7 projects (No.5, 8, 26, 27, 31, 32, and 33) in the host countries. However, environmental and social impacts were assessed and results were compiled in EIA based on the requirements of the JICA GL in all those projects, and the EIA is generally endorsed by project proponents etc.
- Project Nos. 39, 40, 44, 45, all of which were Category A projects, were not in the stage of asking for EIA approval since they are Technical Cooperation for Development Planning, which formulates the M/P.
- No major deviation was seen in all the reviewed projects from the requirements of WB's SGP and other international safeguard standards. For 10 projects (Nos.7, 13, 15, 20, 26, 28, 31, 32, 42, 47), it was confirmed that national environmental standards were applied after the review was conducted if there was no major difference between the national and international standards. For example, when the Project No.15 confirmed that there was no major difference between environmental standards of the World Health Organization (WHO) and that of Egypt, the project applied for the standard of Egypt. In the case of the Project No.17, though there is no description on the international standards in the EIA, the project confirmed that there is no large difference between the national standards in Viet Nam and international standards for air and noise. The environmental ambient and emission standard values commonly referred as international standard in many projects include the Environment, Health and Safety (EHS) guidelines (ambient air quality, noise, vibration, wastewater, river water, air emissions), WHO standard values (air, noise, vibration, water qualities), International Organization for Standardization (ISO) standard values (vibration), European Union (EU) standard values (air, exhaust gas, water quality) and the standard value of Japan (noise, vibration, drainage, water quality, air, Japan Industrial Standard [JIS] vibration). In addition, although it was not

frequently used, there are some other standards referred as international standards such as Singapore's standard value for noise, Kenya's environmental standard value (referred in a project in South Sudan because there is no environmental standard in South Sudan), United States Environmental Protection Agency (US EPA) standard value for water quality and guidelines for soil erosion, Food and Agriculture Organization (FAO) standard values for water quality. Moreover, a port project (No.16) adopted International Maritime Organization (IMO) Convention for marine spill, 2 projects of the port and coal-fired power projects (Nos.13,16) adopted MARPOL Legislation for pollution prevention, 1 airport project (No.51) adopted International Civil For Aviation Organization standard values for noise, 1 high-speed railway project (No.25) adopted the vibration standard values of Austria, Germany, Italy, Japan, Netherlands-Norway, Sweden, the United Kingdom, and the United States. For the involuntary resettlement, the WB's OP4.12 and ADB Safeguard Policy Statement (SPS) were referenced in most projects.

- Regarding **“2.7 Advice of Advisory Committee for Environmental and Social Considerations”**, it was confirmed that the Advisory Committee meetings were properly held for all 41 Category A projects.  
⇒ JICA's responses to the advices by the Advisory Committee for each project are described in detail in Section 2.2.2(4).
- For all the 100 projects, the agreements were concluded between JICA and project proponents etc.
- There were no cases confirmed in which the cooperation project was canceled due to non-compliance of agreement with JICA.

## **(2) Handling the Information that is prohibited from public disclosure**

For all the projects, the relevant information was disclosed based on the consent with the government and related agencies of host countries. Information that is prohibited from public disclosure was not disclosed mistakenly.

## **(3) Environmental Categorization**

### **(3.1) Change of Environmental Categorization**

Among the reviewed 100 projects, the environmental categorization was changed for 3 projects (Nos.25,27,63). In the case of Project No.25, it was categorized as Category A at the initial stage of project preparation; however, the Engineering Services (hereinafter referred to as E/S) of the power plant component was scoped out after the environmental review, which led the change of categorization (from A to C). In the case of Project No.27, the category was changed from B to A as large-scale resettlement became involved based on the M/P and F/S which have been re-conducted after the flood damage caused by the typhoon which took place after F/S was conducted by the project proponent. In the case of Project No.63, the category was changed from B to C since construction of the final waste disposal site was excluded from the project scope.

**(3.2) Categorization of Technical Cooperation of Development Planning**

Out of 100 reviewed projects, 8 Technical Cooperation for Development Planning projects were included; 4 Category A, 3 Category B, and 1 Category C projects. As for the corresponding sectors, 4 projects belong to the agricultural sector including the large-scale irrigation development and 1 project each for port, railway, power and water supply sectors.

**(4) Responses to Advices from the Advisory Committee**

- As of November 2018, the Advisory Committee meetings were held for 41 projects and 557 pieces of advice were given in total. With respects to 550 out of 557 advice, the preparatory study reports were revised following them (For 1 project currently under preparation of the final report, the advice is to be taken.) and suggested measures were agreed with project proponents etc. and relevant authorities at the time of the project appraisal. In general, advice was followed in reviewed projects, however, it was found difficult to take some advice which is described later. In addition, it was confirmed that the advice on the project implementation was properly followed. At the end of the chapter, a separate table summarizing the response to the advice on the project implementation is attached in Table 2 24.
- In some cases, the follow-up of the advice was challenging. This is partially because environmental and social consideration documents such as EIA had already been approved or had been being subject to the official review process when the Advisory Committee meeting was held at JICA's environmental review stage. In such a case, measures following the advice was agreed at the time of the project appraisal on top of EIA. Such challenges are confirmed in 3 projects (Nos.24, 28, 29).
- Details of 3 projects are shown as follows:
  - In the case of No.24 North-South Expressway Construction Project (Ben Luc - Long Thanh Section) in Viet Nam, EIA report was prepared with the assistance of ADB and was approved by Ministry of Natural Resources and Environment(MONRE) on 14 September 2010. However, since the Advisory Committee meetings were held on 16 February 2011 and on 4 March 2011, the advice could not be reflected into the EIA.
  - In the case of No.28 Batchenga - Lena Road Project in Cameroon, the EIA report was concluded in July 2012, and the Advisory Committee meetings were held on 10 November 2014 as the WG and on 1 December 2014 as the general meeting for finalizing advices. Therefore, the advices could not be reflected in the EIA.
  - In the case of Project No.29 Rengali Irrigation Project (Phase 2) in India, the Advisory Committee requested on 6 October 2014 to revise a sentence of "No population will be displaced due to this canal project" as involuntary resettlement occurs for 138 informal households based on the latest RAP". However, this comment could not be incorporated into the EIA since the State Government had already begun the review and approval procedure for the updated EIA dated March 2014.
- For the above three projects, already approved EIAs could not be revised, but JICA and project proponents etc. agreed on suggested measures given by Advisory Committee on top of EIA.

### 2.2.3 Review of "III. Procedures of Environmental and Social Considerations"

#### (1) Overview

The outline of the review is shown below. Ten Category C projects are excluded from this section as the procedures in accordance with JICA GL are not relevant to Category C projects after categorization.

- Out of the 90 projects, alternatives analysis was conducted 79 projects in total, namely in 41 Category A projects and in 38 Category B projects excluding 4 projects (Nos.62,65,66,76) which are to be constructed in the premises of the existing facilities (details are provided in the next section (2)).
- Seven projects were classified into Category FI (Nos.43,56,57,58,59,60,81). For those projects, the institutional capacity on environmental and social considerations of financial intermediaries<sup>1</sup> was examined. Moreover, out of 7 projects, 6 projects do not expect to have Category A subproject at the time of the environmental review (Nos.43,56,57,59,60,81). On the other hand, in the case of Project No.58, it was agreed that the environmental review process and information disclosure for Category A project needs to be taken if any subproject is categorized as Category A prior to its implementation.
- The preparatory study in assistance with JICA was conducted in 67 projects. Within all 67 projects, the environmental and social considerations steps required were taken including scoping, EIA study, information disclosure, and stakeholder meeting. As for other 33 projects, the preparatory study was not conducted.
- Preparation of Environmental Checklist were confirmed with 39 projects out of 42 Category B projects. For the projects which did not make use of the Environmental Checklist, the equivalent information was checked with EIA and other documents. For Category A projects, the necessary information was collected and checked with EIA and/or RAP.
- As for the timing of E/S loan environmental appraisal/review under the current GL, there are two options; prior to the provision of E/S loan or at the provision of loan to the targeted project. Four E/S loan projects (Nos.13,23,34,55) have skipped the environmental review as per the JICA GL as the environmental and social impacts were to be examined through the E/S as a loan components. Environmental and Social impact assessment survey components include support for preparation/review of EIA and/or RAP if already developed and support for environmental/social monitoring activities. For Project No.13, environmental and social monitoring would be supported. Project No.23 included a support for review of the draft EIA report and conducting supplemental surveys in accordance with JICA GL (no land acquisition for the project). Project No.34 has a support for preparation of EIA and RAP reports (the land acquisition process has not yet started and construction work has not been started accordingly). For Project No.55, a support for preparation of the EIA report was included.

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<sup>1</sup> Financial Intermediaries(FI): FIs include public and private financial services providers, including national and regional development banks, which channel financial resources assisted by JICA through two-step loan to a range of economic activities across industry sectors. (Defined with reference to WB ESF ESS9, p.91)

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- "Submission of Monitoring Results and Disclosure "
  - ⇒ It will be described in detail in Section 2.2.3 (3) .
- There is one project (No. 31) where the third party requested the project proponent for disclosure of monitoring results, and asked the monitoring process and results which were properly responded.
- "Discrepancy between Environmental Review Results and Monitoring Results"
  - ⇒ It will be explained in detail in Section 2.2.3(6).
- There was no reviewed project in which JICA asked project proponents etc. to take appropriate actions in accordance with the signed agreement and disbursement was suspended due to a lack of appropriate response by project proponents etc. with respect to environmental and social considerations.
- There are two projects in which a significant change of the project scope occurred. In Project No.4, the project area was expanded due to development of Phase 2 area, namely "Zone B", and the project has undergone the "significant change" process. For Project No.9, the design of the access road component was changed and regarded as a "significant change".
- There is no reviewed project for which JICA recommended MOFA to suspend the cooperation project due to environmental and social considerations.
- There are 8 projects (Nos.39, 40, 44, 45, 83, 84, 85, 89) under "3.4 Technical Cooperation for Development Planning". Stakeholder meetings on SEA were carried out in 7 projects (Nos.39,40,44,45,83,84,85) except for Category C project (No.89).
  - ⇒ Regarding the technical cooperation for development planning, it will be explained in detail in Section 2.2.3(8).

## **(2) Alternatives Analysis and Without Project Scenario**

- Out of the 100 projects for review, the alternative project plan were examined for all 41 projects Category A projects. In addition, the alternative analysis has been conducted with 38 Category B projects except for the ones which are implemented within the premises of existing facilities (Nos.62, 65, 66, 76). In total, the alternatives have been examined in 79 projects.
- In Category A projects, most projects examined without-project scenario. As an exception, in the case of co-financing projects for which EIA was prepared with the support of another donor such as ADB and AfDB, without-project scenario was not examined in the respective report.
- Methodological pattern observed with 70 projects out of the 79 projects were summarized below. Remaining 9 projects are excluded from this analysis as alternative analysis was conducted in a simple methodology for (1) the SME support projects are proposed by the private sector (verification survey/feasibility survey with the private sector for disseminating Japanese technologies, promoting private sector cooperation and BOP business collaboration project); and (2) technical cooperation projects accompanied with small scale construction work but limited environmental and social impacts.
- The examination of alternative project sites/routes are most common in 51 projects. Subsequently, project design alternatives were considered in 34 projects; alternatives of the

construction and operation method were considered in 9 projects (especially, the construction method was examined in 4 projects); the alternative implementation schedules were considered in 4 projects (including selection of priority projects in the M/P). As for 7 technical cooperation projects for development planning which conducted SEA, it was confirmed that alternative project sites and project designs were considered in 4 projects each; and both alternative construction and operation methods and implementation schedules were examined in one project each.

- For 31 Category A projects out of 70 projects which conducted alternative considerations, whether alternatives were considered from economic, social and environmental aspects was reviewed. Alternative analysis from both economic aspects (e.g. project cost, feasibility, etc.) and environmental and social aspects are examined for 24 projects. More specifically, the alternative analysis on the economics aspect was confirmed in 27 projects, environmental aspects in 28 projects, and social aspect in 28 projects. The alternative analysis on social aspects, especially land acquisition and resettlement aspects, were often confirmed.
- Technical alternatives were analyzed for 25 projects. In addition, it was found that alternative analysis includes some other aspects such as geography, effectiveness, demands, safety, difficulty to obtain permissions, the construction period, a flood risk, and consistency with higher level governmental policies.
- Quantitative alternative analysis was confirmed in 22 projects. It was often observed that the quantitative analysis was partially conducted because it is not easy to evaluate alternatives quantitatively for all the options. More specifically, alternative considerations were often conducted at several sites or routes and at the different planning stages under one project. The limited availability of existing data for the alternative consideration at the early planning stage is also another challenge for quantitative evaluation. In addition, there are 2 projects (Nos.32, 34) with which alternative analysis were evaluated quantitatively by Multicriteria Analysis (MCA) using weighted evaluation parameters and both the quantitative and qualitative data.
- Alternative analysis was conducted by considering quantitative and qualitative positive effects in 17 projects. For example, the regional economic effect (including increase in employment), improvement of traffic congestion, easiness for extension, connectivity with other transportation, improvement of transportation network, safety, the economic internal rate of return (EIRR), less travel time, GHG emission reduction, appropriate treatment of heavy metals, reduction of odour, improvement of water quality, improvement of air quality and noise due to improved traffic congestion, environmental conservation by improvement construction (e.g. river bank and sand beach), indirect impact of improved agriculture production by the power generation projects, potential future development, urban planning potentials were considered as positive effects. Although these positive effects were considered, these positive effects are both for the alternatives selected and not selected.
- Most without-project scenario was analyzed qualitatively. Examples of qualitative and quantitative evaluation are shown in the following tables, respectively.

**Table 2-3 Example of Qualitative Without-Project Scenario**

Project No.	Project Name	Example of Without-project Case including Qualitative Evaluation
1	Navoi Thermal Power Station Modernization Project (Uzbekistan)	In the case where the project is not implemented, existing old power plants (Units 3 and 8) need to be operated continuously and the air quality around the power plants will remain in adverse conditions. In addition, the reliability of the facilities will also decrease so that it increases the possibility of an accident.
3	Turakurgan Thermal Power Station Construction Project (Uzbekistan)	In the case where the project is not implemented, existing old and inefficient thermal power plant need to be operated continuously and cannot respond to the increasing power demand.
7	The Kanchpur, Meghna, and Gumti 2nd Bridges Construction and Existing Bridges Rehabilitation Project (Bangladesh)	In the case where the project is not implemented, a serious traffic problem will not be resolved, and accordingly the traffic accidents and environmental pollution will not be mitigated.

Source: Prepared by JICA Study Team

**Table 2-4 Example of Quantitative Without-Project Scenario**

Project No.	Project Title	Example of Without-project Case including Quantitative Evaluation
27	Flood Risk Management Project for Cagayan de Oro River (Philippines)	In the case where the project is not implemented, while it can cope with the flood with 2 to 5-year probability scale, but not with 25-year probability scale, which is the project target.

Source: Prepared by JICA Study Team

- Below are examples of other specific alternatives.

**Table 2-5 Examples of Alternatives**

Project No.	Sector	Project Name	Example of Alternatives
3	Thermal Power Station	Turakurgan Thermal Power Station Construction Project (Uzbekistan)	<ul style="list-style-type: none"> <li>•Power Station: The plan without project implementation, and alternatives on site selection, fuel, and power generation system were examined in EIA or in Preparatory Study.</li> <li>•Transmission Line: The plan without project implementation, and an alternative plan of expressway to install the transmission line as site selection were examined in EIA.</li> </ul>
14	Road	Mandimba-Lichinga Road Upgrading Project (Mozambique)	Since the project improves the existing roads, without-project case, a plan with consideration of the range of construction influence, and a plan to alter the whole road reserve were examined as alternatives with consideration of the road alignment and ROW width.
53		Urban Transportation Line-3 Development Project (1) (Panama)	Route of the Metro Line 3 was selected from 2 candidate routes, and transport system was selected in two steps. In the first step, all the possible urban transport system were listed and evaluated by 4 evaluation criteria which are agreed by Metro Agency and JICA Study Team. In the second step, selected 6 transportation system were examined, and 10 comparison items were selected, and analysis was carried out from the viewpoints of technical validity, cost, schedule, demand, land acquisition/resettlement, and environmental impacts. After a series of discussions and analysis, it was concluded to adopt Pan American Route, and the straddled-type monorail was adopted as the most suitable system for the Line 3.
79	Water Supply	The Project for Augmentation of Water	Without-project case and three alternatives were compared from viewpoints of difficulty of construction (presence of bedrock), the

Project No.	Sector	Project Name	Example of Alternatives
	System	Supply System in Narok (Kenya)	<p>construction site area of a water purification plant, environmental conditions, and maintenance costs. Finally, the alternative 3 was selected.</p> <p>(1) Alternative 1 (a plan in the F/S Report) Alternative 1 is to first install the intake facility about 5 km upstream from the existing central water purification plant, then install a 200 mm diameter water pipe along the river and guide raw water to the existing central water purification plant with natural flow.</p> <p>(2) Alternative 2 Alternative 2 plans to construct a new intake facility and a water purification plant on the future expansion site which is next to the current water supply facility. However, it is planned the distribution reservoir is to be constructed upstream of this plant considering the natural flow.</p> <p>(3) Alternative 3 (Selected Plan) Alternative 3 is to install an intake facility approximately 5 km upstream from the existing central water purification plant as planned in the F/S report, but the new northern water purification plant and the distribution reservoir are planned to be installed upstream of the river. It is planned to distribute water to the city by natural flow only.</p>

Source: Prepared by JICA Study Team

### (3) Submission of Environmental and Social Monitoring Report

- The environmental monitoring results were periodically submitted for 51 projects among 77 reviewed projects with exception of the Category C, Category FI, and Technical Cooperation for Development Planning. Out of 77 projects, 25 projects are not in the stage of monitoring since the construction has not been commenced, and 1 project was suspended due to a security reason in the project site.
- For social monitoring, 45 projects involve land acquisition and/or resettlement. Among 45 projects, social monitoring results were submitted in 29 projects. For remaining projects, land acquisition/resettlement has not yet started in 15 projects, and 1 project was suspended due to a security reason in the project site.

### (4) Environmental and Social Considerations by the Project Proponent in the E/S

Environmental and social impacts were to be examined in four E/S loan projects (Nos.13, 23, 34, 55) among the 100 reviewed projects, through support for drafting environmental and social documents and for monitoring implementation provided in E/S components. In addition, in case of Project No.13, land acquisition was carried out and the construction of the access road had been started during the period that the components covered by E/S loan was undertaken. It was confirmed that compensation for land was paid according to the national law prior to land acquisition, partially some bank accounts for compensation were frozen due to overpayment of the compensation, farming is permitted to continue in areas where construction has not started yet, and livelihood restoration supports are provided as per the Land Acquisition and Resettlement Action Plan (LARAP) such as vocational training on welders and mushroom cultivation promotion, and

employment as project workers.

**(5) Disclosure of Environmental and Social Monitoring results on the JICA Website**

- Among the reviewed projects, JICA and project proponents etc. agreed on disclosure of environmental monitoring results on the JICA web site in 45 projects. Construction work has been started and environmental impacts needed to be monitored in 29 projects, while monitoring reports submitted to JICA were disclosed on the JICA website for all the projects except for 1 project (No.38), which was suspended due to the deterioration of the situation in the project proponent.
- Among the reviewed projects, JICA and project proponents etc. agreed on disclosure of social monitoring results on the JICA web site in 16 projects. Land acquisition and involuntary resettlement had begun in 10 projects which are subject to monitoring, while monitoring reports submitted to JICA were disclosed on the website of JICA except for 1 project (No.38) which was suspended due to the deterioration of the situation in the host country.

**(6) Differences between Environmental Review Results and Monitoring Results**

- Cases that the unanticipated impacts at the timing of environmental review was identified through monitoring were reviewed considering whether there was a difference between the appraisal (environmental review) and the monitoring result. Among the reviewed projects, differences were observed in 5 projects (Nos.5, 6, 11, 24, 42). These differences were not caused from descriptions of the JICA GL itself nor differences in understanding, instead, for example, the happening of events that were not anticipated in the EIA stage, or issues of the institutional capacity of project proponents etc. and related agencies in host countries. In all the projects, it was confirmed that project proponents recognized and addressed the issues with these projects.

**(7) Projects that Significant Changes Happened**

- Among 100 reviewed projects, significant changes as defined in the JICA GL were confirmed in 2 projects. For the No.4 Thilawa Special Economic Zone (Class-A Area) Development Project, the Zone B (Phase 2) development which was added to the plan but implemented later, was recognized as a “significant change” due to the expansion of the investment area. For the project No.9 Matarbari Ultra Super Critical Coal-Fired Power Project(1), the design change of the access road component was regarded as “significant change”.

**(8) Environmental and Social Considerations for Technical Cooperation Projects for Development Planning**

Among 100 reviewed projects, 8 technical cooperation projects for development planning were included. One project which is Category C is excluded from the scope of review of this section. For the rest of 7 projects, necessary process undertaken in line with the JICA GL are reviewed as follows.

- Screening was conducted in all 7 projects.
- Scoping including preliminary-scoping or draft scoping was conducted in all 7 projects.
- Meetings between JICA and project proponents etc. were confirmed in all 7 projects.
- Disclosure of agreement documents and reports were confirmed in all 7 projects.

- Implementation of alternative analysis and Stakeholder Meetings (SHMs) at the SEA stage were confirmed in all 7 projects. More specifically, alternative analysis including examination without-project scenario was conducted in all projects, and alternative location of the project site/route, alternative plan of development scenario/strategies were examined. SHMs were conducted at the M/P preparation stage to share basic understanding regarding development planning with local people and for explanation/meetings on draft M/P. It was confirmed that SHMs were conducted at several stages, not only one stage, in accordance with progress of M/P, though the number of attendances was different by projects (total 101-492 participants).
- As for the unexpected environmental and social impact after completion of technical cooperation projects for development planning, in case of No.44 Joint Feasibility Study for Mumbai-Ahmedabad High Speed Railway Corridor in India, it was confirmed that some complaint letters are from farmers (including organization) whose lands were affected were reached, the JICA office conveyed contents of appeals to the project proponent and requested them to correspond to issues after conducting interviews accordingly.

## **2.2.4 Appendix 1 – 6 Environmental and Social Considerations Required for the Project Proponents**

### **(1) Overall Trend**

The review results on environmental and social considerations required for project proponents etc. as per Appendix 1-6 of JICA GL are summarized as follows. Since the Category C projects (10 projects: Nos.25, 61, 63, 82, 89, 90, 91, 97, and 100) are not subject to the environmental review, those projects were excluded from analysis, and remaining 90 projects are reviewed.

It was confirmed that preliminary survey and examination were conducted for all the 90 projects on environmental and social impacts in the planning stage. For the status of alternatives and mitigation measures to avoid and minimize the impacts, among the surveyed 90 projects, alternatives were examined for all the 41 Category A projects and all the 42 Category B projects, excluding 7 Category FI projects.

- Qualitative and qualitative evaluation of the costs and benefits of environmental and social considerations was observed in 69 projects, and 21 projects which are SME support projects, technical cooperation projects, or Category FI projects, are excluded.
- Whether environmental and social considerations related costs and benefits are harmonized with economic, financial, institutional, social and technical analysis of the project was studied. As a result, 44 projects calculated EIRR including environmental, social costs and benefits. For example, in the case of Project No.29 India: Rengali Irrigation Project (Phase 2), the implementation cost of environmental management plan is included in the project costs, and Project No.35 Kenya: Olkaria V Geothermal Power Development Project includes environmental management costs, land acquisition costs, etc. in the project cost. In each case, EIRR is calculated.

EIRR calculation is not applicable for another 46 projects; including Grant Projects (19 projects excluding category C), 7 FI projects, 7 projects for Technical Cooperation for Development

Planning, 3 Technical Cooperation projects, 3 E/S projects, and 6 SME support projects.

- Among total 83 Category A and B projects, 76 projects carried out EIA/IEE or conducted the IEE level of investigation (including SEA of M/P study). As for the 7 projects in Category B (Poverty Reduction Grant Project and SME Support Project: Nos.68, 92, 93, 94, 95, 98, and 99), which did not carry out EIA study due to no requirements in the host country, information was collected through project appraisal. As for whether the results of the environmental and social considerations, including alternatives and mitigation measures, are recorded as separate documents or as part of other documents, it was fulfilled for all the projects. In particular, in the case of projects with any significant impact, it was confirmed that all the Category A projects have prepared the EIA reports.
- Regarding preparation of the EMP and Environmental Monitoring Plan (EMoP), it was often found that the EMP needed to be updated at the detailed design stage, and the cost of EMP and EMoP was included in the project proponent's administrative/management cost or the contractor's contract amount. As for the survey item of "Scope of Impacts to be Assessed", scoping was conducted in 82 projects. (Not applicable to 7 FI projects. For Project No.85, it will be implemented in the D/D Study.)
- Calculation and evaluation of GHG emissions were conducted quantitatively in the JICA study reports (e.g. F/S report) or EIA for 20 out of 90 projects (Nos.3,6,7,8,9,10,13,14,18,20,21, 35,38,41,51,53,67,70,79, and 95). One project did not conduct any JICA study (No. 22) and so the calculation and evaluation results of GHG emissions were reported in the advisory committee meeting. GHG emissions are mainly calculated in the sectors of power generation, railways, roads, and airports.
- Common method to announce the SHM or invite to SHM are announcement through community representatives, sending invitation letters, posting an advertisement on the newspaper. In addition, announcement via the notice board, telephone calls and radio were also used. In a rare case, announcement on the website, by individual visits, and with use of a loud-speaker are also found in some projects.
- As for the timing of announcement for stakeholder meetings, in many cases, there were no such written records because the preferred announcement timing is not specifically described in JICA GL. However, the advance notice was commonly done one week or 10-15 days before SHM. In some projects, the meeting announcement was done 2-5 days before the SHM or 3 weeks before.
- The languages used in the stakeholder meetings were mostly local languages, though there were no written records in some projects. In case the host country had official language, both the local language and official language were used. For instance, the official languages used in the stakeholder meetings include English (in India, Sri Lanka, the Philippines, Cameroon, and South Sudan), French (in Arabic zone, Cameroon, and South Sudan), Russian (in Uzbekistan), Spanish (in Central and South America) and Portuguese (in Mozambique). A variety of local official languages were used in India and the Philippines. For rare cases, Maa language was used for the meeting with Masai tribes in Tanzania, and a local language, other than Portuguese,

was also used in the stakeholder meeting in Mozambique.

- As for the method of consultation, public meetings with local residents were commonly used, and in some projects, Focus Group Discussions (FGDs) and interviews were also conducted. As a rare case, consultations by visiting individual households were conducted.
- The commonly discussed contents were summarized by projects as follows:

**Loan/Grant Projects (including PSIF):** Discussed contents varied according to the project stage; however, for the EIA/IEE, the project summary, expected environmental and social impacts, findings of the surveys, environmental mitigation measures, and future schedule were generally discussed. For the RAP/ARAP, the project summary, compensation and assistance policy, future schedule, and GRM were commonly discussed. In some projects, more specific issues such as the size of a new house in a resettlement site, the project-related employment opportunities, safety issues for the road project, details of workers' camps, the traffic management plan during the construction period, were discussed in stakeholder meetings.

In addition, stakeholder meetings were sometimes held with local residents for RAP/Abbreviated RAP (ARAP) and EIA/IEE at the same time in several projects. There were some projects for which additional FGDs were held with local residents, and such FGDs were also held for the socially vulnerable groups including slum residents, female residents, the poor, the Scheduled Castes and Scheduled Tribes in some projects.

**Technical Cooperation (Development Planning):** Meetings were organized at the SEA stage, and the project outline, planning, expected environmental and social impacts were discussed, and question and answer session was held.

**SME Support Projects:** Though there was no official requirement of conducting stakeholder meetings with local residents for SME Support projects, in one project, the stakeholder meeting was conducted by project proponents etc. (a Japanese company). In the meeting, the project proponent etc. explained the technology of their compost plant to local residents and concerned people, and issues concerned waste, a request for local residents to join the environmental monitoring committee and others were discussed.

**FI:** FIs shall confirm stakeholder meetings of sub-projects. In this regard, it was confirmed that a sub-project (solar power generation) under Project No. 43 organized consultation meetings with representatives of local communities and concerned people for the EIA (no RAP was prepared because of no land acquisition nor resettlement). The contents of the meetings include the project outline, time schedule and Q&A. More specifically, the consumption amount of water, the amount of cutting trees and a request for installing the solar power panel at near education facility were discussed.

**Technical Cooperation /Category C:** Conducting SHM is not applicable.

- The number of participants for each meeting was analyzed for Category A projects. It was found that the number of participants in each meeting significantly varied depending on the project. The number of Project Affected Persons as well as their geographical distributions varied depending on the project (e.g. the linear project and the non-linear project, and the new construction project and the expansion or improvement project of the existing facility),

therefore, it is difficult to set a preferable guideline value of the appropriate number of participants per discussion. For instance, although participation of more than 500 people was also found in one project (No.27), in order to ensure the meaningful participation, several supplementary measures were adopted such as distributing the handouts and increasing the number of the organizer's staff. There were also two projects (Nos.17 and 32) in which additional consultations were conducted to encourage more Project Affected Household (PAH) participation and to improve PAH's understanding.

- Mitigation measures for risks of stakeholder engagement such as consensus building among various stakeholders with different interests and the socially vulnerable groups are studied. More specifically, whether the consultation meeting or FGD was organized for specific groups was studied. For example, in Project No.2, interviews were conducted through individual visits, and FGDs were conducted among people making incense sticks at home, people bathing in the river, three-wheeled taxi drivers and school children. For Project No.32, a separate discussion was held with affected communities with many informal occupants.
- 60 projects have plans or measures for the socially vulnerable groups, and remaining 30 projects are not subject to significant impacts on the socially vulnerable groups since these are Technical Cooperation for Development Plannings or projects which are implemented in the existing facilities. The examples of consideration for socially vulnerable groups include financial compensation, vocational training, provision of employment opportunities, and additional considerations for residences in the resettlement site. Additionally, prioritized employment for women and the youth, opening bank accounts to women so that women can receive compensation, and prioritizing physically handicapped persons to allocate the first floor of the resettlement residence.
- Good practices of stakeholder analysis, responses from project proponents etc. to the third party's request, and consideration for the socially vulnerable groups are described in detail in 2.2.4(9), 2.2.4(10), 2.2.4(11).
- The definition of WB, ADB, and IFC regarding "Critical Natural Habitats" and "Significant Conversion and Significant Degradation" are summarized in "Chapter 4 Draft Discussion Points for Revision of JICA GL for Environmental and Social Considerations" of this report. The illegal logging has not been confirmed in all the reviewed projects.
- Regarding the status of "involuntary resettlement", among the 90 projects, RAP/ARAP was prepared in 39 out of 44 projects with land acquisition. 5 projects for which RAP/ARAP were not prepared, the compensation policy and implementation status/records of the stakeholder meetings were confirmed with the environmental check list and agreed with the project proponents etc.
- Consultation meetings regarding resettlement plans were conducted in all the 39 projects for which RAP/ARAP were prepared.
- Regarding avoiding and minimizing involuntary resettlement and the loss of livelihood, it was found that a total of 44 projects considered measures to avoid and minimize the impact.
- Among 37 projects involving physical resettlement, 28 projects agreed on implementation of

livelihood restoration assistance and prepared the livelihood restoration plan. Although 8 projects have physical resettlement, they have not prepared the livelihood restoration plan because resettlement was either set-back or shifting to the vicinity place and livelihood restoration was not anticipated, or because it was confirmed that none of residents would lose livelihood in the survey.

- With respect to PAHs' livelihood, whether PAHs restored their livelihood, income opportunities and production level was surveyed for 5 projects which planned the livelihood restoration program out of 8 projects which field survey was conducted. Since surveyed projects are in the implementation/preparation stage for livelihood restoration, it is too early to conclude whether livelihood was restored or not in this study. The current survey results are shown as follows.
  - Project No.5 Delhi Mass Rapid Transport System Project Phase 3 (India):  
JICA Study Team visited the relocation site in the field survey and interviewed some PAHs. At the relocation site, social infrastructure such as a medical facility and water supply facilities were in place, and it was confirmed that they were generally satisfied with the living environment. In addition, no complaint was received from the interviewed residents for the livelihood restoration assistance. In addition, external monitoring has been conducted for the relocation site for which physical resettlement has already been completed, and no particular complaint was reported regarding the relocation site and its living environment.
  - Project No.13 Indramayu Coal Fired Power Plant Project (E/S) (Indonesia):  
From October 2016 to August 2018, 300 people participated in the agricultural skills-based livelihood restoration programs and the non-agricultural skills-based programs, and the programs have been continuously provided. Additionally, PAHs were allowed to continue farming on the project sites except for access roads and substation sites.
  - Project No.24 North-South Expressway Construction Project (Ben Luc - Long Thanh Section) (Viet Nam):  
JICA Study Team visited PAHs' new housing and conducted interview. An interviewed PAH mentioned that their revenue increased after relocation and their life became easier because they are now closer to schools and hospitals. In addition, though the livelihood restoration program was announced many times, they did not join the program because they were not interested. Another PAH also mentioned that their living expense increased due to their lifestyle change from nearly self-sufficient to buying food from the market although they did not have to change their job due to resettlement. To cope with this difficulty, the local government provides support for the secondary job.
  - Project No.36 Infrastructure Development Project in Thilawa Area Phase I (Myanmar):
    - Port Subproject: According to the project proponent, the social monitoring on compensation payment has been already carried out. With respect to the livelihood restoration monitoring, it is not yet completed since follow-ups become difficult due to PAHs' moving. Although their original address was stated in the compensation agreement

PAHs, PAHs moved out after compensation payment. However, follow-ups for PAHs' livelihood restoration is being attempted by the project proponent as per JICA's request.

- Power Subproject (transmission line and substation): Social monitoring of the crop compensation payment to PAHs for farmland affected by transmission towers was carried out, and it was confirmed that compensation was paid without any issue and the agreement was signed by PAHs. Livelihood restoration monitoring was not included in the Abbreviated Land Acquisition Plan as the affected land area was limited and no significant negative impact on their livelihood was expected.
- Power Subproject (gas pipeline): Monitoring for compensation payment has been implemented. Regarding livelihood restoration monitoring, follow-up surveys were difficult since the targeted three households were grazers, and no results were available.
- Project No.37 Rental Factory Development Project for SMEs (Viet Nam)  
This project site is located in the existing industrial park which was already developed by the industrial park owner. Livelihood restoration is not applicable for this project since there is no new land acquisition and resettlement required for this project.
- Project No.41 Las Pailas II Geothermal Project (Guanacaste Geothermal Development Sector Loan) (Costa Rica)  
There was no impact on livelihoods as only one landowner is affected, and the land was not cultivated and was an open area at the time of planning.
- Project No.42 Kenya-Tanzania Power Interconnection Project (Tanzania)  
Compensation for the land and structures were already paid. Some PAHs purchased an alternative farmland with compensation, and some purchased the agricultural equipment like tractors since they already possessed enough farmland, or others moved out of the village and shifted to center of Singida. There are PAHs who did not purchase alternative farmland because they own other farmland of a sufficient size outside the Right of Way (ROW) or can use farmland owned by relatives, etc. Therefore, it is confirmed that this is not caused by the lack of alternative farmland or compensation amount.
- Project No. 43 Sustainable Energy Project (Latin America and Caribbean)  
This solar power generation subproject in Costa Rica was carried out in the land plot owned by the local business operator, and no land acquisition and resettlement was required. Therefore, livelihood restoration was not applicable.
- Among the reviewed 44 projects of Category A and B which require land acquisition, 43 projects established the GRM. The remaining 1 project (No.34) is not applicable at this stage since currently the project is in the E/S stage. Besides the GRM for land acquisition/resettlement, the GRM was set up for other issues such as noise during construction stage in 11 projects which does not involve resettlement.  
⇒Details will be described in Section 2.2.4(23).
- "Preparing the Monitoring Plan" was studied for 83 projects excluding 7 FI projects (FI projects do not require the monitoring plan of individual subprojects for the project appraisal since the capacity of FI is evaluated for the environmental and social considerations instead). It is

confirmed that the monitoring plan was prepared in all the 83 applicable projects including 8 technical cooperation projects for development planning in which the framework of the monitoring plan is being prepared.

- Regarding approval, disclosure and availability of copying EIAs, it is confirmed that all category A projects except 5 projects fulfilled these requirements. Excluded projects consist of one project which supports to prepare the EIA under E/S loan project (No.34) and the technical cooperation projects for development planning (Nos.39, 40, 44, and 45). As for the languages used for the EIAs, it was confirmed that all the EIAs were prepared in official languages or languages widely used in the countries in which the projects were to be implemented.
- Regarding availability of copying EIAs, due to common internet use nowadays, more than several project proponents etc. provide a soft copy of the EIAs on the website for public viewing and downloading. So far, it has been considered important to disclose EIAs in a hard copy because of lower availability of internet access and its higher cost in the host countries. However, in some host countries, internet access is becoming more affordable recently.
- In the Category A projects (41 projects in total), it is confirmed that all the required items are included in the EIAs as described in the JICA GL at the appraisal.
- Regarding the EIA implementation status for projects which are Category A due to a large scale of involuntary resettlement, EIAs were prepared in all 6 projects (Nos.2, 7, 11, 27, 28, and 38).
- ⇒ Details will be described in Section 2.2.4(24) .
- As for the JICA GL Appendix 3 “Illustrative List of Sensitive Sectors, Characteristics, and Areas”, applicability of the “sensitive sectors” was confirmed.
- ⇒ Details will be described in Section 2.2.4 (18) .
- With respect to the JICA GL Appendix 6 “Items Requiring Monitoring”, except for 7 Category F1 projects and 7 technical cooperation projects for development planning, in the all 76 projects, applicability of monitoring items, description of standard values, monitoring plan during construction and operation are largely confirmed.
- ⇒ Monitoring of livelihood restoration will be described in detail in Section 2.2.4(19).

## **(2) Investigation and Examination of Environmental and Social Impacts in the Planning Stage**

All projects except SME support projects and private partnership projects examined environmental and social impacts of their projects in the planning stage.

## **(3) Examination of Alternatives and Mitigation Measures to Avoid and Minimize Impact**

Out of 90 reviewed projects, 41 Category A projects and 42 Category B projects except 7 Category FI projects considered alternatives and studied mitigation measurements to avoid and/or minimize the negative impacts. Study results of these alternatives are, if the EIA/IEE and preparatory survey are being carried out, described in the Preparatory Study report.

## **(4) Reflecting the Examination Results in the Project Plan**

In 79 projects which conducted alternative considerations, the alternatives were considered in terms of technical, cost, and environmental and social aspects and the alternative which has a relatively small environmental and social impact was adopted. In general, there was a tendency to adopt the

alternative which land acquisition and involuntary resettlement have less impact on the project.

**(5) Environmental Impact Assessment Reports prepared for the Project with Significant Impacts**

It was confirmed that in the particularly large impact projects, EIA or Environmental and Social Impact Assessment (ESIA) was prepared in all Category A projects. Among them, there was a project which EIA was prepared to meet the requirements of JICA GL although it is not legally necessary to prepare and approve EIA in the project proponents etc. (No. 32 North East Road Network Connectivity Improvement Project (Phase I) and others). In the case of Category A projects, basically an EIA study is being conducted in parallel with the Preparatory Study, but in co-financing projects with ADB/AfDB such as No. 24 North-South Expressway Construction Project (Ben Luc - Long Thanh Section) and No. 28 Batchenga - Lena Road Project, EIA was implemented and approved with the support of the ADB /AfDB.

**(6) The Committee of Experts formed for the Particularly High Impact Projects, or Projects that Have Many Objections**

Among the reviewed projects, the project-specific committee was not formed (excluding the committee for land acquisition or environmental management that was formed by administrative reason of the host country).

**(7) Utilization of the Previous Evaluation (Tiering)**

According to “the Basic Matters relating to the Guidelines etc. to be Established by the Competent Minister in Accordance with the Provisions of the Environmental Impact Assessment Act (The Environment Agency Notification No. 87 of December 12, 1997) (so called ‘the Basic Matters’)” of Japan, it is required to describe alternatives to avoid and minimize impacts which were considered in the previous planning stage in the EIA as tiering.

Excerpt from “the Basic Matters relating to the Guidelines to be Established by the Competent Minister in Accordance with the Provisions of the Environmental Impact Assessment Act”:

Section 4-1(5) “[in cases where] multiple plans concerning location, etc. have been compared, clarify how environmental impact is avoided or minimized in the course of such decision-making.”

The WB’s or IFC’s practices/requirements of tiering has not been confirmed with the written document such as SGP.

**(8) Cases that fall under “Indivisible Projects, Derivative or Secondary Impact, Cumulative Impacts”**

75 projects were analyzed except 10 projects in Category C, 7 projects in Category FI, 3 projects in Technical Cooperation, 4 projects in SME support and one other project.

In the case of indivisible projects, 4 projects were confirmed as the project with an indivisible project. Among these 4 projects, one is a road project in which one section is co-financed by JICA and AfDB and other sections are financed and implemented by AfDB (No. 28).

In No. 35 Olkaria V Geothermal Power Development Project, well drilling was carried out by the

project proponent, so it is considered as indivisible projects. JICA reviews the EIA prepared by the project proponent for the well drilling project and confirms that there is no discrepancy from JICA GL.

Table 2-6 provides an overview of the reviewed projects that have an indivisible project.

**Table 2-6 Overview of the Projects which have an Indivisible Project**

Project No.	Project Name	Environmental Category	Associated Facility
19	Rades Combined Cycle Power Plant Construction Project (Tunisia)	A	Rades III switch yard project
22	Bortnychi Sewage Treatment Plant Modernization Project (Ukraine)	A	It is planned to transport the sludge currently accumulated in the existing sludge disposal site to the existing outside disposal site under the preparatory construction work of Component 5 which is not financed by Japanese ODA of the Project. It is planned to carry the soil around the disposal site together with the sludge, but whether the soil is contaminated, and if contaminated, the extent and depth of actual contamination are unknown at the project appraisal stage.
28	Batchenga - Lena Road Project (Cameroon)	A	In this project, the road between Batchenga - Lena (263.6 km) are divided into 4 sections. JICA co-financed road pavement and construction between Mankin – Yoko, the third section (82.1 km, hereinafter "JICA Loan Section") with AfDB. JICA conducted the project appraisal on the third section (between Mankin - Yoko) for cofinancing. The other sections of this project are considered an indivisible project, and the environmental and social considerations were confirmed by JICA for these sections.
35	Olkaria V Geothermal Power Development Project (Kenya)	A	Geothermal well drilling project with KenGen funds

Source: Prepared by JICA Study Team

The derivative or secondary impact was identified in 2 projects among 75 reviewed projects as per the JICA GL's definition.

**Table 2-7 Projects with Derivative or Secondary Impacts and Mitigation Measures Implemented**

Project No.	Project Name	Derivative or Secondary Impacts	Mitigation Measures
21	National Road No.5 Improvement Project (Thlea Ma'am-Battambang and Sri Sophorn-Poipet Sections) (I) (Cambodia)	At the Advisory Committee at the Draft Final Report (DF/R) stage, it was pointed "[t]he number of shops and houses around the road is expected to increase as the indirect and cumulative impact of this project, so measure should be taken for waste reduction, proper disposal measures and prevention of water pollution caused by domestic drainage etc. It is necessary to raise the issue to relevant organizations through the	Regarding the impact raised by the Advisory Committee, "the importance of waste reduction/proper disposal measures and prevention of water pollution caused by domestic drainage, etc." are described in the final report, and the issues are addressed to relevant organizations through the project proponent at the time of project appraisal.

Project No.	Project Name	Derivative or Secondary Impacts	Mitigation Measures
		project proponent so that necessary measures will be taken in parallel to this project."	
41	Las Pailas II Geothermal Project (Guanacaste Geothermal Development Sector Loan) (Costa Rica)	<ul style="list-style-type: none"> <li>• General provision on EIA in Costa Rica and the technical manual of EIA procedures mention that "Environmental Impact Survey need to be conducted after categorizing the project area in 3 areas considering the environmental characteristics of the project location area. 3 areas are Area of the Project or directly affected (AP), Direct Influence Area (DIA) and Indirect Influence Area (AII)." In the Preparatory Study and EIA, Curubande community, which is located 12 km south west from project area, is identified by Instituto Costarricense de Electricidad (ICE) as Las Pailas Geothermal Power Plant Project's Indirect Influence Area (the area is about 3.7 km<sup>2</sup>).</li> <li>• Positive impact was observed such as construction and maintenance of road for the power plant facilities and social services provided to community residents.</li> </ul>	<p>Construction of the road has completed. Water conduit line construction is completed about 80% (since approval of specifications by government was delayed, it is currently under construction).</p> <p>As for other social programs, the following installations have been completed (based on results of the interview with the residents); additional construction of classrooms in schools, construction of bus stops, construction of sidewalks, improvement of power system of a health center, installation of fences for a soccer field, installation of solar lamps on a playground of a day care center.</p>

Source: Prepared by JICA Study Team

Regarding the cumulative impacts, among analyzed 75 projects, there are 2 projects for which cumulative impacts were identified based on the definition of JICA GL<sup>1</sup>. The sector of these 2 projects was both power generation. In addition, the projects have an existing power plant, and the project is expected to have a cumulative impact on biodiversity conservation, air, water quality, noise, soil, waste, etc. Table 2-8 shows the details of two projects.

**Table 2-8 Projects with Cumulative Impacts and Mitigation Measures Implemented**

Project No.	Project Name	Cumulative Impacts	Mitigation Measures Implemented
19	Rades Combined Cycle Power Plant Construction Project (Tunisia)	A cumulative impact of the existing power plant on air quality and water quality after operation	<p>As the result of air dispersion simulation including the influence of the existing power plant, it is not expected to exceed the host country's and IFC standards.</p> <p>As the result of the thermal effluent dispersion analysis, it is not expected to</p>

<sup>1</sup> Referring to IFC's Performance Standard 1, JICA defines the "cumulative impacts" as cumulative impacts resulting from the incremental impact, on areas or resources used or directly impacted by the project for which JICA cooperates, from other planned or reasonably defined developments at the time the risks and impacts identification process is conducted (e.g. scoping) .

Project No.	Project Name	Cumulative Impacts	Mitigation Measures Implemented
			have a negative impact on the rare species of eelgrass, and mitigation measures are not planned.
35	Olkaria V Geothermal Power Development Project (Kenya)	As this project is in Phase 5, the cumulative impacts of future development were assessed based on the past impacts on biodiversity, air quality, water quality, noise, soil, waste, etc.	As result of simulation which include impacts of the existing power plants, it was pointed out the possibility that air pollution and noise level might exceed the WHO standards. However, for the residents in the possible affected area, no measure is planned since they are supposed to be relocated by Phase 4 work and the monitoring is to be continued.

Source: Prepared by JICA Study Team

**(9) Cases that fall under "Protected Areas that are Specifically Designated by Laws or Ordinances for the Conservation of Nature or Cultural Heritage" and their Circumference**

Among 90 reviewed projects, no project was implemented in "protected areas that are specifically designated by laws or ordinances for the conservation of nature or cultural heritage". 7 projects have these protected areas in their vicinities. Table 2-9 describes impacts and mitigation measures of these 7 projects.

No. 5 Delhi Mass Rapid Transport System Project Phase 3 in India was partially operational at the time of the field survey under this study and took measures to avoid bird strikes such as ringing a horn when the train passes through the nearby bird sanctuary. The project site of No. 24 North-South Expressway Construction Project (Ben Luc - Long Thanh Section) is located approximately 12 km north of the Kanzo Mangrove Protected Forest, which is a biosphere reserve, and although this project passes through the transition zone, the implementation of project in the transition zone is permitted under the national law. This project implements afforestation of the mangrove, reforested mangrove is scheduled to be monitored on a regular basis (once a year) up to three years after reforestation. No.35 Olkaria V Geothermal Power Development Project has already started its construction and monitoring of accidents involving animals and monitoring of landscapes are being carried out. As for the other 2 projects, the construction has not yet started; however, conservation plan and monitoring plan are prepared.

**Table 2-9 Details of the Project Located in the Vicinity of the Area Designated as "Protected Areas that are Specifically Designated by Laws or Ordinances for the Conservation of Nature or Cultural Heritage"**

Project No.	Project Name	The reason of project falls in the "protected areas that are specifically designated by laws or ordinances for the conservation of nature or cultural heritage " and their vicinities
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	<ul style="list-style-type: none"> <li>Areas designated as protected areas or natural forests are not included in the project site. Because the project passes near the bird sanctuary, mitigation measures such as toot horns around the vicinity is taken to avoid bird strikes.</li> </ul>

Project No.	Project Name	The reason of project falls in the "protected areas that are specifically designated by laws or ordinances for the conservation of nature or cultural heritage " and their vicinities
18	National Road No.5 Improvement Project (Prek Kdam - Thlea Ma'am Section) (I) (Cambodia)	<ul style="list-style-type: none"> <li>• There is the Tonle Sap Biosphere Reserve (TSBR) on the north side of the project area, and National Road No. 5 is adjacent to Zone 1 (transition zone) where construction of infrastructure is allowed. The project area is far from the core area of TSBR and no work permission is required.</li> <li>• Cultural heritage: There are no cultural heritage.</li> </ul>
21	National Road No.5 Improvement Project (Thlea Ma'am-Battambang and Sri Sophorn-Poipet Sections) (I) (Cambodia)	<ul style="list-style-type: none"> <li>• There is the Tonle Sap Biosphere Reserve (TSBR) on the north side of the project area, and National Road No. 5 is adjacent to Zone 1 (transition zone) where construction of infrastructure is allowed. Tonle Sap Lake is the largest freshwater lake in Southeast Asia, and the surrounding immersion forests are important for wildlife conservation and researches in worldwide. The ROW of National Road No. 5 is already progressively used as agricultural land and settlements, and this project would not pass through the protected areas. During the consultations between MOE and JICA study team, it was confirmed that ROW of National Road No. 5 does not pass through the TSBR. Pursat Bypass passed through Zone 1 of TSBR, but development was not prohibited. An official document was issued by the Ministry of Water Resources and Meteorology (MOWRAM) to proceed with the project with consideration of the impact on existing irrigation facilities and water quality. There is no need to obtain additional permits other than ESIA for this project</li> </ul>
24	North-South Expressway Construction Project (Ben Luc - Long Thanh Section) (Viet Nam)	This project is located about 12 km north from Can Gio Mangrove Protection Forests that are recognized as the Biosphere Reserve (core areas) by the United Nations Educational, Scientific and Cultural Organization (UNESCO). Though the project passes through around this protected forest, urbanization is permitted in the Transition zone, and the project implementation has been approved by the District People's Committee and the Protected Forest Management Committee. In addition, rare species do not exist in and around the project site.
35	Olkaria V Geothermal Power Development Project (Kenya)	<ul style="list-style-type: none"> <li>• The planned project site is close to Hell's Gate National Park. By regulating vehicle speed and adopting appropriate design of pipelines, the project reduces the impact on wildlife habitat. Though the pipelines will be installed on a part of the road in the national park, no new modification in the national park is expected due to the memorandum with Kenya Wildlife Service (KWS). The geothermal resource development license in Hell's Gate National Park was received, and it was confirmed that there is no problem with Olkaria V Geothermal Power Plant Project.</li> <li>• Because Mount Longonot National Park is located in the vicinity, KWS prepares the Ecosystem Management Plan of Hell's Gate National Park, and KenGen needs to follow this plan and carry out geothermal development accordingly. In addition, a memorandum of understanding on geothermal development has been signed for Hell's Gate National Park and Mount Longonot National Park.</li> </ul>
41	Las Pailas II Geothermal Project (Guanacaste Geothermal Development Sector Loan) (Costa Rica)	<ul style="list-style-type: none"> <li>• The project site and another site for additional facilities are adjacent to Rincon de la Vieja National Park. The park is a part of the UNESCO World Heritage site of Guanacaste Reserve (Área de Conservación Guanacaste: ACG).</li> <li>• Though the project site is not a designated area for cultural protection, petroglyphs (a type of stone maps) created around 800 AD was discovered during construction at the power plant site of Las Pailas II. The found stones have been transferred to the National Museum as a cultural asset after the survey for buried materials, and one stone is displayed on the power plant site to alert the concerned parties such as the contractor in the future construction.</li> </ul>
42	Kenya-Tanzania Power Interconnection Project (Tanzania)	The project area passes through Wildlife Management Area and Game Controlled Area, which are located around the National Park and Important Birds Areas. Although there is no special license other than EIA approval is required under the national law for project implementation in these areas, SHMs were held and a consent was made before the project implementation between the Ministry of Natural Resources and Tourism and the villages that are the authority of the area.

Source: Prepared by JICA Study Team

## (10) Examples of “Critical Natural Habitats”

Among the reviewed projects, 5 projects are located in critical natural habitat<sup>1</sup>. The review results are compiled in the table below. For 2 projects (Nos. 33 and 44), conditions to implement the project in the critical natural habitat were checked as specified in the FAQ of JICA GL. Remaining three projects (Nos. 12, 16, and 20) are not subject to these conditions since the environmental reviews were conducted for the projects before these conditions were specified by JICA. In any case, there is no significant conversion or deterioration, and mitigation measures such as conservation planning and monitoring are planned.

Among these 5 projects, 2 projects (Nos. 12 and 16) started construction works, and environmental monitoring are carried out and the results are disclosed to the public. In the case of No. 12 New Bohol Airport Construction and Sustainable Environment Protection Project in the Philippines, the biodiversity conservation plan was developed, and more than 100,000 seedlings have been prepared since June 2018 and planting has been implemented in the project area (17 cities and municipalities). In the case of No. 16 Port Vila Lapetasi International Wharf Development Project in Vanuatu, attempts have been made to offset while continuously monitoring the impact on coral reefs. Environmental monitoring has not yet been conducted in the remaining 3 projects but planning of conservation measures and preparation of monitoring plans are underway.

**Table 2-10 Grounds and Verification Results that are Considered to be Critical Natural Habitats**

Project No.	Project Name and Country	Grounds and Verification Results of Applied Projects in Critical Natural Habitats
12	New Bohol Airport Construction and Sustainable Environment Protection Project (Under Construction) (Philippines)	Although there are no national parks and protected areas in and around the project area, according to the biodiversity survey report, natural vegetation remains in the project implementation area, and two valuable species according to the Philippine laws and regulations are growing in the area. In addition, it is expected that coconuts and fruit trees protected by Philippine laws and regulations might exist in the project area. [Reference] Vitex parviflora (Family: Lamiaceae, Genus: Vitex) IUCN Status VU Diospyros pilosathera (Genus: Diospiros) IUCN Status None
16	Port Vila Lapetasi International Wharf Development	127 colonies of massive coral and around 20 m <sup>2</sup> of branched corals were confirmed at the planned site to be reclaimed. However, alternative plans were compared, appropriate mitigation measures were prepared, and the project was justified. Monitoring is under

<sup>1</sup> According to the JICA GL FAQ, with reference to the definitions of the WB SGP and the IFC's Performance Standard, examples of critical natural habitats are as follows. In addition, it is also recognized that critical forests refer to forest areas that are specified as critical natural habitats.

Critical natural habitats are;

1. Areas considered to be highly suitable for biodiversity conservation as well as areas critical for rare, threatened, migratory and endangered species, including the following:

(1) Habitats that are of particular importance to species that fall under "Critically Endangered (CR)" and "Endangered (EN)" in the Red List of the International Union for Conservation of Nature (IUCN), (2) Habitats that are of importance to the endemic and / or limitedly distributed species, (3) internationally important habitats that support migratory species and/or flock-forming species, (4) critically endangered ecosystems and/or unique ecosystems, (5) areas related to important evolutionary processes

2. Similar examples other than areas set forth in No.1 above include areas that local communities traditionally think the area should be protected.

Project No.	Project Name and Country	Grounds and Verification Results of Applied Projects in Critical Natural Habitats
	Project (Vanuatu)	implementation continuously.
20	San Miguel Bypass Construction Project (El Salvador)	Of 147 species of plants in 61 families identified at the project site, one species ( <i>Lonchocarpus phaseolifolius</i> ) is classified as "critically endangered" (endangered IA) by IUCN Red List of Threatened Species (2011) for El Salvador. Appropriate measures such as transplantation will be taken.
33	Mumbai Trans-Harbour Link Project (1) (India)	Though a part of the project passes through the tidal flat (Mahul-Sewri Creek) which is an Important Bird Area specified by Birdlife International, the project does not significantly affect the habitats of birds such as flamingos. Therefore, it is assumed that undesirable impacts on the natural environment will not be significant by implementing mitigation measures such as adopting the bridge design accommodating impacts on birds and constructing noise barriers. The project conducts long-term and effective monitoring and evaluation.
40	The Project for Study on Integrated Development of the Adjacent Zones to the Yacyreta Dam Reservoir (Paraguay)	Part of the study area is wetlands and flood plains, and there are endangered species such as Vulnerable (VU) under the IUCN Red List. Although the area is a protected, it decided the protected area is excluded from the F/S area after discussion between Paraguay government and JICA. High possibility of excluding the protected area from the F/S area supported by JICA.

Source: Prepared by JICA Study Team

**(11) Case where "Protected Areas that are Specifically Designated by Laws or Ordinances for the Conservation of Nature or Cultural Heritage" was Changed**

In the 6th WG meeting for reexamination of JICA GL Operation, it was suggested that it is necessary to recognize and to take a prudent action to the potential issues in which the project proponents etc. change the legal status of "protected areas that are specifically designated by laws or ordinances for the conservation of nature or cultural heritage" in order to implement the development projects. These concerns have been sometimes raised at international conferences. In response to this suggestion, the projects listed in this study were reviewed from that point of view, however there was no such practice among the reviewed projects.

**(12) Examples of Natural Habitats paid Attention from the Aspect of "Local Community" and "Social Environment"**

Based on the recommendations in the 2nd and 6th WG meetings for reexamination of JICA GL Operation, considerations from the aspect of "local community" and "social environment" for the natural habitats were studied; however, such a practice was not identified in the review projects. In the case of project No.41, as a reference, since the National Park, which is adjacent to the project site, is the tourism resources and water source, SINAC (government body in charge of national parks) and the project proponent jointly implement conservation activities. They also promote environmental education in order to raise the environmental awareness of the community and to foster them to be a park guide for tourists.

**(13) Reflection of Residents' Comments in the Project Plans after Public Consultation Meeting**

Based on the minutes of the public consultation meetings, the following table summarizes the examples of projects in which the comments were received from the participants at the public consultation meetings and were reflected by the project proponents etc. in project planning. Among

90 projects, 70 projects carried out the public consultation meetings (excluding 6 projects with Category FI [In No.43, this study confirmed that the meetings were conducted in subprojects], 10 projects with Category B which improve the existing facility and located in the existing project [technical cooperation projects and the verification surveys under SME support projects only], 4 Technical Cooperation projects for Development Planning with M/P Implementation). In 30 projects, the public consultation meeting has not been conducted, and these include the master plan study which conducts the consultation meeting at the SEA level, E/S and grant projects with Category B in which SHM to be organized later, other Category B projects, Category C projects, and Category FI projects. In 70 reviewed projects, the comments and opinions raised during the public consultation meetings and their incorporation in planning are summarized in Table 2-11.

**Table 2-11 Comments from the Public Consultation Meetings which were Reflected**

Project No.	Project Name	Comments	Results after Incorporating Comments
3	Turakurgan Thermal Power Station Construction Project (Uzbekistan)	How many employments will be produced?	Employment of youth is reflected in the project plan
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	It was pointed out that socially vulnerable groups such as women and elderly people should be considered at the time of vehicle operations during the Operation and Maintenance (O&M) stage.	Additional measures for the women, elderly and disabled were incorporated in the project.
10	Central Luzon Link Expressway Project (Philippines)	Concerned that the flow of rainwater from the road rushes into participants' land	Measures such as ditch and vertical drainage were incorporated in the design so that the condition did not get worse by rainwater drainage from the road.
17	Hanoi City Ring Road No.3 Construction Project (Mai Dich - South Thang Long Section) (Viet Nam)	At the public consultation meeting held after the design change of the viaduct, concerns about noise were raised.	Installation of noise barrier was included in the plan.
20	San Miguel Bypass Construction Project (El Salvador)	Width of bypass, streetlight installation, impact on school, provision of information, etc.	Alignment of the bypass was shifted by 130 m in order to avoid the impact on the school. Box culvert for livestock crossing, and footpath on the bridge across the Rio Grande de San Miguel and Taisihuat Rivers were installed, based on opinions of Project Affected Persons (PAPs) and local stakeholders.
41	Las Pailas II Geothermal Project (Guanacaste Geothermal Development Sector Loan (Las Pailas II) (Costa Rica)	a) Request for construction of a common water supply. b) Priority employment of Curubande community residents c) Request for cooperation in community infrastructure constructions (construction of a dining room for children, construction of a multipurpose hall, improvement of kindergarten facilities, light	a) Construction budget of drinking water pipelines is included in EMP b) It has already dealt with. Employment of local community residents will be monitored through environmental monitoring. c) Road maintenance and safety measures (installing speed bumps and signs, inspection & measurement of vehicle speed) have been taken place.

Project No.	Project Name	Comments	Results after Incorporating Comments
		<p>installation for sports field, construction of wells for lawn irrigation, expansion of schools and road improvement)</p> <p>d) Presence or absence of local emergency plans.</p> <p>e) Possibility of soil contamination by fuel used to operate the plant</p>	<p>d) Although no regional emergency plan has been prepared, the post-operation health and safety environment plan (Plan de Salud Ocupacional Planta Geotérmica Las Pailas) has been prepared.</p> <p>e) Since the plant is operating in a completely sealed system, there is no possibility of such contamination trouble.</p>
42	Kenya-Tanzania Power Interconnection Project (Tanzania)	Expectations for job creation and benefits to the communities by the project	It was explained in the meeting that their policy is to utilize local workers and the project consists of electrification of rural areas. Although it was for the construction period, it was confirmed in the field survey of this study that many local residents are employed for construction work that does not require specialized skills, and that women are also employed at the contractor's office and engage in office works.
51	Borg El Arab International Airport Extension Project (Egypt)	Renovation of the access road	Renovate access roads from Alexandria Desert Road, Alexandria City, and Borg El Arab City.
64	Mini-Hydropower Development Project (Laos)	<p>a) Landslides occur along roads and riverbanks during the rainy season due to the geological characteristics of this area. This is the cause of the sedimentation of the Nam Woo River and the turbidity of the river. Is there any impact on this project? (residents)</p> <p>b) Will it increase flood damage in upstream of the paddy field due to this project? (residents)</p> <p>c) Even in the past where there was no project, there has been flood damage as a natural disaster, but is there any chance that future flood damage will be attributed to the project? (residents)</p> <p>d) The contractor shall make an effort to reduce the burden on the surrounding environment during construction. In addition, they need to secure funds for the construction of facilities to drain the flood within the project area (District Public Project Bureau).</p>	<p>a) Conversion to the sugar cane fields is progressed in open land in the upstream basin, and it is one of the causes of landslides and river turbidity. The project proponent answered that these will be regulated. In "(4) geomorphology and geology" of the environmental checklist, evaluated results say that (i) no reservoir is developed since the run-off-the-river type power generation method is used, and there would not be concerns caused by the reservoir such as sedimentation trapped by the reservoir which will reduce the sediments inflow into the downstream area, lower the riverbed, soil erosion, reduced capacity of a reservoir, increased riverbed in upstream area, sedimentation, and (ii) as for concerns of a large scale modification, since a smaller dam will be constructed and changes in the river flow are limited, there would be no significant negative impact on geography and geology.</p> <p>b) The project proponent responded that they planned to minimize the impacts. After predicting the impact, it was concluded that 2.66 ha of paddy fields along the river would be</p>

Project No.	Project Name	Comments	Results after Incorporating Comments
			<p>inundated due to the flood that occurs once in 100 years (design flood frequency), and the crops to be damaged will be compensated as per the national law.</p> <p>c) The project proponent responded that in design stage, they would assess the most likely impact. As previously mentioned, the possibility of flooding/inundation was expected.</p> <p>d) It was agreed to make efforts for reducing the impacts on the surrounding environment. Although it is not anticipated that discharging flooded water is required due to this project, by any chance, if it happens, the issue will be considered by Kabupaten and Kecamatan governments. As mentioned above in a) though drainage facility for flooded water and its budget are not included in the JICA preparatory study since they are not identified as negative impacts. However, as a part of the soft components of the project, the operation and maintenance manual will be prepared for troubleshooting during flooding, after flooding and during emergency/down time, and the capacity building training for the project proponent will be provided.</p>

Source: Prepared by JICA Study Team

#### (14) Impact of Disasters on Projects and Examples of Dealing with Accidents at the Project Implementation Stage

During the 7th WG meeting for reexamination of JICA GL Operation, the relationship between the project and the disaster such as the impact of disasters to the project, and responses to the accident at the project implementation stage, were discussed. They are categorized in 3 possible types, namely (i) the project lowers the resistance of the project site and increases the disaster risks, (ii) the project may directly trigger a disaster (e.g. Dam construction might induce earthquakes), (iii) the project may indirectly trigger a disaster (e.g. Construction of a power plant might contribute to global warming). It was suggested that it would not be desirable to exclude disasters from the scope of the EIA. In response to this, the reviewed projects were examined whether there is a project that falls under items (i) to (iii). As a result, the following two projects were confirmed as (i) the project reduces the resistance of the project site and raises the disaster risk. No cases were found that correspond to (ii) and (iii).

**Table 2-12 Projects which Lower the Resistance of the Project Site and  
Increases the Disaster Risk**

Project No.	Project Name	Overview
14	Mandimba-Lichinga Road Upgrading Project (Mozambique)	The risk of soil runoff due to embankment and cutting in mountainous areas is mentioned, and it is pointed out that it is necessary to take measures such as gabions and vegetation according to the preparatory study report. In addition, it is stipulated in the Environmental and Social Management Plan (ESMP) to take appropriate mitigation measures for soil runoff as necessary.
35	Olkaria V Geothermal Power Development Project (Kenya)	It has been pointed out that landslides and soil creep may occur when embankment and cutting are conducted at places with steep slopes and weak ground according to the ESIA. In addition, it is stipulated in the ESMP that mitigation measures such as the installation of retaining walls, the installation of barricades, and signs for danger should be taken as necessary.

Source: Prepared by JICA Study Team

### (15) Good Practices and Issues for Consultation and Stakeholder Analysis

Regarding consultation with local stakeholders, among the Category A projects in which JICA is supporting the preparation of EIA, consultations are conducted with local stakeholders at the scoping stage and the DF/R stage of EIA. In the co-financed projects of No.24 North-South Expressway Construction Project (Ben Luc - Long Thanh Section) and No.28 Batchenga - Lena Road Project, EIAs have already been prepared before JICA involved, and it was confirmed by JICA at the time of the appraisal that appropriate consultation was carried out with support of ADB and AfDB in the past. In addition, the EIA was similarly prepared and approved in the case of No.16 Port Vila Lapetasi International Wharf Development Project in Vanuatu; however, since SHM attendees at the time of EIA preparation were limited to the aid agencies (Australian Agency for International Development: AusAID, JICA), government agencies, local governments, additional 2 SHMs have been conducted during the JICA Preparatory Study.

Table 2-13 shows good practices of consultation which were confirmed among the reviewed projects. These are the summary of the public consultation meetings at the planning stage. Good practices of consultation are identified such as SHMs were organized as many as possible in terms of the frequency and places and the meeting was announced well in advance to increase people's participation. Additionally, it was also observed that the FGDs were organized and a meeting of professional groups was arranged. Good practices were also observed in some projects due to more project-related factors. For instance, a project proponent strongly felt that the public understandings are essential for smooth project implementation based on the previous phase's experience, and the importance of social development was deeply understood in the policies and experiences of the provinces and administrative districts.

**Table 2-13 Outline of Good Practice for Consultations**

Project No.	Project Name	Classification	Content/Individual Factor (If identified by review material)
1	Navoi Thermal Power Station Modernization Project	Additional implementation of	As a result of implementing the planned SHM, it was considered that the information

Project No.	Project Name	Classification	Content/Individual Factor (If identified by review material)
	(Uzbekistan)	SHM	was insufficient, and additional interviews and additional SHMs were implemented.
17	Hanoi City Ring Road No.3 Construction Project (Mai Dich - South Thang Long Section) (Viet Nam)		Added the number of SHMs in response to the request from the residents.
32	North East Road Network Connectivity Improvement Project Phase I (India)		Added the number of SHMs in response to the request from the residents.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	Prior consultation such as meeting date and place, etc.	Carried out prior consultation with the resident welfare association, shopkeeper association of applicable district on the meeting date, time, and place
23	Jamuna Railway Bridge Construction Project(E/S) (Bangladesh)	Detailed SHM implementation	Conducted 83 consultations (public consultation meetings, FGDs, face to face interviews) from June 2017
29	Rengali Irrigation Project (Phase 2) (India)		Meetings were held at 132 locations targeting 507 villages between October 2012 and November 2013
32	North East Road Network Connectivity Improvement Project Phase I (First Term) (India)		Separately held discussions for the Bengali community with many informal occupants
2	New Bridge Construction Project over the Kelani River (Sri Lanka)	Reflection of residents' opinions on plans	Implemented SHMs in multiple times by various ways during the preparation of the EIA and RAP. As a result, support for daily labor and small self-employed workers was included in the livelihood restoration plan, and a relocation of 25 houses was avoided by reexamination of the construction method.
32	North East Road Network Connectivity Improvement Project Phase I (I) (India)		In order to avoid large-scale resettlement in densely populated areas, in the main four villages, widening existing roads was changed to construction of a new bypass.
2	New Bridge Construction Project over the Kelani River (Sri Lanka)	Various meeting styles	In addition to the public consultation meetings, interviews by individual visits, and FGDs for the groups of people who are making the incense sticks, people who are bathing in the Kelani River, three-wheeled taxi drivers, school children were conducted.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)		Informal meetings along the alignment, and FGDs for residents' groups, shops, and slum dwellers were conducted.
7	The Kanchpur, Meghna, and Gumti 2nd Bridges Construction and Existing Bridges Rehabilitation Project (Bangladesh)		Conducted multiple consultations with various stakeholders to improve understanding of PAP requests and to discuss on the compensation calculation and compensation process with stakeholders.
24	North-South Expressway Construction Project (Ben Luc - Long Thanh Section) (Viet Nam)		Separate consultations were held for households including socially vulnerable groups, such as female headed households and households with the disabilities, and

Project No.	Project Name	Classification	Content/Individual Factor (If identified by review material)
			special assistance was explained.
26	Mumbai Metro Line 3 Project (India)		Informal meetings, public meetings, FGDs, and individual interviews were conducted.
31	Ahmedabad Metro Project (1) (India)		In order to hold a consultation meeting at the city level, the door-to-door visits, the meetings for each residential unit, and FGDs were conducted step by step.
33	Mumbai Trans-Harbour Link Project (1) (India)		Informal group meetings on RAP, stakeholder meetings, FGDs (including for residents, shops, and slum dwellers), individual interviews through the socio-economic survey, and discussions with key informants were conducted in order.
11	Pasig-Marikina River Channel Improvement Project (Phase 3) (Philippines)	Participation of diverse actors (professional groups, etc.)	27 professionals participated from related organizations such as Pasig River Regeneration Committee and Non-governmental Organizations (NGOs)
16	Port Vila Lapetasi International Wharf Development Project (Vanuatu)		Identified and invited relevant government agencies, municipalities, tribal chiefs, shipping agents, users of the bay (fishery officials, oil companies, resorts, hotels, and tourists), and NGOs.

Source: Prepared by JICA Study Team

After explaining the draft interim report of this study to the Advisory Committee on January 11, 2019, the advisory committee suggested to review challenges in addition to the good practices of consultation. Challenges of consultation in 2 projects are described in the table below as discussed in the past Advisory Committee meetings.

**Table 2-14 Example of Consultation Challenges**

Project No.	Project Name	Contents
6	Dhaka Mass Rapid Transit Development Project (1) (Bangladesh)	Female participation was quite limited. There is a need for a system in which information is disseminated not only to residents' leaders but also all residents.
33	Mumbai Trans-Harbour Link Project (I) (India)	There are concerns for holding discussions with the concerned fishery persons in advance. As a reference, the impact on the fishery persons (especially the impact on smaller scale fishery or informal fishery persons) was also discussed for other projects.

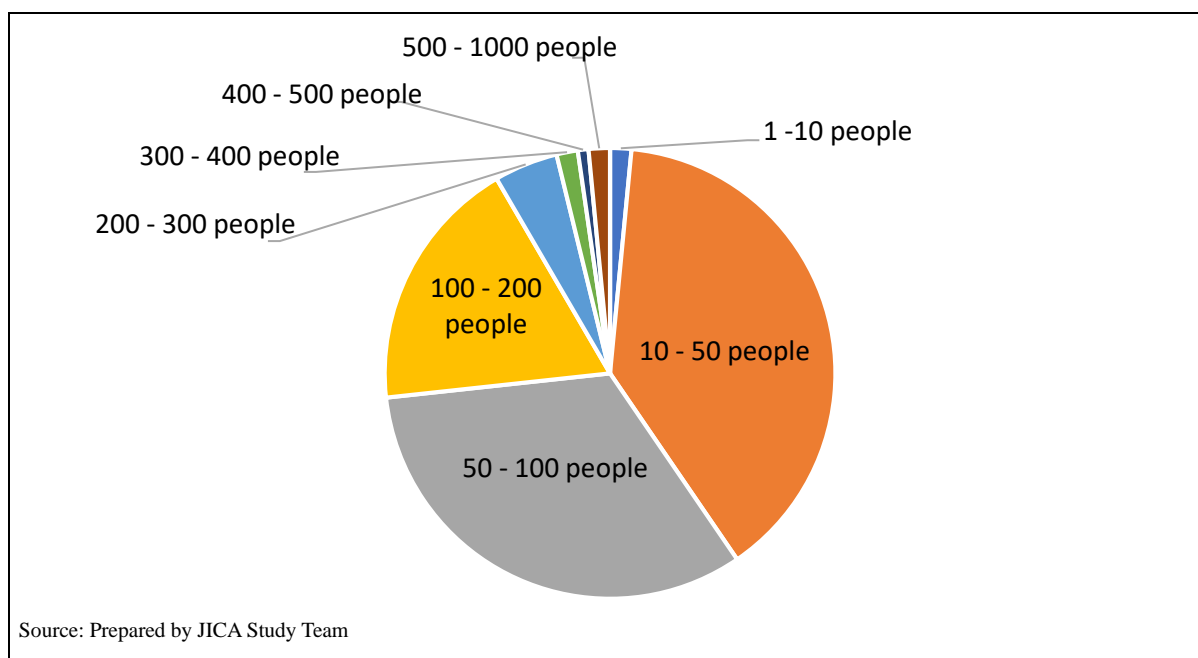
Source: Prepared by JICA Study Team

For the Category A projects which EIA and/or RAP have been prepared, the number of participants per SHM was confirmed in each EIA, RAP, and both EIA & RAP.

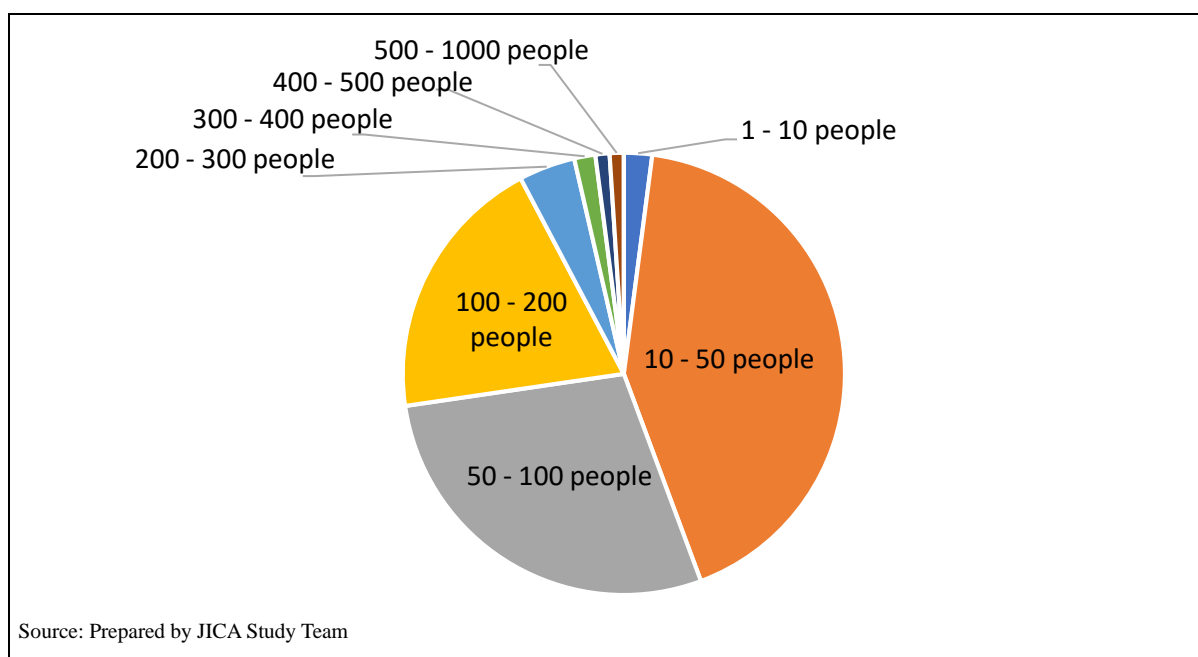
- The number of participants for EIA-related SHMs was mostly between 10 and less than 100 people (72% of SHMs). There are 5 consultation meetings (or 4 projects) which was participated by more than 300 people at one time. Especially in Project No. 27, two public consultation meetings were held with over 700 participants.
- In RAP-related SHMs, 42% of SHMs was attended by 10 to less than 50 participants, and 73%

of the total was held by less than 100 participants.

- Among the reviewed projects, in 12 projects, SHMs were held both for EIA and RAP at the same time. When SHMs for EIA and for RAP were held separately, it was confirmed that the number of meeting participants tends to be smaller for RAP than that for EIA.
- In the case of 6 linear infrastructure projects where potential meeting participants are scattered along the project area (projects Nos.8,18,21,29,32,44), it was observed that SHMs for RAP were held at more than 10 different locations.



**Figure 2-3 Percentage of SHM Participants in EIA for Category A Projects**



**Figure 2-4 Percentage of SHM Participants in RAP for Category A Projects**

In addition, for projects in which multiple SHMs were held, the minimum and maximum number

of SHM participants were confirmed.

- Even in the same project, sometimes the number of participants varies greatly from time to time. This was because both discussions with small groups such as FGDs and public meetings such as SHMs were conducted.
- In project No.27 Flood Risk Management Project for Cagayan de Oro River, SHMs for EIA / RAP were held five times in total. In two of these meetings, the number of participants exceeded 700 people. The reason for the large number of participants could be that local residents have a fresh memory of the damage caused by the typhoon “Sendon” and were highly interested in the river improvement project. Additionally, the SHM was held in Cagayan de Oro, which has a large population.
- Since the number of PAPs depends on the project, and the geographical distribution of project PAPs varies greatly depending on nature of the project, it is difficult to set an appropriate number of participants per meeting. Especially, in the case of linear infrastructure projects, PAPs are more scattered than the non-linear projects such as the industrial park development. Therefore, even if the number of participants is smaller, it can be considered more appropriate to hold multiple meetings at places where the residents can easily access. In addition, in the case where PAPs are concentrated in one place, if there are a large number of PAPs, meetings were held at multiple times or held in a large venues. When it was held in a large venue, it was expected that the PC projector would not be visible to all participants, so additional efforts were made to distribute materials and increase the number of staff. In addition, sometimes time is limited for questions and answers for the large meeting, a follow up action is necessary to receive adequate opinions from participants such as individual discussions and small group discussions.
- As a stakeholder analysis method, there are various methods such as matrix, diagram and brainstorming were adapted. For the reviewed project, the implementation of stakeholder analysis was confirmed in 16 projects. Several common methods are summarized in Table 2-15 accordingly.

For example, in the early stages of a project, the brainstorming was conducted with relevant organizations and identified wider stakeholders from two perspectives: (1) those who have influence or authority over the project, and (2) those who have interest in the success/failure of the project or have influence on the project. Matrices and diagrams are also useful tools for organizing and understanding the power relationships and interests between stakeholders.

Although it is a rather rare approach, for No. 1 Navoi Thermal Power Station Modernization Project, Uzbekistan and No. 3 Turakurgan Thermal Power Station Construction Project which are both in Uzbekistan, stakeholders were identified by the numerical calculation concerning the environmental impact area. The method is considered effective and useful, if environmental information such as weather conditions can be obtained at the stage of stakeholder analysis.

**Table 2-15 Examples of Conducted Stakeholder Analysis**

Project No.	Project Name	Contents
7	The Kanchpur, Meghna, and Gumti 2nd Bridges Construction and Existing Bridges Rehabilitation Project (Bangladesh)	Used a matrix and diagram and conducted brainstorming, FGD, and public consultation.
9	Matarbari Ultra Super Critical Coal-Fired Power Project (I) (Bangladesh)	Same as above
15	Greater Cairo Metro Line No.4 Phase1 Project (Egypt)	Conducted brainstorming.
26	Mumbai Metro Line 3 Project (India)	It is carried out in the procedure of: Informal meeting → public meeting → FGD → individual interview → discussion on important issues → sharing opinions of PAPs.
29	Rengali Irrigation Project (Phase 2) (India)	When implementing EIA, SIA, Rehabilitation & Resettlement Plan, stakeholders are identified by the Participatory Rural Appraisal (PRA), mapping, matrix, diagram, FGD, village meetings, and one-on-one discussion, etc.
31	Ahmedabad Metro Project (1) (India)	Conducted through individual meetings, public meetings, FGDs, and consultations with relevant agencies by considering direct and indirect impacts.
40	The Project for Study on Integrated Development of the Adjacent Zones to the Yacyreta Dam Reservoir (Paraguay)	Stakeholder analysis was conducted by the local office of Department of Agricultural Promotion of Ministry of Farming (DEAg) and local governments with surveys by local governments and in consultation with residents. Stakeholders were categorized into public sector, private sector and social organizations.
41	Las Pailas II Geothermal Project (Guanacaste Geothermal Development Sector Loan (Las Pailas II) (Costa Rica)	Based on Costa Rica's EIA law, the direct impact areas and indirect impact areas are identified. Stakeholders are usually identified by consulting with the Board of Education, which usually represents the residents, and the Development Association of the community.
49	Greater Yangon Water Supply Improvement Project (Myanmar)	Stakeholder analysis was conducted in consultation with Yangon City Development Corporation (YCDC) which is the implementing agency of the project.

Source: Prepared by JICA Study Team

**(16) Good Practice of Environmental and Social Considerations**

While good practices on consultation are discussed for the reviewed projects in the previous section, general good practices in terms of environmental and social considerations are summarized from the projects other than the reviewed project in this section.

**Table 2-16 Good Practices in Environmental and Social Considerations**

No	Project Name	Contents
1	Colombo City Public Transport System Project (Sri Lanka)	For alternatives considerations, concerns were identified from various perspectives such as environmental and social considerations, access, demand, and technical aspects and the alternatives were assessed from these aspects carefully. Since this project passes through the areas next to the Sri Jayawardana Bird Conservation Area and Tarangama Environmental Conservation Area, the legal status and boundaries of the conservation areas were confirmed, SHMs were conducted, the alternative options were carefully examined. As a result, a route that does not pass the protected/conservation area was selected. Alternative routes were also examined to minimize the impacts on the linden and religious places that have a religious value in Sri Lanka.
2	Colombo City Public Transport System Project (Sri Lanka)	When preparing mitigation measures such as compensation planting by this project, trees that are easy to adapt to the local environment were selected in

No	Project Name	Contents
		consultation with researchers of a local university.
3	Nairobi Viaduct Construction and Road Improvement Project (Kenya)	The draft environmental monitoring plan with calculated monitoring costs is considered a good practice since it will ensure the implementation of environmental monitoring. In order to further enhance implementation of environmental monitoring, it was suggested by the advisory committee to specify the cost for each environmental monitoring parameter.

Source: Prepared by JICA Study Team

### (17) Responding to Issues Raised by the Third Party

There were 5 projects in which environmental/social issues were raised to project proponents etc. and/or JICA by the third party.

**Table 2-17 Issues Pointed out to the Project Proponent and/or JICA by the Third Party**

Project No	Project Name	Case
4	Thilawa Special Economic Zone (Class-A Area) Development Project	<ul style="list-style-type: none"> <li>•NGOs pointed out as follows: Affected people's group of Class-A submitted the request letters to JICA, and requested on 7 April 2014 to have a meeting with JICA on 23-35 April 2014; however, JICA didn't reply and decided to invest in the development of Class-A on 23 April 2014.</li> <li>•Some affected families of Class-A who resettled said they were threatened by the government by saying "Their house will be demolished if they don't sign an agreement document for resettlement and compensation" and "if affected people want compensation for land, people have to go to a court".</li> <li>•Since 2014, NGO submitted letters and reports regarding categorization, requests for meeting with JICA, and implementation of the Guidelines.</li> </ul>
6	Dhaka Mass Rapid Transit Development Project (I) (Bangladesh)	A water logging problem (flooding due to the rise of the groundwater level) was pointed out by nearly residents of the north side of the Depot which was not captured by the EIA stage. It has been solved by measures such as constructing drainages.
9	Matabali Ultra-Super Critical Coal-Fired Power Project (I) (Bangladesh)	Issues were raised by an NGO regarding the flood damage in the community near the project site, sedimentation of rivers near the project site, delay of compensation and livelihood restoration assistance by the project proponent, and safety issues of residents due to heavy traffic of project related vehicles.
13	Indramayu Coal Fired Power Plant Project (E/S) (Indonesia)	<ul style="list-style-type: none"> <li>•Comments on the review of Indramayu Coal Fired Power Plant Project were submitted by NGO in August 2017. In addition, the NGO pointed out since August 2017 that it is not appropriate to arrest the local residents who are protesting against the project raised the national flag upside down.</li> <li>•The NGO also pointed out as follows: Though the affected people's group pointed out issues on the project and submitted letters showing objection to the project and JICA finance three times, there was no response from JICA. After the fourth letter was submitted to JICA, JICA Indonesia office had a meeting with the group. After that, one more letter was submitted from the group, however there was no response from JICA.</li> </ul>
19	Rades Combined Cycle Power Plant Construction Project (Tunisia)	While emission of air pollutants (NOx, SOx) was pointed out from the third party, mitigation measures are already included in EIA.

Source: Prepared by JICA Study Team

Since the start of operation under the JICA GL, objection to five projects have been officially raised, and two of them proceeded to the investigation by JICA examiners as per the objection procedures of the JICA GL (Projects Nos.4 and 84). In either case, non-compliance with JICA GL was not confirmed; however, the examiners advised to facilitate the solution of the raised problems in line

with JICA GL's philosophy.

**Table 2-18 Project for which an Objection has been Filed to JICA**

Reception Date	Project No.	Country and Project Name	Current Status
May 16, 2017	83	Support for Agricultural Development Master Plan for Nacala Corridor in Mozambique	Preliminary Investigation: May 17 to July 3, 2017 Investigation Period: July 4 to November 1, 2017 Investigation Report: November 1, 2017 Opinion on the Investigation Report from the Operational Department: December 1, 2017 Opinion on the Investigation Report from the President: March 2, 2018 Opinion on the Investigation Report from the Requester: May 21, 2018
September 7, 2015	26	Mumbai Metro Line 3 Project (India)	Preliminary Investigation: September 8 to October 6, 2015
May 25, 2015	12	New Bohol Airport Construction and Sustainable Environment Protection Project (Philippines)	Preliminary Investigation: May 26 - June 26, 2015
February 10, 2015	26	Mumbai Metro Line 3 Project (India)	Preliminary Investigation: February 11 to March 10, 2015
October 28, 2015	- Non reviewed project	Hanoi City Urban Railway Construction Project: Nam Thang Long – Tran Hung Dao Section (Line 2) (I) (Viet Nam)	Preliminary Investigation: October 29 to December 4, 2014
June 6, 2014	4	Thilawa Special Economic Zone (Class-A Area) Development Project (Myanmar)	Preliminary Investigation: June 7 to July 4, 2014 Investigation Period: July 5 to November 4, 2014 Investigation Report: November 4, 2014 Opinion on the Investigation Report from the Operational Department: December 1, 2014 Opinion on the Investigation Report from the Requester: December 3, 2014

Source: JICA WEBSITE <https://www.jica.go.jp/environment/objection.html>

#### **(18) Consideration for the Socially Vulnerable Groups in the Reviewed Projects**

Among 90 projects, 60 projects prepared the plan to consider socially vulnerable groups. Some Grant Projects, Technical Cooperation, SME support, Other Projects (Private Partnership Projects: No.98 to No.100) and FI projects were excluded from the review scope due to the nature of the projects. Among the infrastructure development projects, several projects were excluded because the project will be implemented within the existing facility's premises.

Regarding assistance for the socially vulnerable groups, in general, there were mostly financial assistance for income, food expenses, medical expenses, etc. Other distinctive consideration examples are summarized in Table 2-19. Non-financial assistance for the socially vulnerable groups includes skill training opportunities, employment matching, employment opportunities, and special arrangement for housing in the resettlement site. In addition, non-monetary measures for specific vulnerable groups include the priority employment for women, opening of bank accounts for women so that female PAPs can receive compensation, and allocating the ground floor of housing in the resettlement site to the people with disabilities.

**Table 2-19 Cases of Consideration for the Socially Vulnerable Groups**

Project No	Project Name	Contents
1	Navoi Thermal Power Station Modernization Project (Uzbekistan)	A survey on socially vulnerable groups was conducted, and in accordance with national rules, government livelihood restoration program, vocational training, employment opportunities, and financial support are provided. (Socially Vulnerable Groups: 11 households are vulnerable, such as female headed households, people with disabilities, the poor, the elderly, etc.)
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	<ul style="list-style-type: none"> <li>• According to the minutes of the meeting, informal occupants and small shop owners also participated in the meeting and expressed their opinions.</li> <li>• In the consultation meetings, hope for compensation for structures owned by informal PAPs without a legal right to land was expressed, and it was incorporated in the compensation/assistance policy for the lost assets.</li> </ul>
7	The Kanchpur, Meghna, and Gumti 2nd Bridges Construction and Existing Bridges Rehabilitation Project (Bangladesh)	<ul style="list-style-type: none"> <li>• Special allowance of 10,000 taka per family, compensation for affected assets, and employment as a construction worker with priority (short-term measures) were incorporated.</li> <li>• Technical training and others based on Livelihood and Income Restoration Program (LIRP) (long-term measures).</li> </ul>
8	National Road No. 5 Improvement Project (Battambang-Sisophon Section) (Cambodia)	Implementation of the Livelihood Recovery Program (LRP), financial assistance (equivalent to USD100 per time), and provision of land to landless households were planned for vulnerable households.
10	Central Luzon Link Expressway Project (Philippines)	Special support was planned in the RAP, such as providing cash and training with socially vulnerable groups.
11	Pasig-Marikina River Channel Improvement Project (Phase 3) (Philippines)	In the RAP, socially vulnerable groups (e.g. the poor, people without land rights, religious minorities, women, children, the elderly, people with disabilities) were defined, and in the entitlement matrix, "the Poor and Socially Vulnerable Households Support Measures" were clearly stated. In this project, all project affected households were informal occupants, so all were treated as socially vulnerable groups.
15	Greater Cairo Metro Line No.4 Phase1 Project (Egypt)	The Resettlement Policy Framework (RPF) stipulates employment support by the project (including vocational training) and services to be provided by the Social Security Bureau for the poor. The similar supports are considered in the RAP as of May 2018.
18	National Road No.5 Improvement Project (Prek Kdam - Thlea Ma'am Section) (I) (Cambodia)	<ul style="list-style-type: none"> <li>• 60 years old or older households, widows, people with disabilities, landless people, the poor (Cambodia poverty line is "monthly income is less than \$ 20 per person", and national poverty line is set/updated by the Ministry of Planning) were recognized as socially vulnerable households in the project area.</li> <li>• 640 households fall into the socially vulnerable groups. (Households over 60 years old: 373 households, Widows: 278 households, People with disabilities: 19 households, Landless people: 111 households, the Poor households: 37 households *one PAH can be classified under more than 1 category)</li> <li>• In addition to the livelihood recovery program, cash assistance of \$100 will be provided to each vulnerable household.</li> </ul>
20	San Miguel Bypass Construction Project (El Salvador)	For children who are 10 years old and less than 10 years old in the project area, women in childbearing age, the elderly, people with disabilities, etc. who are recognized as socially vulnerable groups, an option to build a house through a construction company is provided.
21	National Road No.5 Improvement Project (Thlea Ma'am-Battambang and Sri Sophorn-Poipet Sections) (I)	60 years or older households, widows, people with disabilities, landless people, the poor (Cambodia poverty line is "monthly income is less than \$20 per person") were recognized as socially vulnerable households in the project area. Information will be updated when Detailed Measurement Survey is conducted. Cash assistance of \$100 will be provided to each vulnerable

Project No	Project Name	Contents
	(Cambodia)	household. In addition, these socially vulnerable households are eligible to the livelihood restoration project along with “people who are greatly affected by the project and relocated households”.
23	Jamuna Railway Bridge Construction Project (E/S) (Bangladesh)	A focus group discussion is planned for the socially vulnerable groups such as women with assistance from the E/S consultant, and discussion results will be incorporated in planning.
24	North-South Expressway Construction Project (Ben Luc - Long Thanh Section) (Viet Nam)	Following supports for the vulnerable groups are included in the Entitlement Matrix: <ul style="list-style-type: none"> <li>• Additional monetary support in line with government regulations</li> <li>• Additional support for house construction and livelihood restoration assistance</li> </ul>
27	Flood Risk Management Project for Cagayan de Oro River (Philippines)	<ul style="list-style-type: none"> <li>• Vocational training and employment support are provided to women and people with disabilities.</li> <li>• For the elderly, support programs from the community and neighbors.</li> <li>• For people with disabilities, support for securing income through training, employment, and sales of goods will be provided at a community facility.</li> </ul>
29	Rengali Irrigation Project (Phase 2) (India)	<ul style="list-style-type: none"> <li>• In RAP, FGDs with the Scheduled Tribe (ST)/Scheduled Caste (SC).</li> <li>• During the RAP survey, women were interviewed.</li> <li>• Continuing the Tribal Sub-Plan Approach which is commonly provided to the ST/SC in Odisha State.</li> </ul>
30	North - South Commuter Railway Project (Malolos – Tutuban) (Philippines)	Each LGU will dispatch nurses and social workers to those who need special supports and a medical care before and during resettlement, as well as paying the nuisance fee (total 10,000 pesos).
31	Ahmedabad Metro Project (1) (India)	<ul style="list-style-type: none"> <li>• For affected socially vulnerable households, 1 person per household is entitled to a vocational training opportunity. Training expenses will be paid (including travel and food expenses).</li> <li>• The ground floor of housing will be allocated to people with disabilities in the resettlement site.</li> <li>• The residents in the isolated village will be able to select their neighbors.</li> <li>• Provide visual information for illiterate people.</li> </ul>
32	North East Road Network Connectivity Improvement Project Phase I (I) (India)	At the various stages of the project, special attention was paid to women: <ul style="list-style-type: none"> <li>• Ensure that at least 1 woman is included in the field team of RAP and the restoration plan implementation agency.</li> <li>• Enable women to participate in the activities of this project and receive the benefits as part of RAP .</li> <li>• The project proponent prepares a ID card and bank account for women PAPs and enable women to receive compensation in their own bank account.</li> <li>• As a socially vulnerable group, support women to gain alternative income.</li> <li>• In monitoring process, ensure women’s participation in evaluation so that women's perspectives are reflected.</li> <li>• For road construction, both men and women will be employed. Although most women are expected to commute from their own house to the construction site, if they stay at the labour accommodation on the construction site, necessary safety measures are provided to prevent sexual violence and harassment.</li> </ul>
33	Mumbai Trans-Harbour Link Project (I) (India)	<ul style="list-style-type: none"> <li>• People with disabilities have a priority and an option to select the ground floor of housing in the resettlement site.</li> <li>• Priority loan provision from the local investment fund (initial investment support and other loans)</li> </ul>
34	Engineering Services (E/S) for Construction of Jakarta Mass Rapid Transit East-West Line Project (E/S) (Phase I) (Indonesia)	• Women in parenting age, the elderly, people with disabilities, children are socially vulnerable groups as described in OP4.12 and Involuntary Resettlement Sourcebook (WB, 2004). Provide cash compensation, apartments and kiosks in the relocation site to these socially vulnerable groups.
41	Las Pailas II Geothermal	Decide the date and time of public consultation meetings considering the

Project No	Project Name	Contents
	Project (Guanacaste Geothermal Development Sector Loan (Las Pailas II) (Costa Rica)	availability of the female residents to promote women's participation.
42	Kenya-Tanzania Power Interconnection Project (Tanzania)	<ul style="list-style-type: none"> <li>•The Vulnerable People's Plan (VPP) was prepared for minorities and disclosed on the JICA website.</li> <li>•FPIC consultations are being conducted when VPP is formulated.</li> <li>•Not to relocate the Barbaig tombs, instruct contractors not to kill snakes which considered culturally significant, and make sure not to interrupt the circumcising ceremony during the construction.</li> </ul>
49	Greater Yangon Water Supply Improvement Project (Myanmar)	Women are participating in the public consultation meetings and have an opportunity to speak.
52	Natural Gas Efficiency Project (Bangladesh)	In ARAP, special consideration for socially vulnerable groups (such as the elderly household head, people with disabilities, women headed households, etc.) and implementation of the livelihood restoration support are being considered.
53	Urban Transportation Line-3 Development Project (1) (Panama)	Vulnerable people (e.g. women, children, the elderly, people with disabilities): Providing programs based on the need for PAPs such as health, education, support for people with disabilities, psychological support, etc.
57	Maternal, Neonatal and Child Health (MNCH) and Health System Improvement Project (Bangladesh)	<ul style="list-style-type: none"> <li>•This project aims to install equipment and improve the service at the public medical facilities mainly used by the poor, so it will consider the improvement of the health care for the poor.</li> <li>•Support enabling environment where pregnant women can safely deliver a child.</li> </ul>
62	The Project for Flood Disaster Rehabilitation and Mitigation (Cambodia)	Among the policies in the ARAP, there is a statement that "special support for the socially vulnerable groups is provided." In addition, within the Entitlement Matrix, payment of \$100 per household is set as financial guarantee for the socially vulnerable groups (female-headed households, the elderly, people with disabilities, the poor) that will be affected by the project.
72	The Project for Reinforcement of Power Supply to Accra Central (Ghana)	Among the PAHs, additional financial support will be provided to the socially vulnerable groups (under the poverty line of the WB, the elderly household head, people with physical disabilities).
73	The Project for Improvement of Gulu Municipal Council Roads in Northern Uganda (Uganda)	<ul style="list-style-type: none"> <li>•Around the school, provide a pedestrian lane for school children so that the construction does not hamper commuting. Ban on child labor at construction sites</li> <li>•Monitor gender and child rights issues through the GRM.</li> </ul>
75	The Project for the Expansion of Fishing Port in Nouadhibou (Mauritania)	<ul style="list-style-type: none"> <li>•Approx. 10 people who make dried fish in an abandoned house in the project area are recognized as a socially vulnerable groups.</li> <li>•It will be confirmed whether the equivalent income will be obtained at an alternative site during the construction stage or through an alternative livelihood mean during the operation stage.</li> </ul>
79	The Project for Augmentation of Water Supply System in Narok (Kenya)	The project will reduce the burden of women and children to bring water.
80	The Project for Rehabilitation of Irrigation Facilities in Rwamagana District (Rwanda)	Special attention to be paid to socially vulnerable groups (e.g. people with disabilities, orphans, age 65 years or older) during the asset valuation and compensation payment procedures. Employment will be prioritized for socially vulnerable groups.
81	The Programme for Rehabilitation and	•Enhancing Poverty Alleviation: through efficient and smooth disaster recovery by this project, promote recovery in line with "Build Back Better"

Project No	Project Name	Contents
	Recovery from Typhoon Yolanda (Philippines)	concept and contribute to regional economic growth and poverty alleviation. • Enhancing Social Development: Construct facilities for the people with disabilities at schools, such as special toilets and a slope to the second floor.
86	The Project for Capacity Development of the Department of Climate Change Adaptation and Strategic Risk Management for Strengthening of Public Infrastructure, Phase 2 (El Salvador)	In El Salvador, there were many women participating in road construction, and special arrangement for female workers are available such as changing rooms and toilets for women. Such considerations shall be implemented in the project in line with the government gender approach.
87	Capacity Development Project for Participatory Water Resources Management through Integrated Rural Development (Bangladesh)	Poverty Alleviation: adopting a mechanism called LCS (Laboure Contracting Society) to outsource small-scale (minor) construction and maintenance works to organizations consist of socially vulnerable groups such as women. Gender Considerations: • Socially vulnerable groups are assisted and empowered based on "Gender Equality Strategy and Action Plans 2008-2015" in Local Government Engineering Department (LGED), • Integrated Water Resources Management (IWRM) unit, the counterpart of the project, will have a full time sociologist in charge of gender and development. • In Union Development Coordination Committee (UDCC) and Water Management Cooperative Association (WMCA), more than 3 female members are selected as per the regulations to ensure voices from women.

Source: Prepared by JICA Study Team

The following table summarizes the response to the advice on gender and children's rights given by the members of the JICA Advisory Committee in reviewed projects.

**Table 2-20 Responses to Advice on Gender and Children's Rights**

No.	Project Name	Contents of Advice	Response and Results
1	7. The Kanchpur, Meghna, and Gumti 2nd Bridges Construction and Existing Bridges Rehabilitation Project (Bangladesh)	Although child labor is prohibited in JICA project or by Bangladesh's national law, a F/S report should present specific assistance to be provided with parents and employers in order to stop child labor in case it is found in construction work.	The following contents were added for the consultation with parents and employers in Section 13), Chapter 8 of EIA Report. (1) School attendance support for children (2) Job support for parents (including employment of parents at construction sites) (3) Arrangement of microcredit (4) Introduction to supporting groups such as NGOs
2	9. Matarbari Ultra Super Critical Coal-Fired Power Project (1) (Bangladesh)	Appropriate measures for the project proponent to prevent child labor should be included in the F/S report	Agreement was made with the project proponent not to have any labor contract with children, and to inspect construction site regularly. Patrolling is done by the project proponent and contractors during construction stage and by the project proponent does during operation stage.
3	12. New Bohol Airport Construction and Sustainable Environment Protection Project (Philippines)	Describe the policy to maintain appropriate gender balance during SHM and its results in the final report. Also, apply this policy to SHM that will be implemented in the future.	The policy to maintain appropriate gender balance for SHMs and results were described in the Final Report (F/R) of the JICA Study. In addition, it was confirmed that 34 of 54 participants were female PAPs for the SHM organized in April 2012 to explain that resettlement by the airport construction in the future.
4	19. Rades Combined	Information (including the	The following information on the SHM was added in

No.	Project Name	Contents of Advice	Response and Results
	Cycle Power Plant Construction and Sustainable Environment Protection Project (Tunisia)	number of participants by gender) should be added to the draft final report.in order to help understand how comments from women and socially vulnerable people are reflected into planning.	the DF/R. 1 Number of participants by gender 2 Women's comments 3 Efforts by the project proponent to increase participation (especially women) and their results In addition, women's and socially vulnerable people's participation in planning in Tunisia and their comments on planning were added in the DF/R.
5	29. Rengali Irrigation Project (Phase 2) (India)	Special considerations of gender and socially vulnerable groups in SHM needs to be included in the environmental review results as much as they are confirmed.	Since the Odisha Pani Panchayat Act 2008 (Water Users Association Law) requires 33% of participants to be women, it was operated in a gender-friendly manner. In addition, affected widow households are considered socially vulnerable groups, and it is planned to implement the livelihood restoration program as part of agricultural technical training in the operation stage.
6	32. North East Road Network Connectivity Improvement Project Phase 1 (India)	Add that women will be preferentially employed for jobs at construction work that women can perform in the F/R.	Described in F/R as follows: "Of the employment opportunities that accompany construction, women are preferentially hired for jobs that can be done by women." (Sections 6 and 7 in Chapter 12)
7		Add that women's opinions will be fully reflected in SHM in the F/R of JICA Study.	Described in F/R as follows: "Even in SHM during the RAP implementation stage, participation of women's groups will be considered so that women's opinions are fully reflected" (Sections 6 and 7 in Chapter 12, F/R)

Source: Prepared by JICA Study Team

### (19) Changes of the Number of Project Affected Persons between the Environmental Review and Monitoring Stages

Among the reviewed projects, there were 37 projects in which involuntary resettlement involved, and the number of PAPs to be resettled was identified as an output of environmental review in all these projects. Among them, the number of PAPs at the monitoring stage has been confirmed in 30 projects. The rest of 7 projects (Nos.15,28,30,34,47,53,73) have not been monitored since land acquisition and resettlement have not yet started.

The number of PAPs increased in 7 projects and decreased in 4 projects, while other projects did not see the change in the number. The reasons for the increase include design changes during Detailed Design stage and the update of impact area specified through the detailed census survey. When the number of PAPs includes people whose land is acquired but residential structures are not affected, such information is included in Table 2-21.

**Table 2-21 Changes in the Number of PAPs in the Environmental Review and Monitoring Stages and Reasons**

Project No.	Project Name	Number of PAPs at Environmental Review Stage (Note)	Number of PAPs from Monitoring Results	Reason for Changes in the Number of PAPs
2	New Bridge Construction	1,797 persons	1,741 persons	Based on the design changes in the D/D stage, the detailed census survey revealed the decrease of

Project No.	Project Name	Number of PAPs at Environmental Review Stage (Note)	Number of PAPs from Monitoring Results	Reason for Changes in the Number of PAPs
	Project over the Kelani River (Sri Lanka)			PAPs.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	543 households (1,373 persons)	337 household (604 persons)	Based on the design changes in the D/D stage, the detailed census survey revealed the decrease of PAPs.
6	Dhaka Mass Rapid Transit Development Project (I) (Bangladesh)	1,040 persons	1,154 persons	Based on the design changes in the D/D stage, additional affected households were identified through the detailed census survey.
9	Matarbari Ultra Super Critical Coal-Fired Power Project (I) (Bangladesh)	2,361 persons	2,156 persons	Based on the design changes in the D/D stage, the detailed census survey revealed the decrease of PAPs.
14	Mandimba-Lichinga Road Upgrading Project (Mozambique)	157 households (983 persons)	187 households (1,082 persons)	Based on the design changes in the D/D stage, additional affected households were identified through the detailed census survey.
18	National Road No.5 Improvement Project (Prek Kdam - Thlea Ma'am Section) (I) (Cambodia)	1,072 households	1,370 households	According to the project proponent, the number of households to be relocated was increased due to changes in the width of RoW for the planned road in D/D stage. Details are currently under confirmation.
21	National Road No.5 Improvement Project (Thlea Ma'am-Battambang and Sri Sophorn-Poipet Sections) (I) (Cambodia)	810 households	773 households	The number of households to be relocated was decreased due to change in the design at the D/D stage.
26	Mumbai Metro Line 3 Project (India)	2,744 households (6,867 persons)	2,888 households (7,273 persons)	Based on the design changes in the D/D stage, additional affected households were identified through the detailed census survey.
31	Ahmedabad Metro Project (I) (India)	533 households (2,132 persons)	595 households (2,380 persons)	Based on the design changes in stations, etc. in the D/D stage, additional affected households were identified through the detailed census survey.
33	Mumbai Trans-Harbour Link Project (I) (India)	households (1,272 persons)	322 households (1,332 persons)	Based on the design changes in the D/D stage, additional affected households were identified through the detailed census survey.
52	Natural Gas Efficiency Project (Bangladesh)	140 persons	177 persons	Based on the design changes in the D/D stage, additional affected households were identified through the detailed census survey.

Note: The number of PAPs indicated as a result of environmental review is the number of physically displaced persons.

Source: Prepared by JICA Study Team

**(20) Project that Mentions the Replacement Cost of Compensation**

Of 37 projects where resettlement occurs, in all cases, the payment of compensation at full replacement cost along with the specific calculation method was agreed based on RAP of projects and discussions at the time of appraisal.

**(21) Projects for which GRM has been Established**

Among the reviewed projects in which the land acquisition occurs and fall under the Category A and B, 43 projects out of 44 established the GRM for land acquisition and resettlement in the project. The remaining 1 project (No.34) is excluded because the E/S loan had been provided but land acquisition has not been started. In addition to this, the GRM for non-resettlement issues such as noise caused by construction work was established in 11 projects which does not involve involuntary resettlement.

GRM is established at various levels from the village level, local government level, to higher levels such as prefecture and province levels. In general, if the issue is not solved at the lower level, it will be taken to the higher-level mechanism. In addition, in many cases, PAPs or local resident can seek a resolution in the judicial process, if the person are not satisfied with the decision of the project GRM (GRM does not prevent from utilizing other problem-solving options). This review confirmed the following; establishment of a project-specific GRM besides the host country's existing judicial process (because the judicial process takes longer time and has issue of credibility); participation of PAPs, women, tribal representatives, NGOs in the GRM; and improved availability of the GRM were confirmed in this review study.

**(22) Development of IPP**

The review found that IPPs are often prepared in forest conservation projects. Impacts on indigenous peoples settlements were confirmed in 3 projects (Nos.32,42,44). In the project area of No. 32 North East Road Network Connectivity Improvement Project Phase 1 (I), ST (designated tribe) that falls under the definition of “indigenous peoples” in OP4.10 of the WB were identified. Following the WB OP4.10, JICA GL consider people with the following characteristics in various degrees as indigenous peoples (WB OP4.10 July 2005).

- a. self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- b. collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- c. customary culture, economy, social, or political institutions that are separate from those of the dominant society and culture;
- d. an indigenous language, often different from the official language of the country or region.

PAPs in the project area of No. 32 the Northeastern Province Project fall in the above definition of indigenous peoples. They possess their own identities and languages as Mizo (National Route 54) and Garo (National Highway 51). However, in the project area where the majority of population is Mizo-Garo tribes, it is not possible to say that they live under “a system different from the mainstream society and culture”. In India, designated tribes including Mizo and Garo are recognized

as indigenous peoples in their procedure in India, but in this project, almost all PAPs are Mizo and the socio-economic survey has confirmed that their lifestyle and standard of living were the same as that of people other than Mizo. Therefore, it was decided that IPP was not prepared separately but the RAP included elements of the IPP, two public consultation meetings were conducted considering Free, Prior, Informed Consultation (FPIC), and the basic agreement was reached (RAP consisting of IPP elements was also prepared in the projects financed by ADB and WB in the same state).

In No.42 Kenya-Tanzania Power Interconnection Project, Barbaig tribes identified in the project area were considered as indigenous peoples. However, since the Tanzanian government does not recognize any indigenous peoples in their own country, VPP instead of IPP was prepared and published on the JICA website. During VPP preparation process, consultation meetings were conducted based on the principles of FPIC. At the time of the field survey of this study in April 2019, it was confirmed that VPP was appropriate since the schedule of the implementation of VPP was consistent with ESMP, and the mitigation measures (e.g. tombs should not be relocated, snakes should not be killed, and circumcision rituals should not be disturbed) mentioned in the consultation for VPP were reflected in ESMP. Moreover, it was confirmed that mitigation measures not to kill snakes and not to disturb rituals were reflected in the contractor's contract as not to kill any animals and respect the local culture.

No.44 Joint Feasibility Study for Mumbai-Ahmedabad High Speed Railway Corridor in India has affected designated tribes within the project area, and the IPP framework was prepared.

**(23) EIA Process of Category A Projects Categorized due to Large-Scale Involuntary Resettlement**

According to JICA GL, even if a project does not fall under a sensitive sector that are likely to have a significant adverse impact, it is classified as Category A if it has a sensitive characteristic such as large-scale involuntary resettlement, or it is located in a sensitive area.

It was confirmed that there were 6 projects (Nos.2,7,11,27,28,38) that did not fall under sensitive sectors but had sensitive characteristic as large-scale involuntary resettlement, and were categorized as Category A. Thus, the EIA was prepared in all 6 projects according to the requirements of JICA GL for Category A project; however, in practice, an extent of impacts on environment was not large, and some projects were not required to prepare EIA in accordance with national laws of host countries.

**(24) Relevance of sensitive sectors**

Among sensitive sectors as per JICA GL, 3 sectors namely “power transmission line/distribution”, “water supply, sewage, and wastewater treatment” and “agriculture” have additional threshold criteria for categorization in addition to “large-scale” as shown in parentheses below.

- Power transmission and distribution lines (involving large-scale involuntary resettlement, large-scale logging, or submarine electrical cables)

- Water supply, sewage, and wastewater treatment (having sensitive characteristics or located in sensitive areas or in their vicinity)
- Agriculture (involving large-scale land clearing or irrigation)

Among the reviewed projects, there is 1 project of “power transmission and distribution lines” and 3 projects of “agriculture”. All of them meet the sector-wise criteria for Category A. Further, they were categorized considering sensitive characteristics and sensitive areas, and projects with significant impacts were classified as Category A.

**Table 2-22 Project Categorization in Power Transmission and Distribution Line Sector and Agriculture Sector**

Project No.	Project Name	Categorization	Justification for Category A among “Power Transmission and Distribution Line” and “Agriculture” Sectors
<b>Transmission and distribution sector</b>			
42	Kenya-Tanzania Power Interconnection Project (Tanzania)	A	The project falls into the power transmission and distribution lines sector and located in a sensitive area
<b>Agricultural sector</b>			
29	Rengali Irrigation Project (Phase 2) (India)	A	The project falls into the Agriculture involving large-scale land clearing or irrigation sector (located in a sensitive area and is likely to have significant adverse impact due to its characteristic)
40	The Project for Study on Integrated Development of the Adjacent Zones to the Yacyreta Dam Reservoir (Paraguay)	A	The project falls into the agriculture sector and is likely to have significant adverse impact due to its characteristic
45	The Project on Irrigation Scheme Development in Central and Eastern Uganda (Uganda)	A	The project falls into the agriculture sector located in a sensitive area

Source: Prepared by JICA Study Team

## **(25) Projects whose Livelihood Recovery is being Monitored**

Among the reviewed projects, monitoring of livelihood restoration needs to be carried out in 31 projects, while 6 projects were not subject to monitoring (Nos.1,44,46,62,70,73). Among the projects that are not subject to the monitoring, 2 projects (Nos. 1, 70) were excluded since there is no change in the livelihood, another 2 projects have relatively small scale resettlement (No.73: 1 households; and No. 62: 4 households and relocation of 19 stores), and 1 project (No.46) has no RAP but land acquisition and resettlement are in a process as per the national law and JICA GL. Another 1 project (No.44) was excluded since it is a technical assistance project and the M/P is being prepared.

Among the 31 projects for which livelihood restoration monitoring was planned, monitoring activity has started in 19 projects, and not yet started in 12 projects. The results of the monitoring are summarized below.

Projects that have agreed to disclose social monitoring results and which livelihood restoration is being monitored (The rest of 5 projects have no agreement on disclosure):

- No.26: Mumbai Metro Line 3 Project, India

(1) Conducting industry-related skills training for young workers at 1 company, (2) Conducting vocational training for young workers with weak economic conditions (training on electricity, furniture repair, etc.) at 2 companies.

- No.80: The Project for Rehabilitation of Irrigation Facilities in Rwamagana District, Rwanda  
Although there are records on the progress of land acquisition and received complaints in the monitoring results, no data on livelihood restoration was included. It is expected that it will be described from the next monitoring report.

Among the reviewed projects in which the field survey was conducted, the findings on livelihood restoration assistance was summarized below:

- No.5: Delhi Mass Rapid Transport System Project Phase 3, India  
External monitoring was carried out to check the livelihood restoration program, and no particular problem was reported regarding the relocation site and livelihood restoration.
- No.13: Indramayu Coal Fired Power Plant Project (E/S), Indonesia  
From October 2016 to August 2018, 300 people participated in the livelihood restoration program of "agricultural skills-based," and "non-agricultural skills based". This program is being provided continuously. In addition, except for land acquired for access roads and substation sites, farming is still allowed.
- No.24: North-South Expressway Construction Project (Ben Luc - Long Thanh Section), Viet Nam  
In addition to compensation for affected assets at full replacement cost, provision of support for the aquaculture of shrimp or livestock such as pigs, and support for initial livelihood capacity building such as vocational training were provided according to PAPs' preference. The progress has been monitored every quarter. In Gan Gio area, where the livelihood restoration support was firstly implemented, there were some PAPs who exchanged shrimps and pigs with cash and used for other purposes. Therefore, in the future implementation of the livelihood restoration support, it will strengthen consultation and training for the eligible PAPs.
- No.36: Infrastructure Development Project in Thilawa Area Phase I, Myanmar  
According to the RAP, the port development component planned to promote job opportunities for PAHs before or after construction works upon request as a part of the livelihood restoration program. However, there was no request from PAPs after compensation payment. As a result, no livelihood restoration activity has been implemented.
- No.42: Kenya-Tanzania Power Interconnection Project, Tanzania  
As livelihood restoration support measures, i) rural electrification, ii) renovation of access road near Arusha substation, iii) provision of wells were agreed with the project proponent at the timing of the appraisal. The field survey found that: i) Rural electrification: There is a package of rural electrification in the contractor contract and the contract has been concluded. Currently, the areas to be electrified are being identified, ii) Renovation of access road near Arusha substation: construction started on 15 April, 2019, iii) Provision of wells near Arusha substation: It was reported that the water supply was already prepared by the government

around Arusha Substation.

## 2.2.5 Case Analysis of Ayago Hydroelectric Power Plant Development Project

### (1) Project Background

“Ayago Hydropower Plant Development Project (Preparatory Study for Cooperation)” is classified as Category A because it involves a large-scale hydropower project, and the study was launched in 2012. Since the project was planned within the National Park site, discussions were held on the handling of the project implementation in protected areas under JICA GL.

**Table 2-23 Discussion and Situation at the Advisory Committee**

Date of Advisory Committee Meeting	Discussion and Background
General Meetings on May 11, 2012 (24th meeting) and June 4 (25th meeting) (Explanation of Project Summary)	At the 24th and 25th general meetings, JICA provided briefings on the project. Among these, there was a debate on "implementation of development projects in national parks". (General meeting on May 11, 2012) <a href="http://www.jica.go.jp/environment/advice/pdf/giji/advice24_gijiroku.pdf">http://www.jica.go.jp/environment/advice/pdf/giji/advice24_gijiroku.pdf</a> (General meeting on June 4, 2012) <a href="http://www.jica.go.jp/environment/advice/pdf/giji/advice25_gijiroku.pdf">http://www.jica.go.jp/environment/advice/pdf/giji/advice25_gijiroku.pdf</a> ( <a href="https://www.jica.go.jp/environment/advice/pdf/giji/advice25_data02.pdf">https://www.jica.go.jp/environment/advice/pdf/giji/advice25_data02.pdf</a> )
June 15, 2012 (WG on draft scoping)	Prepared the draft advices. (WG meeting on June 15, 2012) <a href="https://www.jica.go.jp/environment/advice/pdf/giji/uga02_SCO_giji.pdf">https://www.jica.go.jp/environment/advice/pdf/giji/uga02_SCO_giji.pdf</a>
General Meeting on July 6, 2012 (26th meeting)	Discussed the draft advice. The main issues were the following three points. Additional explanation was provided by JICA. 1. Area 1 where the project locates is recognized as protected area, hence implementation of a development project is prohibited in principle in accordance with JICA GL. Do you have sufficient reasons for recognizing this case as an exception? 2. Since the JICA GL have been disseminated to the world, compliance with the GL also attract attention from overseas and accountability of the operation are inevitable, and a reasonable rational for “the exceptional case” is necessary. 3. Whether it is reasonable to proceed the preparatory study to find out if the project could be the exception. Can we obtain the expected outcome if we conduct the study?  It was agreed to continue finalizing the advice at the general meeting. After this meeting, discussions by e-mail were held within the WG, and discussions by e-mail at the general meeting. (General meeting on July 6, 2012) <a href="https://www.jica.go.jp/environment/advice/pdf/giji/advice26_gijiroku.pdf">https://www.jica.go.jp/environment/advice/pdf/giji/advice26_gijiroku.pdf</a>
General Meeting on August 6, 2012 (27th meeting)	Finalized advice on draft scoping. “Because this is the development project in the protected area, it is urgent to re-examine the appropriateness of this project from various perspectives such as the framework of international protected area, national regulations for the protected area, frameworks for resource use and development in Uganda, and the JICA GL. Considering these frameworks and based on the attitude of the Environmental and Social Considerations Committee to this subject, advices are provided in the following three areas: A. Advice on discontinuing the preparatory study (hereinafter referred to as the study), B. Advice to suspend the study and recommend to verify appropriateness of the project implementation, C. Advice on the study” These advices were finalized. 4 members of the committee considered that cooperation to this project violates the JICA GL and abstained from joining the committee members of this advices. The details of the above-mentioned process were disclosed on JICA website, including the

Date of Advisory Committee Meeting	Discussion and Background
	minutes of meetings. (General meeting on August 6, 2012) <a href="https://www.jica.go.jp/environment/advice/WG_others.html#africa">https://www.jica.go.jp/environment/advice/WG_others.html#africa</a>
WG on August 9, 2012	Explaining the background to consider the advices <a href="https://www.jica.go.jp/environment/advice/WG_others.html#africa">https://www.jica.go.jp/environment/advice/WG_others.html#africa</a>
40th General Meeting on October 7, 2013	As a result of discussions with the Uganda government regarding this project, JICA reported that the study will not be continued due to low possibility for Uganda government to submit the request for JICA loan. ( <a href="https://www.jica.go.jp/environment/advice/ku57pq00000ngjcu-att/advice40_gijiroku.pdf">https://www.jica.go.jp/environment/advice/ku57pq00000ngjcu-att/advice40_gijiroku.pdf</a> )

Source: JICA website

In addition, at the reexamination of JICA GL Operation conducted in 2015, WG meetings were held for each issue, and the results were compiled as “review results” based on the advice of the WG meetings.

In relation to the project, the conditions that needs to be met when JICA assists a project in a protected area as an exceptional case were discussed at the 6th WG meeting on "considering the environmental and social impacts on ecosystems" (environmental and social considerations method) on 28th November 2014 which reviewed the JICA GL's operational aspects. This WG meeting clarified points to be considered when deciding the implementation of a JICA project in “areas designated by the government for the purpose of nature protection and cultural heritage protection by laws and regulations”, etc. and these points were added to the FAQ disclosed on JICA website. (The details are disclosed on the JICA website:

<https://www.jica.go.jp/environment/guideline/review.html> )

**Table 2-24 Responses to Advisory Committee's Advices at the Implementation Stage**

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
3	Turakurgan Thermal Power Station Construction Project (Uzbekistan)	1	Provide technical guidance to and confirm with the project proponent so that BOD in wastewater from the plants and employees' facility will be properly treated. If the wastewater contains heavy metals etc., request the project proponent to confirm the impact and appropriate measures by monitoring, etc.	JICA requested the project proponent to treat domestic wastewater properly and to conduct environmental monitoring for wastewater. JICA also requested the project proponent to confirm and monitor the impact when wastewater contains heavy metals, etc.  At this stage of construction work, JICA confirmed that the wastewater from the plant and the employees' facility was properly treated. As a result of monitoring, no particular impact has been confirmed.  With regard to heavy metals, it was confirmed that the river water which will be used as cooling water contains a small amount of iron and copper, but this is far below the standards of IFC's EHS guidelines, and we have confirmed that in EIA, the predicted value through the cooling system is also below the standard of the EHS guidelines. To make everything assured, heavy metals are included in the environmental monitoring item during the operation stage.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	4	In the first paragraph of Section 6.5 of the EIA report on page 6.30, a lack of environmental awareness among engineers and managers concerned with day to day construction activities during implementation of environmental management plans was raised, and regular environmental training programs were suggested. Therefore, it should be confirmed that the concrete measures are stated in the EMP.	Based on this advice, JICA confirmed at the time of the project appraisal that EMP includes a provision of environmental education to workers. In addition, monitoring results show that environmental education was provided to workers.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	5	The construction work is carried out in dry season, and dusts generated during construction and transportation are considered to have a negative impact on the surrounding residents. It is requested to investigate the dust amount and its dispersion area, and make sure that mitigation measures are planned if necessary, and that these measures are planned to be informed to surrounding residents.	JICA confirmed on this advice at the time of the project appraisal. According to the monitoring results, the air quality measurement results such as dust were within the standard value and water sprinkling was regularly performed, and there was no particular problem confirmed.
5	Delhi Mass Rapid Transport System Project Phase 3	6	It is expected that the water use of the nearby residents will be negatively affected when the project uses water from the drilled well and public	We confirmed on this advice at the time of the project appraisal. We have confirmed that water use is included in the EMP. Several mitigation measures were formulated such as storage and use of

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
	(India)		water supply. From this standpoint, it is requested to ensure that detailed mitigation measures have been developed for the negative impacts associated with the high volumes of water use, and that the project proponent has plans to inform surrounding residents of the water use.	rainwater, reuse of wastewater, and thorough water conservation to mitigate the impact of fresh water use by the project. The results of mitigation measures were disseminated to surrounding residents at stakeholder consultation meetings at the appraisal stage. In addition, it has been confirmed that water consumption was recorded in monitoring reports, and negative impacts on water use in the surrounding area have not been reported.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	7	For the expected excavated soil of 13.17 mil. m <sup>3</sup> for this project, it is planned that 2.42 mil. m <sup>3</sup> is used in landfills for the station and depot sites, and remaining 10.75 mil. m <sup>3</sup> is to be treated in an environmentally friendly manner (EIA 4.5.3 on Page 4.9). The method and place of this treatment should be specifically decided, and the impact on natural and social environment should be assessed, and if any negative impact is expected, the mitigation measures should be formulated and planned to disclose to public.	It was confirmed on this advice at the time of the project appraisal. The amount of excavated soil is included in the environmental management plan and monitored. Excavated soil was used for landfills, discarded at the disposal site which was designated by Delhi Metro Rail Corporation Ltd. (DMRC), and collected by a registered vendor. It was also confirmed that a blackboard was set up to record the amount of waste discharged at the construction site and that result was disclosed.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	12	Since it is planned that the summary of SIA report is to be prepared in Hindi and distributed to all project affected residents, it is suggested to make sure that an additional information disclosure measure is taken for those who are illiterate can understand the contents.	It was confirmed in the project appraisal that the project affected residents, including those who are illiterate, were explained about the project in the stakeholder meeting based on the Social Impact Assessment (SIA) report. Informal consultations such as focus group discussions and individual interviews with PAPs were also conducted. The summary of the SIA report has been prepared in Hindi and distributed to the project affected residents.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	15	It is mentioned that project affected residents who lose their livelihood and socially vulnerable groups are to be prioritized for job opportunities and vocational training opportunities at the construction stage. It is requested to make sure that those who are entitled are not discriminated due to low educational background, lack of connections with key persons or the illiterate, etc.	It is confirmed that approximately 30% of the project affected residents were hired by the contractor(s). In addition, it was confirmed with the project proponent that project affected residents will not lose their employment opportunity due to low educational background, lack of connections with influential persons, and the illiterate.
5	Delhi Mass Rapid Transport System Project Phase 3 (India)	17	Since it is planned that eligible (vulnerable) PAPs are able to receive vocational training to improve their skills, please further clarify the type and contents of training and ensure this plan will be	It was confirmed that DMRC hired the NGO for the purpose of carrying out the livelihood restoration assistance (rehabilitation assistance) for project affected residents and provided information and advice to project affected residents on various job opportunities and training. In addition, it was confirmed that the

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
			disseminated to PAPs.	project affected residents include small-business owners such as small shops, carpenters, tailors, and tea shops, and technical occupations such as electricians, welders, car shops, and bicycle shops. Since these PAPs will continue their current occupations and they do not need to take the vocational training, the training was not formally conducted for them. It is confirmed that enough employment opportunities are provided to PAPs by the project. For instance, as mentioned above, around 30% of the project affected residents were hired by the contractor, and other PAPs are also engaged in related work of the project.
6	Dhaka Mass Rapid Transit Development Project (1) (Bangladesh)	2	Regarding noise and vibration, at both construction and operation phases, the project should set up appropriate measurement points where noise and vibration can be measured for regular environmental inspection/monitoring and the monitoring duration with an appropriate frequency (esp. during operation).	<p>For noise and vibration during construction and operation stages, mitigation measures such as installation of silencers for construction equipment, installing noise barriers, adjustment of the departure bell volume, and low speed operation on curve are planned. At the time of the project appraisal, it was agreed with the project proponent that as an additional mitigation measure to reduce noise and vibration, use of a long rail would be considered at the time of detailed design, and additional protection measure(s) will be taken by the project proponent in case of complaints.</p> <p>At the time of construction and operation stages, it was confirmed that the project proponent set up appropriate monitoring sites, frequency, and periods at depots, stations and other related facilities along the railway line, and carried out regular monitoring. More specifically, noise level is monitored at the same monitoring points every three months. At several points, noise level was observed above the standard at several points, which were mainly influenced by the background noise level; however, JICA requested the project proponent to implement mitigation measures near sensitive receptors such as hospitals and schools which require silence.</p> <p>Vibration has not been monitored on a regular basis, but the contractor has conducted the measurement, and it was confirmed that the measured results were within the allowable value. In particular, in the case of land reclamation construction (the work has already completed) which generally causes large vibration, the contractor monitored the vibration level in daily basis. There has been no complaint concerning noise or vibration. In addition, monitoring will be conducted once every six months for two years after operation.</p>
6	Dhaka Mass Rapid Transit Development Project (1)	4	Regarding the environmental inspection/monitoring of air and water quality, the project should set up appropriate measurement points, measurement	For air quality, appropriate monitoring points were set up such as depots, stations, facilities and roads along the Mass Rapid Transit (MRT) route. The environmental monitoring plan during the construction stage specifies monitoring once a quarter.

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
	(Bangladesh)		frequency and measurement period so that the status of air pollution and water quality along the MRT route can be properly monitored. In particular, the measurement should be continued during the operation stage.	<p>As a result of monitoring, it was confirmed that Particular Matter 2.5 (PM2.5) and Nitrogen Dioxide (NO<sub>2</sub>) levels exceeded the standard at several monitoring points, and JICA requested the project proponent to implement mitigation measures such as regular maintenance of construction equipment and cleaning the road surface, taking into consideration the influence of background values.</p> <p>Regarding water quality, it was confirmed that the project has set up appropriate monitoring points such as depots, stations, ponds along the MRT route and drainage ditches. According to the environmental monitoring plan during the construction stage, monitoring of water quality is conducted once a quarter. As a result of monitoring, it has been confirmed that the monitoring results of pH, Total Suspended Solids (TSS), etc. exceeded the standard at several monitoring points, and JICA requested the project proponent to implement mitigation measures such as wastewater pretreatment, taking into consideration the influence of background values.</p> <p>In addition, monitoring of air quality and water quality will be conducted once every six months for two years during the operation.</p>
10	Central Luzon Link Expressway Project (Philippines)	2	For pollution-related mitigation measures, JICA should request the project proponent (Department of Public Works and Highways: DPWH) to conduct environmental monitoring for a considerable period of time during the operation and to take necessary measures, if necessary.	<ul style="list-style-type: none"> <li>When JICA requested continuous monitoring to DPWH, it was confirmed that the following monitoring systems have already be in the place which were initiated by DPWH. <ol style="list-style-type: none"> <li>Self-monitoring by DPWH</li> <li>Joint monitoring with local municipalities, etc. (Multi-partite monitoring)</li> <li>External Environmental Audit by the Department of Environment and Natural Resources (DENR)</li> </ol> </li> </ul> <p>Regarding this project, above Nos. 1 and 2 are the main monitoring activities during construction, but at the time of operation, it was confirmed that the Concessionaire is in charge of monitoring. However, DENR has the right to conduct environmental audits at any time during construction and operation stages as stated in No. 3.</p> <ul style="list-style-type: none"> <li>JICA confirmed with DPWH during this project appraisal that DPWH provides pollution-related information to DENR at any time.</li> <li>From the above mentioned monitoring system, it was confirmed that continuous monitoring has been incorporated into the existing system initiated by DPWH for pollution mitigations.</li> <li>At the construction stage, based on the agreement at the time of the project appraisal, it was confirmed that pollution-related monitoring such as air, water,</li> </ul>

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
				noise and waste was being carried out. Since some measured values of air (dust) and noise were exceeded the standard value, JICA requested DPWH to confirm the implementation status of mitigation measures. In addition, it was confirmed that monitoring by the Concessionaire will be conducted at the time of operation.
10	Central Luzon Link Expressway Project (Philippines)	3	At the D/D stage, JICA should confirm with DPWH to consider the in-out flows of construction materials involved in road construction such as excavated soil and soil for embankment, take necessary measures and specify these measures in the specifications of the contract agreement.	• JICA agreed with DPWH that DPWH will make a mass diagram describing the in-out flows of construction materials and the consultant will review it. JICA confirmed that this mass diagram review and implementation of the necessary measures are described in the Terms of Reference (TOR) of the consultant for the D/D.
10	Central Luzon Link Expressway Project (Philippines)	8	Among the project affected residents, there are households that do not agree on resettlement and households that have not yet consulted. For these projects affected residents, please confirm with DPWH that project affected residents will understand fully on specific impacts and compensation methods through the public consultation in early November and the study and consultation in the D/D stage, and DPWH will proceed after reflecting their needs into the compensation methods. During this process, special attention needs to be paid to the following groups: (1) Residents who have expressed opposition to resettlement; (2) Lease farmers and tenant farmers; (3) Project affected residents with agricultural land (TYPE B) who are involuntarily choose cash compensation and relocate their houses due to loss of farmland; and (4) Among the farmers whose houses will be affected by the project, especially the poor farmers	Public consultation meetings with project affected residents have been conducted. In the meetings, JICA confirmed that contents of compensation and others were explained and no particular objection was raised. It was confirmed that DPWH and local governments will (1) study the needs of the residents and (2) provide adequate information to the residents in the further stage of the project. As specified in the advice, JICA also confirmed that DPWH explained to the 4 groups each and no issue was identified.
10	Central Luzon Link Expressway Project (Philippines)	9	Please confirm with DPWH that infrastructure such as electricity and water supply will be developed at the relocation site.	DPWH has secured the budget for infrastructure development such as electricity and water supply at the relocation site. Regarding the institutional arrangement for construction of the resettlement site, JICA confirmed that the responsibility of relevant government organizations will be decided after discussions with local

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
				government of the relocation site and National Housing Authority (NHA). As for the implementation status, it was confirmed that infrastructure development such as power and water supply in the relocation site was under arrangement.
10	Central Luzon Link Expressway Project (Philippines)	10	As for the relocation site (if required), JICA should recommend DPWH to confirm the preference of residents as much as possible and to conduct monitoring so that there is no problem with livelihoods and infrastructure services after resettlement.	<ul style="list-style-type: none"> <li>• In consultation with the residents to be displaced, it was confirmed that a relocation site in a good locational condition was requested, and that the relocation site is scheduled to be developed along this request.</li> <li>• DPWH has two monitoring systems; 1) internal monitoring and 2) external monitoring, for resettlement monitoring.</li> <li>• 1) Internal monitoring mainly focuses on monitoring during the land acquisition and resettlement, such as the progress of compensation payment. On the other hand, in 2) external monitoring, independent external organization monitors the progress of livelihood restoration assistance measures and restoration status after resettlement, the satisfaction of project affected residents, and the presence or absence of complaints by focusing on implementation of appropriate resettlement, and make recommendations to DPWH. It is confirmed that DPWH will make necessary improvements based on the recommendations if any. It was confirmed that external monitoring is under preparation in accordance with implementation of the livelihood restoration program.</li> </ul>
11	Pasig-Marikina River Channel Improvement Project (Phase 3) (Philippines)	4	As the current treatment of wastes including wastewater and hazardous substances are not always in a desirable condition, JICA should identify the impacts of these on the rivers to be maintained in the project.	<ul style="list-style-type: none"> <li>• The project proponent explained that factory wastewater was treated before discharging to the drainage system which flows to Pasig-Marikina River.</li> <li>• In this project, in addition to conducting additional surveys on bottom sediment quality at the D/D stage, JICA agreed with the project proponent to carry out monitoring on dredged soil, soil improved by pre-mixing treatment and river water quality during the construction period.</li> <li>• Monitoring of water quality is carried out, and no particular problem has been identified.</li> </ul>
11	Pasig-Marikina River Channel Improvement Project (Phase 3) (Philippines)	5	As for "Soil and groundwater contamination", there is a possibility that hazardous substances may be mixed in the soil. Therefore, JICA should confirm that a facility or treatment method is in place to prevent soil and groundwater contamination, and if necessary, consider strengthening mitigation measures for the surrounding environment.	<ul style="list-style-type: none"> <li>• A portion of the dredged soil is packed in pollutant confining bags and used for the embankment of this project. In addition, JICA confirmed that the project plans to use other dredged soil for landfilling after improvement by mixing with cements or lime stones and containing hazardous substances.</li> <li>• Moreover, it was agreed to conduct a detailed investigation and confirmation at the D/D stage, to inspect the dredged soil before dredging and after treatment by the contractor and take additional measures as necessary, and to monitor the groundwater quality of the landfill site.</li> <li>• Contamination of the dredged soil has not been confirmed.</li> </ul>

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
11	Pasig-Marikina River Channel Improvement Project (Phase 3) (Philippines)	14	On issues related to flood control of the entire watershed and this project, JICA should make sure that Flood Mitigation Committee (FMC) cooperates with LIAC (Local Inter Agency Committee) to tackle the issues.	<ul style="list-style-type: none"> <li>JICA requested the project proponent on the given advise and confirmed that the FMC was established as planned.</li> </ul>
12	New Bohol Airport Construction and Sustainable Environment Protection Project (Philippines)	20	The tree planting plan needs to clearly mention the use of primitive species and native species, and exclude non-native species, etc. as much as possible. In addition, JICA should consider appropriateness of the tree planting plan as the mitigation measures for flora and fauna and separately describe the mitigation measures.	Both two planted species were confirmed as native species in Bohol. One species was a transplanted native species which was grown at the airport construction site, and another species is a tree which is different species but in the same genus which was from the same island and outside the airport construction site. There is no non-native species planted.
14	Mandimba-Lichinga Road Upgrading Project (Mozambique)	1	Confirm the mechanism to keep in close contact with AfDB and ensure consistency for the project.	During the project appraisal, JICA confirmed the regular donor meeting is to be held every six months including ANE to communicate and coordinate with AfDB on the project. At the project implementation stage, JICA confirmed that the project proponent had a record of meetings with AfDB.
14	Mandimba-Lichinga Road Upgrading Project (Mozambique)	7	As watering during the dry season is required at least three times a day as a dust control measure during the construction stage, confirm that the project pays attention to consideration for affected areas such as providing instruction manuals for dust control at the site to ensure the effective coverage.	During the project appraisal, JICA requested ANE to prepare the instruction manuals for effective dust control and to implement the dust control measure, namely watering at least three times a day for the dry season by prioritizing the affected areas. At the construction stage, it was confirmed that waterings were conducted daily at major work camps, gravel mining areas, sub-work camps, villages, and detour areas, etc.
14	Mandimba-Lichinga Road Upgrading Project (Mozambique)	9	Confirm the impact on the water quality and take necessary measures during construction and operation stages.	Regarding surface water, JICA confirmed the drainage ditch was installed along the roadside in accordance with the ESIA, clogging (by soil or garbage) of the drainage ditch was checked, and monitoring was conducted visually on turbidity of river water near the construction site. No significant adverse impact has been reported.
14	Mandimba-Lichinga Road Upgrading Project (Mozambique)	12	Confirm that there is no problem with population inflow due to the improved convenience of the project road.	Measures against the impact of population inflow (Human Immunodeficiency Virus/Acquired Immuno-Deficiency Syndrome: HIV/AIDS prevention program, etc.) during the construction stage is included in the EMP and implemented accordingly. During the operation stage, large-scale population inflow near the project area due to the improved convenience by the project road is not expected, and the study result mentioned that there is no particular problem anticipated.

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
				However, JICA requested ANE and the province government to implement the appropriate measure if any problem occurs.
14	Mandimba-Lichinga Road Upgrading Project (Mozambique)	17	Confirm the specific expertise and the number of environmental and social specialists who will be engaged in the implementation of the environmental monitoring plan and the Environmental Monitoring Unit (EMU).	During the project appraisal, JICA confirmed with ANE that the environmental monitoring will be supervised collectively by the Environmental Officer and Social Officer of the Project Management Unit (PMU), and the Environmental Officer of the consultant and contractor(s). For EMU, 1 person in charge of environmental and social considerations was selected from ANE, 1 person selected from the consultant for safety management as well as environmental and social considerations, and 5 persons who are social specialist, anthropologist, coordinator, and manager are selected from the contractor.
14	Mandimba-Lichinga Road Upgrading Project (Mozambique)	18	Confirm the capacity building plan for the environmental and social specialists in charge of monitoring and its feasibility, since it is essential to improve the language and technical skills of the staff involved in monitoring.	At the time of the project appraisal, JICA confirmed that there is no problem with the language skills of the staff involved in monitoring, and the capacity of the project proponent staff is being improved due to technology transfer from the consultant and contractor(s). JICA also confirmed with ANE that the equivalent level of staff will be hired in the future. As it is confirmed at the implementation stage, the consultant hired with Japanese ODA loan provides technical support to the project proponent on environmental and social monitoring.
20	San Miguel Bypass Construction Project (El Salvador)	10	As the role of traffic management plan is important as well as EMP and EMoP, JICA should propose the necessity of traffic management plan in particular, including introduction of a car inspection system that prevents unmaintained vehicles from traveling.	The need for a traffic management plan, such as introduction of a car inspection system that prevents unmaintained vehicles from traveling, traffic education (no horns unnecessarily), has been added to the "1.4 Recommendation" of the JICA study report. In addition, JICA proposed the project proponent to prepare a traffic management plan for this project at the time of the project appraisal and confirmed the project proponent's intention to continue the traffic education including speed control and moderate horn uses. At the implementation stage, JICA confirmed with the project proponent that the traffic management plan is prepared including installment of traffic lights in accordance with the Central American Economic General Convention Permanent Office (SIECA) standard; implementation of traffic safety training and campaigns for nearby residents and students; limiting the traveling speed to 40 km/h; preparation of bicycle and pedestrian lanes; and installation of bus stop spaces along roads.
22	Bortnychi Sewage Treatment Plant Modernization Project	4	Since GHG emission is expected to increase after the operation of this project, JICA should request the project proponent to take measures against global	<ul style="list-style-type: none"> <li>As the energy sector accounts for 69 % of GHG emissions in Ukraine, GHG emission reduction is largely owed by the energy sector initiatives. In addition, when the method of accumulating sludge in the current sludge disposal site is used</li> </ul>

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
	(Ukraine)		warming.	<p>as a baseline, the amount of GHG emissions will increase after commencement of operation. However, it is confirmed that in comparison to the originally planned French-type sludge incinerator, the Japanese-style sludge incinerator is expected to reduce GHG more because of its higher efficiency (e.g. heat source using steam and shared power source. etc.)</p> <ul style="list-style-type: none"> <li>• Based on the above effort, JICA requested the project proponent to reduce GHG emission as much as possible during the project implementation.</li> <li>• Construction has not been started at this point, however, regarding sludge incinerators that are expected to be introduced in this project, it is being considered to introduce equipment that complies with EU environmental standards.</li> </ul>
24	North-South Expressway Construction Project (Ben Luc - Long Thanh Section) (Viet Nam)	4	As a result of monitoring by the external monitoring agency, when it is considered that the measures taken are insufficient or a further action is necessary, JICA and ADB also actively check the information provided via monitoring. It should be confirmed with the project proponent that the results and conclusion will not be left to the external monitoring agency alone.	It was agreed with ADB and the project proponent that the monitoring results by the external monitoring agency will be reported not only to ADB but also to JICA through Vietnam Expressway Corporation (VEC), the project proponent. JICA has also obtained and confirmed the external monitoring report.
24	North-South Expressway Construction Project (Ben Luc - Long Thanh Section) (Viet Nam)	6	It is desirable to ensure in writing that the final decision on the land compensation rate will be based on the market price-based replacement cost; if the land price rises, it should be reflected; and the land compensation will be provided to the land owner before actual land acquisition.	<p>JICA confirmed with the project proponent that the land compensation rate is determined based on the replacement cost; and if the land price goes up significantly, the project proponent will carry out the replacement cost survey again and the survey result will be reflected in the compensation rate. In addition, although it is clearly stated in the resettlement plan that compensation will be paid before the land acquisition, JICA confirmed with the project proponent again on these matters.</p> <p>Regarding the validity of the replacement cost survey, JICA confirmed the replacement cost survey results and the due diligence report attached to the final RAP of each district.</p>
26	Mumbai Metro Line 3 Project (India)	8	In the pre-implementation stage, JICA should review the implementation plan for stakeholder consultation to be held after project affected residents have been finalized.	<p>At the time of the project appraisal, JICA agreed with the project proponent to take action based on the given advice. The land acquisition process has not been completed, and the project proponent is continuing to discuss with the project affected residents based on the stakeholder consultation implementation plan which was confirmed by JICA.</p> <p>JICA has confirmed that stakeholder consultation has been conducted after the</p>

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
				project affected residents have been finalized.
26	Mumbai Metro Line 3 Project (India)	15	Since Section 2.10 of the SIA report states that "the household survey was not completely done due to frequent protests and non-cooperation", JICA should confirm the number of households that have not been surveyed directly at the time of environmental review. More specifically, JICA should confirm whether the households who were opposing when the SIA was prepared are surveyed and whether they express their support for the project.	At the time of the project appraisal in 2012, 52 project affected households did not cooperate in the survey. However, it has decreased to 26 households in August 2017. Among these 26 households, 13 households applied to the Complaint Handling Committee and 5 households (3 residences and 2 commercials) were recognized eligible. Land acquisition and resettlement are ongoing and not yet completed. JICA will continue to monitor the situation through project supervision.
26	Mumbai Metro Line 3 Project (India)	17	Please confirm the effectiveness of vocational training for scheduled castes and scheduled tribes and to what extent they contributed to the new employment opportunities based on experiences of other projects.	In the Mumbai Urban Transport Plan (2005), vocational training and placement for low-income people, including the poor, scheduled castes, and scheduled tribes, have been conducted, and the total of 1,571 people have obtained new jobs. Out of these 1,571 people, 842 people have gained jobs through new skills training (e.g. bag making, sewing techniques, food processing, etc.). This livelihood restoration program is also applied to this project. The project proponent hires NGOs to support implementation of a livelihood restoration program, and additionally hires an external monitoring agency to monitor the livelihood restoration status. According to the monitoring results, currently, the company has been selected to carry out vocational training as per the micro plan, and the effectiveness will be examined after implementation of the livelihood restoration program. The micro plan is created based on the needs of each PAP.
29	Rengali Irrigation Project (Phase 2) (India)	6	As for the Wildlife Management Plans prepared by the Forest Department, JICA should confirm its progress, cost and responsibilities.	The cost of Rs. 268.5 million, which is required for the Wildlife Management Plan, has already been deposited by the project proponent to the Forest Department. According to the Wildlife Management Plan, the Elephant Friendly Ramps (EFRs) should be constructed at 28 locations in the left bank area, and all of which have been constructed. In addition, 2 Elephant Passages are planned, and 1 passage is already constructed. The remaining 1 is scheduled to be built by the project proponent. The constructed EFR and Elephant Passages will be maintained by the Forest Department. According to the monitoring results, the Wildlife Management Plan is currently updated for Phase 2, and regular monitoring of elephants is being carried out in the elephant corridor.
31	Ahmedabad Metro	1	Ensure that the additional water demand has no	During the operation stage, water use for vehicle cleaning is mainly expected at

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
	Project (I) (India)		major impact on other water uses and the environment.	the depot; however, 97% of water used for vehicle cleaning is recycled water, and JICA confirmed with the project proponent that there will not be a major impact on other water use and environment. In addition, at the implementation stage, it has been confirmed with the project proponent that water supply for drinking water at stations and depots has already been approved based on the Gujarat Groundwater Sustainable Use Plan, and it will be taken from underground.
35	Olkaria V Geothermal Power Development Project (Kenya)	10	As for pipelines and roads planned in the project area including Hell's Gate National Park, JICA should add the followings in the F/R of the JICA Study: (1) to study the movement of animals before construction starts; and (2) to implement the mitigation measures as such as changing the pipe alignment and installing speed bumps based on the study results.	The followings are added in "Section 7. Animals and Ecosystems" in "Chapter 11 Mitigation Measures and Costs for Implementing Mitigation Measures" under Part II, F/R. "It is desirable to implement the following mitigation measures: • Keep enough distance between transmission lines so that birds are not killed by an electric shock. • When installing bumps on roads in zones where wildlife passes, consider locations where wildlife movement is expected, and install them at appropriate locations in consultation with KWS before construction begins"  As JICA confirmed at the implementation stage, speed bumps have been installed. The steam collection pipes are designed camouflage of the natural environment. The project proponent cooperated with the KWS to investigate the animal's moving and the bird's flight route, and the results were shared with the consultant and were reflected in the design.
38	The Project for Construction of Nile River Bridge (South Sudan)	14	Since the draft RAP (p.31) discusses only the water supply plan of Tokiman West Lukata Moroyok for the infrastructure development in the relocation site, it should describe other infrastructure development plans as much as possible.	As per the advice, other infrastructure development plans were added in the F/R of the JICA Study, and JICA requested the project proponent to follow the plan accordingly. The current progress after the JICA study could not be confirmed since the project has been suspended due to the security reason.
38	The Project for Construction of Nile River Bridge (South Sudan)	15	In the right column of the Employment Opportunity for PAPs in Table 8-1 Compensation Matrix of the draft RAP, add "(Farmer, fisherman, brick manufacturer and anybody whose livelihoods are affected by the project)".	Additional description was added in the F/R of the JICA Study as per the advice, and JICA requested the project proponent to follow the Compensation Matrix accordingly. The latest situation after the JICA study could not be confirmed since the project has been suspended due to the security reason.
39	The Project for the Study on Strengthening	9	Generally, it is observed invasive alien species threaten coastal ecosystems through ballast water and are breeding for a long time in many countries.	JICA confirmed that ballast water issue is not covered in the master plan since the international legislation on ballast water as specified by IMO will be applied to all ships including dredgers.

Project No.	Project Title	Advice Number	Advice to JICA	JICA's Confirmation Result at the Implementation Stage
	Competitiveness and Development of Sihanoukville Port (Cambodia)		Therefore, JICA should 1) describe in the report an example of adverse impacts on ecosystems due to the invasion of alien species into the bay by dumping ballast water, and 2) include examination of proper ballast water management to avoid alien species in the draft TOR of the EIA to be conducted during the F/S.	

Source: Prepared based on the survey item sheets of individual projects

## CHAPTER 3 CHANGES AND TRENDS OF EXTERNAL ENVIRONMENT

Chapter 3 summarizes the survey results on changes in the environment surrounding JICA GL in line with the survey items mentioned in Chapter 1.

### 3.1 Government Policies and International Aid

#### 3.1.1 Development Cooperation Charter

In response to (1) diversification, complication and broadening of development issues the ODA faces, (2) increasing role of non-ODA funds and activities for developing countries, and (3) globalization, the ODA Charter (Cabinet Decision of 1992, revised in 2003) was revised in February 2015 as the Development Cooperation Charter. The points of the Development Cooperation Charter are outlined in the table below. Responding to the diversification, complication and broadening of the development issues, the major approach of the Charter is to strengthen collaboration with public-private partnerships, international organizations, MDBs, and emerging countries.

As a principle of implementation, the Charter states that, in order to ensure appropriateness, it is necessary to pay full attention to the various environmental impacts and climate change measures associated with the developments, and to carry out the development cooperations with due consideration to the environment. The Charter also states that the development co-operation shall be carried out with due attention to social impacts and with participation of diverse participants at all situations, from the view point of correcting disparities as well as considering socially vulnerable people such as children, persons with disabilities, elderly people, ethnic minorities and indigenous people.

**Table 3-1 Outline of Development Cooperation Charter**

Items	Overview
<b>1. Philosophy</b>	
(1) Objectives of Development Cooperation	<ul style="list-style-type: none"> <li>Japan will promote development cooperation in order to contribute more proactively to the peace, stability and prosperity of the international community.</li> <li>Such cooperation will also lead to ensuring Japan's national interests such as maintaining its peace and security, achieving further prosperity, realizing an international environment that provides stability, transparency and predictability, and maintaining and protecting an international order based on universal values.</li> <li>ODA, as the core of various activities that contribute to development, will serve as a catalyst for mobilizing a wide range of resources in cooperation with various funds and actors and, by extension, as an engine for various activities aimed at securing peace, stability and prosperity of the international community.</li> </ul>
(2) Basic policies	<p>A. Contributing to peace and prosperity through cooperation for non-military purposes</p> <ul style="list-style-type: none"> <li>The contribution to peace and prosperity of the world through non-military cooperation is highly regarded as embodying our way as a peaceful nation.</li> <li>Japan will continue to uphold this policy and comply with the principle of avoiding any use of development cooperation for military purposes or for aggravation of international conflicts, in proactively contributing to securing peace, stability and prosperity of the international community.</li> </ul>

Items	Overview
	<p>B. Promoting human security</p> <ul style="list-style-type: none"> <li>- Human security is the guiding principle that lies at the foundation of Japan's development cooperation</li> <li>- Japan will thus focus its development cooperation on vulnerable individuals and provide cooperation for their protection and capacity building so as to realize human security.</li> <li>- Japan will also proactively contribute to promoting basic human rights, including women's rights.</li> </ul> <p>C. Cooperation aimed at self-reliant development through assistance for self-help efforts as well as dialogue and collaboration based on Japan's experience and expertise</p> <ul style="list-style-type: none"> <li>- Japan will continue to provide cooperation aimed at developing countries' self-reliant development by emphasizing their own initiatives and self-help efforts.</li> <li>- Japan will attach importance to building the foundations of self-help efforts and self-reliant development such as human resources, socio-economic infrastructure, regulations and institutions.</li> <li>- It will also go beyond waiting for requests from partner countries, we also emphasize dialogue and collaboration with other countries, including proactively presenting proposals from Japan.</li> </ul>
<b>2. Priority policies</b>	
(1) Priority issues	<p>A. "Quality growth" and poverty eradication through such growth</p> <ul style="list-style-type: none"> <li>- As regards to the fragile states, Japan provides both assistance from a humanitarian point of view and assistance designed to set the development process in motion and overcome vulnerability.</li> <li>- To resolve the poverty issue in a sustainable manner, it is essential to achieve economic growth through human resources development, infrastructure development and establishment of regulations and institutions as well as the growth of the private sector.</li> <li>- Economic growth must be "quality growth" (inclusive, sustainable, resilient) and supports it by utilizing Japan's experience, expertise and technology.</li> <li>- From this perspective, Japan will secure the foundation and driving force of economic growth and will support for promoting human-centered development that promotes basic human life.</li> </ul> <p>B. Sharing universal values and realizing a peaceful and secure society</p> <ul style="list-style-type: none"> <li>- Stable development through "quality growth" will not be achieved unless the rights of individuals are guaranteed, people can engage in economic and social activities with a sense of safety, and the society is managed equitably and stably.</li> <li>- With a view to solidifying the foundations for such development, Japan will provide assistance so as to share universal value and support for the realization of a peaceful, stable, and safe society.</li> <li>- Sharing Universal Values: the establishment of the rule of law, the realization of good governance, the promotion and consolidation of democratization, and respect for basic human rights including women's rights.</li> <li>- Peaceful, stable and secure society: peacebuilding, emergency humanitarian assistance (disaster relief, etc.), response to threats to stability and security (maritime security, terrorism, security maintenance, international public goods, etc.)</li> </ul> <p>C. Building a sustainable and resilient international community through efforts to address global challenges</p> <ul style="list-style-type: none"> <li>- The global challenges cannot be dealt with by a single country. Taking full account of the international development goals such as the Millennium Development Goals (MDGs) and the post-2015 development agenda, Japan will seek to contribute to</li> </ul>

Items	Overview
	building a sustainable and resilient international community.
(2) Priority policy issues by region	<ul style="list-style-type: none"> <li>- Japan will implement strategic, effective and agile cooperation according to the needs and characteristics of each region of the world (Association of Southeast Asian Nations:ASEAN, South Asia, Central Asia and Caucasus, Africa, Middle East, Central and Eastern Europe, Central and South America, Oceania and Caribbean).</li> <li>- Attention will be paid to the increasing relevance of recent developments moving toward regional integration, regional level efforts, greater-area development, and strengthening of inter-regional connectivity.</li> <li>- Despite progress in development, some countries are laden with challenges that hamper sustained economic growth, and small island countries and others are faced with special vulnerabilities despite having attained a certain level of per capita income. Japan will make necessary cooperation in accordance with the actual development needs and capacity to carry the burden.</li> </ul>
<b>3. Implementation</b>	
(1) Implementation principles	<p>A. Principles for effective and efficient development cooperation</p> <p>(a) A more strategic approach</p> <ul style="list-style-type: none"> <li>- Formulate development cooperation policy and set goals based on foreign policy.</li> <li>- Enhance synergy by coordinating ODA with non-ODA funding and cooperation.</li> <li>- Conduct evaluation at policy and project level. Appropriate feedback on the outcome of the policy making process.</li> </ul> <p>(b) Cooperation that takes advantage of Japan's strengths</p> <ul style="list-style-type: none"> <li>- Actively introduce proposals from the private sector etc. In addition to hardware aspects such as infrastructure construction, it will also address the non-physical aspects that encompass developing systems for operating and maintaining such infrastructure as well as human resources development, system and institution building</li> </ul> <p>(c) Proactive contribution to international discussions</p> <p><u>B. Principles for securing the appropriateness of development cooperation</u></p> <p>(a) Situation regarding consolidation of democratization, the rule of law and the protection of basic human rights</p> <p>(b) Avoidance of any use of development cooperation for military purposes or for aggravation of international conflicts</p> <ul style="list-style-type: none"> <li>- Japan will avoid any use of development cooperation for military purposes or for aggravation of international conflicts. In case the armed forces or members of the armed forces in recipient countries are involved in development cooperation for non-military purposes such as public welfare or disaster-relief purposes, such cases will be considered on a case-by-case basis in light of their substantive relevance.</li> </ul> <p>(c) Situation regarding military expenditures, development and production of weapons of mass destruction and missiles, export and import of arms, etc.</p> <p>(d) Impact of development on the environment and climate change</p> <p>(e) Ensuring equity and consideration to the socially vulnerable</p> <p>(f) Promoting women's participation</p> <p>(g) Preventing fraud and corruption</p> <p>(h) Security and safety of development cooperation personnel</p>
(2) Implementation arrangements	<p><u>A. Improvement of the implementation architecture of the government and the implementing agencies</u></p> <p><u>B. Strengthening partnerships</u></p> <p>(a) Public-private partnerships and partnerships with local governments</p> <ul style="list-style-type: none"> <li>- The government will promote development cooperation through public-private partnerships and partnerships with local governments utilizing the resources of the</li> </ul>

Items	Overview
	<p>private sector and local governments and promoting private-led growth, in order to support economic development of developing countries more vigorously and effectively and to enable such development to lead to robust growth of the Japanese economy as well.</p> <ul style="list-style-type: none"> <li>- In promoting public-private partnerships, Japan's development cooperation will seek to serve as a catalyst for expanding economic activities, while utilizing excellent technology and expertise, and ample funds of the private sector for addressing the challenges faced by developing countries.</li> <li>- Japan will strengthen collaboration with companies including SMEs, local governments, universities and research institutes.</li> </ul> <p>(b) Coordination in emergency humanitarian assistance and international peace cooperation</p> <ul style="list-style-type: none"> <li>- Japan will continue to promote coordination with international peace cooperation activities such as international organizations and NGOs for emergency humanitarian assistance and United Nations (UN) peacekeeping operations (PKOs) to maximize their effective implementation.</li> </ul> <p>(c) Partnerships with international, regional and sub-regional organizations  (d) Partnerships with donors, emerging countries and other actors  (e) Partnerships with the civil society</p> <p>C. Strengthening the foundations for implementation</p> <ul style="list-style-type: none"> <li>- In order for Japan's development cooperation to fulfil the required role of realizing its philosophy and implementing its priority policies, the foundations for its sustained implementation including financial and human resources must be strengthened.</li> </ul> <p>(a) Information disclosure and promoting understanding of the public and the international community  (b) Promoting development education  (c) Developing human resources and solidifying the intellectual foundations for development cooperation</p>

Source: Unofficial English Translation of "Development Cooperation Charter Outline" from "Development Cooperation Charter Decision" by JICA and JICA Study Team.

Created based on <https://www.mofa.go.jp/mofaj/gaiko/oda/files/000072775.pdf> (Ministry of Foreign Affairs , H 27.2 )


### 3.1.2 Promoting Quality Infrastructure Investment

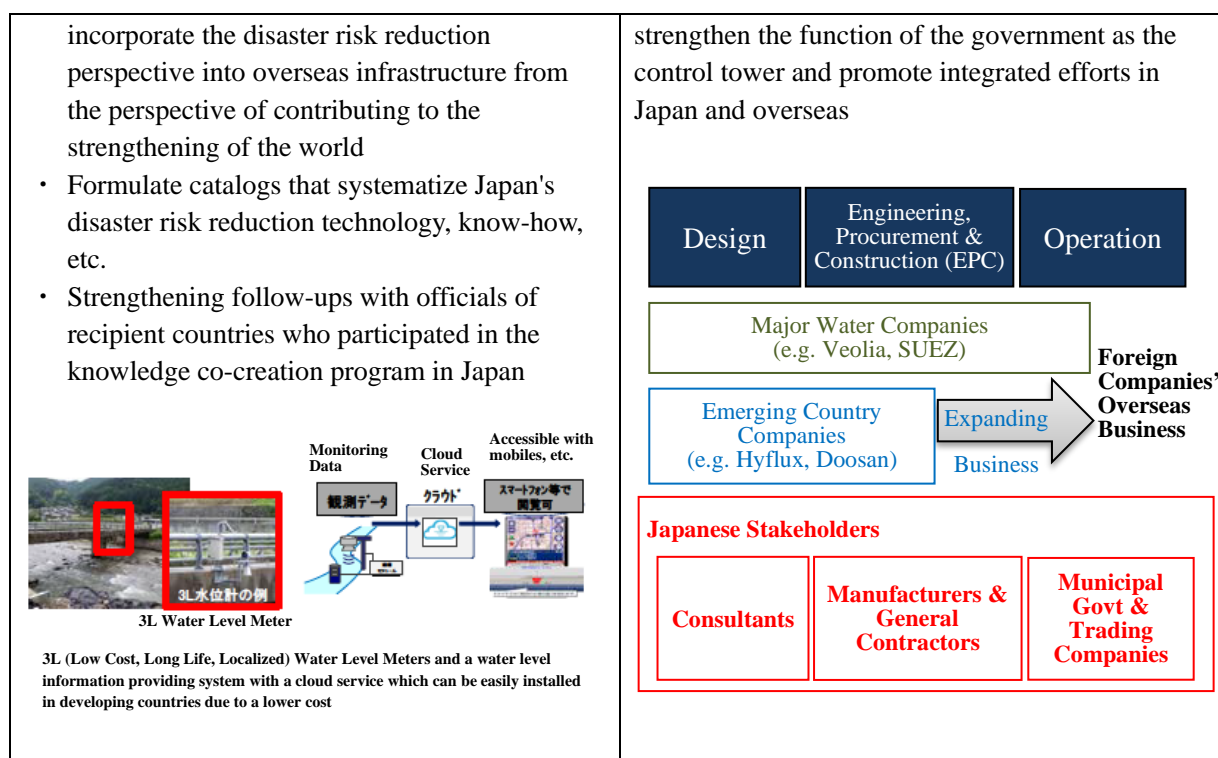
The global demand for developing infrastructure, especially in emerging countries, is huge, and rapid urbanization and economic growth are expected to further expand the market in the future. Therefore, Japanese government promotes quality infrastructure investment to respond to the overseas infrastructure demand and actively contribute to solutions for issues of international society by utilizing the technology, knowledge and know-how in which Japan has an advantage and collaboration between public and private sectors, which also contributes to realizing Japan's economic growth. The contents of quality infrastructure investment promotion are summarized in the following figure which is an excerpt from the document of the 43rd Management Council for Infrastructure Strategy.

## 3. Promotion of Quality Infrastructure

### (1) International standardization of quality infrastructure

- Lead the international standardization of quality infrastructure and contribute to sustainable economic and social development, in order to secure “openness”, “transparency”, “economic

<p>efficiency” and “debt sustainability of borrowing countries” etc. in infrastructure development, in accordance with the G20 principles for quality infrastructure investment and the Asia-Pacific Economic Cooperation (APEC) guidebook</p> <p><b>(2) Contribution to problem solving through the development of technologies and knowledge in Japan, demonstrations, research and development, etc.</b></p> <ul style="list-style-type: none"> <li>• Active use of technology, knowledge and know-how that Japan has an advantage in solving problems in the international community and partner countries, regardless of developing or developed countries</li> <li>• Promote efforts based on the international framework, overseas expansion of technologies such as decarbonization, energy saving, technology and know-how on disaster prevention/ water treatment and waste disposal. Promote research and development of new technologies, and implementation of those technologies.</li> <li>• Improve price competitiveness by customizing Japan's strengths to meet the needs of the counterpart country when socially implementing those technologies.</li> </ul>	
<p><b>Overseas development of low carbon and decarbonizing technology</b></p>	
<p><b>【Export expansion of renewable energy sector such as offshore wind】</b></p> <ul style="list-style-type: none"> <li>• Create “Loan Insurance for Green Innovation” in Nippon Export and Investment Insurance (NEXI), which increase the coverage rate for renewable energy projects such as offshore wind power</li> </ul> <p><b>【Carbon Capture, Utilization and Storage (CCUS) / carbon recycling】</b></p> <ul style="list-style-type: none"> <li>• Realize CCUS / carbon recycling to treat Carbon Dioxide (CO<sub>2</sub>) as resources, to capture it, and to reuse it as fuel and materials for compatibility of energy access improvement and global warming measure</li> </ul> <p><b>【Development of GHG emission reduction technology】</b></p> <ul style="list-style-type: none"> <li>• Develop and expand Japan's superior technologies, such as renewable energy and energy saving, through collaboration with developing countries using the Joint Crediting Mechanism (JCM) etc.</li> <li>• Use JCM in developing countries that do not have regulations for recovery and destruction of fluorocarbons, and support development of the regulations and introduction of the destruction facilities, etc.</li> </ul>	<p><b>【Realization of social implementation by customization】</b></p> <ul style="list-style-type: none"> <li>• Reduce the initial cost by subsidizing JCM, introduce high efficiency energy saving amorphous high efficiency transformer in Viet Nam</li> <li>• Life cycle cost is demonstrated, and a distribution company adopts it as the procurement standard</li> <li>• The core parts are made in Japan, and other parts production and assembly are localized to achieve lower prices.</li> <li>• Technology transfer from Viet Nam to the third country (e.g. Laos)</li> </ul> <div style="text-align: center;">  <p><b>Amorphous High Efficiency transformer</b></p> </div>
<p><b>Leading “Mainstreaming disaster risk reduction”, and overseas development of disaster prevention technology</b></p>	<p><b>Overseas development of water technology and know-how</b></p>
<ul style="list-style-type: none"> <li>• As Japan with a disaster prevention advanced country that compiles the Sendai Framework for Disaster Risk Reduction, it is highly meaningful in terms of diplomacy to</li> </ul>	<p>In order to respond to the packaging of a wide range of fields such as integrated maintenance and operation for water supply and sewage treatment, as well as integrated water resources management,</p>



Source: Unofficial English Translation of Excerpt handout documents for the 43rd Management Council for Infrastructure Strategy "the seventh follow up of infrastructure system export strategy" by JICA and JICA Study Team

<http://www.kantei.go.jp/jp/singi/keikyou/dai43/siryou1.pdf>

**Figure 3-1 Promotion of Quality Infrastructure**

### 3.1.3 G7 Ise-Shima Principles for Promoting Quality Infrastructure Investment

At the G7 Ise-Shima Summit held in 2016 to promote quality infrastructure investment advocated by the Japanese government, "G7 Ise-Shima principle for promoting quality infrastructure investment<sup>1</sup>" as annex to the Summit Declaration was issued. The principle states "reaffirming the crucial importance for stakeholders to work coherently to bridge the existing global demand-supply gap of infrastructure investment by promoting quality infrastructure investment so as to promote strong, sustainable and balanced growth and to enhance resilience in our society, we strive to align our own infrastructure investment with the stated principles." In principle 3, it states "quality infrastructure investment must consider the social and environmental impacts of infrastructure projects and duly address such impacts including by applying social and environmental safeguards that are in line with international best practices as reflected in the most relevant standards including those of existing MDBs," for addressing social and environmental impacts.

### 3.1.4 Trends of International Aid

The following is a brief summary of Sustainable Development Goals and the Paris Agreement as international aid trends related to the environmental and social safeguard policy.

<sup>1</sup> G7 Ise-Shima principle for promoting quality infrastructure investment <https://www.mofa.go.jp/files/000196472.pdf>

**(1) Sustainable Development Goals (SDGs)**

The Sustainable Development Goals (SDGs) were adopted as a successor to the Millennium Development Goals (MDGs, 2001) at the UN Summit in September 2015. The SDGs are the international goals from 2016 to 2030, described in the 2030 Agenda for Sustainable Development, and are consist of 17 goals and 169 targets for a sustainable world. Its 5 major principles for implementation include universality (taking actions by all countries including developed countries), inclusiveness (reflecting the idea of human security “no one will be left behind”), participatory approach (all stakeholders play their own roles), integrated approach (dealing with society, economy and environment), and transparency and accountability (following-up regularly).

**1) JICA's approach to SDGs**

JICA formulated the policy for all the 17 goals and committed to contributing to achieving the SDGs. JICA SDGs position paper<sup>1</sup> of September 12, 2016 states the three pillars of JICA's cooperation toward achieving the SDGs: namely, (1) JICA has been working for realizing “human security” and “quality growth” in order to contribute to peace, stability, and prosperity of the international community. The SDGs accelerate and promote this Japan's cooperation philosophy so that JICA will proactively contribute to achieving the SDGs through its leadership; (2) JICA will play a key role in achieving 10 goals [zero hunger, health, education, water/sanitation, energy, economic growth, industry/infrastructure, sustainable cities, climate actions, forests/biodiversity] of the 17 SDGs making use of Japan's own experience in socio-economic development of Japan and in development cooperation for the international community; and (3) JICA will ensure the impact of cooperation on the SDGs by utilizing Japan's own knowledge, introducing innovations and collaborating with local and international partners in order to accelerate the achievement of the SDGs.

**2) Efforts of WB and ADB to SDGs**

The WB is also involved in the development of the SDGs, and its "Implementing the 2030 Agenda-2018 Update"<sup>2</sup> states that the SDGs are consistent with WB Group's two goals: the end of poverty and the promotion of shared prosperity. In particular, WB has advocated “the end of extreme poverty” by 2030, and focuses on three areas: finance, data, and implementation support at the national level to achieve the SDGs.<sup>3</sup> Within the "Implementing the 2030 Agenda - 2018 Update", in terms of the finance, WB is utilizing internal resources, private resources, and developing tools to solve global public goods issues (including epidemic disease, forced displacement, and climate change) in order to increase the funding. For the data, WB is in charge of development, monitoring, and collecting of data for reviewing the SDGs, and is in charge of creating the SDGs Atlas and reporting on 17

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<sup>1</sup> JICA's Position Paper on SDGs: Toward Achieving Sustainable Development Goals (SDGs)  
[https://www.jica.go.jp/english/ir/bonds/c8h0vm0000awltie-att/bonds\\_01.pdf](https://www.jica.go.jp/english/ir/bonds/c8h0vm0000awltie-att/bonds_01.pdf)

<sup>2</sup> “Implementing the 2030 Agenda - 2018 Update (WB, 2018)”,  
<http://pubdocs.worldbank.org/en/893311531748303554/2030Agenda-2018Update-July-19.pdf>

<sup>3</sup> Sustainable Development Goals (SDGs) and The 2030 Agenda, <http://www.worldbank.org/en/programs/sdgs-2030-agenda#1>

goals in the Inter-Agency Expert Group on the SDG Indicators. As for the implementation support at the national level, in order to support an integrated analysis of the SDGs and the financial framework, WB published "Trajectories for Sustainable Development Goals: Framework and Country Applications" and supports development of policy framework and financial policy.

ADB has a website entitled "ADB and the SDGs."<sup>1</sup> In this website, it is stated that the operations of ADB are linked with the SDGs from 2016 to improve the monitoring of contribution to the SDGs. The site also includes efforts to identify investment projects for achieving the SDGs in the counterpart countries, and to work with partners such as the UN system, MDBs, civil society, experts and the private sector<sup>2</sup>. In addition, in November 2017, "ADB's Transitional Results Framework, 2017 - 2020" along the SDGs were formulated.

## **(2) The Paris Agreement**

As the framework which promised that for the first time in history all of the country is working to reduce greenhouse gas emissions, the Paris Agreement was adopted in UNFCCC 21st Conference of Parties (COP21), which was held in Paris, France until December 13 from November 30, 2015.

Under the Paris Agreement, as a universal long-term reduction target, it stipulates that the temperature rise from before the industrial revolution be suppressed to less than 2°C, and it mentions the continuation of efforts for suppression to 1.5°C. It says "In order to achieve the long-term temperature goal set out in Article 2, Parties aim to reach global peaking of greenhouse gas emissions as soon as possible, recognizing that peaking will take longer for developing country Parties, and to undertake rapid reductions thereafter in accordance with best available science, so as to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century, on the basis of equity, and in the context of sustainable development and efforts to eradicate poverty"<sup>3</sup> Under the Agreement, (1) all parties, including major emitters and developing countries, will prepare Nationally Determined Contributions (NDCs) and pursue domestic mitigation measures to achieve them and continue to submit NDCs every five years with more ambitious targets; (2) all parties will also report regularly on their activities and the information submitted will undergo a technical expert review, and based on the review; (3) there will also be a global stocktake every five years to assess the collective progress towards achieving the purpose of the Agreement.

Additionally, in October 2018, Intergovernmental Panel on Climate Change (IPCC) published a special report on Global Warming of 1.5°C. The report warns that human activities have caused approximately 1.0°C of global warming above pre-industrial levels, and the warming is likely to reach 1.5°C between 2030 and 2052 if the current trend continues. The report urges that rapid and

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<sup>1</sup> "ADB and the Sustainable Development Goals", <https://www.adb.org/site/sdg/main>

<sup>2</sup> "ADB and the Sustainable Development Goals", <https://www.adb.org/site/sdg/main>

<sup>3</sup> Paris Agreement Article 4 Paragraph 1, <https://www.mofa.go.jp/mofaj/files/000197313.pdf>

far-reaching transitions in energy, land, urban and infrastructure (including transport and buildings), and industrial systems (high confidence) is needed and global net human-induced CO<sub>2</sub> emissions must reach net zero at around 2050 to limit global warming to 1.5°C.

The Japanese government has expressed the "Actions for Cool Earth 2.0 (ACE 2.0)" including the financial support of 1,300 billion yen for both the public and private sectors to climate change assistance in developing countries in 2020.

In addition, "the long-term strategy under the Paris agreement"<sup>1</sup> has been approved by the Cabinet of the Government of Japan on June 11, 2019. In this strategy, as a long-term vision, "proclaiming a "decarbonized society" as the ultimate goal and aiming to accomplish it ambitiously as early as possible in the second half of this century, Japan will boldly take measures towards the reduction of GHGs emissions by 80% by 2050. To achieve this, according to the strategy, Japan will realize "a virtuous cycle of environment and growth" towards the vision with business-led disruptive innovation, start swift implementation of actions from now, and take actions for contribution to the world and a bright society with hope for the future.

JICA issued a position paper on climate change<sup>2</sup> in September 2016. The position paper expresses that JICA will further expand its climate change cooperation to developing countries based on the Paris Agreement, and indicates that it will actively disseminate information domestically and internationally.

## **3.2 Changes after the Enforcement of Current JICA GL**

### **3.2.1 Responsibility of JICA**

To consider JICA's potential requirements for investment projects in the private sector, the following sections describe the requirements for investment project of WB, ADB and IFC including respective original paragraphs. Additionally, regulations and the necessary procedures in case of non-compliance of the SGPs of the selected organizations are also summarized.

#### **(1) Responsibility for Investment Projects**

WB: ESF is applicable to the Investment Project Financing, such as loans and guarantees provided by International Bank for Reconstruction and Development (IBRD) and International Development Association (IDA) (ESF, World Bank Environmental and Social Policy for Investment Project Financing, Footnote 3, OP 10.00). WB Group's private sector options are provided via Multilateral Investment Guarantee Agency (MIGA) and IFC and not by WB. As for the ESF contents, the details

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<sup>1</sup> Outlines of Japan's Long-term Strategy under the Paris Agreement <https://www.env.go.jp/press/111914.pdf>

<sup>2</sup> "Position Paper on Climate Change (September 2016)"

[https://www.jica.go.jp/activities/issues/climate/ku57pq00002cucus-att/position\\_paper\\_climate.pdf](https://www.jica.go.jp/activities/issues/climate/ku57pq00002cucus-att/position_paper_climate.pdf), "JICA Climate Change Cooperation Strategy (September 2016)" [https://www.jica.go.jp/english/our\\_work/climate\\_change/c8h0vm00005rzclb-att/strategy\\_01.pdf](https://www.jica.go.jp/english/our_work/climate_change/c8h0vm00005rzclb-att/strategy_01.pdf)

are separately discussed in Section 3.3.1 Current Status and Trend of MDBs' SGPs of this report.

This Environmental and Social Policy for Investment Project Financing sets out the mandatory requirements of the Bank in relation to the projects it supports through Investment Project Financing. Investment Project Financing is comprised of Bank Loans and Bank Gurantees, as defnied in OP 10.00.

*Purpose, and Footnote 3, World Bank Environmental and Social Policy for  
Investment Project Financing, WB ESF*

**ADB:** SPS 2009 is applicable to all the ADB-financed and/or ADB-administered sovereign and non-sovereign projects including loans, grants, investment and guarantees (para 48, SPS). For the contents of ADB SPS, please refer to Section 3.3.1 Current Status and Trend of MDBs' SGPs of this report.

48. This safeguard policy statement applies to all ADB-financed and/or ADB-administered sovereign and non-sovereign projects, and their components regardless of the source of financing, including investment projects funded by a loan; and/or a grant; and/or other means, such as equity and/or guarantees (hereafter broadly referred to as projects).

*p. 15, Para 48, V. SAFEGUARD POLICY STATEMENT  
A. Overarching Statement on ADB's Commitment and Policy Principles  
ADB SPS (2009)*

**IFC:** IFC PS is applied to various projects including loans for the project, FI, investment in the project company but which have the medium or high environmental and social risks or any environmental and social impacts are identified (para3, Policy on Environmental and Social Sustainability, 2012). As for of IFC PS, please refer to Section 3.3.1 Current Status and Trend of MDBs' SGPs of this report.

3. Activities supported and financed by IFC include a wide range of investment and advisory products. Investment products with longer tenor include: (i) direct lending to private sector companies (including corporate and project finance); (ii) lending to various types of FIs as well as through funds and facilities; **(iii) minority equity stakes in companies, including in financial institutions;** and (iv) guarantee facilities, municipal finance, as well as investments managed by IFC's Asset Management Company or any other IFC subsidiary. Investment products with shorter tenor include short-term loans, guarantees, and trade finance products, with maturities of up to three years. **Proposed investments that are determined to have moderate to high levels of environmental and/or social risk, or the potential for adverse environmental and/or social impacts will be carried out in accordance with the requirements of the Performance Standards.**

*para 3, IFC Policy on Environmental and Social Sustainability*

(The bold font was added by JICA Study Team)

## (2) Regulations in Case of Non-Compliance

ADB: para 72 of SPS says that if the borrower/client fails to comply with legal agreements on safeguard requirements and to reestablish compliance, ADB may exercise legal remedies that are available under ADB legal agreements. However, the SPS does not differentiate requirements for loan projects and for equity investment projects, and there is no separate requirement specifically for equity investment projects.

### C. Roles and Responsibilities

72. If a borrower/client fails to comply with legal agreements on safeguard requirements, including those described in the safeguard plans and frameworks, ADB will seek **corrective measures and work with the borrower/client to bring it back into compliance.** If the borrower/client fails to reestablish compliance, then ADB **may exercise legal remedies, including suspension, cancellation, or acceleration of maturity, that are available under ADB legal agreements.** Before resorting to such measures, ADB uses other available means to rectify the situation satisfactory to all parties to the legal agreements, including initiating dialogue with the parties concerned to achieve compliance with legal agreements.

*p. 26, ADB SPS (2009)*

(The bold font was added by JICA Study Team)

**IFC:** para 24 of Policy on Environmental and Social Sustainability states “if the client fails to comply with its environmental and social commitments and to reestablish compliance, IFC will exercise its rights and remedies, as appropriate”. However, it does not differentiate requirements for loan projects and for equity investment projects, and there is no separate requirement specifically for equity investment projects.

24. IFC’s agreements pertaining to the financing of clients’ activities include specific provisions with which clients undertake to comply. These include complying with the applicable requirements of the Performance Standards and specific conditions included in action plans, as well as relevant provisions for environmental and social reporting, and supervision visits by IFC staff or representatives, as appropriate. If the client fails to comply with its environmental and social commitments as expressed in the legal agreements and associated documents, IFC will work with the client to bring it back into compliance, and if the client fails to reestablish compliance, IFC will exercise its rights and remedies, as appropriate.

*Para 24, IFC Policy on Environmental and Social Sustainability*

Additionally, IFC’s Access to Information Policy (AIP) (January 1, 2012) and ADB’s AIP (September 2018) have no separate requirements and responsibilities specifically for equity investment projects.

### 3.2.2 JICA’s New Assistance Program Started after the JICA GL Enforcement in 2010

After the current GL’s enforcement in 2010, there are some new assistance programs which are started or to be started, namely private-sector investment finance, support for Japanese SMEs and SDGs businesses, and projects funded by the Green Climate Fund (GCF). Since the private-sector investment finance is included in the official development assistance loans, the GL are applied as defined in Section 1.7 Covered Schemes of the GL. On the other hand, projects for promoting SMEs and SDGs businesses and projects funded by the GCF are not included in the “covered schemes” in the GL.

The outline of the private-sector investment finance and support for SMEs and SDGs businesses are described briefly in the following table. The projects to be financed by the GCF are a newly added scheme and there is no accepted project as of this report. Therefore, they are not included in the following table.

**Table 3-2 Outline of PSIF and Support for SMEs and SDG Businesses**

Scheme <sup>1)</sup>	Objective <sup>1)</sup>	Description
PSIF	Providing direct investment or loans to the project with a large development impacts financed by the private sector	Loan Amount/Percentage <sup>2)</sup> : in principle, up to 70% of the total project cost. Could be increased to 80% if it is justified (special project characteristics will be considered).

Scheme <sup>1)</sup>		Objective <sup>1)</sup>	Description
			Investment Amount/Percentage <sup>2)</sup> : in principle, 50% or less than 50% of the capital (in case of the company belongs to the recipient country, 25% or below). Additionally, JICA will not be the largest investor. It is also possible to assist the project via a fund.
Support for SMEs and SDG Businesses	Promotion Survey	Collection and analysis of basic information related to the project (approx. 1 year)	Only for SMEs <sup>3)</sup> : Up to 8.5 million yen. In case of the distance areas which is other areas besides East Asia, Southeast Asia and South Asia, the international airfare will be upto 3 million yen, other direct expenses upto 6.8 million yen.
	Feasibility Survey	Feasibility survey on the technology, products and know-how to be promoted and drafting the business model (approx. several months to 1 year)	SMEs <sup>4)</sup> : up to 30 million yen. If shipping of the equipment (excluding small equipment) is required, could be increased to 50 million yen. SDG Business (large scale company only): up to 8.5 million yen.
	Verification Survey	Verifying the technology/products to be promoted and the business model. Preparing the draft business plan through promotion activities (approx. 1-3 years)	SMEs <sup>5)</sup> : up to 100 million yen/project. If it is to solve complicated issues or involves a large product or high technology, up to 150 million yen. SDG Business (large scale company only) <sup>6)</sup> : up to 50 million yen.

Source: Prepared by JICA Study Team based on the following information

- 1) Assistance Menu of Private Sector Investment Finance (Japanese only)  
([https://www.jica.go.jp/priv\\_partner/activities/index.html](https://www.jica.go.jp/priv_partner/activities/index.html))
- 2) FAQs for Private Sector Investment Finance (Japanese only)  
([https://www.jica.go.jp/activities/schemes/finance\\_co/loan/faq.html](https://www.jica.go.jp/activities/schemes/finance_co/loan/faq.html))
- 3) Promotion Survey (Support for SMEs) (Japanese only)  
([https://www.jica.go.jp/priv\\_partner/activities/smebmfs/index.html](https://www.jica.go.jp/priv_partner/activities/smebmfs/index.html))
- 4) Feasibility Survey (Support for SDGs business) (Japanese only)  
([https://www.jica.go.jp/priv\\_partner/activities/sdgsbmfs/index.html](https://www.jica.go.jp/priv_partner/activities/sdgsbmfs/index.html))
- 5) Verification Survey (Support for SMEs) (Japanese only)  
([https://www.jica.go.jp/priv\\_partner/activities/smebvs/index.html](https://www.jica.go.jp/priv_partner/activities/smebvs/index.html))
- 6) Verification Survey (Support for SDGs business) (Japanese only)  
([https://www.jica.go.jp/priv\\_partner/activities/sdgsbvs/index.html](https://www.jica.go.jp/priv_partner/activities/sdgsbvs/index.html))

## (1) PSIF

PSIF covers 3 areas, namely infrastructure/acceleration of growth, SDG/poverty reduction and climate change, and the accepted projects are listed in the following table. The agreements for 24 investment finance projects were signed between 2011 and December 2018 and ranges from small scale non-infrastructure projects (e.g. human resource development for industries, microfinance, coffee value chain, climate change related fund) to various infrastructure projects (e.g. industrial estates, ports, a combined cycle power plant project). Environmental category of these project varies from A to C and FI. The PSIF is subject to apply the JICA GL since it is a part of the ODA loans.

**Table 3-3 PSIF Projects upto December 2018**

No.	Signed Date	Country	Project	Environmental Category
1	September 2018	Brazil	Agricultural Supply Chain Enhancement Project	FI
2	July 2018	Bangladesh	East-West Medical College Hospital Project	C
3	May 2018	Viet Nam	Coffee Value Chain Enhancement Project	B
4	December 2017	Jordan	Al-Muwaqqar Solar Energy Project	B

No.	Signed Date	Country	Project	Environmental Category
5	December 2017	Indonesia	Renewable Energy and Infrastructure Acceleration Facilities	FI
6	August 2017	Myanmar	Thilawa Special Economic Zone (Zone B Phase 1) Development Project (Private Sector Investment Finance)	A
7	June 2017	Bangladesh	Maheshkahali LNG Floating Storage Re-gasification Unit Terminal Activities Project	B
8	June 2017	Philippines	Non-Revenue Water Improvement Project in the West Zone of Metro Manila	B
9	May 2017	Cambodia	Sihanoukville Autonomous Port IPO	B
10	May 2017	Bangladesh	Sirajganj Combined Cycle Power Plant Project	A
11	October 2016	Tanzania	Off-Grid Solar Power Project	C
12	September 2016	Mongolia	Tsetsii Wind Farm Project	B
13	September 2016	ASEAN countries and the other Asian countries	Japan ASEAN Women Empowerment Fund (Investment project under the Private Sector Investment Finance)	C
14	April 2016	Middle East and North Africa countries and region	Middle East and North Africa Fund (Investment project under the Private Sector Investment Finance)	FI
15	May 2016	Asian Countries	Leading Asia's Private Infrastructure Fund	FI
16	December 2015	Asian Countries	Asia Climate Partners LP (Investment project under the Private Sector Investment Finance)	FI
17	August 2015	Viet Nam	Rental Factory Development Project for SMEs (Loan Project under the Private Sector Investment Finance)	B
18	June 2015	Cambodia	Emergency Life Saving Center Development Project	C
19	November 2014	Latin American Countries	MGM Sustainable Energy Fund LP (Investment project under the Private Sector Investment Finance)	FI
20	April 2014	Myanmar	Thilawa Special Economic Zone (Class A Area) Development Project (Private Sector Investment Finance)	A
21	May 2014	Indonesia	Industrial Human Resource Development Project	C
22	January 2013	Viet Nam	Rental Factory Development Project for SMEs	B
23	May 2012	Pakistan	Microfinance project in Pakistan (Investment project under the Private Sector Investment Finance)	C
24	December 2011	Viet Nam	Industrial Human Resources Development Project	C

Source : Prepared by JICA Study Team based on the following document.

1. Private-Sector Investment Finance

([https://www.jica.go.jp/activities/schemes/finance\\_co/loan/resumption.html](https://www.jica.go.jp/activities/schemes/finance_co/loan/resumption.html))

## (2) Support for SMEs and SDGs Businesses

Support for SMEs and SDGs Businesses consists of SME assistance for SMEs and SDGs business for large enterprises. The SME support includes the promotion survey, feasibility survey and verification survey. The SDGs business support includes the feasibility survey and verification survey.

**(3) Support for SME/SDGs Business (Support for SMEs)**

Support for SMEs consists of 3 survey types, and the project duration varies from 3 months to 3 years. The budget also varies from JPY8.5 to 150 million. Operationally, the JICA GL are applied to these projects except the promotion survey. Major project sectors are environment/energy, waste management, water purification/treatment, vocational training/industrial promotion, welfare, agriculture, public health/medical service, education, and disaster prevention/management. The SME support projects accepted by JICA and its environmental category are described in Table 3-4.

(a) Promotion survey: Since the number of accepted projects in recent years is 17-26 projects annually, only projects announced in FY2018 are summarized in the following table. However, since this scheme is to collect the information and does not aim the feasibility study, operationally, the JICA GL are not applicable for this scheme.

**Table 3-4 Support for SME/SDGs Business (1) Promotion Survey (SME Support)**  
**(Announced on 16th April 2018)**

No.	Country	Proposing Enterprises (representative)	Project Name
1	Indonesia	Hokkaido Poracon Co., Ltd.	Survey on Introducing Porous Concrete Products for Prevention of Damage to Infrastructure by Expansive Clays (SME Partnership Promotion)
2	Philippines	Zen Co., Ltd Japan Prolong Limited Company	Survey on Introducing Concrete Repairing Material for Preventing Water Leakage in Philippine (SME Partnership Promotion)
3	Philippines	Berg Earth co., Ltd	Survey on Grafted Seedlings Business for High-Quality-Yield Vegetables in Philippine (SME Partnership Promotion)
4	Cambodia	West Management Co., Ltd.	Survey on Distributing and Utilizing of Japanese Small Second-Hand Construction Machineries Supporting Construction Infrastructure in Cambodia (SME Partnership Promotion)
5	Viet Nam	Grandsoul Research Institute for Immunology	Survey on Improving the Quality of Cancer Care (SME Partnership Promotion)
6	Viet Nam	Green Techno 21	Survey on Organic Lime Fertilizer Project utilizing Waste Eggshell in Viet Nam(SME Partnership Promotion)
7	Viet Nam	Kotobuki Kankyoh Kizai Co., Ltd.	Survey on Water Treatment System of Lakes and Ponds in Viet Nam(SME Partnership Promotion)
8	Myanmar	Nakashima Special Steel / Metalnics Co., Ltd.	Basic survey on local development of special metal molds utilizing high quality special steel (SME Partnership Promotion)
9	Mongolia	Yamaguchi Sangyou Co., Ltd.	Survey on Mongolian Leather Branding based on the RUSSETY Tanning Method in Mongolia (SME Partnership Promotion)
10	Tanzania	Studio Canbe Corp	Survey on Effective Delivery of Bus Rapid Transit Service through Mobile App in Tanzania (SME Partnership Promotion)
11	Zambia	Alpha Kogyo K.K	Survey on Bridge Repair Utilizing Epoxy Resin in Zambia (SME Partnership Promotion)
12	Burkina Faso	Koken Boring Machine Co., Ltd.	Survey on Groundwater Development of Dry area in Burkina Faso (SME Partnership Promotion)
13	Senegal	Stella Environment Corporation	Survey on the Effectiveness of Small-Scale Incinerator for the Healthcare Wastes in the semi-decentralized in Senegal (SME Partnership Promotion)

Source: Prepared by JICA Study Team based on the following information.

List of Accepted Projects under Support for Japanese SMEs Overseas Business Development FY2018 (1) – Promotion Surveys (16 April 2018): [https://www.jica.go.jp/announce/notice/fs/ku57pq000027tajl-att/fs\\_180814\\_result.pdf](https://www.jica.go.jp/announce/notice/fs/ku57pq000027tajl-att/fs_180814_result.pdf)

Additionally, accepted projects under Support for Japanese SMEs Overseas Business Development before FY2017 are available on the below link – Promotion Surveys (SMEs):

[https://www.jica.go.jp/priv\\_partner/activities/fs/index.html](https://www.jica.go.jp/priv_partner/activities/fs/index.html)

(b) Feasibility Survey for SME Support: Although the projects are not the cooperation assistance applying the JICA GL, operationally the GL have been applied to the projects since the projects include a feasibility survey. Since recently the number of the feasibility surveys is approx. 20-36 projects annually, only the projects announced in FY2018 are summarized in the following table. Mostly the projects are classified as environmental category C.

**Table 3-5 Support for SME/SDGs Business (2) Feasibility Survey (SME Support)**  
(Announced on 16th April 2018)

No.	Country	Proposing Enterprises (representative)	Project Name	Environmental Category
1	Indonesia	Nakazato Construction Co., Ltd.	Feasibility Survey for Cleaning of Urban Water Supply Pipes to Improve Water Quality and Supply Capacity in Indonesia	C
2	Indonesia	Ishibashi Co., Ltd.	Feasibility Survey for Creating Supply Chain of Organic Wastes Recycling in Indonesia	C
3	Philippines	Takara Co., Ltd.	Feasibility Survey for increasing garlic production and producing processed black garlic for improvement of livelihood in the Philippines	C
4	Thailand	Mikiriken Industrial Co.,Ltd.	Feasibility Survey for Decolorization of Dyeing Waste Water by Microorganism in Thailand	C
5	Thailand	Nakamura Shobokagaku Co., Ltd.	Feasibility Survey for an Application of Multi-functional Fire Fighting Pump to Mitigate Forest Fire and Haze in Chiang Mai, Thailand	C
6	Cambodia	Takii & Co.,Ltd	Feasibility Survey for Quality Seed and Grafting Method for High Value-Added Vegetable Farming in Cambodia	C
7	Laos	Sanko Construction Co., Ltd. Okayama Concrete Industry Co., Ltd.	Feasibility Survey for Durable Road Construction by Utilizing Precast Concrete in Laos	B
8	Laos	Negoro Sangyo Co.,Ltd	Feasibility Survey for Producing Regenerated Raw Materials from Waste PET Bottles in Laos	C
9	Viet Nam	Suzuken Kogyo Co.,Ltd	Feasibility Survey for Reducing the Amount of Construction Waste by Safety and Efficient Sorting and Separation System in Viet Nam	C
10	Viet Nam	Nakashima Bussan Co., Ltd.	Project survey on improving shrimp farming productivity through natural harmonized aquaculture technology	C
11	Myanmar	OKAMURA Co., Ltd.	Feasibility Survey for Advanced Johkasou Introduction to Hospitals, Markets etc. in Poor South Delta Area for Water Sanitation Improvement	C
12	Myanmar	Harue Co., Ltd.	Feasibility Survey for System Introduction on Collection, Transportation and Incineration of Medical Waste for the Preparation of Private Consignment in Yangon, Myanmar	B
13	Myanmar	Merry Time Foods Co., Ltd., Higashimaru Co., Ltd.	Feasibility Survey for Shrimp Hatchery Technologies in Myanmar	B
14	Mexico	Asada Corporation	Feasibility Survey for the Reduction of Seashell Waste by High-performance Small Incinerator and the Recycling of Incineration Residues for Agriculture, Fisheries, Animal Husbandry in Mexico	B
15	Mexico	Kuroda Industry Co., Pantech Co.,	Feasibility Survey for Recycling Technology for Agricultural Film and Plastic in Mexico	C
16	Nicaragua	βace,Inc.	Feasibility Survey for the Cacao Value Chain	C

No.	Country	Proposing Enterprises (representative)	Project Name	Environmental Category
			Development and Value Addition in Nicaragua	
17	Peru	Lequios Soft Inc.	Feasibility Survey for Disaster Prevention by Japanese Early Earthquake Warning System in Peru	C
18	Kenya	Tomita Technologies Ltd.	Feasibility Survey for establishing a production site of horticultural crops with hydroponics in Northern Corrido in Kenya	C

Source: Prepared by JICA Study Team based on the following information.

List of Accepted Projects under Support for Japanese SMEs Overseas Business Development FY2018 (1) – Feasibility Surveys (16 April 2018): [https://www.jica.go.jp/priv\\_partner/activities/smebmfs/index.html](https://www.jica.go.jp/priv_partner/activities/smebmfs/index.html)

Additionally, accepted projects under Support for Japanese SMEs Overseas Business Development before FY2017 are available on the below link – Feasibility Surveys (SMEs):

[https://www.jica.go.jp/priv\\_partner/activities/fs/index.html](https://www.jica.go.jp/priv_partner/activities/fs/index.html)

(c) Verification Survey for SME Support: Although the project is not the cooperation assistance applying the JICA GL, operationally the GL have been applied to the project since the project has a possibility to have environmental and social impacts. Since recently the number of the verification surveys is approx. 16-19 projects annually, the projects that the agreements were signed in the 1st and 2nd quarters of FY2018 are summarized in the following table. The projects are classified as environmental category C except 1 project.

**Table 3-6 Support for SME/SDGs Business (3) Verification Survey (SME Support)**  
(Announced on 16th April 2018)

No.	Country	Proposing Enterprises (representative)	Project Name	Environmental Category
1	Viet Nam	Naniwa Flower Auction Co., Ltd.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Value Added Cut Flower in Lam Dong Province, Viet Nam	C
2	Viet Nam	J Files Co., Ltd.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for the Advanced Waste Water Treatment System Suited for High BOD	B
3	Viet Nam	Watakyu Seimoa Corporation.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Linen Supply for Improving Hygienic Environment in Public Hospitals in Viet Nam	C
4	Viet Nam	Fe System Work Corporation.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Improving Agricultural Processing and Product Development Capacity through Inter-City Collaboration between Asahikawa City and Quang Ninh Province in Viet Nam	C
5	Myanmar	Lead Giken	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Electric Assist Bicycle in Myanmar	C
6	Mongolia	Toitu Co., Ltd.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Introducing Cardiotocography and Central Monitor System for Improving Prenatal Care in Mongolia	C
7	India	Uotani Co., Ltd.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for the Improvement of Productivity and Quality of Sugarcane through Sugarcane Harvester in India	C
8	Mexico	Ocean Construction Co., Ltd	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Sustainable Fishery with Using Shellnurse in Mexico	C
9	Mexico	Kanepackage Co., Ltd.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Promoting	C

No.	Country	Proposing Enterprises (representative)	Project Name	Environmental Category
			further development in Packaging Industry as a Supporting Industry for Automobile Industry	
10	Ecuador	Astem Co., Ltd.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Information Infrastructure for Safety and Security of Persons with Inadequate Access to TV Broadcasting	C
11	Morocco	Eco-stage Engineering Co., Ltd.,	Verification Survey with the Private Sector for Disseminating Japanese technologies for Recycling of Olive Mill Waste by use of Oil Temperature Decompression Drying Machine	C
12	Kenya	KJS Company	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Establishment of e-Learning System for improvement in Quality of Education in Kenya	C
13	South Africa	Hayashi Soji Co., td.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Preventing Railway Track Accident	C
14	Tanzania	Tsuji Plastics Inc.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Improving Night-time Road Safety through Application of Solar-powered Active Road Studs in Tanzania	C
	Senegal	Teral Inc.	Verification Survey with the Private Sector for Disseminating Japanese Technologies for Upgrading and Expanding Small Water Supply Source with AC and DC Powered Solar Pump Systems in Rural Area	C

Source: Prepared by JICA Study Team based on the following information.

1. List of Accepted Projects under Support for Japanese SMEs Overseas Business Development FY2018 (1) – Pilot Surveys (16 April 2018): [https://www.jica.go.jp/announce/notice/teian/ku57pq000027bez-att/teian\\_180814\\_result.pdf](https://www.jica.go.jp/announce/notice/teian/ku57pq000027bez-att/teian_180814_result.pdf)
  2. Information Disclosure under new Guidelines: [https://www.jica.go.jp/english/our\\_work/social\\_environmental/id/index.html](https://www.jica.go.jp/english/our_work/social_environmental/id/index.html)
- Additionally, accepted projects under Support for Japanese SMEs Overseas Business Development before FY2017 are available on the below link –Pilot Surveys (SMEs):
3. Pilot Surveys (SMEs): [https://www.jica.go.jp/priv\\_partner/activities/smebvs/index.html](https://www.jica.go.jp/priv_partner/activities/smebvs/index.html)

#### (4) Support for SME/SDGs Business (Support for SDG Business)

Support for SDG Business was a newly established scheme in July 2018 and so far no accepted projects as of December 2018. Since projects might have a feasibility survey or environmental and social impacts, operationally, the JICA GL are applied to the projects. The previous 2 support programs, namely (1) Feasibility Survey for SDGs Business and (2) Collaboration Program with the Private Sector for Disseminating Japanese Technology also applied the JICA GL operationally, although they were not the cooperation assistance which were covered by the JICA GL. These two previous support programs where the agreement were signed in the 1st and 2nd quarters of FY2018 are summarized in the following table. All the projects are classified as environmental category C.

**Table 3-7 Previous Support Projects which are Classified as Support for SDGs**

No.	Announcement Date	Country	Proposing Enterprises (representative)	Project	Environmental Category	No. of SDGs to be Achieved
Feasibility Survey for SDGs Business (Currently classified as SDGs Business)						
1	8th April 2018	Indonesia	Teijin Frontier Co., Ltd. ,	Feasibility Survey for SDGs Business on Mosquito Repellent Clothing Production and Sales to Prevent Dengue Fever	C	3

No.	Announcement Date	Country	Proposing Enterprises (representative)	Project	Environmental Category	No. of SDGs to be Achieved
2	8th April 2018	Myanmar	Alps Pharmaceutical Ind. co., Ltd.	Feasibility Survey for SDGs Business on Senna Production and Processing to Improve the Income of Small-Scale Farmers	C	10
3	8th April 2018	Myanmar	Sompo Risk Management & Health Care Inc.	Feasibility Survey for SDGs Business on Development and Dissemination of Loan-Incidental Insurance Products to Improve the Access to Finance in Rural Areas	C	1,13
4	8th April 2018	Bangladesh	Ichiban Life Corporation	Feasibility Survey for SDGs Business on Moringa Production, Processing and Marketing to Improve the Income of Farmers	C	10
5	8th April 2018	South Africa	Remote Sensing Technology Center of Japan	Feasibility Survey for SDGs Business on Dissemination of Agricultural Information Services to Improve Agricultural Productivity by Using Satellite-Based Data	C	2,13
6	8th April 2018	Burkina Faso	Fuji Oil Holdings Inc.	Feasibility Survey for SDGs Business on Establishing Soybean Food Value Chain to Improve Nutrition and Increase Women's Income	C	2,5
<b>Collaboration Program with the Private Sector for Disseminating Japanese Technology</b>						
7	14th May 2018	Indonesia	OPTiM Corporation	Collaboration Program with the Private Sector for Disseminating Japanese Technology for Remote Work Assisting Service	C	—
8	14th May 2018	Cambodia	Nichireki Co.,Ltd.	Collaboration Program with the Private Sector for Disseminating Japanese Technology for In-place Base Course Stabilization System for Solid Pavement	C	—
9	14th May 2018	Viet Nam	Michinori Holdings, Inc.	Collaboration Program with the Private Sector for Disseminating Japanese Technology for Bus Management and Operation Know-how	C	—
10	14th May 2018	Nepal	Nikken Sohonsa Corporation	Collaboration Program with the Private Sector for Disseminating Japanese Technology for Environment-friendly Slope Restoration with Soil Algae	C	—

No.	Announcement Date	Country	Proposing Enterprises (representative)	Project	Environmental Category	No. of SDGs to be Achieved
11	14th May 2018	Kenya	Kaneka Corporation	Collaboration Program with the Private Sector for Disseminating Japanese Technology for PHBH Compound Based Bio-degradable Plastic Bags	C	—
12	14th May 2018	Kenya	Wellthy Corporation	Collaboration Program with the Private Sector for Disseminating Japanese Technology for Treatment of Seasonally Varying Highly Turbid Water	C	—

Source: Prepared by JICA Study Team based on the following information.

1. Feasibility Survey for SDGs Business:

[https://www.jica.go.jp/announce/notice/bop/ku57pq000027nsw1-att/result\\_01\\_20180406.pdf](https://www.jica.go.jp/announce/notice/bop/ku57pq000027nsw1-att/result_01_20180406.pdf)

2. Project for promotion of private technology for social and economic development of development countries

[https://www.jica.go.jp/announce/notice/kaihatsu/ku57pq000028izy0-att/result\\_20180514.pdf](https://www.jica.go.jp/announce/notice/kaihatsu/ku57pq000028izy0-att/result_20180514.pdf)

## (5) Entrustment by the Green Climate Fund

In 2017, JICA was accredited as an implementing entity of GCF and is implementing GCF funded projects as per para 3, Chapter 13, the Act of the Incorporated Administrative Agency - Japan International Cooperation Agency. Currently, some proposals to be submitted to GCF are being prepared but are not yet accepted. It is expected that the JICA GL will be applied to the entrusted projects by GCF.

## 3.3 Summary of MDBs' SGPs

### 3.3.1 Current Status and Trend of MDBs' SGPs

#### (1) Overview of MDBs' SGPs

Structures of SGPs, Guidance Notes (GN) and relevant documents of the WB, ADB and IFC are summarized below. In addition to the documents listed in the table, these MDBs also prepare and publish safeguards-related evaluation reports, case studies and reports on specific topics.

**Table 3-8 Summary of MDBs' SGPs**

Document	WB	ADB	IFC
Policy	ESF (2016): The ESF sets out the WB's commitment to sustainable development through a Bank Policy and 10 ESSs. The ESF consists of i) a Vision for Sustainable Development; ii) WB Environmental and Social Policy for Investment Project Financing (the mandatory requirements that apply to the Bank; and iii) ESSs (the mandatory requirements for the	SPS (2009): The SPS describes common objectives of ADB's safeguards, lays out policy principles, and outlines the delivery process for ADB's SGP. Appendix 1 to 4 articulate specific safeguard requirements for the borrower/ client, which are: - 1. Environment - 2. Involuntary Resettlement	Sustainability Framework (Updated in 2012): The Framework articulates IFC's strategic commitment to sustainable development and is an integral part of approaches for risk management. The Framework consists of i) the Policy on Environmental and Social Sustainability; ii) the PS; and iii) the AIP.  The PSs are:

Document	WB	ADB	IFC
	<p>borrowers and the projects). The ESF was approved in 2016 and took effect in 2018.</p> <p>The ESSs are:</p> <ul style="list-style-type: none"> <li>- ESS1: Assessment and Management of Environmental and Social Risks and Impacts</li> <li>- ESS2: Labor and Working Conditions</li> <li>- ESS3: Resource Efficiency and Pollution Prevention and Management</li> <li>- ESS4: Community Health and Safety</li> <li>- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</li> <li>- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> <li>- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</li> <li>- ESS8: Cultural Heritage</li> <li>- ESS9: Financial Intermediaries</li> <li>- ESS10: Stakeholder Engagement and Information Disclosure</li> </ul>	<ul style="list-style-type: none"> <li>- 3. Indigenous Peoples</li> <li>- 4. Special Requirements for Different Finance Modalities</li> </ul> <p>Operations Manual Bank Policies (BP) Safeguard Policy Statement (for staff use)(2013): These policies were prepared for use by ADB staff.</p>	<ul style="list-style-type: none"> <li>- PS1: Assessment and Management of Environmental and Social Risks and Impacts</li> <li>- PS2: Labor and Working Conditions</li> <li>- PS 3: Resource Efficiency and Pollution Prevention</li> <li>- PS4: Community Health, Safety, and Security</li> <li>- PS5: Land Acquisition and Involuntary Resettlement</li> <li>- PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> <li>- PS7: Indigenous Peoples</li> <li>- PS8: Cultural Heritage</li> </ul> <p>AIP articulates IFC's commitment to transparency.</p>
Guidance Note (GN)	GN for Borrowers (2018): The GN provide guidance for the borrower on the application of each ESS.	-	GN (2012): Guidance Note is prepared for each PS to offer helpful guidance on the PS requirements. GN 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources was updated in June 2019.

Source : JST based on the MDB's SGPs below.

WB ESF: <https://projects-beta.worldbank.org/en/projects-operations/environmental-and-social-framework>

ADB SPS : <https://www.adb.org/documents/safeguard-policy-statement>

IFC SP : <http://www.ifc.org/performancestandards>

Details of the new WB ESF, which took effect in October 2018 are discussed in sections (2) and 3.3.2 below.

## (2) Recent Revision / Update of MDBs' SGPs

“JICA confirms that projects do not deviate significantly from the World Bank's Safeguard Policies, and refers as a benchmark to the standards of international financial organizations; to internationally

recognized standards, or international standards, treaties, and declarations, etc.; and to the good practices etc. of developed nations including Japan, when appropriate.” (JICA GL 2.6). In the context of this policy, the current status about the revision and updates of SGPs of the WB, ADB and IFC as well as their evaluations since the JICA GL took effect has been reviewed. The current situation is summarized below. The WB approved the ESF in 2016, which took effect in October 2018. ADB announced that the evaluation of the application of the SPS would be conducted from July 2018 to November 2019. Although IFC partially updated the GN corresponding to the PSs, currently it is not revising the SGP.

**Table 3-9 Status of MDBs’ SGPs and Their Revision**

MDB	Current SGPs	Revision Status of SGPs
WB	ESF approved in August 2016. ESF took effect in October 2018.	✓ No
ADB	SPS approved in July 2009. SPS took effect six months after the approval.	✓ ADB’s Independent Evaluation Department is conducting “Corporate Evaluation of the Safeguard Policy Statement”. The evaluation targets seven countries (India, Papua New Guinea, China, Viet Nam, Uzbekistan, Indonesia and Nepal) and is to be carried out from July 2018 to November 2019. The concept paper of the study was published in September 2018. As of June 2019, the study results have not been disclosed.
IFC	Sustainability Framework took effect on January 1st, 2012.	✓ No announcement on its website.

Source: JICA Study Team based on the website of MDBs.

The current JICA GL require that “the projects do not deviate significantly from the World Bank’s Safeguard Policies.” The WB’s ESF and major changes from the previous OPs are summarized below.

Three components of the ESF are as follows:

- A Vision for Sustainable Development: This sets out the Bank’s aspirations regarding environmental and social sustainability.
- The WB Environmental and Social Policy for Investment Project Financing: This sets out the mandatory requirements that apply to the WB.
- The ESSs: This, together with their Annexes, set out the mandatory requirements that apply to the Borrower and projects. The requirements are grouped into 10 ESSs in a similar fashion to IFC PSs.

Major changes from the previous SGPs can be summarized as follows:

- 1) Previously, safeguard requirements were articulated in independent OPs and Bank BPs. Now they are integrated. The ESSs apply to all projects supported by the WB through Investment Project Financing. Four new areas/topics that were not covered or articulated as a stand-alone policy in the previous OPs/BPs are: Labor and Working Conditions (ESS2), Community Health

and Safety (ESS4), Financial Intermediaries (ESS9) and Stakeholder Engagement and Information Disclosure (ESS10).

- 2) Previously, the projects were screened and categorized as A, B, C or FI based on the type, location, sensitivity and scale of the project. Under the Environmental and Social Policy, the WB classifies all projects (including projects involving FIs) into one of four classifications: high risk; substantial risk; moderate risk; and low risk. In determining the appropriate risk classification, the Bank takes into account the relevant issues, such as type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and social risks and impacts; and the capacity and commitment of the Borrower. The WB reviews the risk classification assigned to the project on a regular basis, including during implementation, and may change the classification where necessary, to ensure that it continues to be appropriate. (Environmental and Social Policy, para.20, 21)
- 3) The structure and contents of the SGP requirements are aligned with IFC and other MDBs' SGPs and international good practices.

### 3.3.2 Comparison of WB's Previous SGPs with the New ESF

The table below shows the differences and major changes between the WB's new ESF and the previous SGPs. Following table describes the WB ESF first and ESS. Direct quote from the texts of the SGPs are shown in *Italic* in the table.

**Table 3-10 Major Differences between Previous SGPs and the ESF/ESS**

No	Area	New SGPs (ESF/ESS) <sup>1)</sup>	Previous SGPs (OP) <sup>2)</sup>	Major Changes (Unless otherwise specified, the changes are new, additional requirements under the new ESF/ESS.)
1	Common Approach	<p>&lt;Environmental and Social Policy for Investment Project Financing&gt;</p> <ul style="list-style-type: none"> <li>Where the Bank is jointly financing a project with other multilateral or bilateral funding agencies, the Bank will cooperate with such agencies and the Borrower in order to agree on a common approach for the assessment and management of environmental and social risks and impacts of the project. A common approach will be acceptable to the Bank, provided that such an approach will enable the project to achieve objectives materially consistent with the ESSs. (para.9)</li> </ul>	<ul style="list-style-type: none"> <li>No requirements regarding common approach are specified in the OPs.</li> </ul>	<ul style="list-style-type: none"> <li>Introduction of common approach in co-financing projects</li> </ul>
2	Categorization of projects	<p>&lt;Environmental and Social Policy for Investment Project Financing&gt;</p> <ul style="list-style-type: none"> <li>The Bank will classify all projects (including projects involving Financial Intermediaries (FIs)) into one of four classifications: High Risk, Substantial Risk, Moderate Risk or Low Risk. In determining the appropriate risk classification, the Bank will take into account relevant issues, such as the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and social risks and impacts; and the capacity and commitment of the Borrower (including any other entity responsible for the implementation of the project) to manage the environmental and social risks and impacts in a manner consistent with the ESSs. Other areas of risk may also be relevant to the delivery of environmental and social mitigation measures and outcomes, depending on the specific project and the context in which it is being developed. [...] The Bank will disclose the project's classification and the basis for that classification on the Bank's website and in project documents. (para.20)</li> <li>The Bank will review the risk classification assigned to the project on a regular basis, including during implementation, and will change the classification where necessary, to ensure that it continues to be appropriate. Any change to the classification will be disclosed on the Bank's website. (para.21)</li> </ul>	<p>&lt;OP4.01: Environmental Assessment &gt;</p> <p>The Bank classifies the proposed project 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.</p> <p>(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.</p> <p>(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 projects.</p> <p>(c.) Category C: A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental impacts.</p> <p>(d.) Category FI: A proposed project is classified as Category FI if it involves investment of Bank funds through a financial intermediary, in subprojects that may result in adverse environmental impacts. (para 8)</p>	<ul style="list-style-type: none"> <li>New classification approach (High Risk, Substantial Risk, Moderate Risk, Low Risk)</li> </ul>
3	Information Disclosure	<p>&lt;Environmental and Social Policy for Investment Project Financing&gt;</p> <ul style="list-style-type: none"> <li>The Bank will disclose documentation relating to the environmental and social risks and impacts of High Risk and Substantial Risk projects prior to project appraisal. This documentation will [...] be provided in draft or final form (if available). (para.51)</li> </ul>	<p>&lt;OP4.01 &gt;</p> <ul style="list-style-type: none"> <li>Once the borrower officially transmits the Category A Environmental Assessment (EA) report to the Bank, the Bank distributes the summary (in English) to the executive directors (EDs) and makes the report available through its InfoShop. Once the borrower officially transmits any separate Category B EA report to the</li> </ul>	<ul style="list-style-type: none"> <li>Disclosure of documentation relating to the environmental and social risks and impacts prior to appraisal.</li> </ul>

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		<ul style="list-style-type: none"> <li>There is no requirement in terms of the period of disclosure.</li> </ul>	Bank, the Bank makes it available through its InfoShop. (para.18)	
4	Environmental and Social Commitment Plan (ESCP)	<p>&lt;ESS1 Assessment and Management of Environmental and Social Risks and Impacts&gt;</p> <ul style="list-style-type: none"> <li><b>ESIA:</b> The Borrower will carry out an environmental and social assessment of the project to assess the environmental and social risks and impacts of the project throughout the project life cycle. The assessment will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle, including those specifically identified in ESSs2–10. (para.23)</li> <li><b>ESCP:</b> The Borrower will develop and implement an ESCP, which will set out measures and actions required for the project to achieve compliance with the ESSs over a specified timeframe. (para.36)</li> </ul>	<p>&lt;OP4.01&gt;</p> <ul style="list-style-type: none"> <li>The Bank requires environmental assessment (EA of projects proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making. (para.1)</li> <li>EA takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples, and physical cultural resources); and transboundary and global environmental aspects. (para.3)</li> <li>Depending on the project, a range of instruments can be used to satisfy the Bank's EA requirement: environmental impact assessment, regional or sectoral EA, strategic environmental and social assessment (SESA), environmental audit, hazard or risk assessment, EMP and ESMF. (para.7)</li> </ul>	<ul style="list-style-type: none"> <li>Preparation of an environmental and social impact assessment report, taking into account the requirements of ESS1-10</li> <li>Preparation of ESCP</li> </ul>
5	ESIA Report	<p>&lt;ESS1&gt;</p> <ul style="list-style-type: none"> <li>The indicative outline of ESIA is provided in ESS1 Annex 1 D, which is:               <ol style="list-style-type: none"> <li>Executive Summary</li> <li>Legal and Institutional Framework</li> <li>Project Description</li> <li>Baseline Data</li> <li>Environmental and Social Risks and Impacts</li> <li>Mitigation Measures</li> <li>Analysis of Alternatives</li> <li>Design Measures</li> <li>Key Measures and Actions for the ESCP</li> <li>Appendices.</li> </ol> </li> </ul>	<p>&lt;OP4.01&gt;</p> <ul style="list-style-type: none"> <li>Annex B of OP4.01 presents the contents to be included in the EA report. They are:               <ol style="list-style-type: none"> <li>Executive summary;</li> <li>Policy, legal, and administrative framework;</li> <li>Project description;</li> <li>Baseline data;</li> <li>Environmental impacts;</li> <li>Analysis of alternatives;</li> <li>EMP; and</li> <li>Appendixes.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>Contents to be included in ESIA reports (additional elements include: (e) environmental and Social Risks; (h) design measures; and (i) ESCP)</li> </ul>
6	The use of Borrower's ES Framework	<p>&lt;ESS1&gt;</p> <ul style="list-style-type: none"> <li>When a project is proposed for Bank support, the Borrower and the Bank will consider whether to use all, or part, of the Borrower's ES Framework in the assessment, development and implementation of a project. Such use may be proposed provided this is likely to address the risks and impacts of the project, and enable the project to achieve objectives materially consistent with the ESSs. (para.19)</li> <li>If the Borrower and the Bank propose to use all, or part, of the Borrower's ES Framework, the Bank will review the Borrower's ES Framework<sup>15</sup> in accordance</li> </ul>	<p>&lt;OP4.00 Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank Supported Projects&gt;</p> <ul style="list-style-type: none"> <li>The Bank's environmental and social ("safeguard") policies are designed to avoid, mitigate, or minimize adverse environmental and social impacts of projects supported by the Bank. The Bank encourages its borrowing member countries to adopt and implement systems that meet these objectives while ensuring that development resources are used transparently and efficiently to achieve desired outcomes. To encourage the development and effective application of such systems and thereby focus on building borrower capacity beyond individual</li> </ul>	<ul style="list-style-type: none"> <li>The use of the Borrower's ES Framework</li> </ul>

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		with the requirement of paragraph 19. The Borrower will provide information to the Bank in connection with the assessment. (para.20)	project settings, the Bank is piloting the use of borrower systems in Bank-supported projects. The key objective of the pilot program is to improve overall understanding of implementation issues related to greater use of country systems. (para.1) • The Bank considers a borrower's environmental and social safeguard system to be equivalent to the Bank's if the borrower's system is designed to achieve the objectives and adhere to the applicable operational principles set out in Table A1 <sup>1</sup> . (para.2)	
7	Analysis of Alternatives	<ESS1> • The methodology and requirements in relation to the analysis of alternatives are articulated in Annex 1 D (g) of ESS1. They are: - Systematically compares feasible alternatives to the proposed project site, technology, design, and operation—including the “without project” situation—in terms of their potential environmental and social impacts. - Assesses the alternatives’ feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the alternative mitigation measures. - For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible.	<OP4.01> • The methodology and requirements in relation to the analysis of alternatives are articulated in Annex B, f), which is: - Analysis of alternatives. Systematically compares feasible alternatives to the proposed project site, technology, design, and operation--including the "without project" situation--in terms of their potential environmental impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions; and their institutional, training, and monitoring requirements. For each of the alternatives, quantifies the environmental impacts to the extent possible, and attaches economic values where feasible. States the basis for selecting the particular project design proposed and justifies recommended emission levels and approaches to pollution prevention and abatement.	• No differences
8	Quantification of costs and benefits	<ESS1> • For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible. (ESS 1 Annex1D (g))	<OP4.01> • For each of the alternatives, quantifies the environmental impacts to the extent possible, and attaches economic values where feasible. (Annex B)	• No differences
9	Associated Facilities, Indirect Impacts, and Cumulative Impacts	<ESS1> • For the purpose of this ESS, the term “Associated Facilities” means facilities or activities that are not funded as part of the project and are: (a) directly and significantly related to the project; (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist. (para.11) • Associated Facilities will meet the requirements of the ESSs, to the extent that the	• The definition of associated facilities, indirect and secondary impacts, and cumulative impacts are not specified in OP.	• The definition of associated facilities, indirect and secondary impacts, and cumulative impacts

<sup>1</sup> Environmental and Social Safeguard Policies—Policy Objectives and Operational Principles (<https://policies.worldbank.org/sites/ppf3/PPFDocuments/Environmental%20and%20social%20safeguard%20policie.pdf>)

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		<p><i>Borrower has control or influence over such Associated Facilities (para.10)</i></p> <ul style="list-style-type: none"> <li><i>An indirect impact is an impact which is caused by the project and is later in time or farther removed in distance than a direct impact, but is still reasonably foreseeable, and will not include induced impacts. (footnote 21)</i></li> <li><i>The cumulative impact of the project is the incremental impact of the project when added to impacts from other relevant past, present and reasonably foreseeable developments as well as unplanned but predictable activities enabled by the project that may occur later or at a different location. Cumulative impacts can result from individually minor but collectively significant activities taking place over a period of time. The environmental and social assessment will consider cumulative impacts that are recognized as important on the basis of scientific concerns and/ or reflect the concerns of project-affected parties. The potential cumulative impacts will be determined as early as possible, ideally as part of project scoping. (footnote 22)</i></li> </ul>		
10	Labor	<p>&lt;ESS2 Labor and Working Conditions&gt;</p> <ul style="list-style-type: none"> <li>The requirements of the borrower in relation to labor and working conditions are newly added to the WB's SGP.</li> <li><i>The scope of application of ESS2 depends on the type of employment relationship between the Borrower and the project workers. The term "project worker" refers to:</i> <ul style="list-style-type: none"> <li><i>(a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers);</i></li> <li><i>(b) people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers);</i></li> <li><i>(c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and</i></li> <li><i>(d) people employed or engaged in providing community labor (community workers). (para.3)</i></li> </ul> </li> <li>The specific requirements depend on the type of project worker. For example, Labour Management Procedure (LMP), Occupational Health and Safety Measure (OHSM) and Grievance Mechanism, described below, are applies to (a) direct workers and (b) contracted workers. LMP and OHSM are partially applied to (c) primary supply workers, depending on scale and nature of the project, and for (d) community workers, the below are not required but corrective actions may be</li> </ul>	<ul style="list-style-type: none"> <li>No OPs specify requirements regarding types of project worker, LMP, OHSM, and Grievance Mechanism for Workers.</li> </ul>	<ul style="list-style-type: none"> <li>Types of project worker, LMP, OHSM, and Grievance Mechanism for Workers</li> </ul>

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		<p>required when obvious and significant issues such as child labour and/or forced labour are found. (para. 4-8)</p> <ul style="list-style-type: none"> <li>LMP: Set out such as working hours, wages, overtime, compensation and benefits, nondiscrimination and equal opportunity, protection of vulnerable workers, protection of rights to form/join workers' organizations, no child labour/forced labour. (para. 9-20)</li> <li>OHSM: The OHS measures will be prepared, taking into account General EHSG and, as appropriate, the industry-specific EHSGs and other GIIP. (para.24) These measures are to be prepared by the borrower and implemented/supervised by the contractor.</li> <li>Grievance Mechanism: It is required that a grievance mechanism be provided for all direct and contracted workers, and where relevant, for their organizations. (para.21)</li> </ul>		
11	Estimation of GHG emissions	<p>&lt;ESS3 Resource Efficiency and Pollution Prevention and Management&gt;</p> <ul style="list-style-type: none"> <li>The borrower will estimate <i>gross GHG emissions resulting from the project, providing that such estimation is technically and financially feasible.</i> (para.16) Estimation scope is only Scope 1 in order to avoid double counting. (GN16.1)</li> <li><i>For projects that have diverse and small sources of emissions (for example, community-driven development projects) or where emissions are not likely to be significant (for example, projects in education and social protection), GHG estimations will not be required.</i> (para.16)</li> <li>The threshold of significance (the amount above which requires GHG estimation) is not specified in ESS.</li> <li>GHG estimation will be done only once before project commencement as a part of ESIA of the project. (para 16)</li> <li>The ESIA including the GHG estimation is disclosed, based on the risk classification of the project.</li> </ul>	<p>&lt; OP4.01 &gt;</p> <ul style="list-style-type: none"> <li><i>EA takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples, and physical cultural resources); transboundary and global environmental aspects.</i> (para.3)</li> <li><i>Global environmental issues include climate change, ozone-depleting substances, pollution of international waters, and adverse impacts on biodiversity.</i> (footnote 5)</li> <li>Procedures and requirements regarding estimation of GHG emission are not specified in OP.</li> </ul>	<ul style="list-style-type: none"> <li>Estimation of GHG emissions resulting from the project</li> </ul>
12	GHG emission for alternative analysis	<p>&lt;ESS3&gt;</p> <ul style="list-style-type: none"> <li>Analysis of alternatives to avoid or minimize GHG emissions: <i>The Borrower will consider alternatives and implement technically and financially feasible and cost-effective options to avoid or minimize project-related air emissions during the design, construction and operation of the project.</i> (para.15)</li> </ul>	<ul style="list-style-type: none"> <li>No OPs specify requirements of conducting alternative analysis to avoid or minimize project-related GHG emissions.</li> </ul>	<ul style="list-style-type: none"> <li>Alternative analysis of technically and financially feasible and cost-effective options to avoid or minimize project-related GHG emissions</li> </ul>
13	Management of hazardous	<p>&lt;ESS3&gt;</p> <ul style="list-style-type: none"> <li><i>The Borrower will avoid the generation of hazardous and nonhazardous waste.</i></li> </ul>	<ul style="list-style-type: none"> <li>No OPs specify requirements concerning hazardous wastes, chemicals and hazardous materials.</li> </ul>	<ul style="list-style-type: none"> <li>Requirements concerning hazardous wastes, chemicals</li> </ul>

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	wastes, chemicals, hazardous materials and pesticides	<p>Where waste generation cannot be avoided, the Borrower will minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. Where waste cannot be reused, recycled or recovered, the Borrower will treat, destroy, or dispose of it in an environmentally sound and safe manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material. (para.17)</p> <ul style="list-style-type: none"> <li>The Borrower will avoid the manufacture, trade and use of chemicals and hazardous materials subject to international bans, restrictions or phaseouts unless for an acceptable purpose as defined by the conventions or protocols or if an exemption has been obtained by the Borrower, consistent with Borrower government commitments under the applicable international agreements. (para.19)</li> <li>Where projects involve recourse to pest management measures, the Borrower will give preference to integrated pest management (IPM) or integrated vector management (IVM) approaches using combined or multiple tactics. (para.21)</li> <li>The Borrower will not use any pesticides or pesticide products or formulations unless such use is in compliance with the EHSGs. (para.22)</li> <li>For any project involving significant pest management issues or any project contemplating activities that may lead to significant pest and pesticide management issues, the Borrower will prepare a Pest Management Plan (PMP). (para.25)</li> </ul>	<ul style="list-style-type: none"> <li>In assisting borrowers to manage pests that affect either agriculture or public health, the Bank supports a strategy that promotes the use of biological or environmental control methods and reduces reliance on synthetic chemical pesticides. In Bank-financed projects, the borrower addresses pest management issues in the context of the project's environmental assessment. (OP4.09 Pest Management, para.1)</li> <li>The Bank uses various means to assess pest management in the country and support IPM and the safe use of agricultural pesticides. (OP4.09, para.3)</li> <li>The following criteria apply to the selection and use of pesticides in Bank-financed projects: <ul style="list-style-type: none"> <li>(a) They must have negligible adverse human health effects.</li> <li>(b) They must be shown to be effective against the target species.</li> <li>(c) They must have minimal effect on nontarget species and the natural environment.</li> <li>(d) Their use must take into account the need to prevent the development of resistance in pests. (OP4.09, para.6)</li> </ul> </li> </ul>	and hazardous materials
14	Community Health and Safety	<p>&lt;ESS4 Community Health and Safety&gt;</p> <ul style="list-style-type: none"> <li>The Borrower will identify and implement measures to address emergency events. (para.19)</li> <li>Borrowers engaged in projects having the potential to generate emergency events will conduct a risk hazard assessment [...] the Borrower will prepare an Emergency Response Plan (ERP) in coordination with the relevant local authorities and the affected community. (para.20)</li> <li>Regarding the safety of dams, the Borrower will engage experienced and competent professionals for the supervision of the design and construction of new dams, and require the owner of the dam to adopt and implement dam safety measures during the design, bid tendering, construction, operation, and maintenance of the dam and associated works. (Annex 1A, para.1)</li> <li>Where the risks and impacts of community exposure to hazardous materials and</li> </ul>	<ul style="list-style-type: none"> <li>The OPs do not address specifically the risk associated with influx of labor, security personnel and community safety. The requirement and contents of ERP are not covered either.</li> <li>The impact and risks of climate change are not taken into account in design of structural elements or components of a project.</li> <li>When the Bank finances a project that includes the construction of a new dam, it requires that the dam be designed and its construction supervised by experienced and competent professionals. It also requires that the borrower adopt and implement certain dam safety measures for the design, bid tendering, construction, operation, and maintenance of the dam and associated works. (OP4.37 Safety of Dams, para.2)</li> </ul>	<ul style="list-style-type: none"> <li>Adding new considerations on emergency responses, hazardous waste, influx of workers, risks of security personnel, safety of the affected communities</li> <li>Consideration of climate change impacts and risks in design of structural elements or components of a project</li> </ul>

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		<p>wastes are potentially significant, it may be appropriate to develop a Hazardous Waste Management Plan or a Hazardous Materials Management Plan. The Hazardous Materials Management Plans should set out, at a minimum, the organizational arrangements and responsibilities for hazardous material identification, storage, handling, use, and disposal, including the processes for monitoring and managing the risks and for implementing the necessary mitigation measures throughout the project life cycle. (GN 18.4)</p> <ul style="list-style-type: none"> <li>• The Borrower will take measures to avoid or minimize transmission of communicable diseases that may be associated with the influx of temporary or permanent project labor. (para.16)</li> <li>• The WB's GN on Managing Risks Related to Labor Influx (2016) articulates three principles to manage the risks of adverse impacts on communities that may result from temporary project induced labor influx. They are: <ul style="list-style-type: none"> <li>- Reduce labor influx by tapping into the local workforce;</li> <li>- Assess and manage labor influx risk based on appropriate instruments; and</li> <li>- Incorporate social and environmental mitigation measures into the civil works contract.</li> </ul> </li> <li>• When the Borrower retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by these security arrangements to those within and outside the project site. (para.24) The Borrower will review all allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence and, where necessary, report unlawful and abusive acts to the relevant authorities. (para. 27)</li> <li>• The Borrower will design, construct, operate, and decommission the structural elements of the project in accordance with national legal requirements, the EHSGs and other GIIP, taking into consideration safety risks to third parties and affected communities. (para.6)</li> <li>• When structural elements or components of a project are situated in high-risk locations, including those with risk of extreme weather or slow onset events, and their failure or malfunction may threaten the safety of communities, the Borrower will engage one or more independent experts with relevant and recognized experience in similar projects, separate from those responsible for the design and construction, to conduct a review as early as possible in project development and throughout the stages of project design, construction, operation, and</li> </ul>		

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		decommissioning. (para.8)		
15	Land Acquisition, Resettlement	<p>&lt;ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement&gt;</p> <ul style="list-style-type: none"> <li>This ESS applies to permanent or temporary physical and economic displacement resulting from the following types of land acquisition or restrictions on land use undertaken or imposed in connection with project implementation. (para.4 )</li> <li>Compensation will be made at replacement cost. There is no major change in the definition of replacement compared with OP4.12. In this ESS, replacement cost is defined as <i>the market value as established through independent and competent real estate valuation, plus transaction costs when there is functional market, and where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement material and labor for construction of structures or other fixed assets, plus transaction costs.</i> (footnote 6)</li> <li>Compensation standards for categories of land and fixed assets will be disclosed and applied consistently. [...] a clear basis for calculation of compensation will be documented, and compensation distributed in accordance with transparent procedures. (para.13)</li> <li>For relocation of persons who have no recognizable legal right or claim to the land or assets they occupy or use, <i>the Borrower will provide arrangements to allow them to obtain adequate housing with security of tenure. Where these displaced persons own structures, the Borrower will compensate them for the loss of assets other than land, such as dwellings and other improvements to the land, at replacement cost.</i> (para.29)</li> <li>The 200 people threshold for preparing the resettlement plan and abbreviated resettlement plan in OP4.12 is deleted and <i>the Borrower will prepare a plan proportionate to the risks and impacts associated with the project</i> (para.21). ESS5 does not specify the quantitative threshold of involuntary resettlement to prepare the resettlement plan.</li> <li>Valuation of and compensation for losses and transitional support, which are components of RAP, are described as follows: <ul style="list-style-type: none"> <li>(a) Valuation of and compensation for losses: [t]he methodology to be used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation for land, natural resources and other assets under local law and such supplementary measures as are necessary to achieve replacement cost for them. (para 10, ESS 5 Annex 1)</li> </ul> </li> </ul>	<p>&lt;OP4.12 Involuntary Resettlement&gt;</p> <ul style="list-style-type: none"> <li>This policy covers direct economic and social impacts that both result from Bank-assisted investment projects, and are caused by <ul style="list-style-type: none"> <li>(a) the involuntary taking of land resulting in <ul style="list-style-type: none"> <li>(i) relocation or loss of shelter;</li> <li>(ii) loss of assets or access to assets; or</li> <li>(iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or</li> </ul> </li> <li>(b) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. (para.3)</li> </ul> </li> <li>“Replacement cost” is the method of valuation of assets that helps determine the amount sufficient to replace lost assets and cover transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. (footnote.11)</li> <li>As a condition of appraisal of projects involving resettlement, the borrower provides the Bank with the relevant draft resettlement instrument which conforms to this policy, and makes it available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them. (para.22)</li> <li>Those who have no recognizable legal right or claim to the land they are occupying are provided resettlement assistance in lieu of compensation for the land they occupy, and other assistance, as necessary, to achieve the objectives set out in this policy, if they occupy the project area prior to a cut-off date established by the borrower and acceptable to the Bank. (para.16)</li> <li>A resettlement plan or abbreviated resettlement plan is required for all operations that entail involuntary resettlement unless otherwise specified. (para.17 (a))</li> <li>A draft resettlement plan that conforms to this policy is a condition of appraisal [...] for projects referred to in para. 17(a) above. However, where impacts on the entire displaced population are minor, or fewer than 200 people are displaced, an abbreviated resettlement plan may be agreed with the borrower. (para.25)</li> <li>Where domestic law does not meet the standard of compensation at full replacement cost, compensation under domestic law is supplemented by additional measures necessary to meet the replacement cost standard. (footnote.11)</li> </ul>	<ul style="list-style-type: none"> <li>Elements to be included in a resettlement plan (the requirements in the case of physical relocation and economic relocation are distinguished in ESS5).</li> </ul>

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		<p>(b) Transitional support: [t]he resettlement plan provides transitional support to those whose livelihood will be disrupted. This may include payment for lost crops and lost natural resources, payment of lost profits for businesses, or payment of lost wages for employees affected by business relocation. The plan provides that the transitional support continues for the duration of the transition period. (para 29, ESS5 Annex 1)</p> <ul style="list-style-type: none"> <li>Minimum elements of a resettlement plan are provided in Annex 1 A, which are: <ul style="list-style-type: none"> <li>- Description of the project</li> <li>- Potential impacts</li> <li>- Objectives</li> <li>- Census survey and baseline socioeconomic studies</li> <li>- Legal framework</li> <li>- Institutional framework</li> <li>- Eligibility</li> <li>- Valuation of and compensation for losses</li> <li>- Community participation</li> <li>- Implementation schedule</li> <li>- Costs and budget</li> <li>- Grievance redress mechanism</li> <li>- Monitoring and evaluation</li> <li>- Arrangements for adaptive management.</li> </ul> </li> <li>In addition to the above, resettlement plans require additional information and planning Elements when project circumstances require the physical relocation of residents (or businesses). They are: <ul style="list-style-type: none"> <li>- Transitional assistance</li> <li>- Site selection, site preparation, and relocation</li> <li>- Housing, infrastructure, and social services</li> <li>- Environmental protection and management</li> <li>- Consultation on relocation arrangements</li> <li>- Integration with host populations.</li> </ul> </li> <li>In addition to above-mentioned elements, in case of physical displacement, transitional assistance for relocation of household members and their possessions; site selection, site preparation, and relocation, housing, infrastructure, and social services; environmental protection and management; consultation on relocation arrangements; and integration with host populations are included in the</li> </ul>	<ul style="list-style-type: none"> <li>Displaced persons are (i) offered support after displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of living (para.6 (c))</li> <li>Elements to be included in a resettlement plan is described in Annex A of OP4.12. They are: <ul style="list-style-type: none"> <li>- Description of the project;</li> <li>- Potential impacts;</li> <li>- Objectives;</li> <li>- Socioeconomic studies;</li> <li>- Legal framework;</li> <li>- Institutional Framework;</li> <li>- Eligibility;</li> <li>- Valuation of and compensation for losses;</li> <li>- Resettlement measures;</li> <li>- Site selection, site preparation, and relocation;</li> <li>- Housing, infrastructure, and social services;</li> <li>- Environmental protection and management;</li> <li>- Community participation;</li> <li>- Integration with host populations;</li> <li>- Grievance procedures;</li> <li>- Organizational responsibilities;</li> <li>- Implementation schedule;</li> <li>- Costs and budget; and</li> <li>- Monitoring and evaluation.</li> </ul> </li> </ul>	

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		resettlement plan (para 17-23, ESS 5, Annex 1). Moreover, if any economic displacement, replacement of farmland, loss of access to land or resources, support for alternative livelihoods, consideration of economic development opportunities, and transitional support for livelihoods are included in the resettlement plan (para 24-29, ESS 5 Annex 1).		
16	Classification of Habitat	<p>&lt;ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources&gt;</p> <ul style="list-style-type: none"> <li>• “Habitat” is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the nonliving environment. (para.13) The definition of three different types of habitats and the requirements of implementing a project in these habitats are articulated in this ESS as follows: <ul style="list-style-type: none"> <li>- Modified habitats are areas that may contain a large proportion of plant and/or animal species of nonnative origin, and/or where human activity has substantially modified an area’s primary ecological functions and species composition. (para.19)</li> <li>- 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. (para.21)</li> <li>- Critical habitat is defined as areas with high biodiversity importance or value, including: <ul style="list-style-type: none"> <li>(a) habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches;</li> <li>(b) habitat of significant importance to endemic or restricted-range species;</li> <li>(c) habitat supporting globally or nationally significant concentrations of migratory or congregatory species;</li> <li>(d) highly threatened or unique ecosystems;</li> <li>(e) ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d). (para.23)</li> </ul> </li> </ul> </li> <li>• For modified habitat, the Borrower will avoid or minimize impacts on such biodiversity and implement mitigation measures as appropriate. (para.20)</li> <li>• For natural habitat the Borrower will seek to avoid adverse impacts on them in accordance with the mitigation hierarchy. Where natural habitats have the</li> </ul>	<p>&lt;OP4.04 Natural Habitats&gt;</p> <ul style="list-style-type: none"> <li>• Natural habitats are land and water areas where (i) the ecosystems’ bio-logical communities are formed largely by native plant and animal species, and (ii) human activity has not essentially modified the area’s primary ecological functions. All natural habitats have important biological, social, economic, and existence value. Important natural habitats may occur in tropical humid, dry, and cloud forests; temperate and boreal forests; mediterranean-type shrub lands; natural arid and semi-arid lands; mangrove swamps, coastal marshes, and other wetlands; estuaries; sea grass beds; coral reefs; freshwater lakes and rivers; alpine and sub alpine environments, including herb fields, grasslands, and paramos; and tropical and temperate grasslands. (Annex A para 1. a)</li> <li>• Critical natural habitats are: <ul style="list-style-type: none"> <li>(i) existing protected areas and areas officially proposed by governments as protected areas (e.g., reserves that meet the criteria of the World Conservation Union [IUCN] classifications), areas initially recognized as protected by traditional local communities (e.g., sacred groves), and sites that maintain conditions vital for the viability of these protected areas (as determined by the environmental assessment process); or</li> <li>(ii) sites identified on supplementary lists prepared by the Bank or an authoritative source determined by the Regional environment sector unit (RESU). Such sites may include areas recognized by traditional local communities (e.g., sacred groves); areas with known high suitability for bio-diversity conservation; and sites that are critical for rare, vulnerable, migratory, or endangered species.<sup>4</sup> Listings are based on systematic evaluations of such factors as species richness; the degree of endemism, rarity, and vulnerability of component species; representativeness; and integrity of ecosystem processes. (Annex A para 1. b)</li> </ul> </li> <li>• The Bank does not support projects that, in the Bank’s opinion, involve the significant conversion or degradation of critical natural habitats. (para.4)</li> <li>• The Bank does not support projects involving the significant conversion of natural habitats unless there are no feasible alternatives for the project and its siting, and</li> </ul>	<ul style="list-style-type: none"> <li>• Classification of habitats and approach for risk management</li> </ul>

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		<p><i>potential to be adversely affected by the project, the Borrower will not implement any project-related activities unless:</i></p> <p><i>(a) There are no technically and financially feasible alternatives; and</i></p> <p><i>(b) Appropriate mitigation measures are put in place, in accordance with the mitigation hierarchy, to achieve no net loss and, where feasible, preferably a net gain of biodiversity over the long term. When residual impacts remain despite best efforts to avoid, minimize and mitigate impacts, and where appropriate and supported by relevant stakeholders, mitigation measures may include biodiversity offsets adhering to the principle of “like-for-like or better.” (para.22)</i></p> <ul style="list-style-type: none"> <li>For critical habitat, <i>the Borrower will not implement any project activities that have potential adverse impacts unless all of the following conditions are met:</i> <p><i>(a) No other viable alternatives within the region exist for development of the project in habitats of lesser biodiversity value;</i></p> <p><i>(b) All due process required under international obligations or national law that is a prerequisite to a country granting approval for project activities in or adjacent to a critical habitat has been complied with;</i></p> <p><i>(c) The potential adverse impacts, or likelihood of such, on the habitat will not lead to measurable net reduction or negative change in those biodiversity values for which the critical habitat was designated;</i></p> <p><i>(d) The project is not anticipated to lead to a net reduction in the population<sup>13</sup> of any Critically Endangered, Endangered, or restricted-range species, over a reasonable time period;</i></p> <p><i>(e) The project will not involve significant conversion or significant degradation of critical habitats. In circumstances where the project involves new or renewed forestry or agricultural plantations, it will not convert or degrade any critical habitat;</i></p> <p><i>(f) The project’s mitigation strategy will be designed to achieve net gains of those biodiversity values for which the critical habitat was designated; and</i></p> <p><i>(g) A robust and appropriately designed, long term biodiversity monitoring and evaluation program aimed at assessing the status of the critical habitat is integrated into the Borrower’s management program. (para.24)</i></p> </li> <li><i>Biodiversity Management Plan (BMP): Where significant risks and adverse impacts on biodiversity have been identified, the Borrower will develop and implement a BMP. BMP consists of objectives, activities, mitigation measures,</i></li> </ul>	<p><i>comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs. If the environmental assessment<sup>4</sup> indicates that a project would significantly convert or degrade natural habitats, the project includes mitigation measures acceptable to the Bank. (para.5)</i></p> <ul style="list-style-type: none"> <li>No OPs specify the requirement of BMP or include reference related to the applicability of offset.</li> </ul>	

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		<p>implementation schedule, institutional responsibilities and cost estimates (para 9, ESS 6 &amp; GN Appendix 1).</p> <ul style="list-style-type: none"> <li>• <i>Offsets will be considered as a last resort, only if significant residual adverse impacts remain after all technically and financially feasible avoidance, minimization, and restoration measures have been considered. (para.15)</i></li> <li>• <i>A biodiversity offset will be designed and implemented to achieve measurable, additional, and long term conservation outcomes that can reasonably be expected to result in no net loss and preferably a net gain of biodiversity. In the case of an offset used as mitigation for residual adverse impacts on any area of critical habitat, a net gain is required. (para.16)</i></li> </ul>		
17	Protected Area	<p>&lt;ESS6&gt;</p> <ul style="list-style-type: none"> <li>• <i>Where the project occurs within or has the potential to adversely affect an area that is legally protected, designated for protection, or regionally or internationally recognized, the Borrower will ensure that any activities undertaken are consistent with the area's legal protection status and management objectives. (para.26)</i></li> <li>• <i>Internationally recognized areas of high biodiversity value include World Heritage Natural Sites, Biosphere Reserves, Ramsar Wetlands of International Importance, Key Biodiversity Areas, Important Bird Areas, and Alliance for Zero Extinction Sites, among others. (footnote 16)</i></li> </ul> <p>It does not mean that implementation of the project is prohibited in these protected area; however, to implement the project, certain conditions need to be met.</p> <ul style="list-style-type: none"> <li>• In addition to meeting applicable requirements in this ESS, the Borrower will do the following to implement a project in protected area:  <i>(a) Demonstrate that the proposed development in such areas is legally permitted;</i>  <i>(b) Act in a manner consistent with any government recognized management plans for such areas;</i>  <i>(c) Consult and involve protected area sponsors and managers, project-affected parties including Indigenous Peoples, and other interested parties on planning, designing, implementing, monitoring, and evaluating the proposed project, as appropriate; and</i>  <i>(d) Implement additional programs, as appropriate, to promote and enhance the conservation aims and effective management of the area. (para.27)</i></li> <li>• If the project area falls one of the habitats, the borrower needs to meet the requirements in the protected area to implement the project in addition to requirements in the habitats.</li> </ul>	<p>&lt;OP4.04&gt;</p> <ul style="list-style-type: none"> <li>• <i>Existing protected areas and areas officially proposed by governments as protected areas (e.g., reserves that meet the criteria of the World Conservation Union [IUCN] classifications) is considered as critical habitat in OP4.04. (Annex A para 1. b)</i></li> <li>• <i>The Bank does not support projects that, in the Bank's opinion, involve the significant conversion or degradation of critical natural habitats. (para.4)</i></li> </ul>	<ul style="list-style-type: none"> <li>• Definition of protected area, and conditions of implementing a project within protected area</li> </ul>

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18	Indigenous Peoples	<p>&lt;ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IP/SSAHUTLC)&gt;</p> <ul style="list-style-type: none"> <li>In this ESS, the term “Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities” [...] is used in a generic sense to refer exclusively to a distinct social and cultural group possessing the following characteristics in varying degrees: <ul style="list-style-type: none"> <li>Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others; and</li> <li>Collective attachment<sup>6</sup> to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas; and</li> <li>Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and</li> <li>A distinct language or dialect, often different from the official language or languages of the country or region in which they reside. (para.8)</li> </ul> </li> <li>The borrower will propose measures and actions in consultation with the affected Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities and contained in a time-bound plan, such as an Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities plan. (para.13)</li> <li>When Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are the sole, or the overwhelming majority of, project beneficiaries, the elements of the plan may be included in the overall project design, and preparation of a stand-alone Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities plan is not necessary. (para.15)</li> <li>In some circumstances, a broader integrated community development plan<sup>10</sup> will be prepared, addressing all beneficiaries of the project and incorporating necessary information relating to the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. (para.17)</li> <li>When IP/SSAHUTLC are the target of resettlement, a resettlement plan can be prepared separately or combined, as appropriate, as long as the process is in line with the conclusion of the FPIC process and in accordance with ESS5. (GN 31.2)</li> <li>This ESS defines the scope and application of FPIC as follows: <ul style="list-style-type: none"> <li>The scope of FPIC applies to project design, implementation arrangements and</li> </ul> </li> </ul>	<p>&lt;OP4.10 Indigenous Peoples&gt;</p> <ul style="list-style-type: none"> <li>For purposes of this policy, the term “Indigenous Peoples” is used in a generic sense to refer to a distinct, vulnerable, social and cultural group<sup>6</sup> possessing the following characteristics in varying degrees: <ul style="list-style-type: none"> <li>self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;</li> <li>collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories</li> <li>customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and</li> <li>an indigenous language, often different from the official language of the country or region. (para.4)</li> </ul> </li> <li>Where the project affects Indigenous Peoples, the borrower engages in free, prior, and informed consultation with them. (para.10)</li> <li>In deciding whether to proceed with the project, the borrower ascertains, on the basis of the social assessment [...] and the free, prior, and informed consultation [...], whether the affected Indigenous Peoples’ communities provide their broad support to the project. (para.11)</li> <li>Annex B of OP4.10 presents elements to be included in the Indigenous Peoples Plan (IPP). They are: <ul style="list-style-type: none"> <li>A summary of the social assessment;</li> <li>A summary of results of the free, prior, and informed consultation with the affected Indigenous Peoples’ communities that was carried out during project preparation;</li> <li>A framework for ensuring free, prior, and informed consultation with the affected Indigenous Peoples’ communities during project implementation;</li> <li>An action plan of measures to ensure that the Indigenous Peoples receive social and economic benefits;</li> <li>An appropriate action plan of measures to avoid, minimize, mitigate, or compensate for these adverse effects;</li> <li>The cost estimates and financing plan;</li> <li>Accessible procedures appropriate to the project to address grievances by the affected Indigenous Peoples’ communities arising from project implementation; and.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Definition of FPIC</li> <li>In ESS7, the term of “IP/SSAHUTLC” is used instead of “Indigenous Peoples”</li> </ul>

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		<p><i>expected outcomes related to risks and impacts on the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities;</i></p> <p><i>(b) FPIC builds on and expands the process of meaningful consultation [...], and will be established through good faith negotiation between the Borrower and affected Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities;</i></p> <p><i>(c) The Borrower will document: (i) the mutually accepted process to carry out good faith negotiations that has been agreed by the Borrower and Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities; and (ii) the outcome of the good faith negotiations between the Borrower and Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, including all agreements reached as well as dissenting views; and</i></p> <p><i>(d) FPIC does not require unanimity and may be achieved even when individuals or groups within or among affected Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities explicitly disagree. (para. 25)</i></p> <ul style="list-style-type: none"> <li>Indicative outline of IP/SSAHUTLC plan is provided in Appendix A of the Guidance Note for ESS7, which is: <ol style="list-style-type: none"> <li>A summary of the Targeted Social Assessment</li> <li>A summary of the results of the meaningful consultation tailored to IP/SSAHUTLC</li> <li>A framework for meaningful consultation tailored to IP/SSAHUTLC during project implementation</li> <li>Measures for ensuring IP/SSAHUTLC receive social and economic benefits that are culturally appropriate and gender sensitive and steps for implementing them.</li> <li>Measures to avoid, minimize, mitigate, or compensate IP/SSAHUTLC for any potential adverse impacts that were identified in the social assessment, and steps for implementing them</li> <li>The cost estimates, financing plan, schedule, and roles and responsibilities for implementing the IP/SSAHUTLC Plan</li> <li>Accessible procedures appropriate to the project to address grievances by the affected IP/SSAHUTLC arising from project implementation; and</li> <li>Mechanisms and benchmarks appropriate to the project for monitoring,</li> </ol> </li> </ul>	<p><i>- Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the IPP.</i></p>	

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		evaluating, and reporting on the implementation of the IP/SSAHUTLC Plan.		
19	Cultural Heritage	<p>&lt;ESS8 Cultural Heritage&gt;</p> <ul style="list-style-type: none"> <li>This ESS applies to both tangible and intangible cultural heritage. The definition of tangible and intangible cultural heritage provided in ESS8 are as follows: <ul style="list-style-type: none"> <li>Tangible cultural heritage includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water; and</li> <li>Intangible cultural heritage includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts and cultural spaces associated therewith—that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history. (para. 4)</li> </ul> </li> <li>The requirements of this ESS8 will apply to all projects that are likely to have risks or impacts on cultural heritage. This will include a project which: <ul style="list-style-type: none"> <li>(a) Involves excavations, demolition, movement of earth, flooding or other changes in the physical environment</li> <li>(b) Is located within a legally protected area or a legally defined buffer zone</li> <li>(c) Is located in, or in the vicinity of, a recognized cultural heritage site or</li> <li>(d) Is specifically designed to support the conservation, management and use of cultural heritage. (para.5)</li> </ul> </li> <li>The requirements of ESS8 apply to cultural heritage regardless of whether or not it has been legally protected or previously identified or disturbed. (para.6)</li> <li>The Borrower will avoid impacts on cultural heritage. When avoidance of impacts is not possible, the Borrower will identify and implement measures to address impacts on cultural heritage in accordance with the mitigation hierarchy.<sup>1</sup> Where appropriate, the Borrower will develop a Cultural Heritage Management Plan. (para.9)</li> <li>A project-specific chance finds procedure will be followed if previously unknown cultural heritage is encountered during project activities. (para.11)</li> </ul>	<p>&lt;OP4.11 Physical Cultural Resources&gt;</p> <ul style="list-style-type: none"> <li>This policy addresses physical cultural resources,<sup>1</sup> which are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Physical cultural resources may be located in urban or rural settings, and may be above or below ground, or under water. Their cultural interest may be at the local, provincial or national level, or within the international community. (para.1)</li> <li>As an integral part of the EA process, the borrower develops a physical cultural resources management plan that includes measures for avoiding or mitigating any adverse impacts on physical cultural resources, provisions for managing chance finds, any necessary measures for strengthening institutional capacity, and a monitoring system to track the progress of these activities. The physical cultural resources management plan is consistent with the country's overall policy framework and national legislation and takes into account institutional capabilities with regard to physical cultural resources. (para.9)</li> <li>No OPs specify requirements regarding intangible cultural heritage.</li> </ul>	<ul style="list-style-type: none"> <li>Intangible cultural heritage is added in ESS8</li> </ul>
20	FI	<p>&lt;ESS9 Financial Intermediaries&gt;</p> <ul style="list-style-type: none"> <li>This ESS applies to Financial Intermediaries (FIs) that receive financial support from the Bank. (para.4)</li> </ul>	<p>&lt;OP4.01&gt;</p> <ul style="list-style-type: none"> <li>For a project involving a FI, the Bank requires that each FI screen proposed subprojects and ensure that subborrowers carry out appropriate EA for each</li> </ul>	<ul style="list-style-type: none"> <li>Application of requirements depending on the risks and impacts and development of</li> </ul>

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		<ul style="list-style-type: none"> <li>The requirements of this ESS apply to all FIs that receive support from the Bank, either directly from the Bank or the Borrower, or through the Borrower or other FIs, as follows:               <ul style="list-style-type: none"> <li>Where Bank support is provided to the FI to fund clearly defined FI subprojects, the requirements of this ESS will apply to each of the FI subprojects;</li> <li>Where Bank support is provided to the FI for a general purpose, the requirements of this ESS will apply to the entire portfolio of the FI's future subprojects from the date on which the legal agreement becomes effective. (para.5)</li> </ul> </li> <li>The FI will comply with any exclusions in the legal agreement and apply relevant national law for all FI subprojects. In addition, the FI will apply the relevant requirements of the ESSs to any FI subproject that involves resettlement (unless the risks or impacts of such resettlement are minor), adverse risks or impacts on Indigenous Peoples or significant risks or impacts on the environment, community health and safety, labor and working conditions, biodiversity or cultural heritage. (para.11)</li> <li>FIs are required to develop and maintain, in the form of an ESMS, effective environmental and social systems, procedures and capacity for assessing, managing, and monitoring risks and impacts of subprojects, as well as managing overall portfolio risk in a responsible manner. (para.3) The ESMS consists of environmental and social policy, environmental and social procedures (e.g. categorization, impact assessment, monitoring), organizational capacity and competency, and monitoring and reporting. (para.3, para.14-23)</li> </ul>	<p>subproject. Before approving a subproject, the FI verifies [...] that the subproject meets the environmental requirements of appropriate national and local authorities and is consistent with this OP and other applicable environmental policies of the Bank. (para.10)</p> <ul style="list-style-type: none"> <li>In appraising a proposed FI operation, the Bank reviews the adequacy of country environmental requirements relevant to the project and the proposed EA arrangements for subprojects, including the mechanisms and responsibilities for environmental screening and review of EA results. When necessary, the Bank ensures that the project includes components to strengthen such EA arrangements. For FI operations expected to have Category A subprojects, prior to the Bank's appraisal each identified participating FI provides to the Bank a written assessment of the institutional mechanisms (including, as necessary, identification of measures to strengthen capacity) for its subproject EA work. If the Bank is not satisfied that adequate capacity exists for carrying out EA, all Category A subprojects and, as appropriate, Category B subprojects – including EA reports – are subject to prior review and approval by the Bank. (para.11)</li> </ul>	ESMS for FI projects
21	Stakeholder Engagement Plan, Stakeholder Analysis	<p>&lt;ESS10 Stakeholder Engagement and Information Disclosure&gt;</p> <ul style="list-style-type: none"> <li>ESS10 applies to all projects supported by the Bank through Investment Project Financing. (para.4)</li> <li>“Stakeholder” refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties). (para.5)</li> <li>The Borrower will develop and implement a Stakeholder Engagement Plan (SEP) (...) A draft of the SEP will be disclosed as early as possible, and before project appraisal. (para.13) The SEP includes identification of stakeholders and proposal for future engagement. (para.13)</li> <li>The Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and</li> </ul>	<p>&lt;OP4.01&gt;</p> <ul style="list-style-type: none"> <li>For all Category A and B projects proposed for IBRD or IDA financing, during the EA process, the borrower consults project-affected groups and local nongovernmental organizations (NGOs) about the project's environmental aspects and takes their views into account. The borrower initiates such consultations as early as possible. For Category A projects, the borrower consults these groups at least twice: (a) shortly after environmental screening and before the terms of reference for the EA are finalized; and (b) once a draft EA report is prepared. In addition, the borrower consults with such groups throughout project implementation as necessary to address EA-related issues that affect them. (para.14)</li> <li>No OPs specify definition of stakeholder, stakeholder analysis and SEP.</li> <li>No OPs specify meaningful consultation and a GRM for whole a project cycle.</li> </ul>	<ul style="list-style-type: none"> <li>Reference to SEP (the definition of stakeholders, stakeholder analysis, preparation and implementation of the stakeholder engagement plan, and meaningful consultation and grievance redress mechanism planned for the entire project cycle)</li> </ul>

No	Area	New SGPs (ESF/ESS) <sup>1)</sup>	Previous SGPs (OP) <sup>2)</sup>	Major Changes (Unless otherwise specified, the changes are new, additional requirements under the new ESF/ESS.)
		<p><i>respond to them. (para.21)</i></p> <ul style="list-style-type: none"><li>• <i>Meaningful consultation is a two-way process. (para.22)</i></li><li>• <i>The Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances. (para.26)</i></li><li>• <i>The grievance mechanism may include the following:</i><ul style="list-style-type: none"><li><i>(a) Different ways in which users can submit their grievances</i></li><li><i>(b) A log where grievances are registered in writing and maintained as a database</i></li><li><i>(c) Publicly advertised procedures</i></li><li><i>(d) Transparency about the grievance procedure</i></li><li><i>(e) An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.</i></li></ul></li></ul> <p><i>(Annex 1 para1-3)</i></p>		

Source:  
1) WB ESF: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>  
2) WB OPs related to Environmental and Social Safeguards: <https://policies.worldbank.org/sites/ppf3/Pages/Manuals/Operational%20Manual.aspx>

### 3.3.3 Policies of MDBs on Specific Safeguards Topics

#### (1) The Use of Common Approach

Under the current GL, JICA is co-financing about 10 projects each year with other MDBs. This section reviews the policies of the WB, ADB and IFC in terms of conditions of using the common approach when co-financing a project, and actual procedures when the common approach is adopted.

##### 1) The WB

The text related to common approach in the WB's ESF is shown below.

Where the Bank is jointly financing a project with other multilateral or bilateral funding agencies, the Bank will cooperate with such agencies and the Borrower in order to agree on a common approach for the assessment and management of environmental and social risks and impacts of the project. A common approach will be acceptable to the Bank, provided that such approach will enable the project to achieve objectives materially consistent with the ESSs. The Bank will require the Borrower to apply the common approach to the project. The Bank will also coordinate with such agencies so that the Bank and the Borrower may be able to disclose one set of project-related materials for stakeholder engagement.

The World Bank Environmental and Social Policy for Investment Project Financing, p5, para 9  
World Bank ESF (2018)

As above, the WB may use the common approach on the condition that it will achieve safeguards-related objectives materially consistent with the ESSs. However, the specific details in terms of how the project as a whole including components financed by other MDBs will be reviewed, monitored or how procedures related to preparation and disclosure of safeguards documents are not articulated in the ESF. At the time of preparation of this report, no project that applies the common approach as per the ESF has been identified.

##### 2) ADB

SPS (2009) states that ADB “will make efforts to collaborate with the borrower/client and cofinanciers to adopt a single social and environmental assessment and planning process and unified safeguard documentation, consultation, and disclosure requirements to satisfy the safeguard principles and requirements of ADB and the cofinanciers”(SPS, para.70).

Some bilateral donors have a policy to use MDB's safeguards policy when jointly financing projects with such MDBs. AusAID's policy, for example, states that “the Department of Foreign Affairs and Trade (DFAT) promotes harmonization of policies among donors to reduce the burden of multiple donor requirements on partner governments. DFAT's key multilateral partners have

their own environmental and social safeguard systems, which are broadly consistent with this policy. The safeguards systems of these partners can generally be accepted when they are implementing an investment supported by DFAT.”<sup>1</sup> In such cases, ADB’s SPS is applied and ADB will take primary responsibility to ensure that the safeguards requirements are adhered to. Agence Française de Développement (AFD), meanwhile, makes every effort to agree on a common approach for the assessment and management of the project’s environmental and social risks with the cofinancier(s) in order to avoid excessive environmental and social due diligence and “if AFD is not the coordinator of the financing, AFD assesses the environmental and social documents produced under the responsibility of the client and/or lead funder” (para.7-8, AFD Environmental and Social Risk Management Policy). For example, in Greater Colombo Water and Wastewater Management Improvement Investment Program - Tranche 3, a project co-financed by ADB and AFD, SPS was used to prepare IEE and RAP.

In 2008, ADB signed Framework Cofinancing Agreement (FCA) with Islamic Development Bank (IDB). ADB also developed ADB–IDB Partnership and Cofinancing Guide in 2016. The Guide states “Projects cofinanced under the FCA must comply with ADB’s and IDB’s prevailing social and environmental safeguard requirements” and “ADB, IDB, and the borrower collaborate to meet the prerequisites, through early consultation and agreement on a common approach to addressing environmental and social risks. Partners apply their respective accountability policies, specifically those relating to anticorruption and integrity measures” (p.11). In practice, ADB and IDB jointly develop a project through information sharing and coordination, which include harmonizing the schedule of the mission. Regarding safeguard, however, it is required that both ADB and IDB’s requirements be met and thus falls short of harmonizing the process and adopting a common approach. As of 2017, ADB have co-financing agreements with 12 agencies, including Partnership for Quality Infrastructure with JICA. More recently, ADB and the Republic of Korea signed a memorandum of understanding to expand Korea’s cofinancing support for ADB projects in Asia and the Pacific<sup>2</sup>.

### 3) IFC

IFC’s Sustainability Policy and PS do not include reference to common approach.

## (2) MDBs’ Policies on Disclosure of Safeguards Documents

### 1) Disclosure of Safeguards Documentation

The Environmental and Social Policy of the WB states that the Bank will “disclose documentation relating to the environmental and social risks and impacts of High Risk and Substantial Risk projects prior to project appraisal. (para 51)”. There is no requirement related to the duration of disclosure. Also, the documents such as EIA do not have to be the final version as long as these documents

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<sup>1</sup> Environmental and Social Safeguard Policy (Updated March 2019), p. 21, Australian Aid, <https://dfat.gov.au/about-us/publications/Documents/environmental-social-safeguard-policy.pdf>

<sup>2</sup> ADB Signs Agreements with the Republic of Korea to Strengthen Cofinancing and Technical Cooperation (3 May 2018), <https://www.adb.org/news/adb-signs-agreements-republic-korea-strengthen-cofinancing-and-technical-cooperation>

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“provide sufficient detail to inform stakeholder engagement and Bank decision making (para.51)”. Once the draft documentation is finalized or updated, it will be disclosed.

Meanwhile, disclosure of draft environmental impact assessment reports of Category A projects for at least 120 days before Board consideration is required under ADB’s SPS (para.53). IFC does not require disclosure of EIA reports, but Environmental and Social Review Summary (ESRS), a document prepared by the IFC, has to be disclosed in the IFC website prior to IFC’s Board of Directors/Management consideration of the investment. The required disclosure period is 60 days for Category A projects and 30 days for Category B and C projects. (para.4.2.6, IFC Environmental and Social Review Procedures Manual, October 2016)

## **2) Disclosure of Monitoring and Supervision Reports**

There is no formal requirement about the disclosure of environmental and social monitoring reports in SGPs and policies on information disclosure of the WB, EBRD, IBD and AfDB. ADB, on the other hand, requires that the environmental monitoring report be disclosed on ADB’s website (para.17, Appendix 1, SPS). Apart from that, the aide-mémoire of operational missions is made publicly available if both the WB and the country/borrower agrees. (para.3a, Access to Information Directive/Procedure, revised April 2019)

## **3.4 Changes in Surroundings Related to the Review of JICA GL for Environmental and Social Considerations and its Process**

### **3.4.1 Ruggie Principles (Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework)**

In 2008, “Protect, Respect and Remedy” Framework was submitted to the UN Human Rights Council by Mr. John Ruggie who was assigned as the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises in 2005. The framework was called “Ruggie Framework” and rests on 3 pillars, namely “the State duty to protect against human rights abuses by third parties, including business enterprises,” “the corporate responsibility to respect human rights,” and “access to remedy.” To implement the framework, the Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework (hereafter called “Guiding Principles”) was developed and unanimously welcomed by the Council.

The government of Japan has made a commitment to implement the Guiding Principles and announced to develop the national action plan for business and human rights at the UN Forum on Business and Human Rights in November 2016. According to MOFA of Japan, it is expected that the national action plan is to be disclosed in mid-2020.

### 3.4.2 SGP of WB, ADB and IFC as the Standards and Good Practices to be Referred

With reference to Section 2.6 of JICA GL, the referenceable standards and good practices of the SGPs of WB, ADB and IFC are reviewed and summarized as the reference. SGPs of ADB and IFC are described separately in Section 3.3.1.

WBG's sector wise EHSs.

EHS consists of the General EHSs and the Industry Sector Guidelines which are designed to be used together. Since the Industry Sector Guidelines indicate sector-specific potential environmental and social impacts and indicators/standards for environmental and social considerations, it is easier for project proponents etc. or EIA approving agency to confirm the sector specific survey parameters and required considerations.

Currently, there are 8 sectors which have the sector-wise guidelines are available on the official website, namely agribusiness/food production, chemicals, forestry, general manufacturing, infrastructure, mining, oil and gas, and power, and under each sector, there are several project specific guidelines. For example, the mining EHSs describe more specific impact on underground water and health, safety and environment of tailing dams, and the infrastructure EHSs (for railways) discuss maintenance of rolling stocks, which are more specific and details than the descriptions of the general EHSs.

MDBs' application of the EHSs are summarized as follows:

WB: "The project will apply the relevant requirements of the [EHSs]. When host country requirements differ from the levels and measures presented in the EHSs, the Borrower will be required to achieve or implement whichever is more stringent. If less stringent levels or measures than those provided in the EHSs are appropriate in view of the Borrower's limited technical or financial constraints or other specific project circumstances, the Borrower will provide full and detailed justification for any proposed alternatives through the environmental and social assessment. This justification must demonstrate, to the satisfaction of the Bank, that the choice of any alternative performance level is consistent with the objectives of the ESSs and the applicable EHSs, and is unlikely to result in any significant environmental or social harm." (ESS 1, para18)

ADB: ADB SPS refers to EHSs as an example of the internationally recognized standards in Appendix 1 for "9. Pollution Prevention and Abatement" (para 33, SPS) and "10. Health and Safety" (para 41, SPS).

IFC: IFC PS states that the EHSs are a technical source of information during project appraisal; the performance levels and measures of the EHSs are generally considered to be achievable in new facilities at reasonable costs by existing technology; for IFC-financed projects, it may involve the establishment of site-specific targets with an appropriate timetable for achieving them; and in case that less stringent levels or measures are appropriate for the project, a full and detailed justification for any proposed alternatives is required to describe in an EIA Report (para 6, 7,

Environmental and Social Sustainability, PS).

Equator Principles 3 (EP3):

EP3 requires compliance with IFC's PS and EHSG in addition to the national legislations and clearance of environmental and social safeguards for the project in Non-Designated Countries. If it is in the designated countries, the national legislations and clearance need to be complied (p. 6, EP).

### **3.4.3 Quantification of Environmental and Social Costs and Benefits in Japan and MDBs' Projects**

Quantification of environmental and social costs and benefits is described in Appendix of JICA GL. Various examples of the quantification in Japan and MDBs are summarized as follows.

**Japan:** According to "The Basic Matters relating to the Guidelines etc. to be Established by the Competent Minister in Accordance with the Provisions of the EIA Act (The Environment Agency Notification No.87 of December 12, 1997),"there is no requirement for quantification of the costs and benefits for the EIA.

#### **MDBs' Practices:**

The practices of quantification of costs and benefits for the EIA are summarized below according to each SGP.

(1) WB: ESF describes "For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible." in (g) Analysis of Alternatives, Annex 1-D, ESS 1.

(2) ADB: in SPS, para 4 under "D. Requirement, Safeguard Requirements 1: Environment" of SPS describes "The rationale for selecting the particular project location, design, technology, and components will be properly documented, including, cost-benefit analysis, taking environmental costs and benefits of the various alternatives considered into account. The "no project" alternative will be also considered." However, it does not specify the quantification for costs and benefits.

(3) IFC: Para 61 of IFC GN states "The client should consider economic, financial, environmental and social costs and benefits and identify to which parties these accrue." However, there is no requirement for quantitative evaluation of the environmental and social cost and benefits in the PS nor GN.

**JICA:** The costs of land acquisition, environmental management plan, environmental and social monitoring reports are all included in the project cost for JICA projects. Additionally, as for the environmental and social costs and benefits of JICA's projects including the reviewed projects, the GHG emission or reduction was included as the costs or benefit when Economic Internal Rate of Return (EIRR) is calculated in economic analysis since the market value is available for GHG emission especially for the large scale power generation projects which GHG emission is relatively large. For instance, No.1 Navoi Thermal Power Station Modernization Project which replaced the

existing obsolete power plant with a highly-efficiency Gas Combined Cycle Cogeneration Power Plant (CCPP) calculated the economic benefit of GHG emission reduction using the average spot rate for the certified emission reduction (CER) of Blue Next, a European environmental trading exchange and was considered the largest CO<sub>2</sub> permit spot market. Another example is Shahid Rajaei Power Plant Construction Project, a project to construct high-efficiency gas turbine combined cycle power generation units in Qazvin Province, Iran. It has also calculated the benefit of GHG emission reduction using the trading price of the European Union Emission Trading Scheme (EU ETS).

WB: When the costs and benefits of GHG emission or reduction was included, it is suggested that the benefits and costs are quantified with the shadow price based on “Shadow price of carbon in economic analysis Guidance Note” (para 2, Applicability, Shadow price of carbon in economic analysis Guidance Note, 2017).

ADB: ADB uses the same rate for all the projects for the economic value of the GHG emission by referring to the IPCC report (para 160, 161, Guidelines for the Economic Analysis of Projects, ADB).

### **3.4.4 Alternative Considerations Especially for “Without Project Scenario”**

MDBs’ SGP and Japanese legislation on alternative considerations at the SEA and EIA stages were reviewed and summarized below. As for the JICA GL, there is no specific description on alternative considerations at each stage of SEA and EIA and on whether “without project scenario” includes the zero option as part of such scenario.

#### **(1) MDB**

##### **a) SEA Stage**

The SGPs of WB or ADB do not specify requirements on alternative considerations for SEA.

##### **b) EIA Stage**

WB ESS1, ADB SPS and IFC PS describe alternative considerations as follows:

WB: “(g) Analysis of Alternatives

- Systematically compares feasible alternatives to the proposed project site, technology, design, and operation—including the “without project” situation—in terms of their potential environmental and social impacts.
- Assesses the alternatives’ feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the alternative mitigation measures.
- For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible.” (para 13 (g), Annex 1.D, ESS1)

ADB: “Examine alternatives to the project’s location, design, technology, and components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative.” (Policy Principle 3, 1. Environmental Safeguards, SPS)

“This section examines alternatives to the proposed project site, technology, design, and operation—including the no project alternative—in terms of their potential environmental impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions; and their institutional, training, and monitoring requirements. It also states the basis for selecting the particular project design proposed and, justifies recommended emission levels and approaches to pollution prevention and abatement.” (F. Analysis of Alternative, Annex to Appendix 1: Outline of an Environmental Impact Assessment Report)

IFC: “For greenfield developments or large expansions with specifically identified physical elements, aspects, and facilities that are likely to generate potential significant environmental or social impacts, the client will conduct a comprehensive Environmental and Social Impact Assessment...”(footnote 11, PS1)

“For greenfield developments, the ESIA includes an examination of technically and financially feasible alternatives...” (GN 25)

## (2) Japan

In Japan, according to “the Basic Matters relating to the Guidelines etc. to be Established by the Competent Minister in Accordance with the Provisions of the EIA Act (The Environment Agency Notification No.87 of December 12, 1997),” “without project scenario” needs to be included in alternative considerations at scoping stage (*hairyosho* preparation stage)<sup>1</sup>. Moreover, “without project scenario” includes “zero option” which is defined as the alternative option in which the same project purpose is feasible without the project which is subject to EIA and also considered as one of the alternative considerations<sup>2</sup>.

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<sup>1</sup> The Guidelines for the Introduction of Strategic Environmental Assessment (MOEJ, 5 April 2007) targets the projects which are likely to be large scale and have significant impacts, especially Class-1 projects specified by EIA Act of Japan (13 June 1997) and which project location and project scale are not finalized but in the planning stage. Additionally, the EIA Network website of MoEJ defines that *Hairyosho* is the document which describes examination results of alternatives for the project location and scale in a planning stage for environmental conservation ([http://assess.env.go.jp/1\\_seido/1-1\\_guide/3-1.html](http://assess.env.go.jp/1_seido/1-1_guide/3-1.html)).

<sup>2</sup> According to “The Basic Matters relating to the Guidelines etc. to be Established by the Competent Minister in Accordance with the Provisions of the Environmental Impact Assessment Act (The Environment Agency Notification No.87 of December 12, 1997),”.

1.1 (3) In examining the items for Primary Environmental Impact Consideration, as a general rule, appropriate multiple plans concerning location and scale, or structure and placement of building etc. pertaining to Class-1 project (hereinafter referred to as the “multiple plans concerning location etc.”) shall be prepared, and in the case where such multiple plans concerning location etc. are not prepared, the reason thereof shall be clarified.

1.3 (3) A statement to the effect that efforts must be made to include an option of not implementing the said project, to the extent that it is feasible, in the multiple plans concerning location etc., shall be specified in the Guidelines for the Selection of the Items for Primary Environmental Impact Consideration etc.

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In the EIA stage of an individual project, alternative considerations are required (1) “concerning a wide range of environmental conservation measures including those related to structure and location of buildings, environmental conservation facilities, and construction method, etc.” at the scoping stage” (4.5.(3) A), and (2) “adequacy of the environmental conservation measures which are being considered for adoption shall be verified through means such as comparative examination of multiple proposals” at the draft final EIA stage, (5.2.(5)) of the “Basic Matters relating to the Guidelines etc. to be Established by the Competent Minister in Accordance with the Provisions of the EIA Act (The Environment Agency Notification No.87 of December 12, 1997)”.

**(3) “Without Project Scenario”**

Although the ESIA of WB funded projects have alternative considerations including “without project” (no project at all), the case which does not have the proposed project but with other measures to achieve the same proposed project objective is not considered unlike “without project scenario” defined in the Basic Matters relating to the Guidelines etc. to be Established by the Competent Minister in Accordance with the Provisions of the EIA Act of Japan (The Environment Agency Notification No.87 of December 12, 1997). As for ADB funded projects, the ESIA also considers a “without project” alternative; however, the case without the proposed project but with other measures to achieve the same proposed project objective is not considered.

**3.4.5 Natural Disaster Aspect in the EIA for Projects in Japan and Funded in MDBs**

Basic Act on Disaster Management of Japan defines that disaster “means damage resulting from a storm, tornado, heavy rainfall, heavy snowfall, flood, slope failure, mudflow, high tide, earthquake, tsunami, eruption, landslide, or other abnormal natural phenomena, or a large fire or explosion or other causes provided for by Cabinet Order and similar to the above in the extent of damage they cause” (Article 2.1)

Additionally, during the working group meeting for reexamination of JICA GL Operation, it was suggested to differentiate the definition of “disasters” and “accidents”, so far there is no clear definition of “accidents” in the Basic Matters relating to the Guidelines etc. to be Established by the Competent Minister in Accordance with the Provisions of the EIA Act of Japan (The Environment Agency Notification No.87 of December 12, 1997). As for WB ESF and IFC PS, there is also no clear requirements in the ESIA separately for “disasters” and “accidents”. For instance, WB ESS4 describes emergency events arising from both natural and man-made hazards, such as fire, explosions, leaks or spills, which may occur for a variety of different reasons, including failure to implement operating procedures that are designed to prevent their occurrence, extreme weather or lack of early warning.

**(1) Handling of the Disaster Aspect in Japanese Environmental Impact Assessment Act**

The “Basic Matters” relating to the Guidelines etc. to be Established by the Competent Minister in

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Accordance with the Provisions of the EIA Act (The Environment Agency Notification No.87 of December 12, 1997) are the matters that should be basic across the board regardless of the type of the project, related to standards and guidelines for each type of project to be set by the competent ministry. In Appendix of “Basic Matters”, a table showing category of environmental components are shown. In the table, disasters (both natural disasters and accidents) are not listed.

**Table 3-11 Category of Environmental Component Shown in the “Basic Matter”**

Category of Environmental Component			Category of Effect Factor	Construction			Presence•Service		
			Subcategory						
Maintenance of Sound Condition of Natural Components of the Environment	Air Environment	Ambient air quality							
		Noise, infrasound							
		Vibration							
		Offensive odor							
		Other							
	Water Environment	Water quality							
		Sediment							
		Ground water							
		Other							
	Soil Environment and Other Environment	Landform, geology							
		Ground							
		Soil							
		Other							
Ensuring Biodiversity and Systematic Conservation of Natural Environment	Flora								
	Fauna								
	Ecosystem								
Beneficial Contact between People and Nature	Landscape								
	Places for activities with nature								
Environmental loads		Waste etc.							
		Greenhouse gas etc.							
Radioactive materials in general environment		Radiation quantity							

Source : Environmental Impact Assessment Network, MOEJ website  
 ([http://assess.env.go.jp/files/1\\_seido/1-3\\_horei/honbun260627-1.pdf](http://assess.env.go.jp/files/1_seido/1-3_horei/honbun260627-1.pdf))

The competent ministry of each target sector sets the subcategories of the environmental

components which are likely to be impacted by the target sector's characteristics based on the above-mentioned components. The ministry also issues the ministerial ordinance and technical guidelines on a specific methodology for EIA for each target sector. In practice, it is suggested to consider land stability changed by development (e.g. liquefaction, ground deformation such as subsidence and landslides, and increased risk of slope failure, etc.) as environmental impact items for the EIA in "EIA Technical Guide – Ambient Air, Water, Soil and Environmental Impact (2017, Japanese Ministry of Environment)".

## (2) Examples of EIA based on Japanese EIA Act Which Dealt with Natural Disasters

As of May 2019, 3 examples<sup>1</sup> which dealt with natural disasters were found as shown in the table below, by searching on the internet including "Environmental Impact Assessment Network" managed by Ministry of Environment, Japan. However, it should be noted that regarding Project No.1 and 2, the contents of each EIA document are different from the current EIA contents since the EIA Act was not fully applied at that time and the transitional measure was applied for these projects, although these EIA documents were published after enforcement of the Act.

**Table 3-12 Projects that have Selected Parameters related to Natural Disaster in their EIA under the Japanese EIA Act**

No.	Selected Parameters related to Natural Disasters		Project Name
1	Landform, geology	Impact on stability of land, change of sediment discharge amount, change of current landform	Urban development project for housing in south east district, Seto city
2	Landform, surface geology, soil, unique natural phenomenon	Degree of change of landform, stability of slope, preservation of surface soil	Shitou first specified land readjustment project in Ichihara city planning project
3	Landform and geology	Stability of land	Linear Chuo Shinkansen (between Tokyo and Nagoya city)

Source: 1, 2: Website of Environmental Impact Assessment Network, MOEJ

[http://assess.env.go.jp/2\\_jirei/index.html](http://assess.env.go.jp/2_jirei/index.html)

3: Website of Central Japan Railway Company

<https://company.jr-central.co.jp/chuoshinkansen/assessment/document1408/nagano/>

Projects No.1 and 2 of Table 3-12 are area development projects and No.3 is a linear development project. In these EIAs, disasters related parameters, such as landslide and slope failure induced by instability of slope and banking, were selected because the projects involved a large scale land forming and slope construction works. As an example, the impact assessment and mitigation measures of stability of land for Project No.3 is summarized below as EIA document was disclosed

<sup>1</sup> EIA reports prepared under the Japanese Environmental Impact Assessment Act are partially available on the website, which mainly includes the EIA reports which are currently disclosed.

on the website of project proponents etc.

“EIA of Linear Chuo Shinkansen (between Tokyo and Nagoya city) (Nagano prefecture)” was prepared for Project No. 3 in August 2014. In the scoping of the EIA, “Stability of Land” was selected under the environmental component category of “Landform and Geology,” by considering the construction work of tunneling, cutting and removal of existing structures. As the environmental mitigation measures for a land stability, “applying appropriate design and construction method,” “protection of slopes” and “appropriate management of construction” were proposed in the EIA as shown in the following box. The EIA, however, does not include any impact assessments on natural disaster-related parameters for the operation phase.

<Applying appropriate design and construction method>

Table 8-3-2-9(1) Content of environmental mitigation measure

Implementing organization		Central Japan Railway Company
Details of implementation	Type, method	Applying appropriate design and construction method
	Location, area	Changes to be made by construction works
	Time, period	Design phase and construction phase
Effect of environmental mitigation measure		Applying construction plan to secure land stability by grasping details of the property of the area based on detail survey of landform, geology, etc. prior to construction work and thus, impact on stability of land can be avoided.
Uncertainty		N/A
Impact on other environmental aspects		N/A

<Protection of slopes>

Table 8-3-2-9(2) Content of environmental mitigation measure

Implementing organization		Central Japan Railway Company
Details of implementation	Type, method	Protection of slopes
	Location, area	Areas to be applied earth cutting
	Time, period	Construction phase
Effect of environmental mitigation measure		For slopes and slant, appropriate protection method such as retaining wall, concrete spraying and ground anchoring, etc. will be applied depending on the condition. For rock lump with a potential rock fall, appropriate protection method such as removal works and rock fall prevention works, etc. will be applied. Then, collapse of slope and slant will be prevented and thus, impact on stability of land can be avoided. Greening is also considered, and planting works will be implemented as much as possible.
Uncertainty		N/A
Impact on other environmental aspects		N/A

<Appropriate management of construction>

Table 8-3-2-9(3) Content of environmental mitigation measure

Implementing organization		Central Japan Railway Company
Details of implementation	Type, method	Appropriate management of construction
	Location, area	Changes to be made by construction works
	Time, period	Construction phase
Effect of environmental mitigation measure		During excavation, embankment and cutting works,

	construction management will be conducted with attention to landform, geology and groundwater condition, construction work having high safety will be realized and thus, impact on stability of land can be avoided.
Uncertainty	N/A
Impact on other environmental aspects	N/A

Source: Website of Central Japan Railway Company  
[https://company.jr-central.co.jp/chuoshinkansen/assessment/document1408/nagano/pdf/eis2\\_naganoh08-03-02.pdf](https://company.jr-central.co.jp/chuoshinkansen/assessment/document1408/nagano/pdf/eis2_naganoh08-03-02.pdf)

### (3) WB's Practice for Disasters

WB ESS4 specifies impacts of disasters in the following sections:

“The Borrower will design, construct, operate, and decommission the structural elements of the project in accordance with national legal requirements, the EHSGs and other GIIP, taking into consideration safety risks to third parties and affected communities. Structural elements of a project will be designed and constructed by competent professionals, and certified or approved by competent authorities or professionals” (para 6, ESS 4).

ESS4 also requires the borrowers that “[t]he types of measures that can be incorporated to reflect climate change considerations and other risk conditions such as flooding are discussed in more detail in the EHSGs and GIIP” (ESS4 GN6.4).

Additionally, ESS4 requires the borrowers to consider the incremental risks of the public’s potential exposure to operational accidents or natural hazards, including extreme weather events, where the project includes new buildings and structures that will be accessed by members of the public. (para7, ESS4).

### 3.4.6 Climate Change Issue in the ESIA under MDBs’ SGP

Impact assessment of climate change in the ESIA under MDBs’ SGP was reviewed as a reference for Appendix “Scope of Impacts to Be Assessed” of JICA GL in Table 3-13. There is no SGP which mention any specific requirements to contribute to the Paris Agreement (2°C goal). However, prediction and quantification of GHG emission and alternative consideration for GHG emission reduction which are technically and financially feasible are discussed in the SGP as summarized in Table 3-14.

**Table 3-13 Requirements on GHG Emission**

	WB	ADB	IFC
<b>Scope of Prediction and Quantification of GHG Emission</b>	“As part of the environmental and social assessment of the project, “the Borrower will characterize and estimate sources of air pollution related to the project. This will include an estimate of gross GHG emissions resulting from the project...” except the following cases. (para 16) <ul style="list-style-type: none"> <li>For projects that have diverse and small sources of emissions (for example, community-driven</li> </ul>	The threshold to quantify the GHG emission “is generally 100,000 tons of carbon dioxide equivalent per year for the aggregate emissions of direct sources* and indirect sources* associated with electricity purchased for own consumption.” (SPS Appendix 1, footnote 10)	“For projects that are expected to or currently produce more than 25,000 tonnes of CO2-equivalent annually, the client will quantify direct emissions...”(para8, PS3). “Clients with projects producing significant GHG emissions are required to evaluate (i) Scope 1 Emissions and (ii) Scope 2

	WB	ADB	IFC
	development projects); and • where emissions are not likely to be significant (for example, projects in education and social protection) (para 16) “To avoid double counting, gross GHG emissions are calculated only for direct GHG emissions (scope 1*)” (GN 16.1)		Emissions.” (GN3, Annex A)
<b>Threshold for GHG Emission Calculation</b>	None	Generally, 100,000 tons of carbon dioxide equivalent per year for the aggregate emissions as above-mentioned (SPS Appendix 1, footnote 10)	More than 25,000 tonnes of CO2-equivalent annually as above-mentioned (para 8, PS3)
<b>Frequency of GHG Emission Calculation</b>	Expected 1 time when the ESIA is prepared. (para 16, ESS 3)	Annually & quantitatively (para 39, SPS)	Annually & quantitatively (para 8, PS3)
<b>Information Disclosure</b>	To be disclosed as a part of ESIA depending on the risk classification	To be disclosed as a part of ESIA	“[C]lients are encouraged to disclose their GHG emissions annually through corporate reports, or through other voluntary disclosure mechanisms currently being used by private sector companies internationally” (para 19, GN3)

Note: (i) Scope 1 Emissions: direct emissions from the facilities that they own or control within the physical project boundary and, if feasible and relevant, and (ii) Scope 2 Emissions: indirect emissions associated with the project's use of energy but occurring outside the project boundary (e.g., GHG emissions from purchased electricity, heat or cooling). (Annex A, IFC PS GN 3)

Source: Prepared by JICA Study Team based on respective MDBs' SGP

As for the EP3, requirements regarding quantification of GHG emission are stipulated as s below:

“Quantification of GHG emissions will be conducted by the client in accordance with internationally recognised methodologies and good practice, for example, the GHG Protocol. The client will quantify Scope 1 and Scope 2 Emissions.”

The Equator Principles Financial Institutions (EPFI) will require the client to report publicly on an annual basis on GHG emission levels (combined Scope 1 and Scope 2 Emissions) during the operational phase for Projects emitting over 100,000 tonnes of CO2 equivalent annually. Clients will be encouraged to report publicly on Projects emitting over 25,000 tonnes. Public reporting requirements can be satisfied via regulatory requirements for reporting or environmental impact assessments, or voluntary reporting mechanisms such as the Carbon Disclosure Project where such reporting includes emissions at Project level.” (EP 3, p.12)

Current JICA GL also regard the impact of climate change as the scope of impacts to be assessed, and the Climate Finance Impact Tool for Mitigation, so called “the JICA Climate-Fit (Mitigation)” is used as a methodology to evaluate the GHG emission reduction from the baseline scenario.

Alternative considerations for GHG emission reduction which are technically and financially feasible are discussed in the SGP of WB and IFC. As shown in Table 3-14, WB ESS 3 mentions it as the project-related air emission, while IFC PS 3 specifically states as project-related GHG emissions. Such description was not found in ADB SPS.

**Table 3-14 Analysis of Alternative Considerations on GHG Emission Reduction which is Technically and Financially Feasible and Cost Effective**

WB	IFC	ADB
“In addition to the resource efficiency measures described above, the Borrower will consider alternatives and implement technically and financially feasible and cost-effective options to avoid or minimize project-related air emissions during the design, construction and operation of the project.” (para 15, ESS 3)	“In addition to the resource efficiency measures described above, the client will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project.” (para 7, PS 3)	N/A

### 3.4.7 Indivisible Projects, Derivative and Secondary Impact and Cumulative Impact under MDBs’ SGP

Impact assessment of the associated facility, indirect impact and cumulative impact in the ESIA under MDBs’ SGP was reviewed as a reference for Appendix “Scope of Impacts to Be Assessed” of JICA GL<sup>1</sup>. As for the impact caused by persons’ actions, such an impact is included in the cumulative impact under regulations of US Council on Environmental Quality, though SGPs of WB, ADB and IFC do not include them in the definition of the cumulative impact.

**Table 3-15 Definition of Associated Facility under MDBs’ SGP**

Organization	Definition	Requirements
WB	“Associated Facilities” means “ <i>facilities or activities that are not funded as part of the project and, in the judgment of the Bank, are: (a) directly and significantly related to the project; and (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist</i> ”. (para 11, ESS 1)	The environmental and social assessment will also identify and assess, to the extent appropriate, the potential environmental and social risks and impacts of Associated Facilities. The Borrower will address the risks and impacts of Associated Facilities in a manner proportionate to its control or influence over the Associated Facilities. To the extent that the Borrower cannot control or influence the Associated Activities to meet the requirements of the ESSs, the environmental and social assessment will also identify the risks and impacts the Associated Facilities may present to the project. (para 32, ESS1)
ADB	Associated facilities are facilities that are “ <i>not funded as part of the project (funding may be provided separately by the borrower/client or by third parties), and whose viability and existence depend exclusively on the project and whose goods or services are essential for successful operation of the project</i> ” (para 6, Appendix 1, SPS)	The impact of the associated facility is included in the scope of the project impact and risks. However, potential impacts that might occur without the project or independently of the project are not included. In general, SPS also requires that “Environmental impacts and risks will also be analyzed for all relevant stages of the project cycle, including preconstruction, construction, operations, decommissioning, and postclosure activities such as rehabilitation or restoration”. (para 6, Appendix 1, SPS)
IFC	Associated facilities, are “ <i>facilities that are not funded as part of the project and that would not have been constructed or expanded if the project</i>	The impact of the associated facility is included in the scope of the project impact and risks (para 8, PS1)

<sup>1</sup> The English terminology used here is the one adopted by MDBs for “indivisible projects” as well as “derivative and secondary impacts” under JICA GL.

Organization	Definition	Requirements
	<i>did not exist and without which the project would not be viable</i> ". (para 8, PS1)	

Source: Prepared by JICA Study Team.

**Table 3-16 Definition of Indirect Impact/Secondary Impact under MDBs' SGP**

Organization	Definition
WB	An indirect impact is an impact which is caused by the project and is later in time or farther removed in distance than a direct impact, but is still reasonably foreseeable, and will not include induced impacts <sup>1</sup> . (footnote 21, ESS1)
ADB	At an early stage of project preparation, the borrower/client will identify potential direct, indirect, cumulative and induced environmental impacts on and risks to physical, biological, socioeconomic, and physical cultural resources and determine their significance and scope, in consultation with stakeholders, including affected people and concerned NGOs. (para 4, Appendix 1, SPS)
IFC	[I]mpacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent. (para8, PS1)

Source: Prepared by JICA Study Team based on the respective SGP

**Table 3-17 Definition of Cumulative Impact under MDBs' SGP**

Organization	Definition
WB	The cumulative impact of the project is the incremental impact of the project when added to impacts from other relevant past, present and reasonably foreseeable developments as well as unplanned but predictable activities enabled by the project that may occur later or at a different location. Cumulative impacts can result from individually minor but collectively significant activities taking place over a period of time. The environmental and social assessment will consider cumulative impacts that are recognized as important on the basis of scientific concerns and/or reflect the concerns of project-affected parties. The potential cumulative impacts will be determined as early as possible, ideally as part of project scoping. (Footnote 22, ESS1)
ADB	(iii) areas and communities potentially affected by cumulative impacts from further planned development of the project, other sources of similar impacts in the geographical area, any existing project or condition, and other project-related developments that are realistically defined at the time the assessment is undertaken; and (iv) areas and communities potentially affected by impacts from unplanned but predictable developments caused by the project that may occur later or at a different location. (para 6, Appendix 1, SPS.)
IFC	Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted. (para 8, PS1)

Source: Prepared by JICA Study Team based on respective SGPs

### 3.4.8 Consideration for Protected Area, Biodiversity and Critical Natural Habitats in the ESIA under MDBs' SGP

Impact assessment on the protected area, biodiversity and critical natural habitats in the ESIA under MDBs' SGPs was reviewed as a reference for Appendix "Compliance with Laws, Standards, and Plans" of JICA GL.

#### (1) Evaluation of Risks and Impacts

Required practices by WB, IFC and ADB are summarized below:

<sup>1</sup> Para 23.4 of WB ESS 1 GN describes "Borrowers are not expected to assess or mitigate induced impacts due to their unknown, speculative, uncertain, or remote nature" and also "[i]mpacts that are merely possible, or that are considered "speculative," are not reasonably foreseeable."

WB: “Where the environmental and social assessment has identified potential risks and impacts on biodiversity or habitats, the Borrower will manage those risks and impacts in accordance with the mitigation hierarchy and GIIP. The Borrower will adopt a precautionary approach and apply adaptive management practices in which the implementation of mitigation and management measures are responsive to changing conditions and the results of project monitoring.” (para 12, ESS6)

ADB: “The borrower/client will assess the significance of project impacts and risks on biodiversity and natural resources as an integral part of the environmental assessment process specified in paras. 4–10. The assessment will focus on the major threats to biodiversity, which include destruction of habitat and introduction of invasive alien species, and on the use of natural resources in an unsustainable manner. The borrower/client will need to identify measures to avoid, minimize, or mitigate potentially adverse impacts and risks and, as a last resort, propose compensatory measures, such as biodiversity offsets, to achieve no net loss or a net gain of the affected biodiversity.” (para 24, Appendix 1, SPS)

IFC: IFC PS 6 states that “[t]he risks and impacts identification process as set out in PS 1 should consider direct and indirect project-related impacts on biodiversity and ecosystem services and identify any significant residual impacts. ... As a matter of priority, the client should 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 should be implemented. ... Given the complexity in predicting project impacts on biodiversity and ecosystem services over the long term, the client should 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 the project’s lifecycle.” (para.6-10, PS6) .

## **(2) BMP**

Required practices by WB, IFC and ADB are summarized below:

WB: “[w]here significant risks and adverse impacts on biodiversity have been identified, the Borrower will develop and implement a [BMP]” (para 9, ESS 6). BMP includes the purpose of biodiversity management, summary of the activities, mitigation measures, implementation schedule, institution and responsibility, costs, and others,” (Appendix 1, GN 6).

ADB: There is no description on the BMP or any other relevant action plan.

IFC: “ In such cases where a client is able to meet the requirements defined in paragraph 17, the project’s mitigation strategy will be described in a Biodiversity Action Plan and will be designed to achieve net gains of those biodiversity values for which the critical habitat was designated” (para18, PS6).

### (3) Biodiversity Offsets

Required practices by WB, IFC and ADB are summarized below:

WB: “[f]or the protection and conservation of habitats and the biodiversity they support, the mitigation hierarchy includes biodiversity offsets. Offsets will be considered as a last resort, only if significant residual adverse impacts remain after all technically and financially feasible avoidance, minimization, and restoration measures have been considered.”(para15, ESS 6). Additionally, “[a] biodiversity offset will be designed and implemented to achieve measurable, additional, and long term conservation outcomes that can reasonably be expected to result in no net loss and preferably a net gain of biodiversity” (para 16, ESS 6).

ADB: “If some residual impacts are likely to remain significant after mitigation, the EMP will also include appropriate compensatory measures (offset) that aim to ensure that the project does not cause significant net degradation to the environment. ... Monetary compensation in lieu of offset is acceptable in exceptional circumstances, provided that the compensation is used to provide environmental benefits of the same nature and is commensurate with the project’s residual impact.”(para 13, Appendix 1, SPS). Additionally, “[t]he borrower/client will need to identify measures to avoid, minimize, or mitigate potentially adverse impacts and risks and, as a last resort, propose compensatory measures, such as biodiversity offsets, to achieve no net loss or a net gain of the affected biodiversity” (para 24, Appendix 1, SPS).

IFC: “[f]or the protection and conservation of biodiversity, the mitigation hierarchy includes biodiversity offsets, which may be considered only after appropriate avoidance, minimization, and restoration measures have been applied. A biodiversity offset should be designed and implemented to achieve measurable conservation outcomes that can reasonably be expected to result in no net loss and preferably a net gain of biodiversity; however, a net gain is required in critical habitats” (para 10, PS6).

### (4) Definition of Habitats

Habitats are defined by WB, ADB and IFC as shown in Table 3-18. The definitions by these 3 organizations are quite similar; however, IFC and ADB have included “areas associated with key evolutionary processes in the critical habitat. Moreover, ADB has included importance of the habitats for local communities in the definition. Lastly, there is no requirement for development in modified habitats in the SGP of WB, ADB and IFC.

**Table 3-18 Definition of Habitats**

SGP	Definition
WB ESS 6	WB defined the habitats include “a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the nonliving environment” and classified into 3 types, namely modified habitat, natural habitat and critical habitat as shown below. <b>Modified habitat:</b> Modified habitats are areas that may contain a large proportion of plant and/or animal species of nonnative origin, and/or where human activity has substantially

SGP	Definition
	<p>modified an area's primary ecological functions and species composition. Modified habitats may include, for example, areas managed for agriculture, forest plantations, reclaimed coastal zones, and reclaimed wetlands. (ESS6 para 19)</p> <p><b>Natural habitat:</b> 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. (ESS6 para 21)</p> <p><b>Critical habitat:</b> Critical habitat is defined as areas with high biodiversity importance or value, including:</p> <ul style="list-style-type: none"> <li>(a) habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches</li> <li>(b) habitat of significant importance to endemic or restricted-range species</li> <li>(c) habitat supporting globally or nationally significant concentrations of migratory or congregatory species</li> <li>(d) highly threatened or unique ecosystems</li> <li>(e) ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d).</li> </ul>
ADB SPS	<p><b>Modified habitat:</b> In areas of modified habitat, where the natural habitat has apparently been altered, often through the introduction of alien species of plants and animals, such as in agricultural areas (para 25)</p> <p><b>Natural habitat:</b> Land and water areas where the biological communities are formed largely by native plant and animal species, and where human activity has not essentially modified the area's primary ecological functions. (Glossary)</p> <p><b>Critical habitat:</b> A subset of both natural and modified habitat that deserves particular attention. Critical habitat includes areas with high biodiversity value, including habitat required for the survival of critically endangered or endangered species; areas having special significance for endemic or restricted-range species; sites that are critical for the survival of migratory species; areas supporting globally significant concentrations or numbers of individuals of congregatory species; areas with unique assemblages of species or that are <b>associated with key evolutionary processes</b> or provide key ecosystem services; and areas having biodiversity of <b>significant social, economic, or cultural importance to local communities</b>. (Footnote 5)</p>
IFC PS6	<p><b>Modified habitat:</b> Modified habitats are areas that may contain a large proportion of plant and/or animal species of non-native origin, and/or where human activity has substantially modified an area's primary ecological functions and species composition. (para 11)</p> <p><b>Natural habitat:</b> 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. (para 13)</p> <p><b>Critical habitat:</b> Areas with high biodiversity value, including (i) habitat of significant importance to Critically Endangered and/or Endangered<sup>11</sup> 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. (para 16)</p>

Source: Prepared by JICA Study Team based on respective SGP

## (5) Requirements for the Development Project in the Natural Habitat

Requirements for the development project in the Natural Habitat are summarized in Table 3-19.

**Table 3-19 Requirements for the Development Project in the Natural Habitat**

SGP	Requirements
WB ESS 6	<p>If natural habitats are identified as part of the assessment, the Borrower will seek to avoid adverse impacts on them in accordance with the mitigation hierarchy. Where natural habitats have the potential to be adversely affected by the project, the Borrower will not implement any project-related activities unless:</p> <ul style="list-style-type: none"> <li>(a) There are no technically and financially feasible alternatives.</li> <li>(b) Appropriate mitigation measures are put in place, in accordance with the mitigation hierarchy, to achieve no net loss and, where feasible, preferably a net gain of biodiversity over the long term. When residual impacts remain despite best efforts to avoid, minimize and mitigate impacts, and where appropriate and supported by relevant stakeholders, mitigation measures may include biodiversity offsets adhering to the principle of "like-for-like or better." (para 22)</li> </ul>
ADB SPS	<p>In areas of natural habitat, the project will not significantly convert or degrade such habitat, unless the following conditions are met:</p>

SGP	Requirements
	<p>(i) No alternatives are available.</p> <p>(ii) A comprehensive analysis demonstrates that the overall benefits from the project will substantially outweigh the project costs, including environmental costs.</p> <p>(iii) Any conversion or degradation is appropriately mitigated.</p> <p>Mitigation measures will be designed to achieve at least no net loss of biodiversity. They may include a combination of actions, such as postproject restoration of habitats, offset of losses through the creation or effective conservation of ecologically comparable areas that are managed for biodiversity while respecting the ongoing use of such biodiversity by Indigenous Peoples or traditional communities, and compensation to direct users of biodiversity. (para 26, 27)</p>
IFC PS6	<p>The client will not significantly convert or degrade natural habitats, unless all of the following are demonstrated:</p> <ul style="list-style-type: none"> <li>· No other viable alternatives within the region exist for development of the project on modified habitat.</li> <li>· Consultation has established the views of stakeholders, including Affected Communities, with respect to the extent of conversion and degradation.</li> <li>· Any conversion or degradation is mitigated according to the mitigation hierarchy.</li> </ul> <p>In areas of natural habitat, mitigation measures will be designed to achieve no net loss of biodiversity where feasible. Appropriate actions include:</p> <ul style="list-style-type: none"> <li>· Avoiding impacts on biodiversity through the identification and protection of set-asides</li> <li>· Implementing measures to minimize habitat fragmentation, such as biological corridors</li> <li>· Restoring habitats during operations and/or after operations</li> <li>· Implementing biodiversity offsets. (para 14, 15)</li> </ul>

Source: Prepared by JICA Study Team based on respective SGP

## (6) Requirements for the Development Project in the Critical Natural Habitats

Requirements for the development project in the Critical Natural Habitats are summarized in Table 3-20.

**Table 3-20 Requirements for the Development Project in the Critical Natural Habitat/Critical Habitat**

SPS	Requirements
WB ESS 6	<p>In areas of critical habitat, the Borrower will not implement any project activities that have potential adverse impacts unless all of the following conditions are met (para 24):</p> <ol style="list-style-type: none"> <li>No other viable alternatives within the region exist for development of the project in habitats of lesser biodiversity value.</li> <li>All due process required under international obligations or national law that is a prerequisite to a country granting approval for project activities in or adjacent to a critical habitat has been complied with.</li> <li>The potential adverse impacts, or likelihood of such, on the habitat will not lead to measurable net reduction or negative change in those biodiversity values for which the critical habitat was designated.</li> <li>The project is not anticipated to lead to a net reduction in the population<sup>13</sup> of any Critically Endangered, Endangered, or restricted-range species, over a reasonable time period.<sup>14</sup></li> <li>The project will not involve significant conversion or significant degradation of critical habitats. In circumstances where the project involves new or renewed forestry or agricultural plantations, it will not convert or degrade any critical habitat.</li> <li>The project's mitigation strategy will be designed to achieve net gains of those biodiversity values for which the critical habitat was designated.</li> <li>A robust and appropriately designed, long-term biodiversity monitoring and evaluation program aimed at assessing the status of the critical habitat is integrated into the Borrower's management program.</li> </ol>
ADB SPS	<p>No project activity will be implemented in areas of critical habitat unless the following requirements are met (para 28):</p> <ol style="list-style-type: none"> <li>There are no measurable adverse impacts, or likelihood of such, on the critical habitat which could impair its high biodiversity value or the ability to function.</li> <li>The project is not anticipated to lead to a reduction in the population of any recognized endangered or critically endangered species<sup>6</sup> or a loss in area of the habitat concerned such that</li> </ol>

SPS	Requirements
	<p>the persistence of a viable and representative host ecosystem be compromised.</p> <p>(iii) Any lesser impacts are mitigated in accordance with para. 27. (para 28)</p> <p>※para 27. Mitigation measures will be designed to achieve at least no net loss of biodiversity. They may include a combination of actions, such as postproject restoration of habitats, offset of losses through the creation or effective conservation of ecologically comparable areas that are managed for biodiversity while respecting the ongoing use of such biodiversity by Indigenous Peoples or traditional communities, and compensation to direct users of biodiversity.</p>
IFC PS6	<p>In areas of critical habitat, the client will not implement any project activities unless all of the following are demonstrated (para 17):</p> <ul style="list-style-type: none"> <li>a) No other viable alternatives within the region exist for development of the project on modified or natural habitats that are not critical.</li> <li>b) 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.</li> <li>c) The project does not lead to a net reduction in the global and/or national/regional population of any Critically Endangered or Endangered species over a reasonable period of time.</li> <li>d) A robust, appropriately designed, and long-term biodiversity monitoring and evaluation program is integrated into the client's management program.</li> </ul>

Source : Prepared by JICA Study Team based on respective SGP

## **(7) Definition of Protected Areas and Requirements for the Development Project in the Protected Area under MDBs' SGP**

In addition to the above-mentioned habitats, the definition and requirements for legally protected areas under MBDS' SGP are summarized as follows:

WB: ESS6 include “an area that is legally protected, designated for protection, or regionally or internationally recognized” in protected areas (para 26, ESS 6). The protected areas consist of “[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” (footnote 15, ESS 6).

As for Internationally recognized areas of high biodiversity value, “World Heritage Natural Sites, Biosphere Reserves, Ramsar Wetlands of International Importance, [KBA], [IBA], and Alliance for Zero Extinction Sites, among others” are included (footnote 16, ESS 6).

ADB: ADB SPS also describes requirements for legally protected areas; however, the definition and examples are not available in the SPS (para 30, Appendix 1, SPS).

IFC: PS6 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” (footnote 16, PS 6).

Internationally recognized areas include UNESCO Natural World Heritage Sites, UNESCO Man and the Biosphere Reserves, KBA, and wetlands designated under the Convention on Wetlands of International Importance (the Ramsar Convention) and others” (footnote 17, PS 6).

**Table 3-21 Requirements for the Protected Areas**

SGP	Requirements
WB ESS 6	<p>The Borrower will meet the requirements of paragraphs 13 through 25 of this ESS, as applicable. In addition, the Borrower will:</p> <ul style="list-style-type: none"> <li>a) Demonstrate that the proposed development in such areas is legally permitted.</li> <li>b) Act in a manner consistent with any government recognized management plans for such areas.</li> <li>c) Consult and involve protected area sponsors and managers, project-affected parties including Indigenous Peoples, and other interested parties on planning, designing, implementing, monitoring, and evaluating the proposed project, as appropriate.</li> <li>d) Implement additional programs, as appropriate, to promote and enhance the conservation aims and effective management of the area. (para27)</li> </ul>
ADB SPS	<p>In circumstances where some project activities are located within a legally protected area, in addition to the requirement specified in para. 28, the borrower/client will meet the following requirements:</p> <ul style="list-style-type: none"> <li>(i) Act in a manner consistent with defined protected area management plans.</li> <li>(ii) Consult protected area sponsors and managers, local communities, and other key stakeholders on the proposed project.</li> <li>(iii) Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area. (para30)</li> </ul>
IFC PS6	<p>In circumstances where a proposed project is located within a legally protected area or an internationally recognized area, the client will meet the requirements of paragraphs 13 through 19 of this Performance Standard, as applicable. In addition, the client will:</p> <ul style="list-style-type: none"> <li>a) Demonstrate that the proposed development in such areas is legally permitted.</li> <li>b) Act in a manner consistent with any government recognized management plans for such areas.</li> <li>c) Consult protected area sponsors and managers, Affected Communities, Indigenous Peoples and other stakeholders on the proposed project, as appropriate.</li> <li>a) Implement additional programs, as appropriate, to promote and enhance the conservation aims and effective management of the area.(PS 6, para 20)</li> </ul> <p>Implementing additional programs may not be necessary for projects that do not create a new footprint.(Footnote 18)</p>

Source: Prepared by JICA Study Team based on respective SGP

## **(8) Applicability of the SGP to Supply Chain**

Applicability of the SGPs of the MDBs to supply chain is summarized as below:

- WB: ESS6 states “[w]here a Borrower is purchasing natural resource commodities, including food, timber and fiber, that are known to originate from areas where there is a risk of significant conversion or significant degradation of natural or critical habitats, the Borrower’s environmental and social assessment will include an evaluation of the systems and verification practices used by the primary suppliers. The Borrower will establish systems and verification practices which will: (a) identify where the supply is coming from and the habitat type of the source area; (b) where possible, limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion or degradation of natural or critical habitats; and (c) where possible and within a reasonable period, shift the Borrower’s primary suppliers to suppliers that can demonstrate that they are not significantly adversely impacting these areas. (para38, 39, ESS6) Additionally, it states “[t]he ability of the Borrower to fully address these risks will depend upon the Borrower’s level of control or influence over its primary suppliers.” (para 40, ESS6).
- ADB: SPS does not specify the applicability clearly.
- IFC: the client is required to confirm the primary supplier’s evaluation in terms of environment

and social aspects and its verification, more specifically “The systems and verification practices will (i) identify where the supply is coming from and the habitat type of this area; (ii) provide for an ongoing review of the client’s primary supply chains; (iii) limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural and/or critical habitats (this may be demonstrated by delivery of certified product, or progress towards verification or certification under a credible scheme in certain commodities and/or locations); and (iv) where possible, require actions to shift the client’s primary supply chain over time to suppliers that can demonstrate that they are not significantly adversely impacting these areas. The ability of the client to fully address these risks will depend upon the client’s level of management control or influence over its primary suppliers.” (para 30, IFC PS6)

### **(9) Illegal Activities on Ecosystem and Biodiversity**

Current JICA GL state that illegal logging is one of the illegal activities which should be avoided. MDBs’ SGPs regarding such illegal activities on ecosystem and biodiversity, including illegal logging, are reviewed. Based on the premise of that a project complies the national legislations of the borrower’s country, stipulations in the MDBs’ SGPs about such illegal activities which should be avoided by the project are summarized below.

- WB ESS6 does not describe any other illegal activities on Ecosystem and Biodiversity which should be avoided by the borrower.
- ADB SPS prohibits “production of or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements or subject to international phaseouts or bans, such as .... (d) wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora” in Appendix 5 ADB Prohibited Investment Activities List of SPS.
- IFC PS6 does not specify any other illegal activities on Ecosystem and Biodiversity which should be avoided by the client.

## **3.5 Comparison among Bilateral Donors’ SGPs**

The SGPs of major bilateral funding agencies both in developed countries and emerging countries are studied based on the public information disclosed on their websites. The target agencies which provide various assistance, such as providing funding and technical assistance as JICA does were selected and include AFD, Kreditanstalt für Wiederaufbau, Germany (KfW), Department for International Development, UK (DFID), Commonwealth Development Corporation, UK (CDC), Millennium Challenge Corporation, USA (MCC), Overseas Private Investment Corporation, USA (OPIC), United States Agency for International Development (USAID), Economic Development Cooperation Fund/Export-Import Bank of Korea (EDCF/KEXIM), Export-Import Bank of China (CEXIM), and Neighbouring Countries Economic Development Cooperation Agency, Thailand

(NEDA).

However, information of the SGPs of DFID and CEXIM are included in Table 3-22 (1) and (2) as a reference since these SGPs are not fully or partially available on their website and not fully confirmed.

Table 3-22 (1) Survey on Bilateral Donor Agencies' SGPs (France, Germany, UK)

No.	Items	AFD (France)	KfW ( Development Bank) (Germany)	DFID (United Kingdom)	CDC (United Kingdom)
<b>General Outline</b>					
1	Outline of the government policy on bilateral assistance (which is equivalent to the Development Cooperation Charter of the Japanese Government)	<ul style="list-style-type: none"> <li>There is no policy paper which is equivalent to the Development Cooperation Charter; however, according to the public information on the French Foreign Ministry website, the summary of its policy is as follows: <ul style="list-style-type: none"> <li>Provide assistance through loans, grants and technical cooperation in line with the needs of the recipient country. The emphasis is on Africa, conflict affected countries, etc. ("French official development assistance; priorities, principles &amp; key figures", "Development Assistance", French Foreign Ministry website<sup>1</sup>)</li> </ul> </li> <li>France declares four prioritized areas as follows: <ul style="list-style-type: none"> <li>The fight against climate change and environmental conservation</li> <li>Human development and gender equality</li> <li>Economic development for social progress</li> <li>Strengthening human rights, stability and peace. (Same as above)</li> </ul> </li> <li>France has formulated separate policies on sustainable development, human rights, gender, etc. in addition to the development assistance policy. (Listed at the bottom of above-mentioned "French Foreign Policy")</li> <li>-While emphasizing considerations to Effectiveness, Transparency &amp; Accountability, there is no description on environmental and social considerations and SGPs. ("Principles of French official development assistance" from the above-mentioned Ministry of Foreign Affairs site. <sup>2</sup>)</li> <li>France is the second-largest contributor to the European Development Fund (EDF) and through its contribution, helps countries and sectors which France can provide assistance and aims at realizing the diplomatic policy of France or EU ("France and EU Development Policy" from the above-mentioned Ministry of Foreign Affairs site. <sup>3</sup>)</li> </ul>	<ul style="list-style-type: none"> <li>According to the German Federal Ministry for Economic Cooperation and Development (BMZ) website <sup>4</sup>, the target of BMZ's development policy is freedom and security for all; a life without poverty, fear and environmental destruction. German bilateral official development cooperation consists of the economic cooperation and the technical cooperation. ("International Cooperation", "The direct approach to the partner", "Working approach", "Aims", "Ministry" on BMZ website)</li> <li>According to the BMZ issued Guidelines for Bilateral Financial and Technical Cooperation (February 2019) <sup>5</sup>, the priority areas of German development cooperation include realizing democracy, civil society, development of peace, education, health, environmental policy, sustainable economic development, energy, etc. <sup>5</sup> (2 Priority areas, BMZ Guidelines for Bilateral Financial and Technical Cooperation)</li> </ul> <p>As for the institutional arrangement, under BMZ, the Kreditanstalt für Wiederaufbau (KfW) is in charge of financial cooperation (FC) and the Deutsche Gesellschaft für Technische Zusammenarbeit (GTZ) is in charge of technical cooperation (TC). (16, BMZ Guidelines for bilateral Financial and Technical Cooperation)</p>	<ul style="list-style-type: none"> <li>In 2015 "UK Aid: Tackling global challenges in the national interest"<sup>6</sup> was published, and it declares the followings: <ul style="list-style-type: none"> <li>It is targeted to spending 0.7% of Gross National Income (GNI) on international development. (Para 2, Foreword, "UK Aid: Tackling global challenges in the national interest")</li> <li>British interests are tackling to the threat of terrorism and global climate change, not the causes of mass migration and disease, and the strategic areas to be supported by UK are "strengthening global peace, security and governance", "strengthening resilience and response to crises", "promoting global prosperity", and "tackling extreme poverty and helping the world's most vulnerable." (Para 8, Foreword, "UK Aid: Tackling global challenges in the national interest")</li> <li>As a result of a new approach, British Government will allocate 50% of all DFID's spending to fragile states and regions, increase aid spending for the Syrian crisis and the related region, fund to global public health, and shift from "general budget support" to "target spending" (Para 13: Foreword, "UK Aid: Tackling global challenges in the national interest")</li> <li>Assistance in climate change program "will be delivered through a cross-government effort, including crisis response such as disaster prevention and the additional investment in clean energy innovation". (Climate Change Box 3.D, "UK Aid: Tackling global challenges in the national interest")</li> <li>The government strive to end sexual violence, Female Genital Mutilation (FGM) and child, early and forced marriage, in conflict as social considerations for the vulnerable groups. (3.17, "UK Aid: Tackling global challenges in the national interest")</li> <li>The government will aim for all UK government departments to be ranked as 'Good' or 'Very Good' in the international Aid Transparency Index. (4.11, "UK Aid: Tackling global challenges in the national interest")</li> <li>There is no specific description on environmental and social considerations and SGPs.</li> </ul> </li> </ul>	
<b>SGPs</b>					
	SGP name (Note: For each SGP website, see the list below)	Environmental and Social Risk Management Policy for AFD-funded Operations	KfW Development Bank Sustainability Guideline; Assessment of Environmental, Social, and Climate Performance: Principles and Process (April 2016)	<ul style="list-style-type: none"> <li><u>SMART Rules : Better Programme Delivery (April 2019)</u><sup>7</sup></li> <li>Technical Guidance (environmental impact assessments, social impact applications, conflict analysis, assessment evidence, and benefit feedback) has not been disclosed on the website. The following explanations refer to the above SMART Rules.</li> </ul>	<ul style="list-style-type: none"> <li><u>CDC's Code of Responsible Investing (March 2017)</u></li> <li>Climate Change Policy<sup>8</sup></li> <li>Gender Equality Position Statement<sup>9</sup></li> <li>Commitments to strength safeguards measures against sexual exploration, abuse and sexual harassment in the development finance sector (SEA policy paper)</li> <li>Environmental, Social, Governance (ESG) Toolkit (website)</li> </ul>

<sup>1</sup> French Ministry for Europe and Foreign Affairs, French official development assistance; priorities, principles & key figures: <https://www.diplomatie.gouv.fr/en/french-foreign-policy/development-assistance/french-official-development/>

<sup>2</sup> French Ministry for Europe and Foreign Affairs, Principles of French official development assistance: <https://www.diplomatie.gouv.fr/en/french-foreign-policy/development-assistance/french-official-development/principles-of-french-development/>

<sup>3</sup> French Ministry for Europe and Foreign Affairs, France and EU Development Policy: <https://www.diplomatie.gouv.fr/en/french-foreign-policy/development-assistance/france-and-eu-development-policy/>

<sup>4</sup> The Federal Ministry for Economic Cooperation and Development (BMZ): <http://www.bmz.de/en/ministry/index.html>, [http://www.bmz.de/en/ministry/approaches/bilateral\\_development\\_cooperation/index.html](http://www.bmz.de/en/ministry/approaches/bilateral_development_cooperation/index.html)

<sup>5</sup> Federal Ministry of Economic Cooperation and Development, Guidelines for bilateral Financial and Technical Cooperation with cooperation partners of German development cooperation (February 2019): [https://www.bmz.de/en/zentrales\\_downloadarchiv/wege\\_und\\_akteure/190221\\_Guidelines\\_Financial\\_and\\_Technical\\_Cooperation.pdf](https://www.bmz.de/en/zentrales_downloadarchiv/wege_und_akteure/190221_Guidelines_Financial_and_Technical_Cooperation.pdf)

<sup>6</sup> DFID, UK aid tackling global challenges in the national interest: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/478834/ODA\\_strategy\\_final\\_web\\_0905.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/478834/ODA_strategy_final_web_0905.pdf)

<sup>7</sup> Version XI: effective 1st April 2019 until 1st October 2019. Smart Rules is DFID's operating framework, and shows the due diligence implementation policy etc. throughout the program cycle. (Smart Rules, Executive Summary) Technical Guidance is introduced in Smart Rules as business reference materials and guidance covering a wide range of fields such as environmental and social impact assessment. (1.3 Discretionary resources and guidance, Smart Rules)

<sup>8</sup> Climate Change Policy: <https://assets.cdcgroup.com/wp-content/uploads/2018/06/25150830/Climate-Change-Policy.pdf>

<sup>9</sup> Gender Equality Position Statement: <https://assets.cdcgroup.com/wp-content/uploads/2018/07/11143751/Gender-Position-Statement.pdf>

No.	Items	AFD (France)	KfW (Development Bank) (Germany)	DFID (United Kingdom)	CDC (United Kingdom)
					<sup>1</sup> (Refer to the underlined code unless otherwise stated below)
2	Documents to be disclosed, disclosure period, and method for environmental and social considerations documents	<ul style="list-style-type: none"> <li>• There is no description on information disclosure by AFD.</li> <li>• AFD supports disclosure by clients, but disclosure by clients is not mandatory. ("the client will be encouraged to make these documents available to the public.")</li> <li>• Documents subject to information disclosure (recommended): EIA/ESIA, ESMP, RAP, etc. (For projects of High, Substantial, Moderate risk category)</li> <li>• Once the environmental and social documents have been reviewed by AFD, AFD requests the executing agency disclose the ESIA, ESMP and/or RAP in the borrower's country so that major stakeholders can access them, and to ensure the timeline for stakeholder meetings in which comments are incorporated. The client will also be encouraged to disclose updated ESIA, ESMP or RAP in the accessible place such as their offices or via the Internet. (Disclosure of information: Analysis of the documentation in 3. Principles)</li> </ul>	<ul style="list-style-type: none"> <li>• There is no specific description.</li> </ul>	<ul style="list-style-type: none"> <li>• According to SMART Rules, it is supposed to refer to the Technical Guidance for specific measures (1.3 Discretionary resources and guidance in Part 1); however, it is not possible to confirm it because the Technical Guidance is not disclosed on the website.</li> </ul>	<ul style="list-style-type: none"> <li>• There is no description on the documents to be disclosed, disclosed period and method in the Code.</li> <li>• The Code reflects international standards and practices including IFC Performance Standards and it is considered to be dealt with along the IFC requirements. (para 2, Text 1.1)</li> </ul>
3	Categorization Method	<ul style="list-style-type: none"> <li>• Categorization of the environmental and social risk: AFD analyzes and classifies all potential projects into High – Substantial – Moderate – Low environmental and social risks, depending on the extent of the potential risks borne by the project.</li> <li>• The classification takes into account the nature and scale of the project, the location and sensitivity of the affected area, the severity of the potential environmental and social risks and impacts, as well as the client's capacity to manage them.</li> <li>• By category, the scope of the environmental and social assessment, the level of environmental standards, the scope of stakeholders engagement and the level of information required are decided for projects. (Categorization of the environmental and social risk in 3. Principles)</li> </ul>	<ul style="list-style-type: none"> <li>• All FC measures will be classified into one of the following three categories "A", "B" or "C"<sup>2</sup>, according to the relevance of their potentially adverse environmental and social impacts and risks. Additionally, screening will be conducted for a possibility to reduce GHG emission and a necessity of mitigation measures for climate change. (4.3.2.1)</li> <li>• 10.1 Annex 1 illustrates the list of FC measures and sector examples which may have potential significant adverse environmental and social impacts (assigned to category A or B).</li> </ul>	<ul style="list-style-type: none"> <li>• There is no specific description in SMART Rules. According to SMART Rules, it is supposed to refer to the Technical Guidance for specific measures (1.3 Discretionary resources and guidance in Part 1), but it is not possible to confirm it because the Technical Guidance is not disclosed on the website.</li> </ul>	<ul style="list-style-type: none"> <li>• The Code does not specify the method of categorization, however, the Code is based on international standards including IFC PSs. (para 2, Text 1.1)</li> <li>• According to CDC's ESG Toolkit<sup>3</sup>, uniform rules for categorization are not defined; however, it is recommended to categorize into High, Medium (Medium-High, Medium-Low) and Low according to IFC PSs etc. Along these categories, the scope and level of E &amp; S Due Diligence will be determined. (ESG Toolkit, "Proposed E&amp;S Inherent risks/impacts Categorisation")</li> <li>• According to CDC's ESG Toolkit, categorization takes into account the project mitigation measures in addition to project risks / impacts. However, the borrower's management and response capability of E&amp;S risks / impacts is not considered in the categorization (assessing the management ability of the borrower etc. according to the category.) (ESG Toolkit website)</li> </ul>
4	Referred International standard (. Whether it refers to an international organization or some international standard as JICA GL do).	<ul style="list-style-type: none"> <li>• AFD has adopted the WB's prevailing environmental and social operational standards to projects with environmental and social risks categorized as High or Substantial. For other operations, the projects must be appraised and implemented in compliance with the prevailing national environmental and social regulations in</li> </ul>	<ul style="list-style-type: none"> <li>• Compulsory for the ESDD of a FC measures are the standards of the WB Group (i.e. for public agencies the Environmental and Social Safeguards of the WB and the IFC Performance Standards for cooperation with the private sector) and their General and sector-specific EHSG as well as the Core Labour Standards of the</li> </ul>	<p>There is no specific description in SMART Rules. According to SMART Rules, it is supposed to refer to the Technical Guidance for specific measures (1.3 Discretionary resources and guidance in Part 1), but it is not possible to confirm it because the Technical Guidance is</p>	<ul style="list-style-type: none"> <li>• The requirements of IFC PSs and WBG EHS Guidelines are applied<sup>8 9</sup> (para 2 of Section 1.1, and the second half of Schedule 4 "Additional E&amp;S Requirements for Specific Circumstances")</li> <li>• The Code says it reflects international standards and practices including UN Guiding Principles on Business and Human Rights. Thus, the principles are considered to refer to as appropriate. (Text 1.1 paragraph 2)</li> <li>• Low categorized projects are also subject to basic E&amp;S due</li> </ul>

<sup>1</sup> CDC ESG Toolkit: <https://toolkit.cdcgroup.com/>

<sup>2</sup> Category A: If they may have diverse significant adverse impacts and risks on the environment and the social conditions of the affected population. Impacts and risks may potentially be significantly adverse because the complex nature of the FC measure, the scale (large to very large), the sensitivity of the location(s) of the FC measure or the impacts and risks are irreversible or unprecedented. Such impacts and risks may affect a larger area that is beyond the site of the facility under construction, the facility itself as well as any associated facilities or the FC measure area in a narrower sense. (4.3.2.2)

Category B: If they may have potentially adverse risks and impacts upon the environment and on the social conditions of those concerned. However, the impacts and risks may have a lesser extent than these of category A FC measures and can usually be mitigated through state-of-the-art mitigation measures or standard solutions. Typically, the potential impacts and risks of category B FC measures are limited to a local area, are in most cases reversible and are easier to mitigate through appropriate measures. (4.3.2.4)

Category C: If they are expected to have no or only minor adverse environmental and social impacts or risks and if the implementation and operation of the FC measure does not require any particular protection, compensation or monitoring measures. (4.3.2.5)

<sup>3</sup> CDC ESG Toolkit website, Screening and Categorization: <https://toolkit.cdcgroup.com/investment-cycle/screening-and-categorisation/>

<sup>8</sup> The second paragraphs in CDC 1.1. "Code of Responsible Investing" have the following description. "It [the Code] reflects international standards and practices including the International Finance Corporation's Performance Standards, and the UN Guiding Principles on Business and Human Rights. It also reflects CDC's requirements in relation to climate change.

<sup>9</sup> CDC "Code of Responsible Investing", Schedule 4 "Additional E & S Requirements for Specific Circumstances" in the second half (2 paragraphs from the bottom of page 8) has the following description. "the requirements of relevant IFC PSs and EHS Guidelines should be met."

No.	Items	AFD (France)	KfW (Development Bank) (Germany)	DFID (United Kingdom)	CDC (United Kingdom)
		the country where the project takes place. <sup>1</sup> ( Environmental and social reference standards in 3. Principles) • AFD may apply cofinancer’s SGP when cofinance project. If AFD is not the coordinator of the financing, AFD assesses the environmental and social documents produced under the responsibility of the client and/or lead funder. AFD may request additional information and/or implement complementary due diligence. When AFD is the lead or coordinator of the financing, AFD requires the cofinancers and the borrowers to use the AFD procedures for the due diligence. (3. Principles' Cofinancing Operations)	ILO.(4.2.2. <sup>2</sup> ) • If the FC measure involves funds related to the European Union (EU) or is financed in countries with EU membership prospects, the environmental and social standards of the EU also apply. (4.2.2. <sup>3</sup> )	not released on the web <sup>4</sup> .	diligence process, and the project will be reviewed for occupational health and safety, labour standards and, in some cases, energy efficiency. (ESG Toolkit, “Proposed E&S Inherent risks/impacts Categorisation”)
5	Socially vulnerable groups, or special considerations	• There is no provision for the definition of socially vulnerable groups, other than seeking the participation of vulnerable groups in stakeholder consultations. (3. Principles Stakeholder participation-consultation)	• There is no special description concerning the definition of and considerations for the socially vulnerable groups.	There is no specific description in SMART Rules. According to SMART Rules, it is supposed to refer to the Technical Guidance for specific measures (1.3 Discretionary resources and guidance in Part 1), however, it is not possible to confirm it because the Technical Guidance is not available on the website.	• There is no provision of the definition of socially vulnerable groups in the Code. • In the Code, it includes banning of forced labour; banning of child labour; pay wages which meet or exceed industry or legal national minima; no discrimination in terms of recruitment and progression (on the basis of gender, race, and any other social backgrounds, etc.); and respect for the right of all workers. (Middle lines of “General Requirements” in Schedule 3.)
6	Response to climate change (Estimates of GHG emissions, emissions thresholds for which estimates are required, consideration of alternatives with lower GHG emissions, and confirmation of consistency with the counterpart country's Nationally Determined Contributions: NDC)	• There is no special provision. • It is assumed that measures will be required in line with the WB ESS, etc., since AFD has adopted the WB's prevailing environmental and social operational standards.	• A Climate Assessment is conducted to identify and prevent any adverse impacts and risks, or minimize them to an acceptable level in addition to ESDD. (4.1.1. ) • When screening or assessing impacts, the possibility of GHG emission reductions and the need for adaptation measures against climate change need to be considered. (4.3.1 , 4.3.3.1) • When carrying out the in-depth climate assessment, it must be confirmed whether it is a compatible with the National Adaptation Plan (NAP). Also when carrying out the in-depth climate assessment, it needs to be confirmed whether it is compatible with the NDC. (4.4.5) • There is no description on the concept of GHG emissions for which estimation is required and the definition/interpretation of the GHG amount in alternatives.	There is no specific description in SMART Rules. According to SMART Rules, it is supposed to refer to the Technical Guidance for specific measures (1.3 Discretionary resources and guidance in Part 1), however, it is not possible to confirm it because the Technical Guidance is not disclosed on the website.	•If GHG emissions are expected and the requirements of the IFC PS and EHS guidelines are applicable, appropriate impact assessment needs to be conducted, and mitigation measures as per the Climate Change Policy of the CDC will be sought. (Latter half of Schedule 4 “Additional E & S Requirements for Specific Circumstances”) • Climate Change Policy (September 2014) was formulated separately, and it is mentioned that the policy aims to evaluate risk / impact on climate change, support transition to lower carbon society, and support introducing renewable energy. The policy on coal-fired power generation was formulated separately. (1.1 and 1.2, Climate Change Policy) • The CDC actively assesses climate change risks, and in its environmental review, energy use efficiency, water use efficiency, climate change adaptation and disaster response (for large-scale projects susceptible to climate change risk only) will be assessed from the view point of climate change. The CDC will also consider providing loans for those measures as necessary. (Chapter 2, Climate Change Policy
7	Rules on Meaningful Participation of Stakeholders	• For High and Substantial risk projects, a free, prior and informed consultation needs to be conducted with affected residents, communities and relevant Civil Society Organizations (CSOs). • There is no specification of the timing of	• It is mentioned that information needs to be provided in a timely and culturally appropriate manner (4.6.1).However, there is no specific description about “meaningful participation”.	There is no specific description in SMART Rules. According to SMART Rules, it is supposed to refer to the Technical Guidance for specific measures (1.3 Discretionary resources and guidance in Part 1); however, it is not possible to confirm it because the Technical	• When the negative impact on the environmental society is expected in the activities of the company receiving support from CDC, an appropriate stakeholder engagement plan should be developed.(Schedule 4 “Additional E&S Requirements for Specific Circumstances”)

<sup>1</sup> In 3. Principles of AFD "Environmental and Social Risk Management Policy for AFD-funded Operations" has the following description in "Environmental and social reference standards". “Pursuant to the Paris Declaration on Aid Effectiveness promoting Donor alignment and coordination, AFD has adopted the WB’s prevailing environmental and social operational standards. These standards apply to projects with environmental and social risks categorized as High or Substantial. For other operations, the projects must be appraised and implemented in compliance with the prevailing national environmental and social regulations in the country where the operation takes place.”

<sup>2</sup> “Compulsory for the ESDD of a FC measures are the standards of the World Bank Group (i.e. for public agencies the Environmental and Social Safeguards of the World Bank and the IFC Performance Standards for cooperation with the private sector) and their General and sector-specific EHSG as well as the Core Labour Standards of the ILO.”

<sup>3</sup> “If the FC measure involves funds related to the EU or is financed in countries with EU membership prospects, the environmental and social standards of the EU also apply.”

<sup>4</sup> The following description is given in Part 1, 1.3 Discretionary resources and guidance of DFID "SMART Rules". “These [a wide range of operational guidance materials] are designed to share learning and improve the way we design, deliver, monitor, evaluate and learn from Business Plans and programmes. These guides do not contain additional mandatory rules (these are covered within the Smart Rules) but do represent professional good practice. Staff and managers can use their judgement in applying them.

Technical guidance – covering cross-cutting areas such as environmental impact assessments, social impact appraisal, conflict analysis, assessing evidence, and beneficiary feedback – is available on the Evidence and Programme Exchange.

Operational guidance on programme management and delivery is available on the Smart Rules homepage. These are listed as ‘Smart Guides’ and are aligned with the principles and approach of the Smart Rules.”

However, the Guidance has not been obtained.

No.	Items	AFD (France)	KfW ( Development Bank) (Germany)	DFID (United Kingdom)	CDC (United Kingdom)
		<p>consultations, and consultation needs to be conducted more than one time in the impact assessment process as per the national law.</p> <ul style="list-style-type: none"><li>• The initial consultation must be conducted in a transparent manner and must be accessible to all persons potentially affected by the project.</li><li>• Local residents need be consulted in a culturally appropriate manner and a language they can understand, and measures enable local residents to understand need to be provided based on their cultural and educational standards.</li><li>• For the high risk projects, or the project has a significant change during the project implementation stage, consultation needs to be conducted during the implementation phase as necessary.</li><li>• The results of the consultation will be reflected in the final draft EIA, etc. and the AFD will review the draft final EIA. (Stakeholder participation-consultation in 3. Principles)</li></ul>		<p>Guidance is not available on the website.</p>	<ul style="list-style-type: none"><li>• It mentions the need for stakeholder participation in E&amp;S Due Diligence.</li></ul>

Source: Respective SGPs as shown below and the footnote

List of Website Links for Reviewed SGPs

- AFD (France) : Environmental and Social Risk Management Policy for AFD-funded Operations  
[https://www.afd.fr/sites/afd/files/2017-10/Environmental-social-risk-management-policy-afd\\_0.pdf](https://www.afd.fr/sites/afd/files/2017-10/Environmental-social-risk-management-policy-afd_0.pdf)
- AFD GCF (France) : Transforming Financial Systems for Climate, Environmental and Social Framework (February 2018)  
<https://www.afd.fr/sites/afd/files/2018-09-02-18-12/environmental-social-framework-climate.pdf>
- KfW (Germany) (KfW Development Bank) : KfW Development Bank Sustainability Guideline, Assessment of Environmental, Social, and Climate Performance: Principles and Process (April 2016)  
[https://www.kfw.de/PDF/Download-Center/Konzernthemen/Nachhaltigkeit/FZ-Nachhaltigkeitsrichtlinie-2014\\_E.pdf](https://www.kfw.de/PDF/Download-Center/Konzernthemen/Nachhaltigkeit/FZ-Nachhaltigkeitsrichtlinie-2014_E.pdf)
- DFID (United Kingdom) : SMART Rules : Better Programme Delivery  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/791174/Smart-Rules-External-Apr19.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/791174/Smart-Rules-External-Apr19.pdf)
- CDC (United Kingdom) : CDC's Code of Responsible Investing  
[https://assets.cdcgroup.com/wp-content/uploads/2018/10/29104330/Code\\_of\\_Responsible\\_Investing\\_March\\_2017\\_UPDATE31.pdf](https://assets.cdcgroup.com/wp-content/uploads/2018/10/29104330/Code_of_Responsible_Investing_March_2017_UPDATE31.pdf)

**Table 3-22 (2) Survey on Bilateral Donor Agencies' SGP (US, Korea, China, Thailand)**

No.	Items	MCC (USA)	OPIC (USA)	USAID (USA)	EDCF / KEXIM (Korea)	CEXIM (China)	NEDA (Thailand)
General Outline							
1	Outline of the government policy on bilateral assistance (which is equivalent to the Development Cooperation Charter of the Japanese Government)	<ul style="list-style-type: none"><li>• The Trump administration, which was ordained in January 2017, has not clearly announced the strategy on foreign aid policy (as of July 2017). However, through the process of budgeting, under the President's "US First" policy, it is revealed that the main mission of the State Department, including the USAID, is promotion of US national security and economic interests and value, and that international cooperation from the United States needs to be more efficient and effective<sup>1</sup>.</li><li>• Although it is not a policy equivalent to the Development Cooperation Charter of Japan, according to the Joint Strategic Plan (JSP)<sup>2</sup> of the United States Department of State and the USAID for FY2018-2022 (February 2018)<sup>2</sup>, the strategic goals of US foreign policy and development assistance (Goals) are set as follows: Goal 1: Protect America’s Security at Home and Abroad Goal 2: Renew America’s Competitive Advantage for Sustained Economic Growth and Job Creation Goal 3: Promote American Leadership through Balanced Engagement Goal 4: Ensure Effectiveness and Accountability to the American Taxpayer</li><li>• Strategic Objectives are set under each Goal. For bilateral cooperation, for example, the following Strategic Objectives are mentioned under "Goal 2: Renew America's Competitive Advantage for Sustained Economic Growth and Job Creation": Strategic Objective 2.1: Promote American prosperity by advancing bilateral relationships and leveraging international institutions and agreements to open markets, secure commercial opportunities, and foster investment and innovation to contribute to U.S. job creation Strategic Objective 2.2: Promote healthy, educated and productive populations in partner countries to drive inclusive and sustainable development, open new markets and support U.S. prosperity and security objectives Strategic Objective 2.3: Advance U.S. economic security by ensuring energy security, combating corruption, and promoting market-oriented economic and governance reforms</li><li>-OPIC and MCC are also included as agencies of Cross Agency Collaboration to realize the above goals. (Above-mentioned descriptions except 1<sup>st</sup> item is excerpted from p.35-38, JSP)</li></ul>			<ul style="list-style-type: none"><li>• Framework Act on International Development Cooperation (The Framework Act) was formulated, and in its Article 3, it identifies following five basic principles of the Korea’s international development cooperation: (i) reduce poverty; (ii) improve the human rights of women, children and the disabled, and achieve gender equality; (iii) realize sustainable development and humanitarianism; (iv) promote cooperative economic partnership; and (v) pursue peace and prosperity in the international community.</li><li>• The Strategic Plan for International Development Cooperation (The Strategic Plan) was formulated, and its policy includes (i) fulfillment of responsibility as a DAC member, and (ii) the scale-up of the amount of ODA provided, and the strengthening of the ODA implementation system. It also adopted three core strategies, namely (i) sharing Korea’s development experiences; (ii) enhancing the ODA system; and (iii) strengthening inclusive partnership for development.</li><li>• The Mid-term Strategy for Development Cooperation (2016-2020) adopts comprehensive approach and implements plans such as the Humanitarian Assistance Strategy and the Multilateral Aid Strategy to contribute to SDGs achievement.</li><li>• No description related to environmental and social considerations and safeguard policies is found in its policy. (Excerpt from Legal Framework<sup>3</sup>), Strategic Plan<sup>4</sup>, Mid-term Strategy<sup>5</sup>)</li></ul>	<ul style="list-style-type: none"><li>• According to the 13th Five-Year Plan for Economic and Social Development of the People’s Republic of China 2016-2020<sup>6</sup>, it aims to increase overseas aid amount and to improve methodology, especially focusing on (i) human resources, development planning, and economic policy; (ii) expand foreign cooperation and aid in the areas of science, technology, education, medical care, disaster prevention and mitigation, environmental governance, the protection of wild fauna and flora, and poverty alleviation; and (iii) step up the provision of humanitarian aid. (Chapter 53)</li><li>• China will also actively implement the 2030 Agenda for SDGs and help establish diversified systems for development financing, help safeguard international public security, combat terrorism, and actively support and participate in the peacekeeping operations of the United Nations. (Chapter 53)</li><li>• Capacity building in agricultural sector (Chapter 18)</li><li>• Climate change measures (Chapter 46)</li><li>• China will Promote strengthening of bilateral cooperation in the Belt and Road Initiative (Chapter 51) .</li></ul>	<ul style="list-style-type: none"><li>• There is no policy paper that is equivalent to the Development Cooperation Charter of Japan. However, according to the public information on the NEDA website<sup>7</sup>, the summary is as follows:<ul style="list-style-type: none"><li>• NEDA is a leading organization that cooperates with the neighbouring countries in economic and social development to expand trade and investment opportunities among Thailand and its neighbouring countries. NEDA’s mission is to conduct financial and technical assistance, integrate with government and private agencies, plan and implement joint projects of related countries, promote private sector participation, and promote capacity development and organizational development so that projects comply with international standards.</li><li>• As the Corporate Value, four items are listed: Networking, Energy, Driving Forward, and Accountability. Accountability includes consideration for Governance.</li><li>• No description related to environmental and social considerations and SGPs is found.</li></ul></li></ul>
SGPs							

<sup>1</sup> Ministry of Foreign Affairs Official Development Assistance (ODA) Development Cooperation Reference Material (2017 version) Chapter 3 Economic Cooperation of Other Countries Section 2 Outline of Economic Cooperation of Major Donors and Regional Organizations (<https://www.mofa.go.jp/mofaj/gaiko/oda/files/000409546.pdf>) p.246-

<sup>2</sup> JSP FY2018-2022 (February 2018) (<https://www.state.gov/documents/organization/277156.pdf>) JSP is the document in which the United States Department of State and USAID suggest on how to implement US foreign policy and development assistance based on the National Security Strategy by President Trump. (JSP Overview, p16)

<sup>3</sup> Korea ODA Website, Legal Framework: <http://www.odakorea.go.kr/eng.policy.StrategicPlan.do>

<sup>4</sup> Korea ODA Website, Strategic Plan: <http://www.odakorea.go.kr/eng.policy.StrategicPlan.do>

<sup>5</sup> Korea ODA Website, Mid-term Strategy: <http://www.odakorea.go.kr/eng.policy.Mid-termODAPolicy.do>

<sup>6</sup> The 13<sup>th</sup> Five-Year Plan for Economic and Social Development of the People's Republic of China 2016-2020 (Translated by Compilation and Translation Bureau, Central Committee of the Communist Party of China) (<http://en.ndrc.gov.cn/newsrelease/201612/P020161207645765233498.pdf>)

<sup>7</sup> NEDA, Vision and Mission website: <https://www.neda.or.th/2018/en/about?n=nGO4ZDWewEb3QWewEb3Q>

No.	Items	MCC (USA)	OPIC (USA)	USAID (USA)	EDCF / KEXIM (Korea)	CEXIM (China)	NEDA (Thailand)
SGP name (* For each SGP website, see the list below.)		MCC Environmental Guidelines (August 2010)	Environmental and Social Policy Statement (January 2017)	<ul style="list-style-type: none"> <li>Automated Directives System (ADS) Chapter 204 Environmental Procedures (February 2013)<sup>1</sup></li> </ul> <p>Title 22, Code of Federal Regulations, Part 216 (22 CFR 216)</p>	EDCF Safeguard Policy (2016)	<p>Information about CEXIM's SGP has not been disclosed.</p> <p>&lt;Reference Material&gt;</p> <ul style="list-style-type: none"> <li>China Banking Regulatory Commission (CBRC) 'Green Credit Guidelines (GCG)' (2012)<sup>2</sup> (GCG)</li> <li>The Export-Import Bank of China 'White Paper on Green Finance' (2016)<sup>3</sup> (White Paper)</li> </ul>	Environmental and Social Safeguards Guidelines (January 2019)
2	Documents to be disclosed, disclosure period, and method for information disclosure regarding environmental and social considerations documents	<ul style="list-style-type: none"> <li>Implementing entities will be expected to make documents such as ESIA and environmental management plan publicly available and easily accessible. (5. Public Consultation and Disclosure)</li> <li>There is no detailed provision on the document subject to information disclosure, the disclosure period and method.</li> </ul>	<p><u>Information Disclosure by OPIC<sup>4</sup></u></p> <p>Although disclosure of project-related information is primarily the responsibility of Applicants, OPIC is committed to making non-confidential project-specific information available. Project-related information that is posted on the OPIC website includes project summaries, summaries of OPIC environmental and social monitoring reports, and OPIC's active portfolio list. OPIC may withhold records or portions of records that are exempted from public disclosure under the Freedom of Information Act (FOIA). (5.3)</p> <p>OPIC provides the project summaries which identify the rationale for designating the project as Category A, environmental and social standards to be used in EIA and the location for local access to environmental and social project information. OPIC also posts on its website detailed project summaries<sup>5</sup> for a period of not less than 40 days before Category A projects are presented for approval. (5.5)</p> <p>OPIC also prepares and discloses project summaries which contain environmental and social information for non-Category A projects. These project summaries are posted on OPIC's website for a period of not less than 30 days prior to execution of the OPIC Agreement.(5.8)</p> <p>•If the Project is screened as Category A, Applicants are required to submit an ESIA and a Baseline Audit for public</p>	<ul style="list-style-type: none"> <li>Scoping statements are circulated to the relevant federal agencies if deemed necessary. Comments are received for 30 days.(216.3(a)(4) (iii) , 22 CFR 216)</li> <li>Information disclosure is conducted based on the Freedom of Information Act. Interested persons can obtain information and reports on EA and EIS. (216.10, 22 CFR 216)</li> </ul> <p>The draft Environmental Impact Statement will be notified and posted in the Federal Register and published for 45 days or more. Comments received will be reflected in the final version of EIS. (216.7 (c), 22 CFR 216)</p> <p>If public hearings are held, draft Environmental Impact Statements to be discussed should be made available to the public at least fifteen (15) days prior to the time of the public hearings, and a notice will be placed in the Federal Register giving the subject, time and place of the proposed hearings. (216.8(b), 22 CFR 216)</p>	<ul style="list-style-type: none"> <li>It has a section for information disclosure and clarify the roles and responsibilities of the borrower and Korea Eximbank.</li> <li>Korea Eximbank shall post the environmental and social documents (Draft or final non-technical summary of ESIA/IEE report, draft or final summary of RAP / IPP) on its website for Category A and Category B projects. (41.)<sup>6</sup></li> <li>Korea Eximbank requires the borrower to ensure that relevant environmental and social information is made available publicly to affected communities and stakeholders for transparent decision-making.</li> <li>The borrower shall provide the following environmental and social information to the affected communities: Objectives, nature, scale, and period of activities pertaining to the proposed project. Potential risks and impacts as well as mitigation measures, Process of stakeholder participation and grievance-redress mechanisms.</li> <li>The borrower is responsible to provide relevant environmental and social information in a timely manner, at an accessible location, and in a form and language(s) understandable to the project affected people and other stakeholders. (38 to 40)</li> </ul>	<ul style="list-style-type: none"> <li>It was impossible to confirm</li> <li>According to the Article 24 of GCG, "Banking institutions shall make public their green credit strategies and policies, and fully disclose developments of their green credit business. As for credit involving major environmental and social risks, the banking institutions shall disclose relevant information according to laws and regulations."</li> <li>There is no specific description in White Paper.</li> </ul>	<ul style="list-style-type: none"> <li>It has a section on information disclosure, and clearly specify the roles and responsibilities of the borrower and NEDA.</li> <li>It requests that information be disclosed to a wide range of stakeholders on the website from the early stage of project formation so that comments can be fed back to project formation.</li> <li>NEDA discloses information on environmental and social considerations, in order to ensure accountability and to promote the participation of various stakeholders.</li> <li>Relevant countries are required to actively publish draft, final and updated versions of documents such as EIA / IEE, environmental and social management plans, resettlement plans and ethnic group development plans.</li> <li>In addition, it is required to disclose the results of environmental and social monitoring during the project implementation or construction period.</li> <li>About the method of information disclosure, disclosure on a website is assumed.</li> </ul> <p>(Excerpt from 4.Principles)</p> <ul style="list-style-type: none"> <li>The related country shall ensure that relevant information about environmental or social issues is made available in a timely</li> </ul>

<sup>1</sup> As a USAID safeguard policy, ADS is defined in compliance with Code of Federal Regulations (CFR): <https://gov.ecfr.io/cgi-bin/ECFR>. In addition, the environmental procedures of USAID are described in CFR in CFR Title 22. Foreign Relations, Chapter II. Agency for International Development, Part 216. Environmental Procedures. These are regarded as documents that show the procedure of substantial environmental impact assessment of USAID. There are other ADSs related to gender equality and climate change risk management for USAID programs and projects, but here we will list the ADS on environmental procedures as SGP as a representative one.

<sup>2</sup> China Banking Regulatory Commission (CBRC) 'Green Credit Guidelines (GCG)' (2012): Guidelines for promoting green credit, applied to policy banks in China, commercial banks, rural cooperative banks, and rural credit unions.

<sup>3</sup> The Export-Import Bank of China 'White Paper on Green Finance' (2016): A white paper summarizing the policies and procedures of China's Export-Import Bank's green finance (<http://cms.eximbank.gov.cn/upload/accessory/20172/20172201624516937087.pdf>)

<sup>4</sup> Information disclosure case by OPIC: <https://www.opic.gov/opic-action/all-project-descriptions>

<sup>5</sup> It includes information of major environmental and social risks and impacts of the project, mitigation measures, means for meeting application criteria, information on local environmental and social monitoring by OPIC, and information on consultation with affected people.

<sup>6</sup> Information disclosure case by Korea Eximbank: <https://www.koreaexim.go.kr/site/program/board/basicboard/list?menuid=002002004006&boardtypeid=460#>

No.	Items	MCC (USA)	OPIC (USA)	USAID (USA)	EDCF / KEXIM (Korea)	CEXIM (China)	NEDA (Thailand)
			<p>disclosure on the OPIC website in English. At a minimum, the Applicant is required to provide a local language translation of the executive summary of the ESIA (and Baseline Audit) and make the summary available to Project Affected People in a format that is readily understandable and tailored to meet the information needs of them. (5.18)</p> <ul style="list-style-type: none"> <li>Applicants are required to prepare and implement an Environmental and Social Action Plan (“ESAP”) and ESAPs are required for all Category A projects. These documents need to be made public in accordance with OPIC’s disclosure requirements. (3.14)</li> <li>Applicants are required to provide periodic reports to Project Affected Persons. This report needs to include implementation status of any ESAP and Remediation Plan, other issues, changes and mitigation measures. (5.20)</li> </ul>				<p>manner, in an accessible place, and in a form and language(s) understandable to affected people and to other stakeholders through project formation and implementation stage.(7.2)</p>
3	Category Classification Method	<ul style="list-style-type: none"> <li>MCC will screen all projects based on environmental and social impacts, sector and site location. The screening process will be done by referring to the OECD Common Approaches and the practices of the WB. (4.2)</li> <li>The categories are divided into A, B, C, D. (classification criteria are almost the same as JICA GL. Category D is FI in JICA GL.) (4.2)</li> <li>Appendix C lists the examples of projects with the potential to cause significant negative environmental impacts due to their type, location, sensitivity and scale.</li> </ul>	<ul style="list-style-type: none"> <li>Projects that fall under Category Prohibited Projects (Appendix B) are excluded first. Moreover, OPIC categorizes projects based on OPIC’s three factors of (1) the potential impacts within a project’s Area of Influence in the absence of any required mitigation, (2) the Applicant’s capacity to effectively manage the environmental and social risks and impacts and (3) the potential role of third parties in achievement of successful outcomes. (2.5)</li> <li>In addition, projects that include the following factors that raise environmental and social risks are classified into Category A or Special Consideration: those projects that discharge high levels of contaminants (including Greenhouse Gases); in the absence of adequate pollution controls, as well as those projects that are considered high risk in the absence of sound environmental and social management, projects with large-scale development, significant reductions in priority ecosystem services and places of social value, projects in places with historically</li> </ul>	<ul style="list-style-type: none"> <li>Projects, programs or activities involving the following are exempt from these procedures: International disaster assistance; Other emergency circumstances; and Circumstances involving exceptional foreign policy sensitivities. (216.2(b), 22 CFR 216)</li> <li>Except as noted above, the following applies if all new projects, programs and activities conducted by USAID are to be carried out and significant changes or extensions are made.</li> <li>Projects that are not subject to IEE and EIA. (216.2(c), 22 CFR 216): Technical support mainly implemented by USAID.</li> <li>Projects normally having a significant impact on the environment. (216.2(d), 22 CFR 216)</li> </ul>	<ul style="list-style-type: none"> <li>The borrower shall complete a screening form for categorization during the initial stages of project preparation and submit it to Korea Eximbank as early as possible.</li> <li>Korean Eximbank categorizes into categories A, B and C based on the type of project, location, sensitivity and scale, expected size and content of risks, and estimated impacts (classification criteria are almost the same as JICA GL).</li> <li>Categories A and B require the implementation of ESIA or IEE, respectively, however, ESIA and IEE are not required for category C projects.</li> </ul>	<ul style="list-style-type: none"> <li>It was impossible to confirm</li> <li>GCG’s Article 11 mentioned that “Banking institutions shall develop client environmental and social risk assessment criteria (client E&amp;S risk rating standard).”</li> <li>There is no specific description in White Paper.</li> </ul>	<ul style="list-style-type: none"> <li>The specific content of the category classification is not defined and the project will be categorized according to environmental and/or social laws or guidelines of its government. Environmental and social considerations procedures are conducted in line with domestic laws of the borrowers. (para 1, 6.1 Pre-construction Stage)</li> </ul>

No.	Items	MCC (USA)	OPIC (USA)	USAID (USA)	EDCF / KEXIM (Korea)	CEXIM (China)	NEDA (Thailand)
			<p>PAPs and human rights concerns, projects in places with historically concerns in workers' human rights. Examples of these categories of projects are provided in Appendix A.(2.5)</p> <ul style="list-style-type: none"> <li>OPIC categorizes all projects and subprojects as Category A, B, C or D (classification criteria are almost the same as JICA GL. Category D is FI in JICA GL). OPIC may apply an additional classification of Special Consideration<sup>1</sup> to projects that have heightened potential for adverse project-related social risks related to the involvement of or impact on Project Affected People including Workers. (2.6)</li> </ul>				
4	Referred International standard, and (Whether it refers to an international organization or some international standard as JICA GL do).	<ul style="list-style-type: none"> <li>The MCC Environmental Guidelines (August 2010) policy is formulated based on the OECD common approach and international principles including the Equator Principles in use by international commercial banks.</li> <li>MCC will only support projects that meet the requirements of IFC PS.</li> <li>MCC may provide guidance to a host country as may be advisable in light of international standards, such as the Environmental, Health, and Safety Guidelines of the WB Group or World Health Organization guidelines and standards for implantation of the program.</li> </ul> <p>(Excerpt from 2. Sources of Policy; Applicability of Guidelines)</p>	<ul style="list-style-type: none"> <li>It adopts IFC PS and sector guidelines in the environmental and social review process. (1.5)</li> <li>Applicants must meet the requirements of the IFC Performance Standards. (2.9)</li> </ul>	<ul style="list-style-type: none"> <li>ADS Chapter 204, a USAID SGP, is prepared in accordance with "22 CFR 216". (ADS 204.1)</li> <li>No special international standards are referenced in ADS Chapter 204 and 22 CFR 216<sup>2</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>The EDCF policy is not intended to impose mandatory requirements and provides guidance to borrowers. The Korean Eximbank will take into account variables such as the host country context, the scale and complexity of project impacts, and the associated cost-benefit considerations, as well as those of project performance. (1)</li> <li>A proposed project must comply with the borrowing country's environmental and social requirements, and may refer to internationally recognized standards, when appropriate. If the relevant requirements of the borrower's country regulations and laws are more stringent than the requirements of the EDCF SGP or internationally recognized standards, it is required that the project may comply with more stringent requirements. (18)</li> <li>Where any MDBs or financial institutions are supporting the project, Korea Eximbank may</li> </ul>	<ul style="list-style-type: none"> <li>It was impossible to confirm.</li> <li>GCC's Article 21 mentions that "The banking institutions shall make promise in public that appropriate international practices or international norms will be followed as far as such overseas projects are concerned, so as to ensure alignment with good international practices." However, it does not mention any specific international standards.</li> <li>There is no specific description in White Paper.</li> </ul>	<ul style="list-style-type: none"> <li>NEDA Project must comply with the laws, standards, policies, and plans of the borrower country.</li> <li>Internationally accepted standards - International standards, treaties, and declarations should also be applied as appropriate.</li> <li>If there arises the matter(s) that is not specified in this guideline, NEDA may use internationally accepted standards which are agreeable between NEDA and the borrower.(5.5)</li> </ul>

<sup>1</sup> OPIC Environmental and Social Policy Statement (January 2017) 2.6: Special Consideration projects are considered to have heightened potential for adverse project-related social risks associated with the involvement of or impact on Project Affected People including Workers. Projects may be classified as Special Consideration based on an assessment of the severity of possible social risks, and their relevance to a project. Key risk factors that are taken into consideration may include:

- Industry or sector: labor-intensive industries or sectors that are statistically more likely to infringe upon Labor Rights.
- Regional vulnerabilities: projects in countries (i) with a documented history of Labor Rights issues, (ii) having recently experienced conflict associated with Project Affected People, or (iii) with weak or compromised regulatory systems.
- Presence of vulnerable groups: (i) utilization or reliance to a large degree on large pools of sub-contracted, unskilled, temporary, and/or migrant Workers, including within the supply chain; (ii) project risks or impacts that fall disproportionately on Project Affected People who, because of their particular circumstances, may be disadvantaged or vulnerable, or (iii) sectors in which there is a high risk for the use of forced labor or child labor.
- Significant adverse impacts: (i) projects anticipated to have adverse impacts on a significant numbers of Workers, or (ii) projects that by their nature or footprint could cause or be anticipated to cause (or be complicit in) significant adverse Human Rights impacts.

<sup>2</sup> However, in USAID's Sector Environmental Guidelines (which is a supplemental document for the SGP), international standards such as IFC's are referred.

No.	Items	MCC (USA)	OPIC (USA)	USAID (USA)	EDCF / KEXIM (Korea)	CEXIM (China)	NEDA (Thailand)
					agree to the application of their environmental and social policies and procedures to the project, provided that Korea Eximbank is satisfied that they are consistent with the EDCF SGP.(19.)		
5	Socially vulnerable groups, or special considerations	<ul style="list-style-type: none"> <li>As one examples of Appendix C, “project areas of importance for indigenous peoples or other vulnerable groups” is mentioned.</li> <li>There is no specific description concerning the definition and consideration of the socially vulnerable groups other than the above.</li> </ul>	<ul style="list-style-type: none"> <li>One of the elements classified as “Special Consideration” is when there is a vulnerable group affected by the project. (2.6)</li> <li>One of the social factors to be considered in ESIA is “individuals and groups that may be particularly vulnerable because of gender, poverty or other factors”. (3.10)</li> </ul>	<ul style="list-style-type: none"> <li>Within ADS, gender equality and women's empowerment are listed, and it is required to integrate gender perspectives in Country Development Cooperation Strategies, project design, implementation, etc. and to carry out gender analysis for that purpose. (ADS 205.3.1)<sup>1</sup></li> <li>There is no specific description concerning the definition and consideration of the socially vulnerable other than the above.</li> </ul>	<ul style="list-style-type: none"> <li>There is no provision for the definition of socially vulnerable, other than seeking the participation of socially vulnerable groups in stakeholder consultations. (43-45)</li> <li>Indigenous peoples may be particularly vulnerable when project activities include commercial development of the knowledge and cultural resources of indigenous peoples, physical displacement from their traditional lands, and commercial development of natural resources that would adversely affect their livelihood. In these projects, the borrower will seek the consent of affected Indigenous Peoples communities.(32-40, Appendix 2)</li> </ul>	<ul style="list-style-type: none"> <li>It was impossible to confirm. GCG and White Paper have no description on the matter.</li> </ul>	<ul style="list-style-type: none"> <li>There is no specific description.</li> </ul>
6	Response to climate change (Estimates of GHG emissions, emissions thresholds for which estimates are required, consideration of alternatives with lower GHG emissions, and confirmation of consistency with the counterpart country's NDC)	<ul style="list-style-type: none"> <li>There is no specific description regarding the response to climate change. (Note: MCC is working on Climate-Resilient development as part of MCC's support policy, not within SGP)<sup>2</sup></li> </ul>	<ul style="list-style-type: none"> <li>A desk based climate vulnerability/impact assessment will be conducted by utilizing publicly available tools and databases such as the WB Climate Change Knowledge Portal.(8.2)</li> <li>OPIC has committed to reduce the Direct Greenhouse Gas Emissions associated with projects in OPIC’s active portfolio by 30 percent over a ten year period (June 30,2008 – September 30, 2018) and by 50 percent over a fifteen year period (June 30, 2008 – September 30, 2023).(8.3)</li> <li>In order to achieve the 30 and 50 percent reduction goals, OPIC establishes an annual transactional cap for all new projects with significant Direct Greenhouse Gas Emissions.(8.5)</li> <li>As a condition of OPIC support, all projects that are expected to produce or currently produce Direct Emissions exceeding 25,000 metric tonnes of CO<sub>2eq</sub> per year must quantify and</li> </ul>	<ul style="list-style-type: none"> <li>Climate risk management guidance is prepared. Quantitatively assessing climate risk is difficult, so risks will be evaluated as low, moderate or high. (p.8, Chapter 201, Mandatory Reference for ADS)<sup>3</sup></li> <li>There are no stipulations on the estimation of GHG emissions, the emission thresholds for which estimation is required, the examination of alternatives with lower GHG emissions, and confirmation of consistency with the borrower’s NDC.</li> </ul>	<ul style="list-style-type: none"> <li>There is no specific description.</li> </ul>	<ul style="list-style-type: none"> <li>It was impossible to confirm. GCG and White Paper have no description about the matter.</li> </ul>	<ul style="list-style-type: none"> <li>There is no specific description.</li> </ul>

<sup>1</sup> Automated Directives System (ADS), Chapter 205 Integrating Gender Equality and Female Empowerment in USAID’s Program Cycle (April 2017): <https://www.usaid.gov/sites/default/files/documents/1870/205.pdf>

<sup>2</sup> <https://www.mcc.gov/initiatives/initiative/climate-resilience>

<sup>3</sup> A Mandatory Reference for Automated Directives System (ADS), Chapter 201 Climate Risk Management for USAID Projects and Activities (April 2017) : [https://www.usaid.gov/sites/default/files/documents/1868/201mal\\_042817.pdf](https://www.usaid.gov/sites/default/files/documents/1868/201mal_042817.pdf)

No.	Items	MCC (USA)	OPIC (USA)	USAID (USA)	EDCF / KEXIM (Korea)	CEXIM (China)	NEDA (Thailand)
			<p>annually report to OPIC the Direct Emissions from their Project. As a condition of OPIC support and consistent with the requirements of Performance Standard 3 of IFC, Applicants also shall quantify the significant indirect emissions (outside project site) associated with off-site production of electricity used by the Project.(8.14)</p> <p>·There is no description regarding consistency with GHG emissions and NDC in consideration of alternative proposals.</p>				
7	Rules on Meaningful Participation of Stakeholders	<p>·Implementing entities will be expected to incorporate timely, participatory, and meaningful public consultation in the development of ESIA's, and associated EMPs. (5. Public Consultation and Disclosure)</p>	<p>Applicants are required to carry out Meaningful Consultation with PAPs.</p> <p>·In Appendix D, “Meaningful Consultation” is defined as follows: A process that (1) begins early in the project preparation stage and is carried out on an on-going basis throughout the project life cycle; (2) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to Project Affected People; (3) is undertaken in an atmosphere free of intimidation or coercion; (4) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (5) enables the incorporation of all relevant views of affected people and other Stakeholders into decision making, such as project design, mitigation measures.</p>	<p>·Conduct consultations in the local country early in the preparation of the EIA and before the impact assessment is completed and the project is approved. (216.6 (e) (1), CFR 216)</p> <p>·It is encouraged to provide reasonable notification to the affected persons as feasible, to ensure public participation, and to review and incorporate their comments in the process of environmental and social impact assessment. (ADS 204.3.4 a.(4))</p> <p>· There is no special description or definition of meaningful participation.</p>	<p>· It requests the borrower to ensure information disclosure to affected people and stakeholders and participation in the decision making process, especially by affected people throughout the project cycle. Also, reflect the opinions from them in the project. (14、16、38、39、40、41、43、44)</p> <p>· Consultation with stakeholders including affected people in the impact assessment process is necessary.(22)</p> <p>·The borrower shall identify concerned stakeholders and develop communication mechanisms to facilitate dialogue among relevant stakeholders. The borrower will also develop and implement a participation mechanism tailored to the characteristics and interests of the affected people. The participation mechanism may include special measures to enable meaningful participation of vulnerable groups. (43)</p>	<p>· It was impossible to confirm.</p> <p>· GCG Article 11 mentioned that “Banking institutions shall establish sufficient, effective stakeholder communication mechanisms” but there is no provision for meaningful participation.</p> <p>· There is no specific description in White Paper.</p>	<p>·NEDA requires the borrower country to engage in meaningful consultation with local stakeholders during the Project’s preparation and implementation phases, and monitoring phases in a manner commensurate with the risks to, and impacts on, those affected by the Project. NEDA encourages the borrower country to prepare minutes of their meetings after such consultation. (7.1)</p>

Source: Respective SGPs as shown below and the footnote

#### List of Website Links for Reviewed SGPs

- Millennium Challenge Corporation (MCC) (USA) : MCC Environmental Guidelines (August 2010)  
<https://www.mcc.gov/resources/doc/environmental-guidelines>
- Overseas Private Investment Corporation(OPIC) (USA) : Environmental and Social Policy Statement (January 2017)  
[https://www.opic.gov/sites/default/files/files/final%20revised%20ESPS%2001132017\(1\).pdf](https://www.opic.gov/sites/default/files/files/final%20revised%20ESPS%2001132017(1).pdf)
- United States Agency for International Development (USAID) (USA) : Automated Directives System (ADS), Chapter 204 Environmental Procedures (February 2013)  
<https://www.usaid.gov/sites/default/files/documents/1865/204.pdf>
- United States Agency for International Development (USAID) (USA) : Title 22, Code of Federal Regulations, Part 216 (22 CFR 216)  
[https://www.usaid.gov/our\\_work/environment/compliance/22cfr216](https://www.usaid.gov/our_work/environment/compliance/22cfr216)
- EDCF / KEXIM (Korea) : EDCF Safeguard Policy (2016) :  
<https://www.edcfkorea.go.kr/site/homepage/menu/viewMenu?menuid=005001006003>
- CEXIM (China) : information is not disclosed to the public
- NEDA (Thailand) : Environmental and Social Safeguards Guidelines (January 2019)

### 3.6 Japan's Treaty Ratification

Table below shows the major international treaties ratified or not ratified by Japan related to environmental and social considerations. In the case where the other country has not ratified the treaty, but it was ratified by Japan, and with respect to the treaties that Japan has not ratified, attention needs to be paid to the response.

**Table 3-23 Status of Ratification of International Treaties Related to Environmental and Social Considerations**

No.	Official Name/Abbreviation or common name	Overview
<b>I. Treaties Ratified</b>		
<b>Environment</b>		
1	Convention on Biological Diversity	Entered into Force: 1993 Ratification Year: 1993 Number of Parties: 194 countries, EU and Palestine (As of December 2018) Article 1. Objectives ( 1 ) Conservation of biodiversity ( 2 ) Sustainable use of components of biodiversity ( 3 ) For the purpose of fair and equitable sharing of the benefits arising out of the utilization of genetic resources
2	Cartagena Protocol on Biosafety (Cartagena Protocol)	Entered into Force: 2003 Ratification Year: 2004 Article 1 OBJECTIVE The Protocol focuses on transboundary migration in particular and is at a sufficient level in the area of safe transport, handling and use of Living Modified Organisms (LMOs) that may adversely affect biodiversity conservation and sustainable use.
3	The Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention)	Entered into Force: 1975 Ratification Year: 1980 Number of Parties: 170 countries (As of December 2018) Wetlands such as wet field, marshes and tidal flats bring up diverse organisms, and are especially important as waterfowl habitats. However, wetlands are likely to be targets for development such as landfill and reclamation, and the need to stop their destruction has come to be recognized. Some wetlands cross borders, and many of the water birds cross the regions regardless of the border, so international efforts are required. Therefore, to promote the conservation of wetlands that are internationally important as water bird habitats and the animals and plants that inhabit and grow there, and to promote the appropriate use of wetlands (also commonly referred to as "wise use") the Convention was adopted at the International Conference on the Conservation of Wetlands and Waterfowl held on February 2, 1971, in Ramsar, a town on the coast of the Caspian Sea, Iran (effective on December 21, 1975) .
4	Convention on International Trade in Endangered Species of Wild Fauna and Flora (Washington Convention)	Entered into Force: 1975 Ratification Year: 1980 Number of Parties: 182 countries, EU (As of December 2018) The Washington Convention (CITES: Convention on the International Trade of Endangered Species of Wild Fauna and Flora) aims to protect wild animals and plants by the exporting and importing countries work together to regulate the international trade of wild fauna and flora.
5	Protocol of 1997 to amend the International Convention for the Prevention of Pollution from Ships of 2 November 1973, as modified by the Protocol of 17 February 1978 (Marpol Treaty)	Entered into Force: 2005 Ratification Year: 2005 Number of Parties: 30 countries (As of February 2007) An international treaty and its protocol to stipulate the prohibition of dumping and releasing controlled substances, the duty of reporting, and procedures for the purpose of preventing marine pollution caused by ship navigation and accidents.
6	Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal	Entered into Force: 1992 Ratification Year: 1993 Number of Parties: 181 countries, EU and Palestine (As of May 2015) The "Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal" was formulated, which stipulates international frameworks and procedures for the regulation of transboundary movement of certain hazardous wastes. At the Conference of the Parties to the Basel Convention on May 10, 2019 on the International Movement of Harmful Waste held in Geneva, Switzerland, a

No.	Official Name/Abbreviation or common name	Overview
		draft treaty amendment was adopted to include dirty plastic waste as an import and export regulatory target.
7	Stockholm Convention on Persistent Organic Pollutants (Stockholm Convention)	Entered into Force: 2004 Ratification Year: 2004 Number of Parties: 178 countries, EU (As of September 2014) For the purpose of protecting human health and the environment from persistent organic pollutants, (1) Prohibition of production, use and import / export of 18 substances (substance listed in Annex A) such as polychlorinated biphenyl (PCB), (2) Restriction on production, use, import and export of 2 substances such as DDT (substance listed in Annex B), (3) Reduction of four unintentionally generated dioxins (substance listed in Annex C) are stipulated for proper management of waste in this convention.
8	Montreal Protocol on Substances that Deplete the Ozone Layer	Entered into Force: 1989 Ratification Year: 1989 The main regulatory measures defined in this Protocol are as follows. (1) Setting the elimination schedule of Ozone Depleting Substances (ODS) (Article 2 A to I) (2) Regulation of trade with non-party to this protocol countries (prohibition or restriction of import and export of controlled substances, etc.) (Article 4) (3) Evaluation and reexamination of regulatory measures based on the latest information on science, environment, technology and economy (Article 6) (4) Setting the phasing schedule hydrofluorocarbons (HFC) used as a chlorofluorocarbons (CFC) substitute (J Article 2) (added in Protocol revision of 2016)
9	United Nations Framework Convention on Climate Change  Kyoto Protocol to the United Nations Framework Convention on Climate Change (Kyoto Protocol)  Paris Agreement	Entered into Force: 1994 Ratification Year: 1994 Number of Parties: 197 countries / organizations The ultimate goal of the Convention is to achieve stabilization of atmospheric greenhouse gas concentrations at levels where human activities do not bring about a dangerous impact on the climate system.  Entered into Force: 2005 Ratification Year: 2005 Number of Parties: 192 countries / organizations (The framework until 2020, the framework after 2020 is the Paris Agreement) It imposes on Annex I countries (the developed countries) of the Framework Convention to reduce greenhouse gas emissions by a fixed numerical value in the ratio of 1990 in five years from 2008 (Annex B). On the other hand, it does not impose reduction obligations on non-Annex I countries (developing countries).  Adoption Year: 2015 Ratification Year: 2016 Number of Parties: 185 countries / organizations An international framework on climate change that sets out measures to combat global warming after 2020. Participating countries have the obligation to create and submit and maintain Nationally Determined Contribution (NDC), and have the duty to take domestic measures to achieve the purpose of the reduction targets.
<b>Cultural property</b>		
10	Convention Concerning the Protection of the World Cultural and Natural Heritage (World Heritage Convention)	Entered into Force: 1975 Ratification Year: 1992 Number of Parties: 193 countries, EU (As of February 2018) The aim of this convention is to establish an international cooperation and assistance system to protect and preserve cultural and natural heritage as a world heritage for all humanity and protect them from the threat of damage and destruction.
<b>Labour</b>		
11	ILO Declaration on Fundamental Principles and Rights at Work	Adopted at the ILO General Assembly on June 18, 1998, in order to respond to the challenges of globalization. This declaration is also referred to as "core labor standards (CLS) of the ILO, one of the most important basic documents of the ILO alongside ILO Charter and the Declaration of Philadelphia. Globalization is a factor in economic growth, and although economic growth is a prerequisite for social progress, it is a fact that it alone is not sufficient to secure social progress. It needs to be accompanied by a common value-based social ground principle to enable all stakeholders to demand an equitable distribution of wealth that has contributed to their creation.
12	Convention concerning Forced or Compulsory Labour(No.29)	Entered into Force: 1932 Ratification Year: 1932 Number of ratified countries: 178 countries A treaty intended to abolish the use of all forced labor in the shortest possible

No.	Official Name/Abbreviation or common name	Overview
		time. Forced labor refers to all labor that is forced by the threat of punishment and that is not voluntarily offered.
13	Convention concerning Freedom of Association and Protection of the Right to Organise (No.87)	Entered into Force: 1948 Ratification Year: 1966 Number of ratified countries: 155 countries Workers and employers shall have the right to establish and to join organizations of their own choosing without previous authorization. Workers' and employers' organizations (including unions) shall have the right to draw up their constitutions and rules, to elect their representatives in full freedom, to organize their administration and activities and to formulate their programmes. The public authorities shall refrain from any interference which would restrict this right or impede the lawful exercise thereof. Workers' and employers' organizations shall not be liable to be dissolved or suspended by administrative authority. Workers' and employers' organizations must respect the laws of the country when exercising these rights. On the other hand, the laws of that country must not be such as to violate the security set forth in this Convention.
14	Convention concerning the Application of the Principles of the Right to Organise and to Bargain Collectively (No.98)	Entered into Force: 1951 Ratification Year: 1953 Number of ratified countries: 166 countries Workers shall enjoy adequate protection against acts of anti-union discrimination such as make the employment of a worker subject to the condition that he shall not join a union or shall relinquish trade union membership or cause the dismissal of or otherwise prejudice a worker by reason of union membership or because of participation in union activities outside working hours or, with the consent of the employer, within working hours.
15	Convention concerning equal remuneration for men and women workers for work of equal value (No.100)	Entered into Force: 1953 Ratification Year: 1967 Number of ratified countries: 173 countries Equal remuneration for men and women workers for work of equal value refers to rates of remuneration established without discrimination based on sex. The Convention provides a definition of remuneration which includes the ordinary, basic or minimum wage or salary and any additional emoluments whatsoever payable directly or indirectly, whether in cash or in kind, by the employer to the worker and arising out of the worker's employment
16	Convention concerning Minimum Age for Admission to Employment (No.138)	Entered into Force: 1973 Ratification Year: 2000 Number of ratified countries: 171 countries The Convention, which revises the 10 Conventions in the field adopted in the past, defines the minimum age for employment as the end of compulsory education age of 15 years, under any circumstances it must be followed in order to abolish child labor and improve working conditions for young workers.
17	Convention concerning the promotional framework for occupational safety and health (No.187)	Entered into Force: 2009 Ratification year: 2007 Number of ratified countries: 47 countries Promote the development of a preventive health and safety culture by establishing a national plan on occupational safety and health and placing occupational health and safety at the top of the national policy agenda. This convention also promotes a safer and healthier working environment through precautionary measures.
<b>Indigenous people</b>		
18	United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)	The UN General Assembly in 2007 adopted the "Declaration on the rights of Indigenous Peoples". The 46 Article of Declaration, which covers the following, defines a wide range of indigenous rights. <ul style="list-style-type: none"> <li>• Self-determination rights (indigenous peoples have the right to autonomy or self-government, and they can maintain their distinct manner of economic, social and cultural development)</li> <li>• The right not to be subjected to forced assimilation</li> <li>• Right to seek restitution or compensation for land or resources</li> <li>• Right to seek autonomy</li> <li>• Right to practice cultural and religious practices</li> <li>• Right to educate and receive education in their own languages</li> <li>• The right to use land and resources that have traditionally been connected</li> </ul>
<b>Human Rights</b>		
19	Universal Declaration of Human Rights	It was adopted by the 3rd UN General Assembly on December 10, 1948. In order to respect and secure human rights and freedoms, it declared "a common standard of achievement for all peoples and all nations."
20	Convention on the Rights of the Child	Entered into Force: 1990 Ratification year: 1994 Number of Parties and Regions: 196 (As of February 2016)

No.	Official Name/Abbreviation or common name	Overview
		The Convention on the Rights of the Child defines children under the age of 18 as "children" and extends the rights defined in the International Human Rights Code for children. This convention provides detailed and specific matters that are necessary from the perspective of respecting and securing children's human rights. It was adopted by the 44th UN General Assembly in 1989 and entered into force in 1990. Japan ratified this convention in 1994 .
21	Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)	Entered into Force: 1981 Ratification Year: 1985 Number of Parties: 189 countries For the purposes of this Convention, "discrimination against women" refers to gender-based distinction, exclusion or restriction, in the political, economic, social, cultural, civil or any other field. Discrimination also refers to any effect or purpose to harm or invalidate women (whether married or not) to recognize, exercise and enjoy human rights and fundamental freedoms on a basis of equality with men.
22	International Convention on the Elimination of All Forms of Racial Discrimination (ICERD)	Entered into Force: 1969 Ratification Year: 1996 Number of Parties: 179 countries International Convention on the Elimination of All Forms of Racial Discrimination mainly focuses on taking policies without any form of racial discrimination without delay in any appropriate way, in order to ensure equality of human rights and fundamental freedoms. It was adopted by the 20th UN General Assembly in 1965 and entered into force in 1969. Japan joined this convention in 1995.
23	Convention Relating to the Status of Refugees (Refugee Treaty)	Entered into Force: 1954 Ratification Year: 1981 Parties have identified that the UN Charter and the Universal Declaration of Human Rights have confirmed the fundamental rights and freedoms of human rights, that the refugee issue is a major concern of the United Nations and amend and integrate existing international agreements on refugees. Taking into account the fact that it is desirable to expand its scope of protection, and that the refugee problem cannot be resolved without international cooperation, and to prevent the refugee problem from becoming a source of tension among nations, all countries are hoped to take all necessary measures. Finally, it recognizes the importance of cooperation between the UN High Commissioner for Refugees and each country.
<b>II . Treaties not Ratified</b>		
<b>Environment</b>		
24	Convention on Long-range Transboundary Air Pollution	Entered into Force: 1979 Number of Parties: 51 (As of September 2012) Establish a framework for the general obligation to limit, reduce and prevent air pollution, such as long-distance transboundary air pollution.
25	Convention on Environmental Impact Assessment in a Transboundary Context	Entered into Force: 1991 Number of Parties: 45 (As of September 2012) To apply domestic environmental impact assessment procedures to other countries, and to set up discussions among nations based on the assessment results.
26	Convention on the Protection and Use of Transboundary Watercourses and International Lakes	Entered into Force: 1992 Number of Parties: 39 (As of September 2012) To define that parties should take measures to prevent pollution of the waters of other bordering countries.
27	Convention on the Transboundary Effects of Industrial Accidents	Entered into Force: 1992 Number of Parties: 40 (As of September 2012) Define the duty to establish a disaster prevention system for industrial accidents that have an impact across borders.
28	Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters	Entered into Force: 2001 Number of Parties: 46 (As of September 2012) Establish international standards to secure citizens' access to information, participation in decision-making, and the right to exercise judicial means in the process of formulation and implementation of environmental policies.
29	International Convention for the Control and Management of Ships' Ballast Water and Sediments	Entered into Force: 2017 Number of Parties: 36 (As of December 2012) Regulate and control of ballast water (seawater) and sediments loaded for safe navigation of ships, and harmful aquatic organisms and pathogens contained in ballast water which are transported to the discharge destination, and prevent the danger to the environment, human health and property.
<b>Labour</b>		
30	Convention concerning the Abolition of Forced Labour	Entered into Force: 1959 Number of Parties: 174 (January 2013) A treaty that reinforces and supplements the 1930's Forced Labor Convention (No. 29).

No.	Official Name/Abbreviation or common name	Overview
		Each member of the ILO which ratifies this Convention undertakes to suppress and not to make use of any form of forced or compulsory labour: (a) as a means of political coercion or education or as a punishment for holding or expressing political views or views ideologically opposed to the established political, social or economic system; (b) as a method of mobilizing and using labour for purposes of economic development; (c) as a means of labour discipline; (d) as a punishment for having participated in strikes; (e) as a means of racial, social, national or religious discrimination.
31	Convention concerning Discrimination in Respect of Employment and Occupation	Entered into Force: 1960 Number of Parties: 172 (As of January 2013) It is one of the basic conventions, which is centered on the labor field but has the nature of a more general human rights security treaty. This treaty stipulates that no discrimination should be taken in terms of employment and occupation. The term “discrimination treatment” means “any distinction, exclusion or preference made on the basis of race, color, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation” but discrimination, exclusion, or preference for certain tasks that require special conditions are not considered discrimination treatment.
32	Convention concerning the Protection of Workers against Occupational Hazards in the Working Environment Due to Air Pollution, Noise and Vibration (No. 148)	Entered into Force: 1979 Number of Parties: 45 (As of January 2013) To specify that Parties should take legislative action to prevent occupational hazards in the work environment due to air pollution, noise and vibration, and to protect workers from such hazards.
<b>Indigenous People</b>		
33	Convention concerning Indigenous and Tribal Peoples in Independent Countries	Entered into Force: 1991 Number of Parties: 23 Governments shall have the responsibility for developing, with the participation of the peoples concerned, coordinated and systematic action to protect the rights of these peoples and to guarantee respect for their integrity. No form of force or coercion shall be used in violation of the human rights and fundamental freedoms of the peoples concerned, including the rights contained in this Convention. The government shall consult the peoples concerned, through appropriate procedures and in particular through their representative institutions, whenever consideration is being given to legislative or administrative measures which may affect them directly. In addition, important provisions such as development process and related people's rights, employment and employment conditions, vocational training, handicrafts / rural industries, social security, sanitation, education, land, etc. are included. The rights of ownership and possession of the peoples concerned over the lands which they traditionally occupy in this Convention also affects the work of the UN.

Source: Prepared by the JICA Study Team based on the following information.

1. Convention in general: Ministry of Foreign Affairs site "treaty data search" <https://www3.mofa.go.jp/mofaj/gaiko/treaty/>
2. Convention on the labour and indigenous peoples: ILO Office in Japan site "Convention List (numerical order, including the Protocols) " <https://www.ilo.org/tokyo/standards/list-of-conventions/lang--ja/index.htm>
3. Convention Not Ratified: "International Convention list of which our country is not yet ratified (As of January 2013) National Diet Library Research and Legislative Review Office March 2013"

### 3.7 Achievements and Challenges of JICA 's Capacity Development Programs

JICA invites officials of executing agencies of JICA projects in developing countries to Japan once a year for 2types of JICA Knowledge Co-Creation Program. The Programs are “Practice of Environmental and Social Considerations for Investment Project Financing” aimed at strengthening the practical ability of the staff of project proponents etc. involved in environmental considerations, and “Public Participation, Consensus Building and Resettlement in Public Works Project,” focusing

on social considerations. Participants, during the period of stay in Japan for about 3 to 4 weeks, learn about JICA GL and conduct on-site observations of environmental and social considerations in Japan, conduct discussions and group works among participants gathered from different countries, trainers and host organizations received those participants, and acquire knowledge and skills necessary for environmental and social considerations practices in infrastructure development projects.

In addition, JICA Academy provides trainings, pre-service training, and theme training for JICA staff, and capacity-building trainings for consultants involved in environmental and social considerations named “environmental and social considerations for practitioners and consultants” are provided every year. Also, JICA holds pre-service international cooperation training prior to the overseas assignment of JICA experts. Through these programs, various stakeholders are provided with an opportunity to deepen their understanding of the importance and contents of the JICA GL.

The table below shows the results of the environmental and social considerations related trainings conducted by JICA from 2011 to 2018. Since 2011, approximately 600 to 1,100 persons have participated in the trainings for JICA staff, officials from developing countries, consultants, etc. In the field surveys and questionnaires, the executing agencies have many requests for participating in such trainings concerning environmental and social considerations. Although training in Japan is desirable, there were opinions that JICA may consider to offer the trainings in the host country or neighboring countries so that more practitioners can attend, as the number of participants is limited if it is held in Japan.

As for the participants of the JICA environmental and social considerations practical trainings, 120 officials of executing agencies participated in FY2011, 84 in FY2012, 100 in FY2013, 145 in FY2014, 101 in FY2015, 203 in FY2016, 142 in FY2017, and 53 in FY2018. In addition, 27 out of 100 target projects in this review study confirmed the participation of project personnel in these trainings.

Delhi Metro Rail Corporation (DMRC), which is the executing agency of Delhi Metro Project, is engaged in consulting services in some metro projects in India. In the field survey of this study, they expressed their wish to have a regular workshop with other metro corporations in India to discuss and solve environmental and social issues by sharing their own experiences and learnings of advanced environmental mitigation measures in Japan.

**Table 3-24 Results of Environmental and Social Considerations Training**

Types of Training	Number of Participants (persons)							
	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018
Training for JICA staff (introductory training etc.)	327	323	484	285	388	502	661	352
Developing country officials (trainees etc.)	120	84	100	145	101	203	142	53

Types of Training	Number of Participants (persons)							
	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018
Capacity Building of Consultant	40	97	74	126	79	80	109	203
Other	250	164	226	116	52	122	206	181
Total	737	668	884	672	620	907	1,118	789

Source: Prepared by JICA Study Team based on JICA Performance Evaluation Report

## **CHAPTER 4 DRAFT DISCUSSION POINTS FOR REVISION OF JICA GL**

Discussion points are summarized in Table 4-1 based on the analysis results described in Chapter 2 and 3.

Table 4-1 Draft Discussion Points for Revision of JICA GL

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
Preface			
I . Basic Matters			
1.1 Policy	1. Summarize the Japanese Government’s policies such as “Cabinet decision on the Development Cooperation Charter” and trend of international development such as SDGs.	1. Japanese Governmental Policy and Global Trend in International Development Cooperation 1.1 Japanese Governmental Policy 【The Development Cooperation Charter】 <ul style="list-style-type: none"><li>The Development Cooperation Charter shows the philosophy of Japan’s development cooperation including ODA. It aims to contribute to peace and prosperity through non-military cooperation, promoting human security, supporting self-help efforts as well as dialogue and collaboration based on Japan’s experience and expertise. As implementation principles, Japan will pay due attention to the impact of development on the environment and climate change, and implement development cooperation in an environmentally friendly manner. The Charter also states that Japan will pay attention to the social impact, while making efforts to promote participation of wide-ranging stakeholders in every phase of development cooperation, with a view to reducing inequalities and in consideration of the socially vulnerable groups such as children, persons with disabilities, the elderly, ethnic minorities and indigenous peoples.</li></ul> 【Promotion of Quality Infrastructure Investment】 <ul style="list-style-type: none"><li>The Government of Japan is promoting quality infrastructure investment with the aim to export Japanese quality infrastructure in order to meet global demand for infrastructure, especially in emerging countries. This is to provide quality infrastructure that secures economic efficiency with low life-cycle costs, inclusiveness, safety and resilience, and sustainability. It also aims to apply good standards such as Guidelines for Environmental and Social Considerations for its implementation. Moreover, the Government has the policy to further accelerate procedures in order to roll out its development cooperation strategically.</li></ul> 【G7 Ise-Shima Principles for Promoting Quality Infrastructure Investment】 <ul style="list-style-type: none"><li>G7 Ise-Shima Summit was held in 2016 and “G7 Ise-Shima Principles for Promoting Quality Infrastructure Investment” was announced as one of the attached documents of G7 Ise-Shima Leaders’ Declaration. In the Principal three actions addressing the social and environmental impacts, it is described that quality infrastructure investment must consider the social and environmental impacts of infrastructure projects and duly address such impacts by applying social and environmental safeguards that are in line with international good practices as reflected in the most relevant standards including those of existing MDBs.</li></ul>	Response to the governmental policies such as the Development Cooperation Charter and the Promotion of Quality Infrastructure Investment.
1.2 Objectives			
1.3 Definitions			
1.4 Basic Principles Regarding Environmental and Social Considerations			
		1.2 Global Trend in International Development Cooperation 【SDGs】 <ul style="list-style-type: none"><li>SDGs consist of 17 goals described in the 2030 Agenda for Sustainable Development which was adopted by the UN General Assembly in September 2015. JICA has formulated the policy for all the 17 goals and committed to contributing to achieving the SDGs. JICA has a policy to play a key role in achieving 10 goals for the SDGs: i.e. zero hunger, health, education, water/sanitation, energy, economic growth, industry/infrastructure, sustainable cities, climate actions, and forests &amp; biodiversity. Through complying the JICA GL that promote meaningful participation of project stakeholders, JICA believes that it will adhere to the principle of “No one will be left behind”. Compliance to JICA GL also enable JICA to support international efforts to achieve SDGs, which are key milestones to realize a sustainable society, and complement or reinforce them.</li></ul> 【The Paris Agreement】 <ul style="list-style-type: none"><li>At the COP21 of the UNFCCC, the first international climate agreement was adopted that brings all ratified nations into a common ambitious efforts to reduce GHG emissions and combat climate change. It aims to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase even further to below 1.5°C. The Agreement also states that "in order to achieve the long-term temperature goal [...], Parties aim to reach global peaking of greenhouse gas emissions as soon as possible, recognizing that peaking will take longer for developing country Parties, and to undertake rapid reductions thereafter in accordance with best available science, so as to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century, on the basis of equity, and in the context of sustainable development and efforts to eradicate poverty." Under the Agreement, (1) all parties will prepare NDCs and pursue domestic mitigation measures to achieve them and continue to submit NDCs every five years with more ambitious targets; (2) all parties will also report regularly on their activities and the information submitted will undergo a technical expert review, and based on the review; (3) there will also be a global stocktaking every five years to assess the collective progress towards achieving the purpose of the Agreement. Japanese Government announced “Actions for Cool Earth 2.0: ACE 2.0” that includes provision of approx. 1.3 trillion JPY of public and private climate finance to developing countries by 2020.</li><li>In October 2018, IPCC published a special report on Global Warming of 1.5°C. The report warns that human activities have caused approximately 1.0°C of global warming above pre-industrial levels, and the warming is likely to reach 1.5°C between 2030</li></ul>	Response to the global trend such as SDGs and the Paris Agreement

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
		<p>and 2052 if the current trend continues. The report urges that rapid and far-reaching transitions in energy, land, urban and infrastructure (including transport and buildings), and industrial systems (high confidence) is needed and global net anthropogenic CO2 emissions must reach net zero at around 2050 to limit global warming to 1.5°C.</p> <ul style="list-style-type: none"> <li>The Japanese government adopted “the long-term strategy under the Paris Agreement” in the Cabinet meeting on June 11, 2019. The long-term vision sets the ultimate goal of achieving a “decarbonized society” and commits to make ambitious efforts to achieve it as early as possible in the second half of this century. The vision also states that Japan will take bold measures to reduce GHGs emissions by 80% by 2050. Japan will create “a virtuous cycle of environment and growth” through business-led disruptive innovation and implement actions quickly to contribute to the global society and make a bright future, according to the vision.</li> </ul>	
1.5 Responsibility of JICA	<p>(Confirmed through the review of Chapter II and III of JICA GL)</p> <p>1. Confirmation of safeguard requirements in equity financing by IFC, ADB, and WB. Confirm the responsibility of other donors such as IFC, ADB, etc. for their investment project financing.</p>	<p>1. Safeguard requirements in equity financing by IFC, ADB, and WB</p> <p>WB</p> <ul style="list-style-type: none"> <li>The Environmental and Social Framework (ESF) launched on October 2018 applies to all Investment Project Financing comprised of bank loan and guarantees provided through IBRD and IDA. (ESF, WB Environmental and Social Policy for Investment Project Financing, Footnote 3, OP 10.00) Since the loans to the private sector and equity finance are implemented through MIGA and IFC, such financings are not included in the scope of WB ESF.</li> </ul> <p>IFC</p> <ul style="list-style-type: none"> <li>The IFC conducts a variety of investments, including project finances, investments through financial intermediaries, and equity finance to companies. Regardless of the types, PS are applied to proposed investments that are determined to have moderate to high environmental and/or social risks, or have the possibility of adverse environmental and/or social impacts (Policy on Environmental and Social Sustainability, 2012 (hereinafter referred to as “SP”), para3). Paragraph 24 of SP states that “if the client fails to comply with its environmental and social commitments as expressed in the legal agreements and associated documents, and if the client fails to reestablish compliance, IFC will exercise its rights and remedies”. In IFC’s policy, there is no distinction between equity finance and other forms of investment, and as such there are no safeguard-related requirements that only apply to equity finance.</li> <li>Under the AIP (January 1, 2012), there is no distinction between equity finance and other investments, and there are no safeguard-related requirements that only apply to equity finance.</li> </ul> <p>ADB</p> <ul style="list-style-type: none"> <li>The SPS (2009) applies to all investment projects funded by a loan; and/or a grant; and/or other means, such as equity and/or guarantees. (SPS, para 48) Paragraph 72 of SPS states that “if a borrower/client fails to comply with legal agreements on safeguard requirements and fails to reestablish compliance by an appeal of corrective measures from ADB, ADB may exercise legal remedies, including suspension of the project”. There is no distinction between equity finance and other forms of investment in SPS, and as such there are no safeguard-related requirements that only apply to equity finance.</li> <li>Under the AIP (September 2018), there is no distinction between equity finance and other investments, and there are no safeguard-related requirements that only apply to equity finance.</li> </ul>	
1.6 Requirements of project proponents etc.	(Confirmed through the review of Appendix 1 of JICA GL)		
1.7 Covered Schemes	1. Summarize JICA’s cooperation project schemes such as Private Sector Investment Finance (PSIF), Small and Medium-sized Enterprise (SME) promotion, etc., which were increased after enforcement of the current JICA GL.	<p>1. JICA cooperation project schemes started after enforcement of the current JICA GL</p> <ul style="list-style-type: none"> <li>Cooperation project schemes which started after enforcement of the current JICA GL include the PSIF, and Support for Japanese Small and Medium Enterprises (SMEs) and the SDGs Businesses. In addition, commissioned projects from the GCF may be added to the JICA’s cooperation project schemes. The current JICA GL are applied to the PSIF, because it corresponds to the ODA Loans to which the JICA GL apply. The Support for SME and the SDGs Businesses do not fall under the “Covered Scheme” on the current JICA GL, while the GL have operationally applied to the feasibility survey and verification survey of the Support for SME and the SDGs Businesses. Detailed descriptions of each schemes are as follows:</li> <li>PSIF: 24 projects were signed during 2011-2018. They include a wide range of projects such as infrastructure projects of different scales e.g. industrial park development, port improvement and efficient gas fired power generation, as well as small-scale projects such as human resource development project, micro-finance project, coffee value chain enhancement project, and Asia climate partner fund project. Environmental categories of these projects cover a wide range from A to C, and FI too.</li> <li>The Support for SME and the SDGs Businesses: In principle, this scheme has two types of projects: i.e. “SME support type” targeting small and mid-sized companies and “SDGs Business support type” targeting large-sized companies. The “SME support type” has three support menus: promotion survey, feasibility survey and verification survey, while the “SDGs business support type” has two support menus: feasibility survey and verification/commercialization survey.</li> <li>As for the three menus of “SME support type”, the service periods range from three months to three years and the maximum amount of support service ranges from 8.5 to 150 million Yen. In terms of operation, promotion survey is mainly to collect information and the feasibility is not studied, therefore the JICA GL are not applied to the survey. On the other hand, the JICA GL</li> </ul>	Necessity of inclusion of the Public-Private Partnerships (including feasibility survey and verification survey of the Support for SME and the SDGs Businesses) and entrusted project from the Green Climate Fund within the covered schemes of the JICA GL.

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
	<p>Recommendation from the working group meeting for reexamination of JICA GL Operation 【Applicability of GL to feasibility study and other study for PPP projects】</p> <p>2. As for the Preparatory Survey for PPP infrastructure project and SME promotion assistance for overseas investment, summarize the scheme contents and its relevance to the GL.</p> <p>3. To clearly mention that the SME promotion survey is not subject to the GL in practice since the main purpose of the survey is to collect the information. In addition, as for the SME feasibility survey and the verification survey, to clearly indicate that the projects that would have significant negative environmental and social impacts, that means Category A projects, will not be implemented.</p>	<p>were applied to the feasibility study and the verification survey in their operation because they include projects that may carry out feasibility studies or have environmental and social impacts.</p> <ul style="list-style-type: none"> <li>The main products and technology fields of the feasibility survey and the verification survey are environment/energy, waste, water purification/water treatment, vocational training/industrial training, welfare, agriculture, health/medical care, education and disaster prevention/disaster control. Of the 18 projects of the feasibility survey adopted in the first semester of FY2018, four projects were classified as Categories B and 14 projects were classified as Category C. On the other hand, of the 15 projects of the verification survey adopted at the same period, one project was classified as category B and 14 projects were classified as Category C.</li> <li>The “Support for SDGs Businesses” is the scheme that was newly established in July 2018, and the JICA GL were applied to it in operation because it includes projects that may carry out feasibility studies or have environmental and social impacts. The “Support for SDGs Businesses” replaced Feasibility Survey for SDGs Business and Collaboration Program with the Private Sector for Disseminating Japanese Technology, which were former schemes and were not cooperation projects covered by the JICA GL, however, the JICA GL were practically applied to them. The Feasibility Survey for SDGs Business adopted in the first half of 2018 were all classified as Category C, while the Collaboration Program with the Private Sector for Disseminating Japanese Technology adopted at the same period were all classified as Category C.</li> <li>JICA became an accredited entity of an international organization GCF in 2017. Therefore, it is assumed that JICA would be entrusted the GCF’s projects based on the Article 13 (3) of the Act of the Incorporated Administrative Agency-Japan International Cooperation Agency in future. Currently, project proposal is being prepared for submission to the GCF, and adoption of a project has not been completed. JICA is considering that the JICA GL would be applied to the projects entrusted by GCF.</li> </ul> <p>2. The outline of “SME support type” of the SME Partnership and the SDGs Business Model Formulation projects (former the programs for supporting overseas expansion of SMEs) is described in item 1. above. Based on the recommendation at the time of operation of review, it is stated in the FAQ about JICA GL that the Environmental and Social Considerations Guidelines apply to Preparatory Study for PPP Infrastructure Project, programs for supporting overseas expansion of SMEs (SME ODA F/S and SME Verification Survey).</p> <p>3. As stated in item 1 above, the promotion survey of “SME support type” of the SME Partnership and the SDGs Business Model Formulation projects is mainly for information collection and the feasibility is not studied. Therefore, it is not covered by the JICA GL. On the other hand, JICA has a policy that any proposals for feasibility survey and verification survey that may have significant negative impacts on the environment and society would not be selected.</p>	
	<p>4. Summarize change of the business environment such as promotion and speedup of infrastructure investment, increase of co-financing with international financial institutions, etc., after enforcement of the current GL).</p>	<p>4. Change of the business environment after enforcement of the current JICA GL 【Promotion of Quality Infrastructure Investment】</p> <ul style="list-style-type: none"> <li>The Government of Japan was promoting quality infrastructure investment with the aim to export Japanese high-quality infrastructure in order to meet global demand for infrastructure, especially in emerging countries. This is to provide quality infrastructure that secures economic efficiency with low life-cycle costs, inclusiveness, safety and resilience, and sustainability. It is also aimed to apply high-quality standards such as Guidelines for Environmental and Social Considerations for its implementation. Moreover, the Government has a policy to further accelerate the procedure in order to develop the cooperation strategically.</li> <li>G7 Ise-Shima Summit was held in 2016 and “G7 Ise-Shima Principles for Promoting Quality Infrastructure Investment” was announced as one of the attached documents of G7 Ise-Shima Leaders’ Declaration. In the Principal 3 addressing actions on the social and environmental impacts, it is described that quality infrastructure investment must consider the social and environmental impacts of infrastructure projects and duly address such impacts including by applying social and environmental safeguards that are in line with international best practices as reflected in the most relevant standards including those of existing MDBs.</li> </ul> <p>【Co-financing】</p> <ul style="list-style-type: none"> <li>Every year, approximately 10 co-financing projects are implemented with international financial institutions.</li> <li>The WB Environmental and Social Policy for Investment Project Financing (hereinafter referred to as “Environmental and Social Policy”), which sets out the mandatory requirements that apply to the Bank stipulates that the Bank will cooperate with other multilateral or bilateral funding agencies and the Borrower in order to agree on a common approach, when the Bank is jointly financing a project with the agencies. A common approach for the assessment and management of environmental and social risks and impacts of the project will be acceptable to the Bank, provided that such an approach will enable the project to achieve objectives materially consistent with the ESS 1-10, after understanding the safeguard policies of the co-financer.</li> <li>ADB SPS stipulates that ADB will make efforts to collaborate with the borrower/client and co-financiers to adopt a single social and environmental assessment and planning process and unified safeguard documentation, consultation, and disclosure</li> </ul>	<p>Suitability of introduction of common approach to co-financing projects</p>

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)																								
		requirements to satisfy the safeguard principles and requirements of ADB and of the co-financiers. (SPS, para70)																									
1.8 Measures Taken in an Emergency	<div>1. Summarize cases which applied “measures taken in an emergency” (Categorization, judgement criteria of “emergency,” measure on involvement of the advisory committee, information disclosure, monitoring, follow-up activity, etc.)</div> <div>Recommendation from the working group meeting for reexamination of JICA GL Operation 【Confirmation of environmental and social considerations in case of emergency】</div> <div>2. It is desirable that Category A projects are not applicable to “Emergency Measures” described in Section 1.8 under the JICA GL unless life-saving or humanitarian assistance is urgently needed.</div> <div>3. In the section 1.8 of the JICA GL, it is stated that “an emergency means a case that must be dealt with immediately, such as restoration after natural disasters or post-conflict restoration, when it is clear that there is no time to follow the procedures of environmental and social considerations mentioned in the guidelines”. It is desirable that classification criteria are clarified by describing which projects were classified as emergency projects so far.</div> <div>4. In the past operation, Section 1.8 of the JICA GL was applied to the Technical Cooperation (M/P) projects for natural disasters. In case that it is applied to the other project scheme, it is desirable to explain the procedure to be implemented to the Advisory Committee.</div> <div>5. If environmental and social considerations are simplified for an emergency response, post-project monitoring or any follow-up measure needs to be taken appropriately.</div>	<div>1. Cases applied “Measures Taken in an Emergency”<ul style="list-style-type: none"><li>There were no projects to which “Measures Taken in an Emergency” as per the JICA GL were applied among the reviewed projects. It was confirmed that there had been a total of seven projects (Technical Cooperation for Development Planning) for which emergency measures were applied after the enforcement of the JICA GL. In all the projects, detailed design study was skipped, but preliminary scoping (which is usually carried out in detailed design study) was carried out in the main study. In all cases, the application of “Measures Taken in an Emergency” was reported to the Advisory Committee for Environmental and Social Considerations before the main survey.</li></ul></div> <table><tr><td>Project Name</td><td>Category</td><td>Scheme</td></tr><tr><td>Project for the Comprehensive Flood Management Plan for the Chao Phraya River Basin, Kingdom of Thailand</td><td>B</td><td>Technical Cooperation for Development Planning</td></tr><tr><td>Jarar valley and Shebele Sub-basin Water Supply Development Plan, and Emergency Water Supply, Ethiopia</td><td>B</td><td>Technical Cooperation for Development Planning</td></tr><tr><td>The Project for Enhancing Community Resilience against Drought in Northern Kenya, Kenya</td><td>B</td><td>Technical Cooperation for Development Planning</td></tr><tr><td>Rural Resilience Enhancement Project, Ethiopia</td><td>B</td><td>Technical Cooperation for Development Planning</td></tr><tr><td>Sustainable Smallholder Irrigation Development and Management in Semi-Arid Lands Project, Kenya</td><td>B</td><td>Technical Cooperation for Development Planning</td></tr><tr><td>Project on Rehabilitation and Recovery from Nepal Earthquake, Nepal</td><td>B</td><td>Technical Cooperation for Development Planning</td></tr><tr><td>Project for Development of Regional Disaster Risk Resilience Plan in Central Sulawesi</td><td>B</td><td>Technical Cooperation for Development Planning</td></tr></table> <div>2. There are no projects categorized as “Category A” that applied Measures Taken in an Emergency after enforcement of the current Guidelines.</div> <div>3. Projects to which Measures Taken in an Emergency was applied after enforcement of the current JICA GL were seven projects of Technical Cooperation for Development Planning. The information of the projects are disclosed in JICA’s website. (https://www.jica.go.jp/english/our_work/social_environmental/id/emergency.html)</div> <div>4. Under the current JICA GL, there are no cases to which Measures Taken in an Emergency was applied other than Technical Cooperation for Development Planning scheme.</div> <div>5. When to which Measures Taken in an Emergency was applied to the Technical Cooperation for Development Planning, detailed design study was skipped. However, scoping and preparation of Terms of Reference (TOR) on environmental and social considerations, which were normally prepared during the detailed design stage, were implemented during the main study stage. Among the seven projects, Project on Rehabilitation and Recovery from Nepal Earthquake included the implementation of priority emergency projects, however no environmental and social impacts were identified during the main study stage. In addition, there were no cases that unanticipated impacts on environmental and social aspects were pointed out after the completion of the Technical Cooperation for Development Planning.</div>	Project Name	Category	Scheme	Project for the Comprehensive Flood Management Plan for the Chao Phraya River Basin, Kingdom of Thailand	B	Technical Cooperation for Development Planning	Jarar valley and Shebele Sub-basin Water Supply Development Plan, and Emergency Water Supply, Ethiopia	B	Technical Cooperation for Development Planning	The Project for Enhancing Community Resilience against Drought in Northern Kenya, Kenya	B	Technical Cooperation for Development Planning	Rural Resilience Enhancement Project, Ethiopia	B	Technical Cooperation for Development Planning	Sustainable Smallholder Irrigation Development and Management in Semi-Arid Lands Project, Kenya	B	Technical Cooperation for Development Planning	Project on Rehabilitation and Recovery from Nepal Earthquake, Nepal	B	Technical Cooperation for Development Planning	Project for Development of Regional Disaster Risk Resilience Plan in Central Sulawesi	B	Technical Cooperation for Development Planning	
Project Name	Category	Scheme																									
Project for the Comprehensive Flood Management Plan for the Chao Phraya River Basin, Kingdom of Thailand	B	Technical Cooperation for Development Planning																									
Jarar valley and Shebele Sub-basin Water Supply Development Plan, and Emergency Water Supply, Ethiopia	B	Technical Cooperation for Development Planning																									
The Project for Enhancing Community Resilience against Drought in Northern Kenya, Kenya	B	Technical Cooperation for Development Planning																									
Rural Resilience Enhancement Project, Ethiopia	B	Technical Cooperation for Development Planning																									
Sustainable Smallholder Irrigation Development and Management in Semi-Arid Lands Project, Kenya	B	Technical Cooperation for Development Planning																									
Project on Rehabilitation and Recovery from Nepal Earthquake, Nepal	B	Technical Cooperation for Development Planning																									
Project for Development of Regional Disaster Risk Resilience Plan in Central Sulawesi	B	Technical Cooperation for Development Planning																									
1.9 Dissemination	<div>1. Summarize records which JICA explained about the JICA GL to project proponents etc. and its contents.</div>	<div>1. JICA’s explanation about the JICA GL to project proponents etc. and the contents thereof.<ul style="list-style-type: none"><li>It was confirmed that JICA explained about the JICA GL to the project proponents etc. and the proponents agreed to comply with the JICA GL in all the 100 targeted projects. Staff of the project proponents etc. (120 in FY2011, 84 in FY2012, 100 in FY2013, 145 in FY2014, 101 in FY2015, 203 in FY2016, 142 in FY2017 and 53 in FY2018) participated in the training on the environmental and social considerations conducted by JICA. It was also confirmed that staff members of 28 projects out of the total 100 projects participated in these trainings.</li></ul></div>																									
1.10 Advisory Committee of Environmental and Social Considerations	(Confirmed through the review for “2.7 Advice of the Advisory Committee for Environmental and Social Considerations”)																										

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
II. Process of Environmental and Social Considerations	Survey Items, Recommendation from WG on Review of Operation	Survey Results, Background and Reasons of Discussion Points	Discussion Points (draft)
2.1 Information Disclosure	<ol style="list-style-type: none"> <li>Confirm status of information disclosure by JICA (Categorization, final report, environmental and social considerations reports, results of environmental review, monitoring result)</li> <li>Confirm status of information disclosure by project proponent etc. (Disclosure place, term, language, etc. on environmental and social consideration reports and monitoring results)</li> <li>Confirm status which JICA encouraged project proponents etc. to disclose the information.</li> <li>Confirm if the third party requested information disclosure and its correspondence</li> <li>Confirm correspondence to the information which is prohibited to disclose</li> </ol>	<ol style="list-style-type: none"> <li>Information disclosure by JICA <ul style="list-style-type: none"> <li>In all of the reviewed projects, all the documents related to environmental categorization, final reports of the preparatory survey, environmental and social considerations documents and results of environmental review that need to be disclosed as per the requirements of JICA GL were disclosed in JICA's website. (Private sector partnership projects are not applicable as prior survey is not carried out for this type of project.)</li> </ul> </li> <li>Information disclosure by recipient countries <ul style="list-style-type: none"> <li>As for 41 Category A projects, excluding 1 E/S loan project which environmental and social considerations documents are to be prepared, and 4 projects for Technical Cooperation for Development Planning, it was confirmed that environmental and social considerations documents were disclosed for all 36 projects by the project proponents. In addition, regarding the methodologies of public disclosure, disclosure of environmental and social considerations documents at the project proponent and provision of a copy of these documents are the most common process (36 projects), and the documents are also disclosed on the project proponent's website in 14 projects of them. As for the used language, when the main document is written in English, the executive summary was often prepared in a local language. Regarding 42 Category B projects, excluding 4 projects which disclosure process by the project proponent were confirmed, in many cases, there was no agreement between JICA and the project proponent for disclosure or there was no country regulation which requires the project proponent to prepare environmental and social considerations documents. In the case the project conducted the stakeholder meeting and prepared the environmental and social considerations documents, it is confirmed that the environmental and social considerations documents were disclosed at the stakeholder meeting.</li> </ul> </li> <li>JICA's encouragement to project proponents etc. to disclose the information. <ul style="list-style-type: none"> <li>Out of 82 projects (excluding 8 projects for Technical Cooperation for Development Planning and 10 Category C projects that are not applicable), it was confirmed that JICA and project proponents etc. agreed at the time of appraisal to disclose environmental monitoring results in 45 projects (and among them, it is agreed to disclose social monitoring results in 19 projects). In all projects, JICA explained about the information disclosure based on the JICA GL at the time of environmental review stage. The review study confirmed that JICA encouraged project proponents etc. to disclose the information in all projects; however, JICA could not agree on disclosure of monitoring result with some project proponents etc. The reasons are mostly related to the national legislation or policy and include that disclosure is not required under the national law, or project proponents etc. decided to follow their own disclosure policy. The number of projects in which information disclosure was agreed was increasing since the enforcement of the JICA GL. Among the ODA loan projects for which loan agreement was signed in FY2010, there were only four projects in which disclosure of environmental monitoring results was agreed while the monitoring was to be done in 36 projects, and there were only four projects in which disclosure of social monitoring results was agreed while the monitoring was to be done in 15 projects. On the other hand, in FY 2017, it was improved to 20 out of 38 projects agreed for disclosure of environmental monitoring and 12 out of 14 projects for disclosure of social monitoring.</li> </ul> </li> <li>Request of information disclosure from third parties and how such requests were handled <ul style="list-style-type: none"> <li>The request for information disclosure from third parties was made to JICA in two projects (Nos. 4, 83). Both projects were the subject of JICA's objection procedures.</li> </ul> </li> <li>Information which is not allowed to disclose <ul style="list-style-type: none"> <li>In all projects, JICA has not disclosed such information mistakenly and obtained the consent from the project proponent in advance when disclosing related information.</li> </ul> </li> </ol> <p>【Additional Survey Items】Safeguard provisions of the WB etc. regarding information disclosure</p> <ul style="list-style-type: none"> <li>In the WB Environmental and Social Policy, it is stipulated that for the high-risk projects and the substantial risk projects, reports on environmental and social risks and impacts of the Project based on the environmental and social impact assessment including EIA reports are disclosed before the Bank appraisal. These reports can be disclosed at the draft stage. There is no requirement in terms of the duration of the disclosure period.</li> <li>ADB stipulates that draft environmental impact assessment reports shall be disclosed at least 120 days before Board consideration for environment category A projects. (SPS, para 53)</li> <li>The disclosure of EIA reports is not a mandatory requirement for IFC. Instead, IFC will summarize all necessary information in the ESRS and disclose it. ESRS will be published for 60 days or more prior to the board meeting for Category A projects and 30</li> </ul>	<p>Status of EIA report to be disclosed before the environmental review (draft EIA or approved version)</p> <p>Necessity of disclosure of environmental permit certificate before the environmental review</p> <p>Disclosure period of</p>

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
		<p>days or more in other projects.</p> <ul style="list-style-type: none"> <li>In the current JICA GL, it is described that for Category A projects, JICA discloses the following prior to its environmental review: (1) EIA reports and environmental permit certifications, (2) RAPs for projects that will result in large-scale involuntary resettlement, and (3) IPPs for projects that will affect indigenous people. In addition, it is stipulated that JICA discloses EIA reports 120 days prior to signing loan agreement. (GL 3.2.1, (1), 2) JICA currently discloses approved EIA reports based on this policy, but this creates a challenge for projects. Since JICA proceed to the environmental review only after the EIA reports are disclosed which authorities already approve, any safeguard-related measures not covered by the EIA but required by JICA GL must be agreed on top of EIA. In such a case, the project proponents etc. need to comply not only with EIA but also with additional agreements with JICA, which may create confusion and undermine effective implementation of safeguard measures. These cases were observed in three projects (Nos. 24, 28, 29).</li> </ul> <p>【Additional Survey Items】 Disclosure of monitoring and supervision results</p> <ul style="list-style-type: none"> <li>In the JICA GL, it is required that JICA discloses the results of monitoring conducted by project proponents etc. on its website to the extent that they are made public in project proponents, etc. (3.2.2.7)</li> <li>ADB’s SPS stipulates that ADB discloses monitoring reports on its website. (SPS, para71)</li> <li>There are no provisions concerning the disclosure of environmental and social monitoring results under the safeguard policies and the information disclosure policies of the WB, the EBRD, the IDB and the AfDB.</li> <li>According to the WB Access to Information Directive/Procedure, the “aide-mémoire” of operational missions may be made publicly available if both the WB and the country/borrower agree. (Access to Information Directive/Procedure, para.3a, revised April 2019)</li> </ul>	<p>EIA report</p> <p>Necessity of disclosure of the monitoring results</p>
2.2 Categorization	<ol style="list-style-type: none"> <li>Summarize results of environmental categorization and its reason.</li> <li>Summarize the recategorized project and its reason</li> <li>Summarize categorization justification in case there was a doubt on the categorization from the third party.</li> <li>Confirm the submission status of the screening format.</li> </ol>	<ol style="list-style-type: none"> <li>Environmental Categorization and its rationale <ul style="list-style-type: none"> <li>Significant gaps between the result of environmental categorization and its rationale were not confirmed in all 100 projects.</li> </ul> </li> <li>Changes in Environmental Categorization <ul style="list-style-type: none"> <li>In three projects (Nos.25, 27, 63)out of the 100 projects, the environmental category was changed. The reasons for change were: [No.25] the components related to the engineering service of the power plant were excluded from the project (A→C); [No.27] a large-scale resettlement was confirmed when M/P and F/S were revised in consideration of the flood damage that happened after F/S was initially prepared by the project proponent (B→A), [No.63] the components related to construction of the final waste disposal site were excluded from the project (B→C).</li> </ul> </li> <li>Relevance of environmental category <ul style="list-style-type: none"> <li>It was confirmed that the relevance of the categorization was questioned with two projects by the third parties. They are: Project No.36 Infrastructure Development Project in Thilawa Area (Phase I) in Myanmar, and Project No.83 Support for Agricultural Development Master Plan for Nacala Corridor in Mozambique.</li> </ul> </li> <li>Submission status of the screening format <ul style="list-style-type: none"> <li>Screening was conducted based on the screening form or adequate information from project proponents etc. in all 100 projects.</li> </ul> </li> </ol> <p>【Additional Survey Items】 Provision related to project categorization in the WB ESF, etc.</p> <ul style="list-style-type: none"> <li>In WB OP 4.01, the proposed projects were classified into one of four categories: A, B, C, FI, depending on type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts. As per the new Environmental and Social Policy, the proposed projects are classified into one of four categories: High Risk, Substantial Risk, Moderate Risk or Low Risk, taking into account relevant issues shown below. Risks are reviewed on a regular basis and any change will be disclosed on the Bank’s website. <ul style="list-style-type: none"> <li>➢ The type, location, sensitivity and scale of the Project;</li> <li>➢ The nature and magnitude of the potential ES risks and impacts;</li> <li>➢ The capacity and commitment of the Borrower to manage such risks and impacts in a manner consistent with the ESS (Among the WB ESF, requirements that should be met by the project to be implemented and the Borrower);</li> <li>➢ The environmental and social mitigation measures and outcomes, depending on the specific project and the context; and</li> <li>➢ The nature of the mitigation and technology being proposed; governance structures and legislation; and considerations relating to stability, conflict or security.</li> </ul> </li> <li>In order to comply with each ESS, the requirements for the Borrowers are set that are appropriate to the nature and scale of the project and proportionate to the level of environmental and social risks and impacts. (Environmental and Social Policy, para 6)</li> <li>It is not mentioned in ESF that it is necessary to consider the environmental and social impacts of the associated facilities when determining risk classification. (Environmental and Social Policy, para 6)</li> </ul>	<p>Necessity to refer to new project categorization (High Risk, Substantial Risk, Moderate Risk, Low Risk) introduced in the Environmental and Social Policy (which is about requirements of the WB) which is a part of ESF</p>

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
		<ul style="list-style-type: none"> <li>In the ADB's SPS, it is stipulated that a project's category is determined by taking into consideration direct, indirect, cumulative, and induced impacts of the projects, but not stipulated to consider the environmental and social impacts from the associated facilities. (SPS, para 50)</li> <li>In the IFC's SGP, it is stipulated to consider the potential environmental and social risks of the project in its categorization, but no reference is made to "associated facilities".</li> </ul> <p>【Additional Survey Items】 Category B projects</p> <ul style="list-style-type: none"> <li>Out of 100 reviewed projects, 42 projects are Category B projects. In terms of project scheme, they can be divided into ODA Loan (12 projects), ODA Grant (18 projects), Technical Cooperation (3 projects), Technical Cooperation for Development Planning (3 projects), and SME partnership and others (6 projects). Among them, 9 projects of Technical Cooperation, Collaboration with private partners and others were relatively small-scale (e.g. dispatching experts or installation equipment) and no involuntary resettlement was expected, thus environmental and social impacts were expected to be limited. As for Technical Cooperation for Development Planning projects, due to its nature of the examination of the higher-level plan, the scale of the project presented in the plan and its impacts varied within a certain range. On the other hand, concerning 12 Category B Loan projects, average project cost was about 15 billion Yen and the scale was relatively large, such as rehabilitation of road and airport. In some projects, involuntary resettlement was expected although its scale was not large. As for 18 Category B Grant projects, the average cost of projects was about 2.5 billion Yen, the scale of the projects was relatively small compared to the ODA Loan projects, and so were the project impacts. Category B is the most diverse category that includes various scales of projects, and thus there are considerable variations in terms of project impacts and risks.</li> </ul>	
2.3 Impacts to be Assessed	(Confirmed through the review of Appendix 1 of JICA GL)		
2.4 Consultation with Local Stakeholders	<ol style="list-style-type: none"> <li>Confirm records of consultation between JICA and project proponents etc.</li> <li>(Record of consultation other than the above will be confirmed through the review of Appendix1, Social Acceptability of JICA GL.)</li> </ol>	<ol style="list-style-type: none"> <li>Record of public consultation <ul style="list-style-type: none"> <li>In the current JICA GL, it is stipulated that the project proponents etc. disclose scoping drafts, which consist of project names, countries, locations, project outlines, environmental categorizations and its reasons, alternative analysis, impacts, and contents. Project proponents etc. also consult with local stakeholders reflecting stakeholder analysis for Category A projects, and if necessary, for Category B projects. JICA supports project proponents etc. in doing so in order that they incorporate the results of such consultations into their environmental and social considerations surveys (GL3.1.2.6).</li> <li>Among the 100 projects, it was confirmed that stakeholder consultation meetings for EIA/RAP were held at the environmental review stage in 69 projects. (31 projects are not applicable. They are: 10 Category C Projects, 7 FI Projects, 9 Category B projects for which impacts are likely to be very small (e.g. rehabilitation within the existing facilities or project identification studies of SME Partnership projects, and 5 projects of Technical Cooperation for Development Planning in which stakeholder consultations had been held at the master plan planning.) Of these 69 projects, implementation of stakeholder consultation at the scoping stage was confirmed in all Category A projects excluding 3 projects (36) in which JICA did not implement the feasibility study and project proponents etc. prepared EIA. The same was confirmed in 11 out of 32 Category B projects for which stakeholder consultations was conducted as per the requirements of JICA GL.</li> </ul> </li> </ol> <p>【Additional Survey Items】 Provisions related to stakeholder engagement in the WB ESF</p> <ul style="list-style-type: none"> <li>The WB ESS 10 "Stakeholder Engagement and Information Disclosure" applies to all projects supported by the Bank through Investment Project Financing. (ESS 10 para 4) In ESS 10, it is stipulated that "stakeholder" refers to individuals or groups who (a) are affected or likely to be affected by the project; or (b) may have an interest in the project. (ESS 10 para 5)</li> <li>It is stipulated that the Borrower will develop and implement a SEP. In the SEP, the following contents are described: identification of project-affected parties and other interested parties, the timing and methods of engagement with stakeholders, the range and timing of information provided, the method of announcement of the meeting, the venue, report of the results of the meeting and the grievance mechanism in detail. A draft SEP will be disclosed as early as possible, and before project appraisal. (ESS 10, para 13)</li> <li>The Borrower will undertake a process of meaningful consultation. Meaningful consultation is a two-way process in which stakeholders can express their opinions on project risks, etc., and the Borrower also considers and responds to them. (ESS 10 para 21, 22)</li> <li>The Borrower will propose and implement a grievance mechanism. A grievance mechanism includes different ways in which users can submit their grievances, a log, transparent process, an appeals process when resolution of grievance has not been achieved. (ESS 10 para 26, Annex 1 para 1-3)</li> <li>In the IFC PS 1 "Assessment and Management of Environmental and Social Risks and Impacts", it is stipulated that the client will develop and implement a SEP that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities (para 27). The SEP may include project description, identification of stakeholder, engagement program and description of grievance redress mechanisms. (GN 1 para 98) In addition, the client will disclose relevant project information to the affected communities. The information to be disclosed includes the SEP. (para 29,</li> </ul>	<p>Necessity to refer to the provisions about Stakeholder Engagement Plan stipulated in ESS 10</p> <p>Note: ESS is a part of ESF and indicates the requirements to be met by the borrower and the project</p>

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
		<p>footnote 26)</p> <p>【Additional Survey Items】 Provision of MDBs safeguard requirement regarding stakeholder consultation</p> <ul style="list-style-type: none"> <li>ADB: The SPS stipulates that ADB is committed to working with borrowers/clients to put meaningful consultation processes into practice, and borrowers/clients will conduct the stakeholder engagement activities in a manner commensurate with the risks to and impacts on affected communities. On the other hand, development and implementation of SEP are not required. (SPS, para54)</li> </ul>	
2.5 Concern about Social Environment and Human Rights	1. Confirm special consideration on information disclosure and consultation with local stakeholders taken for cooperation projects in the countries and areas affected by conflict or where basic freedoms, including freedom of expression and the right to receive legal remedy, are restricted.	<p>1. Consideration on information disclosure and consultation with local stakeholders taken for cooperation projects in countries and areas affected by conflict or where basic freedoms, including freedom of expression and the right to receive legal remedy, are restricted</p> <ul style="list-style-type: none"> <li>It was confirmed that none of the 100 projects take place in such countries or areas.</li> <li>According to the Office of the United Nations High Commissioner for Human Rights, etc., it is pointed out that threats and attacks to persons who advocate for defending human rights are becoming international concerns.</li> </ul>	
	2. Confirm any special attention paid to human rights of socially vulnerable groups	<p>2. Confirmation of special attention paid to human rights of socially vulnerable groups</p> <p>It was confirmed that plans on considerations to socially vulnerable groups were developed in 60 out of the 100 projects. (This was not applicable in 10 Category C Projects, 7 FI, and 18 projects in which no impacts to vulnerable groups were identified (e.g. implementation of improvement of the existing facilities, or collaboration with private partners). See Annex 1 Socially Vulnerable Groups for more details.</p> <p>【Additional survey items】 Provisions related to human rights and socially vulnerable groups in the WB ESF</p> <ul style="list-style-type: none"> <li>In the WB ESF, A Vision for Sustainable Development declares at the beginning and focuses on empowering all people to participate in the development process, promoting equality and nondiscrimination, and considering vulnerable individuals and groups. Through these policies, the WB has committed consideration for human rights declared in the Universal Declaration of Human Rights.</li> </ul> <p>【Additional survey items】 Scope of consideration on human rights</p> <ul style="list-style-type: none"> <li>It is described in the Japan’s Development Cooperation Charter that people who are liable to be vulnerable include children, women, persons with disabilities, the elderly, refugees and internally-displaced persons, ethnic minorities, and indigenous peoples.</li> <li>It is described in section 2.5 “Concern about Social Environment and Human Rights” in the JICA GL that vulnerable social groups include women, indigenous peoples, persons with disabilities, and minorities. In addition, it is also described in section 2.3 “Impacts to be Assessed” that items related to human rights to be considered include vulnerable social groups such as poor and indigenous peoples, gender, and children’s rights, but here is no description about refugee, internally displaced people and the elderly.</li> </ul> <p>【Additional survey items】 Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework</p> <ul style="list-style-type: none"> <li>UN Special Representative John Ruggie, who was assigned as a special representative on issue of human rights, transnational corporations, other business enterprises, proposed a framework on business &amp; human rights “Protect, Respect and Remedy” to the UN Human Rights Council in June 2008. The framework is called as “Ruggie Framework”, resting on three pillars: “the state duty to protect against human rights abuses by third parties, including business”, “the corporate responsibility to respect human rights” and “greater access by victims to effective remedy”. In order to implement the framework, “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework” (hereinafter referred to as “Guiding Principles”) was developed and endorsed by the UN Human Rights Council in June 2011.</li> <li>The Japanese Government committed to follow the Guiding Principles and announced that it planned to formulate a National Action Plan on business and human rights at the UN Forum on Business and Human Rights held in November 2016. According to the Ministry of Foreign Affairs, the National Action Plan is scheduled to be published in mid 2020.</li> </ul>	Consideration of human rights and its scope, necessity of adding socially vulnerable groups as a target group for such considerations
2.6 Laws, Regulations and Standards of Reference	<p>1. Whether national legislation on EIA and RAP are complied.</p> <p>2. Whether there is any gap between projects and the international standards such as WB SGP.</p>	<p>1. Compliance with national laws</p> <ul style="list-style-type: none"> <li>Among the 100 projects, EIA approval in line with the national law was required and was obtained in 50 projects. Though 7 Category A projects (Nos. 5, 8, 26, 27, 31, 32, 33) were not required to prepare EIA documents or obtain approvals under the host country’s laws and regulations, it was confirmed EIA reports were prepared in accordance with the requirements of the JICA GL and approved by a ministry in charge or the project proponent. It was confirmed that EIA reports were prepared by the time of environmental review in all 20 Category B projects which were subject to EIA under the national law.</li> </ul> <p>2. Deviations from international standards such as WB SGP</p> <ul style="list-style-type: none"> <li>In the JICA GL, JICA confirms that projects do not deviate significantly from the WB’s SGPs. (GL2.6.3)</li> <li>No major deviation was seen in all the reviewed projects from the requirements of WB’s SGP and other international safeguard standards. Most projects used EHSg (air, noise, vibration, effluent water, surface water, emission gas), WHO standards (air,</li> </ul>	

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)																				
		noise, vibration, water quality), ISO standards (vibration), EU standards (air, emission gas, water quality), Japanese standards (noise, vibration, effluent water, water quality, air, JIS vibration) as a refence of international emission standards. However, in the 10 projects (Nos. 7, 13, 15, 20, 26, 28, 31, 32, 46, 47), only national standards were used in environmental assessment process. This is because in these projects, it was confirmed that there is no major gap between national standards and international standards. Regarding involuntary resettlement, most projects referred WB OP4.12 and the ADB SPS as international standards..																					
	3. Summarize the changes from WB SGP (OPs) to ESF.	<div>3. The changes from WB SGP (OPs) to the ESF</div> <div>3.1 ESF is a comprehensive document consisting of the following documents.</div> <div><div><div>• A vision for Sustainable Development: it sets out the Bank’s aspirations regarding environmental and social sustainability</div><div>• The WB Environmental and Social Policy for Investment Project Financing (Environmental and Social Policy): it sets out the mandatory requirements that apply to the Bank</div><div>• ESS: it sets out the mandatory requirements that apply to the Borrower and projects. The contents of ESS 1 to ESS 10 are as follows:</div></div><table><tr><td>ESS 1</td><td>Assessment and Management of Environmental and Social Risks and Impacts</td></tr><tr><td>ESS 2</td><td>Labor and Working Conditions</td></tr><tr><td>ESS 3</td><td>Resource Efficiency and Pollution Prevention</td></tr><tr><td>ESS 4</td><td>Community Health and Safety</td></tr><tr><td>ESS 5</td><td>Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</td></tr><tr><td>ESS 6</td><td>Biodiversity Conservation and Sustainable Management of Living Natural Resources</td></tr><tr><td>ESS 7</td><td>Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</td></tr><tr><td>ESS 8</td><td>Cultural Heritage</td></tr><tr><td>ESS 9</td><td>Financial Intermediaries</td></tr><tr><td>ESS 10</td><td>Stakeholder Engagement and Information Disclosure</td></tr></table></div> <div>3.2 Major changes are shown as follows:</div> <div>1) Nine individual policies and procedures on safeguard (OPs, BPs) were integrated into the ESF. ESF includes 10 ESSs which apply to all projects. Standards added to the ESS that were not included in the former SGPs or were not presented as a stand-alone policy are Labor and Working Conditions (ESS 2), Community Health and Safety (ESS 4), Financial Intermediaries (ESS 9) and Stakeholder Engagement and Information Disclosure (ESS 10).</div> <div>2) Categorization is based on the magnitude of environmental and social impacts in the former safeguard policies, while it is based on the contents of the project, environmental and social risks of the project and so on in ESF. Environmental and social risks will be evaluated in an integrated manner, and adaptive actions of proposed project will be taken so that changes or unforeseen circumstances can be appropriately managed.</div> <div>3) The new ESF is more aligned with policies of other funding agencies and international good practice, especially those of IFC.</div> <div><div>• It is stipulated in the JICA GL that JICA confirms that projects do not deviate significantly from the WB’s SGP. As the ESF took effect in October 2018, it is necessary to examine whether assessment of significant gaps between the JICA GL and ESS should be required or not.</div></div>	ESS 1	Assessment and Management of Environmental and Social Risks and Impacts	ESS 2	Labor and Working Conditions	ESS 3	Resource Efficiency and Pollution Prevention	ESS 4	Community Health and Safety	ESS 5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	ESS 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS 7	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	ESS 8	Cultural Heritage	ESS 9	Financial Intermediaries	ESS 10	Stakeholder Engagement and Information Disclosure	Necessity of confirming no significant deviation from the WB ESS (requirement for host government)
ESS 1	Assessment and Management of Environmental and Social Risks and Impacts																						
ESS 2	Labor and Working Conditions																						
ESS 3	Resource Efficiency and Pollution Prevention																						
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ESS 8	Cultural Heritage																						
ESS 9	Financial Intermediaries																						
ESS 10	Stakeholder Engagement and Information Disclosure																						
	4. Summarize the gap between WB ESF and the current JICA GL	<div>4. The gap between WB ESF and the current JICA GL</div> <div><div>• Major items in the ESS that were changed from the former WB SGP and other international standards are described in each GL item.</div><div>• As general items, ESS 1 “Assessment and Management of Environmental and Social Risks and Impacts” requires the Borrowers to prepare the following documents.</div><div><div>A) Preparation of ESIA: The environmental and social risks and impacts of the project will be assessed. All relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle will be assessed including those specifically identified in ESSs 2-10 (ESS 1 para 23-). The social aspect includes workers related to the project (ESS 2) and consideration for surrounding communities (ESS 4).</div><div>B) Agreement on ESCP: It is required to prepare a document that summarizes the important points such as mitigation measures and monitoring plan in ESIA.</div></div><div>• If the Bank reviews the Borrower’s ES Framework and concludes that the project’s risks and impacts will be appropriately addressed to achieve objectives materially consistent with the ESSs, so the Borrower can use its ESF (all of or part of), instead of ESS. (ESS 1, para 19, 20)</div></div> <div>WB ESS1: Necessity of referring to the requirements concerning preparation of Environmental and Social Impact Assessment report and Environmental and Social Commitment Plan</div> <div>WB ESS1: Necessity of referring to the requirements concerning the use of borrower’s ES framework</div>																					
	5. Summarize the standards and good practices in the safeguard policies of ADB and IFC which can be referred by the JICA	5. Standards and good practices in the safeguard policies of the ADB and the IFC, which can be referred by JICA projects	Necessity of confirming no significant deviation																				

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)																
	projects	<div>5.1 ADB<ul style="list-style-type: none"><li>The SPS (2009), ADB's SGP, defines the requirements of the ADB, as well as the requirements that borrowers/client to meet, and it consists of environment, involuntary resettlement, indigenous peoples, and special requirements for different finance modalities.</li></ul></div> <div>5.2 IFC<ul style="list-style-type: none"><li>IFC established “International Finance Corporation’s Policy on Social and Environmental Sustainability” and “Environmental and Social Performance Standard (PS)” in 2012. The PS elaborates a set of requirements that are grouped by eight different topics/issues as indicated in the table below. Compared to the WB ESS, ESS 9 and ESS 10 are not included in the IFC PS, but the contents are covered in the IFC's Interpretation Note on Financial Intermediaries (which defines the application of the IFC policies and the PS on environmental and social sustainability to projects of financial intermediaries) and in PS 1, and thus there is no major difference. As for details of each PS, see the section Appendix 1: Environmental and social considerations required for intended projects of this table.</li></ul><table><tr><td>PS 1</td><td>Assessment and Management of Environmental and Social Risks and Impacts</td></tr><tr><td>PS 2</td><td>Labor and Working Conditions</td></tr><tr><td>PS 3</td><td>Resource Efficiency and Pollution Prevention</td></tr><tr><td>PS 4</td><td>Community Health, Safety, and Security</td></tr><tr><td>PS 5</td><td>Land Acquisition and Involuntary Resettlement</td></tr><tr><td>PS 6</td><td>Biodiversity Conservation and Sustainable Management of Living Natural Resources</td></tr><tr><td>PS 7</td><td>Indigenous Peoples</td></tr><tr><td>PS 8</td><td>Cultural Heritage</td></tr></table><ul style="list-style-type: none"><li>IFC also prepared GNs to offer helpful guidance on the requirements contained in the PS.</li><li>In case of JICA’s PPP (PSIF, preparatory survey (PPP infrastructure projects)), proposed companies usually follow environmental and social safeguard procedures in accordance with the Equator Principles, and these projects typically refer IFC's PS as an international standard.</li></ul></div> <div>5.3 Environmental, Health, and Safety Guidelines<ul style="list-style-type: none"><li>WB EHSG are technical reference documents that contain 1) the general guidelines (General EHSG) that include environmental standards, emissions standards, mitigation strategies, safety measures, and occupational health and safety, and 2) the industry-specific guidelines (Industry Sector Guidelines).</li><li>WB and IFC compare borrower’s standards with those of the EHSG, and apply the stricter one. However, in consideration of project-specific conditions such as technical and financial constraints of the borrowers, alternative standards may be applied as long as the purpose of ESS or PS are not impaired and significant impact does not occur. (WB ESS 1, para 18) (IFC PS on Environmental and Social Sustainability, para 6, 7)</li></ul></div>	PS 1	Assessment and Management of Environmental and Social Risks and Impacts	PS 2	Labor and Working Conditions	PS 3	Resource Efficiency and Pollution Prevention	PS 4	Community Health, Safety, and Security	PS 5	Land Acquisition and Involuntary Resettlement	PS 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	PS 7	Indigenous Peoples	PS 8	Cultural Heritage	from gap analysis with IFC PS when considering equity investment/loan provision to Public-Private Partnership projects
PS 1	Assessment and Management of Environmental and Social Risks and Impacts																		
PS 2	Labor and Working Conditions																		
PS 3	Resource Efficiency and Pollution Prevention																		
PS 4	Community Health, Safety, and Security																		
PS 5	Land Acquisition and Involuntary Resettlement																		
PS 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources																		
PS 7	Indigenous Peoples																		
PS 8	Cultural Heritage																		
2.7 Advice of the Advisory Committee for Environmental and Social Considerations	<div>1. Summarize records of advisory committee meetings. (including improvements in its operation and information disclosure.)</div> <div>2. Confirm how advices from the advisory committee at the environmental review stage were incorporated in the projects</div>	<div>1. Summarization of records of JICA Environmental and Social Considerations Advisory Committee<ul style="list-style-type: none"><li>Meetings of the Advisory Committee were properly held for all 41 Category A projects.</li></ul></div> <div>2. Confirmation on how advices from the Committee during the environmental review are incorporated in the projects<ul style="list-style-type: none"><li>Out of the total 557 pieces of advice from the Advisory Committee, 550 pieces of advice suggested revisions/updates of the Preparatory Survey reports (this include advices for one project in which final report is being prepared taking into account the advices) or confirmation or agreement with the project proponent before appraisal. While most advices were properly taken care of, the review study identified several advice that poses some challenges to follow (see the next bullet point). Regarding the remaining 38 pieces of advice, it was confirmed that they were properly addressed during the implementation of the projects.</li><li>In some cases, the follow-up of the advice was challenging. This is partially because environmental and social consideration documents such as EIA had already been approved or had been being subject to the official review process when the Advisory Committee meeting was held at JICA’s environmental review stage. For instance, in three projects (Nos.24, 28, 29), the advice was not incorporated in the EIA since they were already approved or in the process. In such a case, measures following the advice was agreed at the time of the project appraisal on top of EIA.</li></ul></div>	Follow-up on contents additionally agreed upon at the time of appraisal where the EIA report was already approved																
2.8 Decision-making by JICA	<div>1. Confirm the status of agreement documents</div> <div>2. Whether any cooperation project was suspended based on agreement documents.</div>	<div>1. Confirmation of the status of agreement documents<ul style="list-style-type: none"><li>Agreements between JICA and the project proponents etc. were concluded in all the 100 projects.</li></ul></div> <div>2. Suspension based on agreement No cooperation projects were suspended based on the non-compliance with the agreements.</div>																	
2.9 Ensuring Appropriate Implementation of and Compliance with the Guidelines	(To be confirmed separately through the review of objection procedures.)																		

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
2.10 Implementation and Review of the Guidelines	Not applicable.	<ul style="list-style-type: none"> <li>JICA reviewed the operational procedure of the JICA GL in 2015, and prepared FAQs based on the advices of the Advisory Committee, in order to addresses challenges identified through implementation of the JICA GL. The topics discussed and compiled in the FAQs include “impact of associated facility”, “derivative, secondary, cumulative impacts”, “critical natural habitats” “significant conversion or significant degradation”, “protected areas that are specifically designated for the conservation of nature or cultural heritage”, “consideration of environmental and social impacts on ecosystem”, and “stakeholder meeting in consideration of socially vulnerable groups”.</li> </ul>	
III. Procedures of Environmental and Social Considerations	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
3.1 Preparatory Study	<ol style="list-style-type: none"> <li>Summarize practices of alternative analyses including “without project” scenarios</li> <li>Confirm implementation records of each procedure in the preparatory study, such as scoping, EIA/IEE study, information disclosure, stakeholder meetings etc.</li> </ol>	<ol style="list-style-type: none"> <li>Analysis of alternatives including “without project” scenario <ul style="list-style-type: none"> <li>Among the 100 projects, it was confirmed that alternative analysis was examined for all 41 Category A projects. Regarding Category B projects, it was done in 38 projects. Analysis of alternative was not conducted in four exceptional cases such as projects taking place within the premise of existing facility (Project Nos.62, 65, 66, 76).</li> <li>In most Category A projects, “without project” scenario was examined when conducting alternative analysis. As an exception, in the case of co-financing projects in which EIA report was prepared with the support of MDBs (ADB, AfDB), “without project” scenario was not examined.</li> <li>Analysis of alternative was done in 79 projects (41 Category A and 38 Category B). The typical patterns of an analysis are as follows (however, nine projects with limited impacts such as SME support type projects and projects with minor construction work are excluded from the trend analysis as alternative analysis for these projects were simplified): Comparison of alternative project sites and routes are most common and was found in 51 projects, followed by project design (34 projects), construction and operation method (9 projects, out of this, 4 projects focus specifically on construction methods), and the project implementation schedule (4 projects). In terms of M/P study with Strategic Environmental Assessment (7 projects in total), alternative analysis was conducted on project sites (4 projects), project design (4 projects), construction and operation methods (1 project) and project implementation schedule (1 project).</li> <li>Alternative analysis from both economic aspects (e.g. project cost, feasibility, etc.) and environmental and social aspects are examined for 24 projects. More specifically, analysis on the economics aspect was confirmed in 27 projects, environmental aspects in 28 projects, and social aspect in 28 projects. Alternative analysis on social aspects, especially land acquisition and resettlement aspects, were often confirmed. Technical alternatives were analyzed for 25 projects. In addition, it was found that alternative analysis includes some other aspects such as geography, effectiveness, demands, safety, difficulty to obtain permissions, the construction period, a flood risk, and consistency with higher level governmental policies.</li> <li>Out of the 90 projects, alternatives analysis was conducted 79 projects in total, namely in 41 Category A projects and in 38 Category B projects excluding 4 projects (Nos.62,65,66,76) which are to be constructed in the premises of the existing facilities (details are provided in the next section (2)).</li> <li>Out of the 100 projects for review, the alternative project plan were examined for all 41 projects Category A projects. In addition, the alternative analysis has been conducted with 38 Category B projects except for the ones which are implemented within the premises of existing facilities (Nos.62, 65, 66, 76). In total, the alternatives have been examined in 79 projects.</li> <li>Methodological pattern observed with 70 projects out of the 79 projects were summarized below. Remaining 9 projects are excluded from this analysis as alternative analysis was conducted in a simple methodology for (1) the SME support projects are proposed by the private sector (verification survey/feasibility survey with the private sector for disseminating Japanese technologies, promoting private sector cooperation and BOP business collaboration project); and (2) technical cooperation projects accompanied with small scale construction work but limited environmental and social impacts.</li> <li>The examination of alternative project sites/routes are most common in 51 projects. Subsequently, project design alternatives were considered in 34 projects; alternatives of the construction and operation method were considered in 9 projects (especially, the construction method was examined in 4 projects); the alternative implementation schedules were considered in 4 projects (including selection of priority projects in the M/P). As for 7 technical cooperation projects for development planning which conducted SEA, it was confirmed that alternative project sites and project designs were considered in 4 projects each; and both alternative construction and operation methods and implementation schedules were examined in one project each.</li> <li>For 31 Category A projects out of 70 projects which conducted alternative considerations, whether alternatives were considered from economic, social and environmental aspects was reviewed. Alternative analysis from both economic aspects (e.g. project cost, feasibility, etc.) and environmental and social aspects are examined for 24 projects. More specifically, the alternative analysis on the economics aspect was confirmed in 27 projects, environmental aspects in 28 projects, and social aspect in 28 projects. The alternative analysis on social aspects, especially land acquisition and resettlement aspects, were often confirmed.</li> <li>Technical alternatives were analyzed for 25 projects. In addition, it was found that alternative analysis includes some other aspects such as geography, effectiveness, demands, safety, difficulty to obtain permissions, the construction period, a flood risk, and consistency with higher level governmental policies.</li> <li>Quantitative alternative analysis was confirmed in 22 projects. It was often observed that the quantitative analysis was partially</li> </ul> </li> </ol>	Necessity of including “zero option” in “without project scenario” when conducting alternative analysis

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
		<p>conducted because it is not easy to evaluate alternatives quantitatively for all the options. More specifically, alternative considerations were often conducted at several sites or routes and at the different planning stages under one project. The limited availability of existing data for the alternative consideration at the early planning stage is also another challenge for quantitative evaluation. In addition, there are 2 projects (Nos.32, 34) with which alternative analysis were evaluated quantitatively by Multicriteria Analysis (MCA) using weighted evaluation parameters and both the quantitative and qualitative data.</p> <ul style="list-style-type: none"> <li>Alternative analysis was conducted by considering quantitative and qualitative positive effects in 17 projects. For example, the regional economic effect (including increase in employment), improvement of traffic congestion, easiness for extension, connectivity with other transportation, improvement of transportation network, safety, EIRR, less travel time, GHG emission reduction, appropriate treatment of heavy metals, reduction of odour, improvement of water quality, improvement of air quality and noise due to improved traffic congestion, environmental conservation by improvement construction (e.g. river bank and sand beach), indirect impact of improved agriculture production by the power generation projects, potential future development, urban planning potentials were considered as positive effects. Although these positive effects were considered, these positive effects are both for the alternatives selected and not selected.</li> </ul> <p>2. Implementation of each safeguard procedure during preparatory survey</p> <ul style="list-style-type: none"> <li>It was confirmed that every procedure required under JICA GL in the preparatory survey was implemented in 67 projects. This requirement is not applicable for 33 projects as the preparatory study was not conducted.</li> </ul> <p>【Additional Survey Items】 Methods of alternative analysis</p> <ul style="list-style-type: none"> <li>Methods of alternative analysis in SEA stage and in EIA stage are as follows:</li> </ul> <p>1. MDBs</p> <p>(1) SEA Stage</p> <ul style="list-style-type: none"> <li>There are no specific requirements about alternative analysis at SEA in the safeguard policies of WB, IFC and ADB, etc.</li> </ul> <p>(2) EIA Stage: Alternative analysis stipulated in the WB ESS, ADB SPS and IFC PS are as follows:</p> <p>1) WB</p> <ul style="list-style-type: none"> <li>➤ Systematically compares feasible alternatives to the proposed project site, technology, design, and operation-including the “without project” situation--in terms of their potential environmental and social impacts; and</li> <li>➤ Assesses the alternatives’ feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; the institutional, training, and monitoring requirements for the alternative mitigation measures.</li> <li>➤ For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible. (ESS 1, Annex 1 D. Indicative Outline of ESIA, (g))</li> </ul> <p>2) ADB</p> <ul style="list-style-type: none"> <li>➤ Examine alternatives to the project’s location, design, technology, and components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative. (SPS, 1. Environmental Safeguards para 3)</li> <li>➤ Alternatives will be examined for the proposed project site, technology, design, and operation—including the no project alternative—in terms of their potential environmental impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions; and their institutional, training, and monitoring requirements. In addition, the basis for selecting the particular project design proposed, and recommended emission levels and approaches to pollution prevention and abatement will be recorded. (SPS, Annex to Appendix 1: Outline of an Environmental Impact Assessment Report, F.)</li> </ul> <p>3) IFC</p> <p>For those projects with potential significant adverse impacts, the client will conduct a comprehensive environmental and social risks and impacts assessment, including an examination of technically and financially feasible alternatives. (PS 1, footnote 11, GN25)</p> <p>2. Japan</p> <p>1) EIA Act</p> <ul style="list-style-type: none"> <li>It is stipulated in the EIA Act of Japan that efforts must be made to include an option of not implementing the proposed project when assessing different alternatives at the stage of Document on Primary Environmental Impact Consideration (<i>Hairyo-sho</i><sup>1</sup>). In addition, “without project” scenario includes “zero option”, one of the alternatives that can accomplish the objective of the project without implementing the proposed project. (Ministry of the Environment Working Group regarding technical approach for</li> </ul>	

<sup>1</sup> The Ministry of the Environment published a guideline for introducing Strategic Environmental Assessment in 2007. The Guideline applies to mainly type 1 projects as specified in the EIA Act of Japan (Act No. 81 of June 13, 1997) that are large scale and potentially have significant environmental impacts. SEA is to be undertaken during the planning stage of these projects (considering the location and scale of the project). According to the Environmental Impact Assessment Network ([http://assess.env.go.jp/1\\_seido/1-1\\_guide/3-1.html](http://assess.env.go.jp/1_seido/1-1_guide/3-1.html)), *Hairyo-sho* is defined as the document describing the results of the assessment about environmental issues prepared at the stage when the project location and scale are being considered.

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
	<p>3. Recommendation from the 5th working group meeting for reexamination of JICA GL Operation 【Alternative analysis】 It is necessary to clarify interpretations of “without project” scenarios under the JICA GL .</p>	<p>environmental impact assessment in the planning stage, Technical Guidance regarding Procedure of Environmental Impact Assessment in the planning stage, March 2013) The Basic Matters relating to the Guidelines etc. to be Established by the Competent Minister in Accordance with the Provisions of the EIA Act (The Environment Agency Notification No.87 of December 12, 1997), Amendment; the Ministry of the Environment Notification Nos. 83 of 2014, June 27, 2014 (Hereinafter referred to as “Basic Matters”) Section 1, 1 (3) In examining the items in the planning stage, appropriate multiple options concerning location and scale, or structure and arrangement of building etc. pertaining to Class-1 project (hereinafter referred to as the “multiple plans concerning location etc.”) shall be prepared as a general rule, and where such multiple plans concerning location etc. are not prepared, the reason thereof shall be clarified. Section 1, 3 (3) A statement to the effect that efforts must be made to include an option of not implementing the proposed project, to the extent that it is feasible, in the multiple plans concerning location etc., shall be specified in the Guidelines for the Selection of the Items for EIA in the planning stage etc.</p> <ul style="list-style-type: none"> <li>Under the Basic Matters of Japan, alternative analysis is required concerning a wide range of environmental conservation measures including those related to structure and location of buildings, environmental conservation facilities, and construction method etc. at scoping of EIA for individual project (Basic Matters, Section 4.5 (3) A), and comparative examination of multiple proposals concerning environmental conservation measures is required at the DF/R stage. (Basic Matters, Section 5.2 (5))</li> </ul> <p>2) JICA</p> <ul style="list-style-type: none"> <li>In the current JICA GL, description of alternative analysis in SEA and EIA are not differentiated. Moreover, the JICA GL do not explicitly require that “zero option” be included in the assessment of “without project” scenario.</li> </ul> <p>3. “Without project” scenario: the following is how to consider the option of “without project” scenario.</p> <ul style="list-style-type: none"> <li>Although “without project” scenario (namely a scenario that WB project is not implemented) is considered in the ESIA of the WB projects, any other options that would achieve the project objective without the proposed projects are not considered.</li> <li>Similarly, ADB’s projects ESIA considers a scenario where no projects including ADB’s projects are implemented, and any other measures that would achieve the project objectives are not considered.</li> <li>In the current JICA GL, different methods of alternative analysis in SEA and EIA are not elaborated. In addition, the JICA GL do not state clearly whether “without project” scenario should include the zero option.</li> <li>Under the policies of WB and ADB, “without project” scenario does not include the zero option.</li> </ul> <p>【Discussion point raised by the Advisory Committee】 On March 6, 2017, “North East Road Network Connectivity Improvement Project (Phase 3) (Preparatory Survey (ODA Loan))” “Indicator of evaluation of alternatives and viewpoint of evaluation” was discussed at the WG for the proposed scoping and concluded as follows: “So far, there are no methodologies that can be derived from the JICA GL, etc., regarding alternative analysis at the draft scoping stage, and discussions and selection of indicators for comparison and selection of optimal alternatives are conducted case-by-case basis in each project. ... In addition, the Advisory Committee suggested that alternative analysis should with zero option (to achieve the project objectives with other measures without implementing the project). In response, the JICA explained that although comparison with the zero option is desirable, comparison with the “without project” scenario is to be conducted in accordance with the JICA GL.”</p>	
3.2 Loan aid, Grant Aid (excluding projects executed through international organizations) and Technical Cooperation Projects	<ol style="list-style-type: none"> <li>Confirm implementation of environmental review and information disclosure in accordance with categorization. - Preparation of the environmental checklist - Approval and disclosure of EIA, ECC, RAP and IPP and disclosure - In case cooperation projects fall under category FI, confirmation records of FI’s capacity on environmental and social considerations, and records of environmental review for category “A “sub-projects (if any)</li> <li>In case of E/S loan projects, summarize the records of environmental review.</li> <li>In case of E/S loan projects, confirm status of environmental and social considerations by project proponents etc. during the E/S stage</li> <li>Confirm status of receipt and disclosure of monitoring results.</li> <li>Confirm correspondence to a request on disclosure of monitoring results from the third party.</li> </ol>	<ol style="list-style-type: none"> <li>Environmental review procedures in accordance with environmental categorization <ul style="list-style-type: none"> <li>It was confirmed that the environmental checklists were prepared in 39 projects out of 42 of Category B projects. (For the projects that the environmental checklists were not developed, other documents were used to check.) As for Category A projects, it was confirmed that the EIA and/or RAP reports covered all the elements to be checked in the checklist. As for 7 Category FI projects, the institutional capacity of environmental and social management of the financial Intermediaries were reviewed, and no subprojects equivalent to Category A were planned (Nos.43, 56, 57, 59, 60, 81). In one FI project, JICA and FI agreed that environmental review and information disclosure consistent to the requirements of Category A will be carried out prior to its implementation if Category A-level subproject is planned (Project No.58). Refer to “2.1 Information Disclosure” for disclosure status of EIA, ECC, RAP and IPP.</li> </ul> </li> <li>Environmental review in E/S loan projects <ul style="list-style-type: none"> <li>Among the 100 projects, there were 4 E/S loan projects (Nos.13, 23, 34, 55). In all these projects, environmental review was skipped as per the JICA GL at the time of appraisal of E/S loan, because necessary environmental and social assessments are to be carried out as part of activities covered by the E/S loan.</li> </ul> </li> <li>Status of environmental and social considerations during implementation by project proponents etc. in E/S Loan projects <ul style="list-style-type: none"> <li>All four projects of E/S loan (Nos.13, 23, 34, 55) included environmental and social considerations activities (such as support on</li> </ul> </li> </ol>	Necessity of conducting environmental review at the time of E/S loan provision

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
	<p>6. Confirm if there was any differences between environmental review results and monitoring results and its reason (e.g. a need for more detailed descriptions in the GL, an interpretation problem of the GL, a capability/manpower/resource problem, etc.).</p> <p>7. Any project which JICA requested project proponents etc. to take appropriate actions in accordance with agreement documents and suspend loan disbursement (if any).</p> <p>8. Confirm whether the JICA's procedure for the project with significant changes was applied.</p> <p>Recommendation from the 11th WG meeting for reexamination of JICA GL Operation 【E/S loan projects】</p> <p>9. If the project falls under para 2 of Section 3.2.1. (5) “Engineering Service Loan” in the GL, instead of consulting with the Advisory Committee for the first time at the environmental review stage, there should be an opportunity to discuss at the Advisory Committee meeting from the earlier stage, namely the scoping stage of environmental and social considerations which are conducted by the project proponent in the E/S loan project.</p>	<p>preparation or review of EIA, RAP, etc., or support on implementation of monitoring activities). It is planned to conduct the following activities: support on environmental and social impact monitoring (No.13), review of draft EIA report and supplemental survey in line with the JICA GL (no land acquisition is included) (No.23), support on preparation of EIA and RAP (land acquisition and construction have not been started) (No.34), and support on preparation of EIA etc. (No.55).</p> <p>4. Submission and Disclosure status of monitoring result</p> <ul style="list-style-type: none"> <li>In 45 projects, disclosure of environmental monitoring result was agreed between JICA and project proponents etc. Among them, construction activities were commenced in 29 projects at the time of review survey. All environmental monitoring results were disclosed on the JICA website except for one project (No. 38) which was suspended due to deterioration of the security situation.</li> <li>In 16 projects, disclosure of social monitoring result was agreed between JICA and project proponents etc. Among them, land acquisition and involuntary resettlement have started in 10 projects. All social monitoring results were disclosed on the JICA website except for one project (No. 38) which was suspended due to deterioration of the security situation.</li> </ul> <p>5. Request from the third party to disclose monitoring results</p> <ul style="list-style-type: none"> <li>In one project, local people requested disclosure of monitoring process and the results, and the relevant data was provided accordingly. (No.33)</li> </ul> <p>6. Differences between environmental review results and monitoring results</p> <ul style="list-style-type: none"> <li>The results of environmental review and monitoring were reviewed to see if there are any differences (monitoring results were checked against the monitoring plan proposed in EIA/RAP that were confirmed at the time of appraisal). Differences were observed in five projects (Nos.5, 6, 11, 24, 42). These differences did not arise from the JICA GL text itself or differences in interpretation but due to unforeseen events that were not anticipated in the EIA stage, or due to constraints in the operational ability of the project proponents and relevant organizations. It was confirmed that the project proponents identified these unanticipated impacts and dealt with them in all the projects.</li> </ul> <p>7. Projects which JICA requested project proponents etc. to take appropriate actions in accordance with the agreement and subsequently suspended disbursement</p> <ul style="list-style-type: none"> <li>No such case was identified .</li> </ul> <p>8. Procedures taken to Significant changes</p> <ul style="list-style-type: none"> <li>Changes of project scope which were defined as “Significant change” by the JICA GL were identified in two projects. As for Project No.04, the Zone B (Phase 2) project following Phase 1 is considered as a “significant change” because of the expansion of the area targeted for investment. As for Project No.09, design change of access road component was considered as “significant change”.</li> </ul> <p>【Additional Survey Items】 E/S loan projects</p> <ul style="list-style-type: none"> <li>Under the current GL, the timing of environmental appraisal/review has two options; prior to the provision of E/S loan or at the provision of loan to the targeted project. However, some NGOs pointed out that environmental and social impacts have occurred during the period of the E/S loan while environmental review was not concluded prior to E/S loan.</li> </ul> <p>9. Recommendation from WG on Review of Operation</p> <ul style="list-style-type: none"> <li>The timing of the environmental review of the E/S loan and ODA loan to the project itself will be addressed as the discussion point “Necessity of conducting the environmental review at the time of provision of the E/S loan”.</li> </ul>	
3.3 Preliminary Studies of Grant Aid Undertaken by the Ministry of Foreign Affairs (MOFA) of Japan	<p>1. Whether JICA recommended MOFA to suspend the cooperation project.</p>	<p>1. Cases that JICA recommended the MOFA of Japan to suspend the cooperation project.</p> <ul style="list-style-type: none"> <li>There is no project in which JICA recommended suspension of cooperation project to MOFA.</li> </ul>	
3.4 Technical Cooperation for Development Planning	<p>1. Confirm implementation of environmental and social considerations procedures at each stage in accordance with categorization</p> <p>2. Screening</p> <p>3. Scoping</p> <p>4. Consultations</p> <p>5. Disclosure of agreement and/or safeguard documentation</p>	<p>1. Environmental and social considerations procedures at each stage in accordance with categorization</p> <ul style="list-style-type: none"> <li>Among the eight Technical Cooperation for Development Planning projects, environmental and social considerations procedures at each stage were implemented in accordance with the JICA GL. The following describes how the procedures at each stage as per the JICA GL were implemented with 7 projects with the exception of one Category C.</li> </ul> <p>2. Implementation status of screening</p> <ul style="list-style-type: none"> <li>It was confirmed that screening was implemented in all 7 projects.</li> </ul>	

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
	<p>6. Confirm implementation record of stakeholder meetings during SEA stage.</p> <p>7. Experience which unexpected environmental and social impacts were caused after completion of Technical Cooperation for Development Planning, and its correspondence</p> <p>Recommendation from the 5th WG for reexamination of JICA GL Operation 【SEA】</p> <p>8. It is necessary to consider how to conduct the stakeholder meeting at the SEA stage.</p> <p>9. It should be noted that EIA will be implemented at the project level in consideration of the contents of the study, consultation records and information at the SEA stage. (i.e. utilization of previous evaluation results, “Tiering”)</p>	<p>3. Implementation status of scoping</p> <ul style="list-style-type: none"> <li>Scoping including preliminary-scoping or draft scoping was conducted in all 7 projects.</li> </ul> <p>4. Implementation status of consultation between JICA and project proponents etc.</p> <ul style="list-style-type: none"> <li>Among the seven targeted projects, it was confirmed that consultation between JICA and project proponents etc. regarding follow of the JICA GL were implemented in all seven projects.</li> </ul> <p>5. Disclosure of agreement documents and/or reports</p> <ul style="list-style-type: none"> <li>Reports of the detailed planning survey and agreement documents were disclosed on JICA’s website for all seven projects.</li> </ul> <p>6. Stakeholder meetings during SEA stage</p> <ul style="list-style-type: none"> <li>Implementation of SHMs at the SEA stage were confirmed in all 7 projects.</li> </ul> <p>7. Experience which unexpected environmental and social impacts were caused after completion of Technical Cooperation for Development Planning, and its correspondence.</p> <ul style="list-style-type: none"> <li>In one project (No. 44), it was confirmed that some complaint letters were from farmers (including organization) whose lands were affected were reached, the JICA office conveyed contents of appeals to the project proponent and requested them to correspond to issues after conducting interviews accordingly.</li> </ul> <p>8. Records of stakeholder meetings during SEA stage are shown in item 6. above and Section 1.2.3 (8) in Chapter 2.</p> <ul style="list-style-type: none"> <li>Implementation of SHMs at the SEA stage were confirmed in all 7 projects. In Project No.39, the Project for the Study on Strengthening Competitiveness and Development of Sihanoukville Port, three times of stakeholder meetings were implemented in three different venues in which 157 people attended in total, while in the Project No.40, the Project for Study on Integrated Development of the Adjacent Zones to Yacyreta Dam Reservoir, two times of the stakeholder meetings were implemented in eight different venues in which 327 people attended in total.</li> </ul> <p>9. Tiering</p> <ul style="list-style-type: none"> <li>In Japan’s “Basic Matters”, it is required that a tearing that the contents considered to avoid or mitigate the impacts at alternative analysis at the SEA stage will be sorted out at the EIA stage. Section 4, 1 (5): “In cases where multiple plans concerning location etc. were compared, the details of the process of decision-making on the location etc. relating to the target project from multiple plans shall be compiled so as to clarify how environmental impact is avoided or reduced in the course of such decision-making.”</li> <li>The approaches done by the WB and the IFC could not be confirmed.</li> </ul>	
Appendix	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Point (Draft)
Appendix 1. Environmental and Social Considerations Required for Intended Projects	<p>1. Confirm methodology for quantifying cost and benefit related to environmental and social considerations in Japan and other donors.</p>	<p>1. Methods of quantifying cost and benefit related to environmental and social considerations</p> <p>1.1 Calculation of cost</p> <ul style="list-style-type: none"> <li>In the reviewed projects, the cost for land acquisition and implementation of environmental management plan and monitoring plan were included in the calculation of the project cost.</li> </ul> <p>1.2 Inclusion of GHG emissions into the project cost and benefit analysis</p> <ul style="list-style-type: none"> <li>Market price for GHG emissions already exists. Therefore, economic analysis of JICA projects, including reviewed projects, takes into account an increase in GHG emissions as project costs and a decrease in GHG emissions as project benefits to calculate EIRR. In particular, projects with large GHG emissions such as large-scale power generation projects include GHG emissions into cost benefit analysis.</li> <li>The Navoi Thermal Power Station Modernization Project in Uzbekistan (Project No.1) was to install a high-efficiency CCPP by replacing existing power generation equipment in the aging thermal power plant. In this project, reduction of GHG emissions was considered as project benefits and the economic value was assessed by using the average spot price of certified emissions reductions of Blue Next (at that time).</li> <li>The Shahid Rajaei Power Plant Construction Project in Iran was a new power plant construction project in which GHG emissions were added into the project costs by using the trading price of the European Emission Trading Scheme.</li> </ul> <p>1.3 Approach of Japan, WB, ADB and IFC</p> <ul style="list-style-type: none"> <li>“The Basic Matters” in Japan does not require a quantitative cost benefit analysis.</li> <li>In the WB ESS 1, it is described that the environmental and social impacts for each of the alternatives will be quantified to the extent possible, with attachment of economic values where feasible. (ESS 1 Annex1-D) In addition, among environmental and</li> </ul>	Target of quantification of costs and benefits related to environmental and social considerations and its methods

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	<p>Recommendation from the working group meeting for reexamination of JICA GL Operation</p> <p>【Environmental and social costs and benefits in project evaluation】</p> <p>2. Generally, it is said that quantification of environmental and social costs and benefits has challenges in the scope and methodology. However, it is important to have a common understanding in the Advisory Committee on how much and how this quantification needs to be handled in JICA's cooperation projects.</p> <p>3. On the other hand, it is desirable to consider the following points when examining the specific approach in the future, taking into consideration the JICA GL which says “to endeavor to include an analysis of environmental and social costs and benefits in the most quantitative terms possible”:</p> <ul style="list-style-type: none"> <li>✓ For the environmental and social costs and benefits, it is also necessary to consider the quantification of costs, while quantification of benefits was discussed in the past.</li> <li>✓ Additionally, it is important to consider the necessity of “quantitative evaluation” and “economic evaluation” related to environment and society.</li> <li>✓ It is good to note that “internalization of various environmental and social costs associated with development into development costs” is not limited to the quantification of environmental and social costs and benefits at the study phase, and it could be broadly applied to the operation stage by including mitigation measures in the EMP.</li> <li>✓ It is desirable to refer to other aid agencies’ practices (e.g. by reviewing the WB’s appraisal documents and other documents)</li> <li>✓ With regard to quantification of environmental and social costs and benefits, it is necessary to discuss specifically by accumulating actual practices in the projects.</li> </ul>	<p>social costs and benefits that can be quantified will be included in economic analysis. (Guidelines for Economic Analysis of Power Sector Projects, 2015). Increase or reduction of GHG emissions will be added into the project costs or benefits respectively. In this calculation, it is recommended to utilize the shadow price in reference to Shadow price of carbon in economic analysis Guidance Note (2017).</p> <ul style="list-style-type: none"> <li>• In ADB’s SPS, it is stipulated that the borrower/client will examine alternatives to the project’s location, design, technology, and components, taking environmental costs and benefits of the various alternatives considered into account while quantitative analysis is not described. (SPS, Safeguard Requirements 1: environment) On the other hand, in economic analysis, increase or reduction of GHG emissions will be added into the project costs or benefits respectively. The economic value of GHG emissions use the same price for all projects with reference to the IPCC report. (Guidelines for the Economic Analysis of Projects, ADB, para160, 161)</li> <li>• In IFC’s Guidance Note, it is stipulated that the client should consider economic, financial, environmental and social costs and benefits, but quantitative analysis is not described. (PS-1, Guidance Note 1, para 61)</li> </ul> <p>2. As described in item 1. above, cost for land acquisition, implementation of environmental management plan and monitoring plan were calculated and included in the project cost in the reviewed projects. In addition, an increase or reduction of GHG emissions were added into the project costs or benefits respectively in economic analysis for calculating EIRR, because GHG emissions amount can be converted into the market price. In particular, projects with high GHG emissions such as large-scale power generation projects use GHG emissions in its cost benefit analysis.</p> <p>3. The examples of JICA and approaches of the WB, ADB and IFC are as described in item 1. above.</p>	
	<p>4. Confirm methodology for environmental impact assessment of disasters in Japan and other donors.</p> <p>Recommendation from the working group meeting for reexamination of JICA GL Operation</p> <p>【Impacts of a disaster on the project and responses to accidents at the operation stage】</p>	<p>4. Environmental impact assessment of disasters</p> <ul style="list-style-type: none"> <li>• There were three cases of environmental assessment impact studies in Japan conducted as per the Environmental Impact Assessment Act in which assessment items were selected on the assumption of occurrence of disasters such as landslides and slope failures in the items of “Topography and Geology” and “Topography, Surface geology, Soil, Peculiar Natural Phenomenon”. All three cases are development projects targeting relatively large chunk of land areas, and the assessment items were selected considering the potential risk of disasters such as landslide and slope failure that might occur due to large-scale of land reclamation (which potentially undermine the stability of slope and land surface).</li> <li>• It is stipulated in the WB ESS 4 “Community Health and Safety” that the Borrower will design, construct, operate, and decommission the structural elements of the project in accordance with national legal requirement, the EHSR and so on, taking into consideration safety risks to third parties and affected communities. (para 6) Design of the structural element will be incorporated to reflect climate change considerations. EHSR and GIIP will be referred for measures to address the impacts of climate change such as flooding. (ESS 4 GN 6.4) In addition, the Borrower will consider the incremental risks of the public’s potential exposure to operational accidents or natural hazards, including extreme weather events during operation.</li> </ul> <p>5. How disasters are covered in impact assessments in Japan and WB projects are discussed in item 4 above. In addition, the</p>	<p>WB ESS 4 Addition to consideration items: Ensuring community safety that may be affected by the project</p> <p>WB ESS 4 Considerations relating to climate change in the design of infrastructure</p>

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
	<p>5. JICA has proposed, “since disasters such as earthquakes are different from environmental and social impacts caused by the project, it is considered that disasters are not subject to the EIA.” However, it is not desirable to exclude disasters from the scope of “environmental impact assessment” because the following cases may be considered:</p> <ul style="list-style-type: none"> <li>✓ Cases that the project lowers the resilience of the project site and increases disaster risks;</li> <li>✓ Cases that the project may directly trigger disasters (e.g. construction of a dam might induce earthquakes); and</li> <li>✓ Cases that the project may directly trigger disasters (e.g. construction of a power plant might contribute to global warming).</li> </ul> <p>6. If the cases above are subject to EIA, it should be discussed either of the following two ways is appropriate: to add “disaster” as an item of environmental and social considerations, or to evaluate for disasters in the environmental existing checklists of the JICA GL (i.e. geography, geology, etc.), which needs to be discussed.</p> <p>7. If the cases above are subject to EIA, the responsible agency of disaster prevention such as earthquakes should be clarified at the construction and operation stages in addition to the detailed design stage (same as the responsible agency for accident prevention).</p> <p>8. It is desirable to define and differentiate the concept of disasters and accidents.</p>	<p>reviewed projects are classified under the criteria for the relationship between projects and disasters which were discussed as Item 5 of the working group recommendation as follows:</p> <ul style="list-style-type: none"> <li>➤ In case the project which lowers the resilience of the project site and increases disaster risks. Two projects were confirmed among the reviewed projects. In Project No. 14 Mandimba-Lichinga Road Upgrading Project in Mozambique, the risks of soil runoff were pointed out caused by filing and cutting of soils in the mountainous areas, and countermeasures against soil runoff is planned in the ESMP to be taken as needed. In addition, in Project No.35, Project for Olkaria Geothermal Power Development in Republic of Kenya, since landslide etc. may occur by filling and cutting of soils in places where the ground is weak, mitigation measures such as installation of retaining walls, barricades and signs that indicate danger were included in the ESMP as necessary.</li> <li>➤ In case there is a concern that the project may directly trigger disasters. (e.g. Construction of a dam might induce earthquakes.) Not identified.</li> <li>➤ In case there is a concern that the project may directly trigger disasters. (e.g. Construction of a power plant might contribute to global warming.) Not identified.</li> </ul> <p>6. Disasters such as landslides and slope failures were conventionally addressed using existing check items (Geographical features, etc.).</p> <p>7. In general, similar to the accident prevention, consultants/contractors who are in charge of design (and project proponent) at the detailed design stage, construction contractors (and project proponent) at the construction stage, and project proponent at the operation stage are responsible to formulate and execute disaster prevention measures such as earthquakes.</p> <p>8. In the Basic Act on Disaster Management in Japan, it is stipulated in Article 2 (1) that the term “disaster” is defined as damages resulting from a storm, tornado, heavy rainfall, heavy snowfall, flood, slope failure, mudflow, high tide, earthquake, tsunami, eruption, landslide, or other abnormal natural phenomena, or a large fire or explosion or other causes provided for by Cabinet Order and similar to the above in the extent of damage they cause. There is no clear definition of the term “accident” in the Environmental Impact Assessment Act, but in general the accidents are caused by human factors. In WB ESF and ESS, IFC PS, requirements on impact assessments and the countermeasures for disasters and accidents are not clearly described separately. For example, an emergency event which the Borrower will identify and implement measures to address is an unanticipated incident, arising from both natural and man-made hazards, typically in the form of fire, explosions, leaks or spills, which may occur for a variety of different reasons, including failure to implement operating procedures that are designed to prevent their occurrence, extreme weather or lack of early warning. (ESS 4 para 19)</p>	
Underlying Principles	<ol style="list-style-type: none"> <li>1. Confirm status of investigation and examination on environmental and social impacts at the planning stage.</li> <li>2. Confirm status of examination on alternatives and mitigation measures to avoid and minimize environmental and social impacts.</li> <li>3. Confirm if the above-mentioned examination results were reflected in the project plan.</li> <li>4. Confirm if costs and benefits related to environmental and social considerations were tried to be evaluated quantitatively and evaluated qualitatively.</li> <li>5. Confirm if costs and benefits related to environmental and social considerations were closely harmonized with economic, financial, institutional, social and technical analyses of the project.</li> <li>6. Confirm if results of environmental and social considerations study including examination on alternatives and mitigation measures were specified in a separate document or part of other documents.</li> <li>7. Confirm if an environmental impact assessment report was prepared for projects especially with significant environmental and social impacts.</li> <li>8. Confirm if experts committee was established for projects with especially significant environmental and social impacts and arguable projects.</li> </ol>	<ol style="list-style-type: none"> <li>1. Investigation and examination of environmental and social impacts at the planning stage. <ul style="list-style-type: none"> <li>• Investigation and examination status on environmental and social impacts at the planning stage was confirmed for 90 projects (excluding 10 Category C projects). Subsequent analysis is based on the review of 90 projects.</li> </ul> </li> <li>2. Alternative analysis and preparation of mitigation measures to avoid and minimize environmental and social impacts. <ul style="list-style-type: none"> <li>• It was confirmed that alternative analysis was conducted and/or mitigation measures were planned in all 41 Category A projects and all 42 Category B projects. Seven FI projects are not applicable to this requirement.</li> </ul> </li> <li>3. Confirmation on how these analysis was reflected to the project design <ul style="list-style-type: none"> <li>• It was confirmed that in all 79 projects in which alternative analysis was conducted, the option with relatively small environmental and social impacts was selected as a result of alternative analysis.</li> </ul> </li> <li>4. Confirmation on whether efforts were made to quantify environmental and social costs and benefits and whether the quantitative analysis is complemented by qualitative assessment <ul style="list-style-type: none"> <li>• As for the project costs, quantitative analysis was conducted to evaluate the cost of land acquisition, implementation of environmental management and monitoring plan. In some cases, increase or reduction of GHG emissions were added into the project costs or benefits respectively in economic analysis for calculating EIRR. In addition, qualitative evaluation was undertaken on positive and negative impacts of the project and to assess impacts associated with external factors.</li> </ul> </li> <li>5. Cost and benefit analysis related to environmental and social considerations were closely harmonized with economic, financial, institutional, social and technical analyses of the project <ul style="list-style-type: none"> <li>• It was confirmed environmental and social costs and benefits were included in the calculation of EIRR in 44 out of the 90 projects. On the other hand, there were 46 projects for which calculation of EIRR was not required (19 projects of ODA Grants excluding Category C Projects, 7 projects of FI, 7 projects of Technical Cooperation for Development Planning, 3 projects of Technical Cooperation, 3 projects of E/S, and 6 projects of Small and Medium-sized Enterprise support projects).</li> </ul> </li> </ol>	

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		<p>6. Confirmation on whether results of environmental and social considerations study including examination on alternative and mitigation measures were specified in stand-alone document or part of other documents</p> <ul style="list-style-type: none"> <li>In all 83 projects in which alternative analysis was implemented and/or mitigation measures were prepared, the results were described in a part of other documents.</li> </ul> <p>7. Confirmation on whether EIA report was prepared for projects with significant environmental and social impacts</p> <ul style="list-style-type: none"> <li>It was confirmed that EIA or ESIA was prepared in all Category A projects except Technical Cooperation Projects.</li> </ul> <p>8. Confirmation on whether experts committee was established for projects with significant environmental and social impacts and controversial projects</p> <ul style="list-style-type: none"> <li>There were no cases that a committee was established by inviting experts due to the magnitude of impacts and/or controversy of the project (except committees for land acquisition and environmental management, or committees to be set up as per normal administrative procedures in the host country).</li> </ul> <p>【Additional survey items】 Requirements related to FI added to the WB ESF</p> <ul style="list-style-type: none"> <li>WB ESS 9 “Financial Intermediaries” applies to FIs that receive financial support from the Bank. (ESS 9 para 4)</li> <li>Where FI subprojects are likely to have minimal or no adverse environmental or social risks or impacts, the FI will apply national law. On the other hand, the WB ESSs will be applied to subprojects that pose significant risks. (ESS 9 para 11)</li> <li>The procedures for the environmental and social consideration confirmation of the subproject conducted by FI itself is established as ESMS. The contents of ESMS mainly include environmental and social policy, clearly defined procedures for the environmental and social considerations confirmation (categorization, environmental impacts, monitoring, etc.), implementation of monitoring of subprojects and submission of annual report of each subproject. (ESS 9 para 14-23)</li> <li>Under the IFC’s Interpretation Note on FI, IFC requires its FI clients to develop and operate an ESMS in instances where the activities that are supported by IFC financing present E&amp;S risks. The scope and complexity of the ESMS should be commensurate with the level of E&amp;S risk associated with the asset class supported, and the ESMS should incorporate relevant principles of PS 1. FI subprojects with higher E&amp;S risks are required to apply the PSs. Clients for subprojects that have adverse risks will be required to implement a simple E&amp;S screening procedure. (IN 13, footnote IN 13)</li> </ul>	Necessity of application of the requirements according to the risks to financial intermediaries and reference to establishment of ESMS as required in WB ESS 9
Examination of Measures	<ol style="list-style-type: none"> <li>Confirm if appropriate plan and structure for follow-ups, such as environmental management plan and monitoring plan are prepared, and its cost and procurement method are examined.</li> <li>(Other items will be confirmed through the review of Section 2.8.)</li> </ol>	<ol style="list-style-type: none"> <li>Preparation status of Environmental Management Plan (EMP) and Environmental Monitoring Plan (EMoP) In many cases, the Environmental Management Plan (EMP) was attached to the contractor's bidding documents, and the costs of the EMP and the Environmental Monitoring Plan (EMoP) were often allocated as part of the management cost of the project proponent and the contract amount of the contractor.</li> </ol>	
Scope of Impacts to Be Assessed	<ol style="list-style-type: none"> <li>Confirm if appropriate scoping was fully conducted as per the GL.</li> <li>Confirm if the amount of GHG emission by the project was calculated and evaluated.</li> <li>Confirm practices of multilateral and bilateral donors on climate change (GHG emission) and pollution control</li> </ol>	<ol style="list-style-type: none"> <li>Appropriate Scoping <ul style="list-style-type: none"> <li>Out of 90 projects (100 projects minus 10 Category C projects), it was confirmed that scoping was conducted in 82 projects. (7 FI projects are not applicable for this requirement)</li> </ul> </li> <li>Implementation status of calculation/evaluation of GHG emissions <ul style="list-style-type: none"> <li>Out of 90 projects (100 projects minus 10 Category C projects), it was confirmed that GHG emissions were calculated and/or evaluated in 20 projects. Sectors of the projects in which GHG emissions were calculated include power generation, railways, roads, and airports.</li> </ul> </li> <li>Climate change and pollution control <ol style="list-style-type: none"> <li>ESS 3: Resource Efficiency and Pollution Prevention and Management <ul style="list-style-type: none"> <li>The Borrower will avoid the release of pollutants or, when avoidance is not feasible, mitigate their release using the performance levels and measures specified in national law or the EHSs, whichever is most stringent.</li> <li>The Borrower will avoid the generation of hazardous and nonhazardous waste. Where waste generation cannot be avoided, the Borrower will minimize the generation of waste, and reuse, recycle and recover waste. Where waste cannot be reused, recycled or recovered, the Borrower will treat, destroy, or dispose of it in an environmentally sound and safe manner (ESS 3 para 17-18)</li> <li>The Borrower will avoid the manufacture, trade and use of chemicals and hazardous materials subject to international bans, restrictions or phaseouts unless for an acceptable purpose as defined by the conventions or protocols. The production, transportation, handling, storage, and use of hazardous materials for project activities will be assessed through the environmental and social assessment. (ESS 3 para 19-20)</li> <li>Where projects involve recourse to pest management measures, the Borrower will give preference to integrated pest management (IPM) or integrated vector management (IVM) approaches. The Borrower will not use any pesticides or pesticide products or formulations unless such use is in compliance with the EHSs, or that are restricted under applicable international conventions or their protocols. In addition, the Borrower will also not use any formulated pesticide products that meet the criteria described in ESS3 para 22, 23. For any project involving significant pest management issues or any project contemplating activities that may</li> </ul> </li> </ol> </li> </ol>	ESS 3 Necessity of reference to requirements in WB ESS3: hazardous wastes, chemical hazardous materials, and pest management

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		<p>lead to significant pest and pesticide management issues, the Borrower will prepare a Pest Management Plan (PMP). (ESS 3 para 21-25)</p> <ul style="list-style-type: none"><li>Also, in IFC's PS3 “Resource Efficiency and Pollution Prevention”, if there is a difference between the domestic law of the country where the project is implemented and the requirements and measures in the EHS guidelines, the IFC business will be required to meet the stricter requirements.</li></ul> <p>3.2. Predictive quantification of GHG emissions stipulated in MDBs’ safeguard policies.</p> <table><tr><td></td><td><b>WB</b></td><td><b>IFC</b></td><td><b>ADB</b></td></tr><tr><td><b>Scope of predictive quantification of GHG emissions</b></td><td>The Borrower will estimate gross GHG emissions resulting from the project, except the following projects. (ESS 3, para 16) Scope 1 is only targeted to avoid double counting (GN 16.1) - Projects that have diverse and small sources of emissions (for example, community-driven development projects); and - Projects where emissions are not likely to be large amount (for example, projects for education and social protection)</td><td>For projects that are expected to or currently produce more than 25,000 tons of CO<sub>2</sub> equivalent annually (PS 3, para 8). Quantify Scope 1 annual emissions and Scope 2 annual emissions. (GN 3, Annex A)</td><td>For projects that that produce more than 100,000 tons of CO<sub>2</sub> equivalent per year for the aggregate emissions of Scope 1 and Scope 2. Quantify Scope 1 and Scope 2 annual emissions (SPS Appendix 1, footnote 10)</td></tr><tr><td><b>Calculation threshold</b></td><td>No specific reference/ requirements</td><td>More than 25,000 tons of carbon dioxide equivalent per year (PS 3, para 8)</td><td>The total emission amount of scope 1 and scope 2 is 100,000 tons of carbon dioxide equivalent or more per year (SPS Appendix 1, footnote 10)</td></tr><tr><td><b>Frequency of emissions calculation</b></td><td>As part of environmental and social impact assessment, emissions are estimated once before the project implementation (ESS3, para 16)</td><td>Quantification once a year (PS 3, para 8)</td><td>Quantification once a year (SPS, para 39)</td></tr><tr><td><b>Method of information disclosure</b></td><td>Method of information disclosure will be published through ESIA according to risk classification of the project</td><td>Clients are encouraged to disclose their GHG emissions annually through corporate reports, or through other voluntary disclosure mechanisms currently being used by private sector companies internationally. (GN3, para19)</td><td>Method of information disclosure will be published through ESIA</td></tr></table> <ul style="list-style-type: none"><li>In ESS 3, GHGs includes CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), Sulphur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>).</li><li>Under the EP 3, quantification of GHG emissions will be conducted by the client in accordance with internationally recognized methodologies and good practice, for example, the GHG Protocol. The client will quantify Scope 1 and Scope 2 emissions.</li><li>In the current JICA GL, although the scope of impact to be assessed includes climate change, there is no provision for calculation of GHG emissions or its reporting. Meanwhile, JICA has adopted the Climate Finance Impact Tool for Mitigation (JICA Climate FIT (Mitigation)) as a tool to estimate GHG emission reduction against the baseline scenario.</li></ul> <p>3.3. Alternative analysis for technically and financially feasible and cost-effective GHG emission reductions stipulated in MDBs’ safeguard policies</p> <table><tr><td><b>WB</b></td><td><b>IFC</b></td><td><b>ADB</b></td></tr><tr><td>The Borrower will consider alternatives and implement technically and financially feasible and cost-effective options to avoid or minimize project-related air emissions during the design, construction and operation of the project. (ESS 3, para 15)</td><td>The client will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project. (PS 3, para 7)</td><td>No description</td></tr></table>					<b>WB</b>	<b>IFC</b>	<b>ADB</b>	<b>Scope of predictive quantification of GHG emissions</b>	The Borrower will estimate gross GHG emissions resulting from the project, except the following projects. (ESS 3, para 16) Scope 1 is only targeted to avoid double counting (GN 16.1) - Projects that have diverse and small sources of emissions (for example, community-driven development projects); and - Projects where emissions are not likely to be large amount (for example, projects for education and social protection)	For projects that are expected to or currently produce more than 25,000 tons of CO <sub>2</sub> equivalent annually (PS 3, para 8). Quantify Scope 1 annual emissions and Scope 2 annual emissions. (GN 3, Annex A)	For projects that that produce more than 100,000 tons of CO <sub>2</sub> equivalent per year for the aggregate emissions of Scope 1 and Scope 2. Quantify Scope 1 and Scope 2 annual emissions (SPS Appendix 1, footnote 10)	<b>Calculation threshold</b>	No specific reference/ requirements	More than 25,000 tons of carbon dioxide equivalent per year (PS 3, para 8)	The total emission amount of scope 1 and scope 2 is 100,000 tons of carbon dioxide equivalent or more per year (SPS Appendix 1, footnote 10)	<b>Frequency of emissions calculation</b>	As part of environmental and social impact assessment, emissions are estimated once before the project implementation (ESS3, para 16)	Quantification once a year (PS 3, para 8)	Quantification once a year (SPS, para 39)	<b>Method of information disclosure</b>	Method of information disclosure will be published through ESIA according to risk classification of the project	Clients are encouraged to disclose their GHG emissions annually through corporate reports, or through other voluntary disclosure mechanisms currently being used by private sector companies internationally. (GN3, para19)	Method of information disclosure will be published through ESIA	<b>WB</b>	<b>IFC</b>	<b>ADB</b>	The Borrower will consider alternatives and implement technically and financially feasible and cost-effective options to avoid or minimize project-related air emissions during the design, construction and operation of the project. (ESS 3, para 15)	The client will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project. (PS 3, para 7)	No description	<p>Estimation of greenhouse gas (GHG) emissions from project</p> <p>Alternative analysis for cost-effective GHG emission reductions with technical and financial feasibility</p>
	<b>WB</b>	<b>IFC</b>	<b>ADB</b>																													
<b>Scope of predictive quantification of GHG emissions</b>	The Borrower will estimate gross GHG emissions resulting from the project, except the following projects. (ESS 3, para 16) Scope 1 is only targeted to avoid double counting (GN 16.1) - Projects that have diverse and small sources of emissions (for example, community-driven development projects); and - Projects where emissions are not likely to be large amount (for example, projects for education and social protection)	For projects that are expected to or currently produce more than 25,000 tons of CO <sub>2</sub> equivalent annually (PS 3, para 8). Quantify Scope 1 annual emissions and Scope 2 annual emissions. (GN 3, Annex A)	For projects that that produce more than 100,000 tons of CO <sub>2</sub> equivalent per year for the aggregate emissions of Scope 1 and Scope 2. Quantify Scope 1 and Scope 2 annual emissions (SPS Appendix 1, footnote 10)																													
<b>Calculation threshold</b>	No specific reference/ requirements	More than 25,000 tons of carbon dioxide equivalent per year (PS 3, para 8)	The total emission amount of scope 1 and scope 2 is 100,000 tons of carbon dioxide equivalent or more per year (SPS Appendix 1, footnote 10)																													
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<b>Method of information disclosure</b>	Method of information disclosure will be published through ESIA according to risk classification of the project	Clients are encouraged to disclose their GHG emissions annually through corporate reports, or through other voluntary disclosure mechanisms currently being used by private sector companies internationally. (GN3, para19)	Method of information disclosure will be published through ESIA																													
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The Borrower will consider alternatives and implement technically and financially feasible and cost-effective options to avoid or minimize project-related air emissions during the design, construction and operation of the project. (ESS 3, para 15)	The client will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project. (PS 3, para 7)	No description																														

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	<p>Recommendation from the working group meeting for reexamination of JICA GL Operation 【Climate change】</p> <p>4. Although there are some challenges on climate change which are beyond the scope of reexamination of JICA GL operations, the following points can be considered as the issues to be discussed in the future.</p> <ul style="list-style-type: none"> <li>✓ The overall carbon management strategy of JICA needs to be clarified at the earliest.</li> <li>✓ Not only for projects in which is expected to reduce GHG emissions, but also for projects in which would not reduce GHG emissions, GHG emissions should be calculated to grasp total GHG emissions from entire JICA projects.</li> <li>✓ The impacts of climate change should be evaluated by measurement of emissions, not by emission reduction.</li> </ul> <p>5. As environmental items for scoping, “climate change (GHG emission)” is suitable rather than “global warming.”</p> <p>6. In order to grasp the GHG emissions from the entire JICA projects, it is suggested that in principle, GHG emissions during the construction phase should be also evaluated, except only the case where the GHG emissions are particularly negligible compared to the operation phase.</p> <p>7. It is desired that the assessment of GHG emissions for the supply chain is also taken into consideration in the future. For example, as for large-scale development projects of the road or railway sector, it is assumed that a large amount of CO<sub>2</sub> is generated at the time of production of cement. Therefore, it is necessary to consider whether (1) evaluation of GHG emissions associated with production of the raw materials and (2) management and recording of cement consumption could be required.</p> <p>Recommendation from the 5th working group meeting for reexamination of JICA GL Operation 【Climate change】</p> <p>8. As for climate change (GHG emissions) at the scoping stage, a baseline is set in accordance with a certain methodology such as JICA's Climate Finance Impact Tool for Mitigation (JICA Climate FIT (Mitigation)), and the mitigation effect is evaluated by comparing with that baseline. However, just like other impact items, it might be possible to evaluate the impact of climate change (GHG emissions), compared with the current status as a reference point.</p>	<ul style="list-style-type: none"> <li>• EP 3 requires an alternatives analysis to reduce GHG emissions to be conducted by the client when the Project is expected to emit more than 100,000 tons of CO<sub>2</sub> equivalent annually. (EP 3, June 2013, Annex A)</li> </ul> <p>3.4. Contribution to the target of the Paris Agreement (below 2 degrees Celsius above pre-industrial levels)</p> <ul style="list-style-type: none"> <li>• Donors that stipulated contribution to the target of the Paris Agreement in the SGP were not identified.</li> </ul> <p>4. With regard to climate change:</p> <ul style="list-style-type: none"> <li>✓ JICA's overall strategy and plan to address climate change will be considered in the future, taking into consideration the policies of the Japanese government, etc.</li> <li>✓ For the calculation and evaluation of GHG emissions, see the item 3. Climate Change and the “Estimation of GHG emissions from the projects” of the Point of Argument.</li> </ul> <p>5. Currently, based on the recommendations at the time of review of operation, “climate change (GHG emissions)” is used.</p> <p>6. The WB, ADB, and IFC stipulate that total GHG emissions in the life cycle of a project will be predicted in environmental and social impact assessment prior to the start of the project. In addition, IFC and ADB stipulate that the quantification will be conducted annually.</p> <p>7. The WB stipulates that direct emissions (Scope 1) will be quantified, while IFC and ADB stipulate that direct emissions (Scope 1) and indirect emissions from energy use (Scope 2) will be quantified. As of 2019, no MDBs were identified that require estimation of other indirect emissions (Scope 3).</p> <p>8. As described in the item 2, among the 90 projects, quantitative evaluation of GHG emissions were implemented in 20 projects.</p>	
	<p>9. Summarize practices on examination and assessment of derivative, secondary, and cumulative impacts as well as the impacts of indivisible projects</p>	<p>9. Case study of indivisible projects, derivative and secondary impacts, and cumulative impacts</p> <ul style="list-style-type: none"> <li>• Indivisible projects: Out of 90 projects (90 projects excluding 10 Category C projects), four projects were identified as indivisible projects. They are: switch yard project of power generation project (No.19), improvement of sewage treatment plant where existing sludge treatment site was also subject to EIA (No.22), a section of a road financed by co-financier in the co-financing road project (No.28) and borehole project of geothermal project that is conducted by the host country (No.35).</li> <li>• Derivative and secondary impacts: Two projects (Nos.21, 41) were identified. As for Project No.21, since it was predicted that shops and houses around roads would increase, the issue was raised to promote measures for waste reduction and proper treatment, and countermeasures for water pollution caused by domestic wastewater etc. As for Project No.41, positive impacts such as maintenance and management of roads and provision of social services to residents due to the presence of power plant</li> </ul>	<p>WB ESS 1 Necessity of reference to definitions of “associated facility”, “derivative impacts, secondary impacts”, and “cumulative impacts”</p>

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	<p>10. Summarize practice of WB, ADB and IFC on examination and assessment of derivative, secondary, and cumulative impacts as well as the impacts of indivisible projects.</p> <p>Recommendation from the working group meeting for reexamination of JICA GL Operation 【Indivisible projects】</p> <p>11. Regarding the scope of “the extent that is reasonably predictable”, it is necessary to clarify it by accumulating precedents.</p> <p>12. In dealing with the indivisible projects, it should be clearly stated that “appropriate environmental and social considerations documents” of the indivisible projects means that JICA needs to confirm whether environmental and social considerations documents of the indivisible projects comply with the JICA GL.</p> <p>13. Although “indivisible projects” is specified as one of the “Impacts to be assessed” in the JICA GL, it seems somewhat difficult to study and consider the impacts of the indivisible projects which is not financed by JICA.</p> <p>14. In order to clarify the contents of “indivisible projects”, major examples/precedents should be presented.</p> <p>15. Since it is necessary to mention that there are various “indivisible projects,” these examples should be described in the FAQ of the JICA GL in the future</p>	<p>facilities etc. were identified, and no mitigation measures were implemented because only positive impacts were expected.</p> <ul style="list-style-type: none"> <li>Cumulative impact: Two projects were identified. In the Project No.19 of power generation project, cumulative impacts on air and water quality caused by existing power plants were identified, while in the Project No.35 of the phase 5 of the geothermal power plant project, cumulative impacts caused by future development in consideration of the past impacts on biodiversity conservation, air, water quality, noise, soil, waste, etc. in the specific area were identified.</li> </ul> <p>10. Approaches of WB, ADB and IFC to indivisible projects, derivative and secondary impacts, and cumulative impacts</p> <p>10.1. Approaches of WB, MDBs etc. to indivisible projects</p> <ul style="list-style-type: none"> <li>WB: Associated Facilities are facilities that are not funded as part of the project and, in the judgement of the Bank are: (a) directly and significantly related to the project; and (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not were constructed or expanded or conducted if the project did not exist. (ESS 1, para11) Associated Facilities will meet the requirements of the ESSs, to the extent that the Borrower has control or influence over such Associated Facilities. (ESS 1, para 10)</li> <li>ADB: Associated facilities are not funded as part of the project (funding may be provided separately by the borrower/client or by third parties), and whose viability and existence depend exclusively on the project and whose goods or services are essential for successful operation of the project (SPS, Appendix 1, para 6)</li> <li>IFC: Associated facilities are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable. (PS1, para 8)</li> <li>According to the FAQ of JICA’s GL, referring to the definition by IFC, JICA defines “indivisible projects” as related projects for which JICA does not cooperate, 1) which involve associated facilities that would not were constructed or expanded if the project for which JICA cooperates did not exist, and 2) without which, the project for which JICA cooperates would not be viable.</li> </ul> <p>11. As for the specific examples, four projects were identified among the projects targeted for review as described in item 9 above.</p> <p>12. Based on the recommendations from the working group meeting for reexamination of JICA GL Operation, it was added in FAQ that “JICA checks whether or not the documents on environmental and social considerations (Resettlement Plan, Environmental Impact Assessment (EIA) reports, etc.) of indivisible projects were prepared in accordance with the JICA GL, to the extent that is reasonably predictable. Where necessary, JICA will request project proponents etc. to incorporate environmental and social considerations into the projects to the extent required by the JICA GL.</p> <p>13. In para 10 of the WB ESS 1, it is stipulated that Associated Facilities will meet the requirements of the ESSs, to the extent that the Borrower has control or influence over such Associated Facilities. In addition, where necessary, JICA will request project proponents etc., to incorporate environmental and social considerations into the projects as shown in item 12. above.</p> <p>14. Based on the recommendations at the time of operation review, a case of the power transmission line is added to the FAQ as an example of indivisible projects. Four projects were identified among the projects targeted for review. (See 9 above)</p> <p>15. In reference to the results of the review survey, some case studies of indivisible projects are planned to be added in the FAQ in the future.</p>	
		<p>10.2 Approaches of MDBs to derivative and secondary impacts</p> <ul style="list-style-type: none"> <li>WB: An indirect impact is an impact which is caused by the project and is later in time or farther removed in distance than a direct impact, but is still reasonably foreseeable, and will not include induced impacts. (ESS 1, footnote 21)</li> <li>ADB: At an early stage of project preparation, the borrower/client will identify potential direct, indirect, cumulative and induced environmental impacts on and risks to physical, biological, socioeconomic, and physical cultural resources and determine their significance and scope, in consultation with stakeholders, including affected people and concerned NGOs. (SPS, Appendix 1, para 4)</li> <li>IFC: Impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities’ livelihoods are dependent (PS1, para 8)</li> <li>According to the FAQ of JICA’s GL, referring to the definition by IFC, JICA’s definition of “derivative and secondary impacts” are impacts from unplanned but predictable developments caused by the project, for which JICA cooperates, that may occur later or at a different location. On the other hand, in the WB ESS, it is described that indirect impact is “an impact which is caused by the project and is later in time or farther removed in distance than a direct impact, but is still reasonably foreseeable”, and will not include induced impacts.</li> </ul>	

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
	<p>【Derivative impacts, secondary impacts】</p> <p>16. Regarding the scope of “the extent that is reasonably predictable”, it is necessary to clarify it by accumulating precedents.</p> <p>17. IFC PS defines them as “(ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities’ livelihoods are dependent.”. As for (iii), only the impact on the ecosystem is discussed, giving an impression that the impact on the social aspect is not considered. Therefore, (iii) should be deleted to avoid misunderstanding, if the social aspect is also considered in (ii).</p> <p>18. In order to clarify the contents of “derivative and secondary impacts”, major examples/precedents should be presented.</p> <p>19. Whether the project has “derivative and secondary impacts” and its contents should be explained to the advisory committee in the early stage by utilizing the opportunity when the project summary is explained at the general meeting of the advisory committee.</p> <p>20. “Unplanned but predictable development” includes a wide range of factors including expansion.</p>	<p>16. As for the specific examples, four projects were identified among the reviewed projects as described in item 9 above.</p> <p>17. In addition to IFC PS referenced during the review of operation in 2014, more comprehensible will be considered referring the definition of “indirect impact” under WB ESS 1.</p> <p>18. The examples of derivative and secondary impacts are as described in item 9 above.</p> <p>19. Among the Category A projects, the Advisory Committee pointed out derivative and secondary impacts in one project, National Road No.5 Improvement Project (Thlea Ma'am-Battambang and Sri Sophorn-Poipet Sections) (I). Since it was pointed out at the DF/R stage, explanations were given at the general meeting of the DF/R stage and the Environmental Review stage.</p> <p>20. In addition to IFC PS referenced during the review of operation in 2014, it will be considered referring the definition of “indirect impact” under WB ESS 1.</p>	
	<p>【Cumulative impacts】</p> <p>21. Regarding the scope of “the extent that is reasonably predictable”, it is necessary to clarify it by accumulating precedents.</p> <p>22. In order to make the contents of “cumulative impacts” clearer, the major examples/precedents should be presented.</p> <p>23. There are various international discussions on “cumulative impacts”, so there is no need to rush to define the definition and scope, but to reconsider them based on international trends.</p> <p>24. Whether the project has “cumulative impacts” should be explained in the early stage by utilizing the opportunity when the project summary is explained at the general meeting of the advisory committee.</p> <p>25. The “cumulative impact” should include impacts of “persons’ activities”.</p>	<p>10.3 Approaches of MDBs etc. to cumulative impacts</p> <ul style="list-style-type: none"> <li>WB: The cumulative impact of the project is the incremental impact of the project when added to impacts from other relevant past, present and reasonably foreseeable developments as well as unplanned but predictable activities enabled by the project that may occur later or at a different location. Cumulative impacts can result from individually minor but collectively significant activities taking place over a period of time. The environmental and social assessment will consider cumulative impacts that are recognized as important on the basis of scientific concerns and/ or reflect the concerns of project-affected parties. The potential cumulative impacts will be determined as early as possible, ideally as part of project scoping (ESS 1, footnote 22)</li> <li>ADB: The project’s area of influence includes (a) areas and communities potentially affected by cumulative impacts from further planned development of the project, other sources of similar impacts in the geographical area, any existing project or condition, and other project-related developments that are realistically defined at the time the assessment is undertaken; and (b) areas and communities potentially affected by impacts from unplanned but predictable developments caused by the project that may occur later or at a different location. (SPS, Appendix 1, para 6)</li> <li>IFC: Cumulative impacts result from the incremental impact, on areas or resources used or directly impacted by the project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted. (PS1, para 8)</li> <li>According to the FAQ of JICA’s GL, referring to the definition by IFC, JICA defines the “cumulative impacts” as cumulative impacts resulting from the incremental impact, on areas or resources used or directly impacted by the project for which JICA cooperates, from other planned or reasonably defined developments at the time the risks and impacts identification process is conducted (e.g. scoping).</li> </ul> <p>21. As for the specific examples, four projects were identified among the projects targeted for review as described in item 9 above.</p> <p>22. Based on the recommendation at the time of review of operation, it was added in the FAQ that “for instance, in a road project, JICA has requested a host country to consider incremental impacts of the possible accumulation of houses and commercial facilities along the roads to be developed”.</p> <p>23. Definition of “cumulative impacts” by MDBs are shown in item 10 above.</p> <p>24. Among the Category A projects targeted for review, it was confirmed in the Olkalia V Geothermal Power Development Project in Kenya (Project No.35) that noise from multiple power plants was assumed as cumulative effects at the DF/R stage, therefore, mitigation measures such as distribution of personal protective equipment to employees were planned. These were explained as the environmental review policy at the general meeting of the advisory committee.</p> <p>25. Under the Council on Environmental Quality’s regulations in the United States, cumulative impacts include 'persons’ activities'. On the other hand, the WB, IFC, ADB's definitions of cumulative impacts do not include 'persons’ activities' in the definition of the cumulative impacts.</p>	

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		<p>【Additional survey items】 Scope of items to be assessed expanded under the WB ESF</p> <ul style="list-style-type: none"> <li>WB ESS 2 “Labor and Working Condition” <ul style="list-style-type: none"> <li>Scope of application : It is applied to the following four categorized project workers; a) people employed or engaged directly by the Borrower (direct workers), b) people employed or engaged through third parties (contracted workers); c) people employed or engaged in providing community labor (community workers), d) people employed or engaged by the Borrower’s primary suppliers (primary supply workers). For a) and b), the LMP, the OHSM and grievance mechanism mentioned below are required. For c), a part of the LMP and the OHSM are required depending on the nature and scale of the project. For d), the measures mentioned below are not required, but improvement measures are required if serious defects in child labor, forced labor and occupational safety are identified.</li> <li>Development of LMP: It contains working hours, calculation method of salary, overtime work, clear employment conditions including pension, etc., prohibition of discriminatory employment etc., prevention of exploitation, consideration for the vulnerable people, freedom of association and collective bargaining, prohibition of child labor and forced labor.</li> <li>Development of OHSM: It is a document that arranges the occupational health and safety measures based on the relevant EHS guidelines. It is to be prepared by the project proponent, and implemented and controlled by the contractor.</li> <li>Grievance mechanism: It is required to establish the grievance mechanism for labors .</li> </ul> </li> <li>In the IFC PS 2 “Labor and Working Conditions”, although there are no specific documents such as Labor Management Procedures and Occupational Health and Safety Measures stipulated in the WB ESS, important elements of labor and occupational health and safety stipulated in WB ESS 2 are almost equally covered.</li> <li>In the JICA GL, “working conditions (including occupational safety)” was described in the “Scope of Impact to Be Assessed” in Annex 1, but there is no rule other than that.</li> <li>WB ESS 4 “Community Health and Safety” <ul style="list-style-type: none"> <li>Preparation of ERP: In a project where there may be an emergency (human and natural), risks to community health and safety will be identified through ESIA. ERP will be prepared as needed through the risk analysis and assessment.</li> <li>ERP regarding dam: For dams including a water storage dam for a hydropower, water supply, irrigation, or flood control, etc., safety measures will be developed by the engineer with capacity in accordance with GIIP.</li> <li>Preparation of Hazardous Waste Management Plan: In a project where the affected communities are likely to be exposed to dangerous materials, dangerous materials will be identified, the implementation system and responsible body for storage, operation, usage and disposal will be clarified, and implementation of management monitoring plan and mitigation measures will be considered. Definition of dangerous materials follows the EHSG. (*Hazardous waste management in the working environment is required to be implemented as part of pollution control in ESS 3.)</li> <li>Impact of labor influx from outside region and its countermeasures: It was stated that the risks related to labor influx (infectious diseases, etc.) is taken into consideration. According to the WB GN on Managing Risks Related to Labor Influx, key principles are “reduction of labor influx,” “assessment and management of labor influx risk through ESIA, etc.” and “incorporation of social and environmental mitigation measures into the civil works contract.”</li> <li>Security Personnel: The risk to the community inside and outside the project area caused by security measures will be assessed, and if there is a complaint about illegal or violent behavior, it will be reviewed.</li> <li>Securing the safety of infrastructure and structures: The design and construction of structures will be conducted in consideration of the safety of surrounding communities and climate change. If the risk of abnormal weather (including sudden and/or moderate weather changes associated with climate change) is high, independent experts will validate the design of the structure.</li> </ul> </li> <li>There is no big gap between the IFC PS 4 “Community Health, Safety, and Security” and the WB ESS 4. However, the WB ESS 4 requires climate change to be considered in terms of structural safety.</li> <li>WB ESS 8 “Cultural Heritage” <ul style="list-style-type: none"> <li>It applies to “tangible cultural heritage” and “intangible cultural heritage”. Tangible cultural heritage includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Intangible cultural heritage includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts and cultural spaces associated therewith – that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them. (ESS 8 para 4)</li> <li>The requirements of this ESS 8 will apply to all projects that are likely to have risks or impacts on these cultural heritages. This will include a project which: (a) Involves excavations, demolition, movement of earth, flooding or other changes in the physical environment; (b) Is located within a legally protected area or a legally defined buffer zone; (c) Is located in, or in the vicinity of, a recognized cultural heritage site; or (d) Is specifically designed to support the conservation, management and use of cultural heritage. As for intangible cultural heritage, it applies only if a physical component of a project will have a material impact on such cultural heritage or if a project intends to use such cultural heritage for commercial purposes. (ESS 8, para 5,6)</li> </ul> </li> </ul>	<p>WB ESS 2 Necessity of reference to LMP and measures relating to occupational health and safety</p> <p>WB ESS 4 Addition of emergency response, dam safety, hazardous waste, inflow of workers, risk of security personnel, ensuring of community safety that may be affected by the project to the consideration items under JICA GL</p> <p>WB ESS 4 Consideration of climate change into the design of structure</p> <p>WB ESS 8 Addition of intangible cultural heritage to consideration items under JICA GL</p>

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		<ul style="list-style-type: none"> <li>Through the environmental and social assessment, the Borrower will determine the potential risks and impacts of the proposed activities of the project on cultural heritage. Where appropriate, the Borrower will develop a Cultural Heritage Management Plan. (ESS 8 para 8, 9)</li> <li>If unknown cultural heritage is encountered during project activities (such as construction), the cultural heritage will be dealt in accordance with a chance finds procedure that is prepared in each project. (ESS 8 para 11)</li> <li>Considerations regarding the IFC PS 8 “Cultural Heritage” are the same as the WB ESS 8.</li> </ul>	
Compliance with Laws, Standards, and Plans	<ol style="list-style-type: none"> <li>Summarize cases that under “protected areas that are specifically designated for the conservation of nature or cultural heritage.”</li> <li>Summarize practice of WB, ADB and IFC on cases of which project area was in “protected areas that are specifically designated for the conservation of nature or cultural heritage.”</li> <li>(Other items will be confirmed through the review of Section 2.6.)</li> </ol>	<ol style="list-style-type: none"> <li>Cases that fall under “protected areas that are specifically designated for the conservation of nature or cultural heritage.” <ul style="list-style-type: none"> <li>None of 90 projects was implemented in “protected areas that are specifically designated for the conservation of nature and cultural heritage”. On the other hand, seven projects were identified where the projects are located near protected areas. (Nos. 5, 18, 21, 24, 35, 41, 42).</li> </ul> </li> <li>Practices of WB, ADB and IFC on cases of which project area is in “protected areas that are specifically designated for the conservation of nature or cultural heritage” <ol style="list-style-type: none"> <li>Assessment of risks and impacts <ul style="list-style-type: none"> <li>Under the WB ESS 6 “Biodiversity Conservation and Sustainable Management of Living Natural Resources”, the Borrower will identify the potential project-related risks to and impacts on habitats and the biodiversity that they support. The Borrower will manage potential risks and impacts by avoiding, minimizing, then mitigating them (application of the mitigation hierarchy). Where significant residual impacts remain after the Borrower implements the mitigation measures to avoid, minimize and mitigate the risks and impacts, the Borrower will compensate for or offset them. The Borrowers will adopt the precautionary approach and apply adaptive management practices in the implementation of mitigation measures.</li> <li>ADB stipulates that the borrower/client will assess the significance of project impacts and risks focusing on the major threats to biodiversity, which include destruction of habitat and introduction of invasive alien species, and on the use of natural resources in an unsustainable manner. The borrower/client will need to identify measures to avoid, minimize, or mitigate potentially adverse impacts and risks (application of the mitigation hierarchy). (SPS Appendix 1, para 24)</li> <li>Under IFC PS 6 “Biodiversity Conservation and Sustainable Management of Living Natural Resources”, the client should assess direct and indirect project-related impacts on biodiversity and ecosystem services and identify any significant residual impacts. As a matter of priority, the client should 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 should be implemented. Given the complexity in predicting project impacts on biodiversity and ecosystem services over the long term, the client should 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.</li> </ul> </li> <li>Classification of the habitat and summarization of requirements for implementation of the project <ul style="list-style-type: none"> <li>Under the WB ESS 6, “habitat” is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the nonliving environment. Areas that fall under this definition are classified into the three habitats below. The Borrower will implement the project while meeting the requirements of each habitats.</li> </ul> </li> </ol> <ol style="list-style-type: none"> <li>Modified habitat Modified habitats are areas where human activity has substantially modified an area’s primary ecological functions and species composition, such as areas managed for agriculture, forest plantations, reclaimed coastal zones, and reclaimed wetlands. The Borrower will avoid or minimize impacts on such biodiversity and implement mitigation measures as appropriate.</li> <li>Natural habitat Natural habitats are areas where human activity has not essentially modified an area’s primary ecological functions and species composition. Where natural habitats have the potential to be adversely affected by the project, the Borrower will not implement any project-related activities unless there are no technically and financially feasible alternatives; and appropriate mitigation measures are put in place, in accordance with the mitigation hierarchy, to achieve biodiversity offset.</li> <li>Critical habitat Critical habitats are defined as areas with high biodiversity importance or value, including: (a) habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) habitat of significant importance to endemic or restricted-range species; (c) habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) highly threatened or unique ecosystems; and (e) ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d).</li> </ol> </li> </ol>	<p>WB ESS 6 Reference to definition of habitats and protected areas, and its risk management approach</p> <p>Necessity of change of the rule: from the rule that in principle project shouldn’t be implemented in the protected area to the one that project can be implemented based on the classification of the habitat area</p>

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		<p>In areas of critical habitat, the Borrower will not implement any project activities that have potential adverse impacts unless all of the following conditions are met:</p> <ul style="list-style-type: none"> <li>(a) No other viable alternatives;</li> <li>(b) All due process required under international obligations or national law that is a prerequisite to a country granting approval for project activities;</li> <li>(c) The potential adverse impacts on the habitat will not lead to measurable net reduction or negative change in those biodiversity values;</li> <li>(d) The project is not anticipated to lead to a net reduction in the population of any Critically Endangered, Endangered, or restricted-range species, over a reasonable time period;</li> <li>(e) The project will not involve significant conversion or significant degradation of critical habitats;</li> <li>(f) The project's mitigation strategy will be designed to achieve net gains of those biodiversity values; and</li> <li>(g) A robust and appropriately designed, long-term biodiversity monitoring and evaluation program will be implemented.</li> </ul> <p>Where a Borrower has satisfied the conditions above, the project's mitigation strategy will be described in a Biodiversity Management Plan and set out in the legal agreement.</p> <ul style="list-style-type: none"> <li>• ADB and IFC also classify the habitats into three categories, and their definitions are almost the same as the WB. In addition, the requirements of ADB and IFC for the Borrowers/clients in carrying out the projects in areas of critical habitats are similar to those of the WB.</li> <li>• BMP <ul style="list-style-type: none"> <li>• Under the WB ESS 6, where significant risks and adverse impacts on biodiversity were identified, the Borrower will develop and implement a BMP. (ESS 6, para 9) BMP includes objectives of biodiversity management, contents of activities, mitigation measures, implementation schedule, organization structure and responsibility system, and cost. (ESS 6, Appendix 1)</li> <li>• ADB SPS has no description of biodiversity management plans and its action plans.</li> <li>• Under IFC PS 6, when implementing the project that might cause impacts on important habitats, mitigation measures will be complied in the Biodiversity Action Plan.</li> </ul> </li> <li>• Biodiversity offsets <ul style="list-style-type: none"> <li>• In the WB ESS 6, it is stipulated that biodiversity offsets will be considered as a last resort, only if significant residual adverse impacts remain after all technically and financially feasible avoidance, minimization, and restoration measures were considered. (ESS 6, para15) A biodiversity offset will be designed and implemented to achieve measurable, additional, and long-term conservation outcomes that can reasonably be expected to result in no net loss and preferably a net gain of biodiversity. (ESS 6, para16)</li> <li>• Under the ADB SPS, if some residual impacts are likely to remain significant after implementation of avoidance, minimization and mitigation, the appropriate compensatory measures such as biodiversity offsets will be implemented as a last resort, to achieve no net loss or a net gain of the affected biodiversity. (SPS Appendix 1, para 13, para 24)</li> <li>• Under the IFC PS 6, the mitigation hierarchy includes biodiversity offsets, which may be considered only after appropriate avoidance, minimization, and restoration measures were applied. A biodiversity offset should be designed and implemented to achieve measurable conservation outcomes that can reasonably be expected to result in no net loss and preferably a net gain of biodiversity; however, a net gain is required in critical habitats. (para 10)</li> </ul> </li> </ul> <p>2.3. Definition of Protected Area and requirements for implementation of the project</p> <ul style="list-style-type: none"> <li>• In the WB ESS 6, protected areas are areas designated by the government for the protection of long-term nature, its ecosystem services and cultural values. They also include internationally recognized areas. Examples of a protected area recognized internationally are not only the site on the World Heritage List created under the World Heritage Convention of the UNESCO, Biosphere Reserves of UNESCO, the Ramsar Convention Wetland, but also KBA, IBA and Alliance for Zero Extinction Sites. Even in the protected areas, it is not prohibited to carry out projects, but needed to meet certain requirements for its implementation.</li> <li>• Under the WB ESS 6, the Borrower will carry out the project to the extent that it matches the legal status and the purpose of protection if the project is implemented in protected areas or the project may affect protected areas. The borrower will prepare mitigation measures based on the impact assessment and consider not to lose the integrity of the protected area, purpose of its protection, and the biodiversity of the area. If the project site falls into any of the three habitat areas mentioned above, the Borrower will need to meet the requirements for protected areas in addition to the requirements for the concerned habitat. <ul style="list-style-type: none"> <li>• Demonstrate that the proposed development in such areas is legally permitted;</li> <li>• Act in a manner consistent with any government recognized management plans for such areas;</li> <li>• Consult and involve protected area sponsors and managers, project-affected parties including Indigenous Peoples, and other interested parties on planning, designing, implementing, monitoring, and evaluating the proposed project, as appropriate; and</li> <li>• Implement additional programs, as appropriate, to promote and enhance the conservation aims and effective management of</li> </ul> </li> </ul>	

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	<p>Recommendation from the working group meetings for reexamination of JICA GL Operation 【Protected areas specifically designated by laws or ordinances for the conservation of nature or cultural heritage】</p> <p>4. As the FAQ of the JICA GL explains the “conditions” to be “specifically designated area,” it is suggested that specific examples should be described in the FAQ for better understanding.</p> <p>5. First, the protected areas need to be identified by the national legislations of the borrower government. If such a legislation is not available, it should be discussed whether IUCN rules can be applicable. In addition, whether the protected areas need to be identified by IUCN rules should be described.</p> <p>6. Not only the protected areas designated by the central government legislation, but also the designated areas by the ordinance or others of the local governments should be considered as “protected areas”.</p> <p>7. It is necessary to judge rationally whether and to which extent the protected area can be developed for each project in accordance</p>	<p>the area.</p> <ul style="list-style-type: none"> <li>The ADB SPS states “Legally Protected Areas”, while its definition and examples were not described. (SPS, Appendix 1, para 30)</li> <li>In the IFC PS 6, it is stipulated that, in circumstances where a proposed project is located within a legally protected area or an internationally recognized area, the client will meet the requirements applicable to the projects. In addition, the client will meet the following four conditions (para 20): <ul style="list-style-type: none"> <li>Demonstrate that the proposed development in such areas is legally permitted;</li> <li>Act in a manner consistent with any government recognized management plans for such areas;</li> <li>Consult protected area sponsors and managers, Affected Communities, Indigenous Peoples and other stakeholders on the proposed project, as appropriate; and</li> <li>Implement additional programs, as appropriate, to promote and enhance the conservation aims and effective management of the area. (Implementing additional programs may not be necessary for projects that do not create a new footprint.)</li> </ul> </li> <li>In the current JICA GL, it is stipulated that projects must, in principle, be undertaken outside of protected areas that are specifically designated by laws or ordinances for the conservation of nature or cultural heritage, and projects are also not to impose significant adverse impacts on designated conservation areas.</li> </ul> <p>2.4. Application of SGP to the supply chain</p> <ul style="list-style-type: none"> <li>Approaches of WB, IFC and ADB are as follows: <ul style="list-style-type: none"> <li>In the WB ESS 6, it is stipulated that, where a Borrower is purchasing natural resource commodities, that are known to originate from areas where there is a risk of significant conversion or significant degradation of natural or critical habitats, the evaluation and verification practices of the environmental and social aspects of the primary suppliers will be confirmed. (ESS 6, para 38) In addition, it is required that the Borrower will (1) identify where the supply is coming from and the habitat type of the source area; (2) where possible, limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion or degradation of natural or critical habitats; and (3) where possible and within a reasonable period, shift the Borrower’s primary suppliers to suppliers that can demonstrate that they are not significantly adversely impacting these areas.</li> <li>However, it should be noted that the ability of the Borrower to fully address these risks will depend upon the Borrower’s level of control or influence over its primary suppliers. (para 40)</li> <li>IFC, like the WB requires to confirm the evaluation and verification methods of the environmental and social aspects of the primary suppliers. In addition to the three points in the WB ESS 6, a continuous review of the client's primary supply chains is required. However, it should be noted that the ability of the client to fully address these risks will depend upon the client’s level of management control or influence over its primary suppliers. (para 30)</li> <li>No stipulation in the ADB SPS.</li> </ul> </li> </ul> <p>2.5. Illegal behavior other than illegal logging</p> <ul style="list-style-type: none"> <li>There is no stipulation clarifying illegal actions harmful to ecosystem in the WB ESS6.</li> <li>In the ADB SPS, production of or trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora is not eligible for ADB financing.</li> <li>No stipulation clarifying illegal actions harmful to ecosystem in the IFC PS 6.</li> </ul> <p>3. Refer to “2.6 Laws, Regulations and Standards of Reference”</p> <p>4. Based on the recommendation from Advisory Committee for reexamination of JICA GL Operation, it was added in FAQ that examples of areas whose conservation of nature is of international importance include areas listed on the World Heritage List of the UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage, UNESCO Biosphere Reserves and Wetlands of International Importance In addition, areas whose conservation of cultural heritage is of international importance. In addition, the areas listed on the World Heritage List of UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage were stated as the examples of areas whose conservation of cultural heritage is of international importance.</p> <p>5. Based on the recommendation from Advisory Committee for reexamination of JICA GL Operation, as described in 2 above, it was added in FAQ that the protected areas are the area designated as such by the country and/or local governments by laws and/or ordinances to protect nature and cultural heritage. And additional note saying whether or not the area where a project for which JICA cooperates is implemented may fall under the areas designated for the conservation of nature or cultural heritage needs to be rationally decided by referring to the IUCN protected area management categories, etc., and considering regional characteristics.</p> <p>6. Based on the recommendation from Advisory Committee for reexamination of JICA GL Operation, it was clarified in FAQ that protected areas that are specifically designated by laws or ordinances for the conservation of nature include areas designated by</p>	

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	<p>with the conditions specified by the national legislation of the borrower's country.</p> <p>【Project implementation conditions in “area designated specially for nature protection and cultural heritage protection”】</p> <p>8. In consideration of the provision, “[p]rojects must, in principle, be undertaken outside of protected areas that specifically designated by laws or ordinances for the conservation of nature or cultural heritage” (hereafter called the designated area) under the JICA GL, it is necessary to explain that the project implementation in the designated area is not expected.</p> <p>9. However, it is also important to enable project formation, if JICA can justify the background and reasons for implementing the project in the designated area.</p> <p>10. Although the JICA GL define the protected areas mean “the protected area that are specially designated by laws or ordinances for the conservation of nature or cultural heritage”, but it is necessary to consider that there are different contents of the laws and institutions for the protected area management in countries (For example, some countries have the legislation that allows a certain development in the designated areas, such as buffer zones or places where the degree of protection is not high, if the project meets the criteria).</p> <p>11. There are some issues raised at the international conferences, etc. that the borrower government changed the designated areas so that the project can be implemented in “the area designated as such by the country and/or local governments by laws and/or ordinances to protect nature and cultural heritage”. Therefore, it is necessary to take a careful response recognizing the issue.</p> <p>Recommendation from the 2nd &amp; 6th WG 【Critical natural habitats】 【Natural habitats】</p> <p>12. As for “Critical natural habitats”, specific examples should be described for better understanding.</p> <p>13. In the JICA GL, although “critical forests” are listed together with “critical natural habitats”, environmental and social impacts on areas other than forests such as the “ocean” and “highlands” should also be taken into consideration.</p> <p>14. “Critical natural habitats” are defined in the “Ecosystems and Biota” in the JICA GL; however, it should be considered from the aspects of “local communities” and “social environment”.</p> <p>15. The “Key Biodiversity Area (KBA)” which was developed with reference to the IUCN Red List can be used as a list showing critical natural habitats.</p> <p>【Significant conversion and significant degradation】</p> <p>16. JICA's interpretation should be taken into account that “conversion” represents a negative impact from an areal point of view, while “degradation” represents a negative impact from a qualitative point of view.</p> <p>17. As it is specified in the WB's OP 4.04 Annex A, “significant conversion may include, for example, land clearing; replacement of natural vegetation, permanent flooding such as by dam, drainage, dredging, filling, or channelization of wetlands, or surface mining,” some examples should be described in the FAQ of the JICA GL. In addition, it includes the “significant conversion” of “ecosystems not only in land areas but also in water areas” due to serious</p>	<p>the country and/or local governments by laws or ordinances primarily for the conservation of nature.</p> <p>7. Based on the recommendation from Advisory Committee for reexamination of JICA GL Operation, it was added in FAQ that “it needs to be rationally decided considering regional characteristics”.</p> <p>8. Based on the recommendation from Advisory Committee for reexamination of JICA GL Operation, it was clarified in FAQ that, referring to IFC's standards, JICA requires project formation and implementation in such areas (the area designated as such by the country and/or local governments by laws and/or ordinances to protect nature and cultural heritage) to fulfill all conditions.</p> <p>9. As stated in item 8. above, there is an exception to the rule.</p> <p>10. The project site of North-South Expressway Construction Project (Ben Luc - Long Thanh Section) in Viet Nam (Project No.24) is located approximately 12 km north of the Can Gio Mangrove protected forest (center part). It passes through the transition zone around the protected forest, since it is permitted to implement the development projects in the transition zone under the domestic law. Therefore, the project was implemented by acquiring the permission from the Provincial People's Committee and Provincial Conservation Forest Management Office.</p> <p>11. Among the reviewed projects, there was no such practice.</p> <p>12. In reference to the results of the review survey, examples will be described in the FAQ in the future.</p> <p>13. Among the projects targeted for review, five projects were identified where there are likely to be critical natural habitats in the project area. In another 3 projects, preservation measures and monitoring plan were prepared while the environmental monitoring has not been conducted. In the SGP of MDBs such as WB, IFC, ADB, no specific reference to habitats such as “ocean” or “highlands” were not confirmed.</p> <p>14. No applicable cases were identified in the projects targeted for review.</p> <p>15. Under the WB ESS 6, definition of the protected area is expanded, and KBA is included in the internationally recognized protected areas. On the other hand, under JICA, whether or not the area correspond to the critical natural habitats is judged based on the impacts of each project and its risk. This issue will be discussed under the Point of Argument “the WB ESS6 reference to definition of habitats and protected areas, and risk management approach.”</p> <p>16. Based on the recommendation from Advisory Committee for reexamination of JICA GL Operation, JICA's understanding was described in FAQ taking into account areal point of view and qualitative point of view as follows: Based on the definition by the WB's Social and Environmental SGPs, etc., JICA defines “significant conversion” and “significant degradation” to be caused by the implementation of projects as below. Note that whether or not the project for which JICA cooperates will involve “significant conversion or significant degradation” of critical natural habitats and critical forests needs to be decided rationally by considering the content of the project and regional characteristics of the project site, etc. Significant conversion: Elimination or severe reduction of the integrity of a critical natural habitat or critical forests Significant degradation: Substantial reduction of a critical natural habitat's or critical forest's ability to maintain viable populations of its native species or substantial reduction of key ecosystem functions</p> <p>17. Among the projects targeted for review, five projects were identified that the project area corresponded to natural habitats; however, none of the projects involves significant conversion or deterioration. Though a part of the project implementation area corresponded to tree land, tidal flats, marshes, etc. “land clearing; replacement of natural vegetation, permanent flooding such as by dam, drainage, dredging, filling, or channelization of wetlands” wouldn't be planned to be implemented. Although OP4.04 Annex A included an example of significant conversion, ESS 6 does not include any example.</p> <p>18. Based on the recommendation from Advisory Committee for reexamination of JICA GL Operation, it is stated in FAQ that whether or not the project for which JICA cooperates will “involve significant conversion or significant degradation” of critical natural habitats and critical forests needs to be decided rationally by considering the content of the project and regional characteristics of the project site, as shown in item 16 above.</p> <p>19. Based on the recommendation from Advisory Committee for reexamination of JICA GL Operation, it was described in FAQ that after confirming that no feasible alternatives are available in areas other than “critical natural habitats”, JICA, referring to IFC's standards, considers that it is important to fulfill all conditions listed below during project formation and implementation, which shows the requirements for the project implementation and explains that project implementation is not a premise.</p>	

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	<p>pollution and others.</p> <p>18. It is necessary to judge rationally whether the project will cause “significant conversion” or “significant degradation” from the background and the contents of each project.</p> <p>【Conditions for project implementation in “Critical natural habitats”】</p> <p>19. In consideration of the stipulation in the JICA GL that “[p]rojects must not involve significant conversion or significant degradation of critical natural habitats and critical forests”, it is necessary to explain that the project implementation in the critical natural habitat is not expected.</p> <p>20. However, it needs to be carefully examined whether the JICA GL have requirements which make JICA’s project implementation impossible in the critical natural habitats in practice.</p> <p>21. It is necessary to carefully examine whether the JICA GL include “Endangered species II (Vulnerable: VU)” and “Near Threatened: NT” which are classified as per the category of Japanese Ministry of Environment in endangered species, in addition to “Endangered species IA/IB (Critically Endangered: CR and Endangered: EN)” as for the JICA GL’s stipulation of “the list of endangered species in which projects shall not cause net reduction over a reasonable period”. It is important to ensure that the effort of the study and project does not increase and practical measures are taken in implementing mitigation measures and monitoring.</p>	<p>20. Among the projects targeted for review, there were no cases where project formation was not possible because the project area was located in the critical natural habitats. In addition, the definition of natural habitats and the requirements for project implementation are specified in the WB ESS6, as described in 【Classification of the habitat and summarization of requirements for implementation of the project】 on page 22.</p> <p>21. In the WB ESS 6, it is stipulated as requirements for project implementation in the critical habitats that the project is not anticipated to lead to a net reduction in the population of any Critically Endangered, Endangered, or restricted-range species, over a reasonable time period. In addition, in IFC PS 6, it is stipulated that the project does not lead to a net reduction in the population of any CR or EN over a reasonable period of time. In response to these requirements, JICA also stipulates requirement for project implementation that the project does not lead to a net reduction in the population of endangered species IA/IB (CR/ EN).</p> <p>【Discussion point raised by the Advisory Committee】  “Ecosystem services in the paddy fields“ December 2, 2016, Phnom Penh - Bavet Expressway Development Project in Cambodia (Preparatory survey (ODA loan)) from working group on draft final report  “Most of the land temporarily used as a soil pit for this project is likely to be paddy field. It was pointed out that regarding secondary nature generated by human usage such as paddy fields and <i>satoyama</i>, how to evaluate its ecosystem services and the impacts of projects is a forthcoming issue in JICA's environmental and social considerations.”</p>	
Social Acceptability	<p>1. Confirmation of records of stakeholder meetings  1) Dates of announcement and implementation  2) Place  3) Method of consultation (community assemble, individual interview, language)  4) Considerations for socially vulnerable groups  5) Method of announcement  6) Participants (the number of people, percentage of affected people, affiliation, gender, etc.)  7) Contents of discussions (project area, project plan, issues and needs from local residents, etc.)  8) Comments from participants  9) Reply by project proponents etc.  10) Result of reflection of received comments to the plan and project  11) Preparation of Minutes of meeting</p> <p>2. Confirm if any third party raise an issue on the project in terms of social acceptability and its reason (e.g. a need for more detailed descriptions in the JICA GL, an interpretation problem of the JICA GL, a capability/manpower/resource problem, etc.).</p>	<p>1. Records of stakeholder meeting</p> <ul style="list-style-type: none"> <li>Because requirements on stakeholder analysis were not clarified under the JICA GL, the EIA regulations, the WB OP and so on, there were only a few cases that the results of analysis were recorded clearly in the EIA and/or the RAP even though stakeholder analysis were practically implemented. Implementation of stakeholder analysis was not identified from EIAs and RAPs in the review of the 90 projects, but it was confirmed that stakeholder analysis was implemented in 16 projects.</li> <li>The number of participants in each consultation meeting varied from project to project. In addition, the number of projects affected people varies depending on the project, and the geographical distribution of the affected people also varies greatly depending on the nature of the project. Therefore, it is difficult to set an appropriate indicator of the number of participants per session. On the other hand, there was a record that more than 500 people participated in a consultation meeting. In order to secure meaningful participation, it is better to consider taking measures such as distribution of information materials or increase of the number of staffs.</li> <li>It was difficult to find the records of the survey items on the stakeholder consultation from EIAs and RAPs. In some cases, the information of the method of invitation, the timing of invitation, participants by gender, participation rate of PAH, etc. was not included. In addition, the record of language to be used for discussion was not recorded in some RAPs, although local official languages should usually be used in many cases.</li> </ul> <p>The records of consultations during the preparation of EIA and RAP were included in EIAs and RAPs, but it is an issue that explanations such as about what was the reason to select the date, time and place for the meeting and why FGD was necessary, in addition to the records of the minutes of the discussion and the breakdown of the participants, were not sufficiently described in EIAs and Preparatory Survey Reports.</p> <ul style="list-style-type: none"> <li>There were also projects (Project Nos.17 and 32) in which the number of meetings was increased more than originally planned in order to encourage more PAHs participation and to deepen PAHs understanding.</li> <li>As measures to address concerns that may hold down the views of stakeholders with different interests, especially socially vulnerable groups, there were also some cases that discussions and FGDs were held for specific groups only.</li> <li>For example, in the Project No.2, individual interviews were implemented and also FGDs were held targeting people making incense sticks at home work, people bathing in the Kelani River, three-wheel taxi drivers, and school children. In the Project No.32, additional discussions were held only for the Bengali community where there were many non-formal residents.</li> </ul> <p>2. Reasons of request from the third party about stakeholder meeting</p> <ul style="list-style-type: none"> <li>There were five projects (Project Nos.4, 6, 9, 13, 19) in total in which external indications were recorded. Among the projects targeted for review, there were four projects (Project Nos.4, 12, 26, 83) in which objections were filed to JICA, and two projects (Project Nos. 4, 83) in which investigation was implemented by the Examiners for the Guidelines. Although it was concluded that</li> </ul>	<p>Implementation of stakeholder analysis</p> <p>ESS 10 Necessity of reference to Stakeholder Engagement Plan</p>

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	<p>3. Summarize considerations for socially vulnerable groups.</p> <p>Recommendation from the working group meeting for reexamination of JICA GL Operation 【Stakeholder consultation in consideration of socially vulnerable groups】</p> <p>4. It is suggested to consider more specific measures in conducting stakeholder consultation with socially vulnerable groups as the future agenda (following specific points were proposed).</p> <ul style="list-style-type: none"> <li>✓ To consider a mechanism to bring in people who could not attend the stakeholder consultation and to explain remaining issues that could not discussed in the stakeholder consultation.</li> <li>✓ To set the expected maximum number of participants per meeting to ensure meaningful participation if the number of stakeholders is large.</li> <li>✓ To pay attention when stakeholders who have different interests are invited together because it might fail to elicit frank opinions from stakeholders in such a situation.</li> </ul>	<p>there was no violation of the JICA GL in both projects, the examiner gave advice for solving the problem in order to promote the response based on the JICA GL philosophy etc.</p> <p>3. Cases of consideration for socially vulnerable groups</p> <ul style="list-style-type: none"> <li>• Among the 90 projects excluding the 10 of Category C Projects, plans on considerations to socially vulnerable groups were developed in 60 projects. There were 30 projects in which the plans on considerations were not prepared including seven projects of Category FI and the projects in which socially vulnerable groups were not identified because the projects were to be implemented in the existing facilities. In the plans on considerations to socially vulnerable groups, generally financial assistances related to income, food expenses, medical expenses etc. were planned.</li> </ul> <p>【Additional Survey Items】 Stipulation of WB ESS 10 about stakeholder consultations Refer to 2.4 Consultation with local stakeholders.</p> <p>4. Among the reviewed projects, the followings were confirmed as a method of stakeholder consultation in consideration of the socially vulnerable groups.</p> <ul style="list-style-type: none"> <li>✓ In Project Nos.1, 17 and 32, additional stakeholder consultations were conducted in response to the request from the residents, because there was a recognition that the provision of information to the participants was insufficient. In the stakeholder consultation of the original plan, it was judged that the provision of information was insufficient.</li> <li>✓ In relation to stakeholder involvement, under the WB ESS 10, development of a stakeholder engagement plan and stakeholder analysis, and meaningful participation of the stakeholders through them is required.</li> <li>✓ In Project Nos.23, 29 and 32, focus group discussions were held in order to discuss with local residents in detail.</li> </ul> <p>【Point of argument created at the Advisory Committee】 From the Working Group on “ ‘Person with disabilities’ written in Chinese characters,” Draft Final Report of the Mega Manila Subway Project in the Philippines on September 4, 2017. “... Furthermore, while it is described in Section 2.5.2 [in the JICA GL] that persons with disabilities is included in vulnerable social groups who should be given special attention, it is described in item 2 of the Social Acceptability in Appendix 1 that vulnerable social groups include “women, children, the elderly, the poor, and ethnic minorities” and does not specify persons with disabilities. Therefore, the Advisory Committee member suggested that this point could be a topic of argument for the revision of the JICA GL in the future.</p>	
Ecosystem and Biota	<p>1. Summarize practices of the project which was implemented in the critical natural habitats. (including justification, any projects in the critical natural habitats other than forests, consideration status on biodiversity conservation areas, impact on the local community and impact on natural habitat caused by the local community, impact on social environment and impact on natural habitat caused by social environment)</p> <p>2. Summarize practices of the project which was implemented in accordance with “conditions to implement the project in the critical natural habitat”</p> <p>3. Summarize practice of WB, ADB and IFC on projects which involves “critical natural habitats” and “significant conversion or significant degradation”</p> <p>4. Confirm if any illegal logging of the forest was practiced.</p>	<p>1. Summarization of practices of the project which was implemented in the critical natural habitats.</p> <ul style="list-style-type: none"> <li>• Among the reviewed projects, 5 projects are located in critical natural habitat. In any case, there is no significant conversion or deterioration, and mitigation measures such as conservation planning</li> </ul> <p>2. Summarization of practices of the project which was implemented in accordance with “conditions to implement the project in the critical natural habitat”</p> <ul style="list-style-type: none"> <li>• Among the reviewed projects, 5 projects are located in critical natural habitat. For 2 projects (Nos. 33 and 44), conditions to implement the project in the critical natural habitat were checked as specified in the FAQ of JICA GL. Remaining three projects (Nos. 12,16, and 20) are not subject to these conditions since the environmental reviews were conducted for the projects before these conditions were specified by JICA. In any case, there is no significant conversion or deterioration, and mitigation measures such as conservation planning</li> </ul> <p>3. Practices of WB, ADB and IFC on projects which involve “significant conversion or significant degradation” of “critical natural habitats and critical forests.”</p> <ul style="list-style-type: none"> <li>• Refer to “2. Summarization of practices of WB, ADB and IFC on cases of which project area was in “protected areas that are specifically designated for the conservation of nature or cultural heritage.” in the upper row (Laws, Regulations and Standards of Reference).</li> </ul> <p>4. Confirmation of existence of illegal logging</p> <ul style="list-style-type: none"> <li>• Illegal logging was not identified in reviewed 90 projects.</li> </ul>	WB ESS 6 Reference to definition of habitats and protected areas, and risk management approach
Involuntary Resettlement	<p>1. Confirm preparation and disclosure status of RAP and records of consultation meetings (including the meeting contents, language, mode of the consultation)</p> <p>2. Confirm if involuntary resettlement and loss of means of livelihood were avoided and minimized, and effective measures were taken on agreement with affected people in documents.</p> <p>3. Confirm the expected number of project affected people at the environmental review stage.</p>	<p>1. Preparation and disclosure of RAP, consultation meeting (including the meeting contents, language, mode of the consultation)</p> <ul style="list-style-type: none"> <li>• In the JICA GL, it is stipulated that “for projects that will result in large-scale involuntary resettlement, resettlement action plans must be prepared and made available to the public.” and “it is desirable that the resettlement action plan include elements laid out in the WB SGP, OP 4.12, Annex A”. Out of 90 projects (except for 10 Category C projects), RAP/ARAP was developed in 39 projects out of 44 projects that involve land acquisition. For the remaining five projects, RAP/ARAP has not been prepared, but it was confirmed that land acquisition and involuntary resettlement would be implemented based on the domestic law and the JICA GL. In addition, after confirming compensation policy and implementation records of stakeholder consultation through the environmental checklist, JICA agreed with the project proponent.</li> </ul>	WB ESS 5 Annex 1 Reference of the elements of RAP

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	<p>4. Confirm the number of actual project affected people at the monitoring stage.</p> <p>5. Contents of compensation at the environmental review stage. (Timing of compensation, calculation method of compensation rate including full replacement cost, measures for recovering livelihood and other supports.)</p> <p>6. - (Only for the projects subject to the field survey) Confirm if resettled people have improved their standards of living, income opportunities, and production levels or at least restored these to pre-project levels</p> <p>7. Confirm status of establishment of grievance mechanisms.</p>	<p>2. Confirmation on whether involuntary resettlement and loss of means of livelihood were avoided and minimized, and effective measures were taken on agreement with the affected peoples in documents</p> <ul style="list-style-type: none"> <li>Among the 37 projects that involve involuntary resettlement, the agreement was confirmed in the document, and the effective measures for avoidance and mitigation of the impacts were planned and taken in 28 projects. Regarding remaining nine projects, the plan was prepared but they are not in the implementation stage (resettlement has not been implemented, etc.).</li> </ul> <p>3. Confirmation of the estimated number of the affected people at the environmental review stage</p> <ul style="list-style-type: none"> <li>The estimated number of the project affected people at the environmental review stage was confirmed for all 37 projects involving involuntary resettlement.</li> </ul> <p>4. Confirmation of the number of the affected people at the monitoring stage</p> <ul style="list-style-type: none"> <li>Among the 37 projects that involve involuntary resettlement, the number of the affected people was confirmed at the monitoring stage in 30 projects (remaining seven projects are not at the monitoring stage, or did not involve involuntary resettlement. In 11 projects, the number of the affected people was different between estimates at the planning stage and actual figures in the monitoring stage. The numbers increased in the monitoring stage in seven projects, while decreased in four projects. This is mainly because changes of project design during the detailed design stage and the clarification of the scope to be affected by the result of detailed census survey.</li> </ul> <p>5. Confirmation of contents of compensation at the environmental review stage</p> <ul style="list-style-type: none"> <li>In all projects involving involuntary resettlement, the payment of compensation at full replacement cost along with the specific calculation method was agreed based on RAP of projects and discussions at the time of appraisal.</li> </ul> <p>6. Confirmation on whether resettled people have improved their standards of living, income opportunities, and production levels or at least restored these to pre-project levels.</p> <ul style="list-style-type: none"> <li>Among the field investigation projects, the investigation results on the five projects in which livelihood restoration support was implemented are as follows: <ul style="list-style-type: none"> <li>➤ Project No.5- Delhi Mass Rapid Transport System Project Phase 3 in India: External monitoring was carried out based on the implementation of livelihood restoration program, and no particular problems were reported regarding the development status of the relocation site and the livelihood restoration situation.</li> <li>➤ Project No.13- Indramayu Coal fired Power Plant Project (E/S) in Indonesia: From October 2016 to August 2018, 300 people participated in the livelihood restoration programs for “agricultural skills” and “non-agricultural skills”. The programs continue to be provided. Also, except for access roads and substation sites, continuation of agriculture is permitted.</li> <li>➤ Project No.24- North-South Expressway Construction Project (Ben Luc - Long Thanh Section) in Viet Nam: In addition to compensation based on the replacement cost, livestock etc. were provided to PAHs on request for the initial infrastructure development after relocation. There were no reports that their income and living standards were declined compared to before, though there were some reports that some PAHs translated the provided livelihood into cash and used for purposes other than the original intent in the relocated area where the support was provided.</li> <li>➤ Project No.36- Infrastructure Development Project in Thilawa Area Phase I in Myanmar: According to the project proponent, the monitoring of compensation was conducted at the port area. As for the monitoring of livelihood restoration, although the address of the PAH was listed in the agreement, the PAH has moved after compensation at the time of monitoring. Even though the tracking study became difficult, JICA requested to the project proponent to conduct the monitoring of livelihood restoration. Also, as for electricity projects, monitoring of payment of compensation for cultivation in the land of tower part to two PAHs was conducted, and it was confirmed that the payment was made without problems. (Agreement with residents were made.)Project</li> <li>➤ No.42- Kenya-Tanzania Power Interconnection Project in Kenya: As livelihood restoration programs, it was agreed at the time of appraisal to conduct i) rural electrification, ii) improvement of access road near Arusha substation, and iii) provision of wells. At the field investigation, the progress of the programs were confirmed as follows: i) rural electrification: A package of rural electrification was in the contractor’s contract that was concluded, and the areas where the electrification is necessary was under investigation, ii) improvement of access road near Arusha substation: Construction started on April 15, 2019, iii) provision of wells near the Arusha substation: It was reported that the water supply around the Arusha substation was already prepared by the government.</li> </ul> </li> </ul> <p>7. Confirmation of GRM establishment</p> <ul style="list-style-type: none"> <li>Among the 44 reviewed projects which involve land acquisition and are classified as Category A or B, the GRM was established in 43 projects. 1 project (No.34) is excluded because the E/S loan had been provided but land acquisition has not been started.</li> </ul> <p>【Additional survey items】 WB ESS 5 “Land Acquisition, Restrictions on Land Use and Involuntary Resettlement”</p> <ul style="list-style-type: none"> <li>The scope of application under the WB ESS 5 is land acquisition, involuntary resettlement (including resettlement because of</li> </ul>	

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
		<p>restriction on land use), restriction on access to land including communal property and so on. (para 4)</p> <ul style="list-style-type: none"> <li>• Compensation should be at replacement cost and there is no significant change in the definition of “replacement cost“ from OP4.12. However, where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs. On the other hand, where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets. (footnote 6)</li> <li>• Compensation standards will be disclosed and applied consistently for each loss of assets/land. A clear basis for calculation of compensation will be documented, and compensation will be distributed to PAPs in accordance with transparent procedures. (para 13)</li> <li>• In the case of physically displaced persons who have no recognizable legal right or claim to the land or assets they occupy or use, the Borrower will provide arrangements to allow them to obtain adequate housing with security of tenure. (para 29)</li> <li>• In the case of projects affecting livelihoods or income generation (economic displacement), the Borrower’s plan will include measures to allow affected persons to improve, or at least restore, their incomes or livelihoods. (para 33)</li> </ul> <p>ESS 5 Annex 1</p> <ul style="list-style-type: none"> <li>• Under the previous WB SGPs, a RAP is required to be prepared for projects involving more than 200 people’s resettlement, while an abbreviated RAP is required to be prepared for projects involving less than 200 people’s resettlement. On the other hand, ESS 5 requests to prepare the resettlement plan for all projects involving involuntary land acquisition and resettlement, regardless of its magnitude and complexity.</li> <li>• Among the elements of RAP, the descriptions regarding the asset value evaluation method and transition period are as follows: <ul style="list-style-type: none"> <li>➢ Regarding valuation of and compensation for losses, “the methodology to be used in valuing losses to determine their replacement cost” and “the proposed types and levels of compensation for land, natural resources and other assets under local law and such supplementary measures as are necessary to achieve replacement cost for them” are described. (para 10)</li> <li>➢ Transitional support will be provided during the transition period to those whose livelihoods will be disrupted. (para 29)</li> </ul> </li> <li>• Minimum elements of a resettlement plan are described separately for resettlement that involves physical displacement or economic displacement. When project circumstances require the physical relocation of residents, resettlement plans require additional information such as transitional assistance, site selection, site preparation, and relocation, housing, infrastructure, and social services, environmental protection and management, consultation on relocation arrangements and integration with host populations. (ESS 5 Annex 1 para 17-23) On the other hand, in case that resettlement involves economic displacement, the plan will include direct land replacement, loss of access to land or resources, support for alternative livelihoods, consideration of economic development opportunities and transitional support. (ESS 5 Annex 1 para 24-29)</li> </ul> <p>In the IFC PS 5 “Land Acquisition and Involuntary Resettlement”, it is stipulated that, where land acquisition and involuntary resettlement is unavoidable, the client will explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring. (para 13) Though land acquisition and resettlement are the responsibility of the government, the client is required to collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this Performance Standard. If the government resettlement measures do not meet the relevant requirements of the PS5, the client is required to prepare a Supplemental Resettlement Plan that will address the relevant requirements of the PS5, and implement and monitor the plan. (para 30-32)</p>	
Indigenous Peoples	<ol style="list-style-type: none"> <li>1. Confirm if there were adverse impacts on indigenous peoples.</li> <li>2. Confirm if measures to avoid and minimize adverse impacts were examined.</li> <li>3. Confirm if indigenous peoples plan was prepared and disclosed.</li> <li>4. Confirm if free, prior and informed consent (FPIC) process was implemented.</li> </ol>	<ol style="list-style-type: none"> <li>1. Impacts on indigenous peoples <ul style="list-style-type: none"> <li>• Out of 90 projects (except for 10 Category C projects), impacts on indigenous peoples were identified in three projects (Nos. 32, 42, 44).</li> </ul> </li> <li>2. Measures to avoid and minimize adverse impacts <ul style="list-style-type: none"> <li>• In the Appendix A “Environmental and Social Considerations Required for Intended Projects” of the JICA GL, it is stipulated that any adverse impacts that a project may have on indigenous peoples are to be avoided when feasible by exploring all viable alternatives. In the three projects in which the impact on residential areas of indigenous peoples was confirmed in this review study, measures to minimize adverse impacts were proposed in the IPP.</li> </ul> </li> <li>3. Preparation and disclosure of IPP <ul style="list-style-type: none"> <li>• Out of 90 projects (100 projects minus 10 Category C projects), three projects have impacts to indigenous peoples. In one project, RAP was prepared by incorporating elements of IPP (No.32), IPP framework was prepared in another project (Project No.44) and in the other project, the VPP was developed (No.42).</li> </ul> </li> <li>4. Implementation of FPIC <ul style="list-style-type: none"> <li>• It was confirmed that the North East Road Network Connectivity Improvement Project (Phase 1) (I) in India (No.32) would affect people who are recognized as indigenous peoples under the national law. However, IPP was not developed, while the elements of IPP were included in the RAP and FPIC (free, prior and informed consultation) were implemented. It was because PAPs were included in the majority of population of area and had no system different from the mainstream society and culture. (In other projects which was implemented in the same State in India by ADB and WB, RAPs including the elements of IPP were also</li> </ul> </li> </ol>	<p>Necessity of reference to the term “Indigenous Peoples/Sub-Sahara African Historically Underserved Traditional Local Communities”</p> <p>WB ESS 7 Reference to the definition of FPIC (Free, Prior, and Informed Consent)</p>

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
		<p>developed instead of a stand-alone IPP.)</p> <ul style="list-style-type: none"> <li>In the Kenya-Tanzania Power Interconnection Project (No.42), consultations were conducted based on FPIC principles during the VPP preparation. At the time of the field survey of this study (April 2019), it was confirmed that VPP was appropriate since the schedule of the implementation of VPP was consistent with ESMP, and the mitigation measures mentioned in the consultation for VPP (graves are not to be relocated, snakes should not be killed, circumcision ceremonies should not be disturbed) were incorporated. In addition, the mitigation measures (do not kill snakes and do not disturb rituals) were also reflected in the form of a ban on killing animals and cultural consideration in the contract with the contractor.</li> </ul> <p>【Additional Survey Items】 ESS 7 “Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities”</p> <ul style="list-style-type: none"> <li>At the consultation meeting for introduction of ESF conducted by WB, some stakeholders expressed their concerns that the term “indigenous people” would trigger conflict between different groups of peoples. Therefore, the title of ESS 7 was changed to “Indigenous Peoples/Sub-Sahara African Historically Underserved Traditional Local Communities”.</li> <li>The definition of the term “Indigenous Peoples/Sub-Sahara African Historically Underserved Traditional Local Communities” (hereinafter as “indigenous people”) was not changed from that of “indigenous peoples” in OP 4.10 (ESS 7, para 8)</li> <li>It is stipulated in the WB ESS 7 that the Borrower will develop the plan of mitigation measures which is proportionate to the potential risks and impacts of the project in consultation with the affected indigenous peoples. (ESS 7, para 13) It is not necessary to develop the plan independently in the following cases; (1) when indigenous peoples are the sole, or the overwhelming majority of, the elements of the plan may be included in the overall project design (ESS 7, para 15); (2) in circumstances where the indigenous peoples live together with other people, a broader integrated community development plan will be prepared, intended not only the indigenous peoples but also other peoples, addressing all elements of mitigation measures which is proportionate to the potential risks and impacts on the indigenous people (ESS 7, para 17); (3) in case the indigenous peoples are targeted for land acquisition and/or involuntary resettlement, the documents based on ESS 5 and ESS 7 can be combined.</li> <li>In the IFC PS 7 “Indigenous Peoples”, it is described that the “indigenous peoples” possess characteristics of self-identification, collective attachment to geographically habitats or ancestral territories, customary cultural, economic, social, or political institutions, a distinct language or dialect, often different from the official language or languages of the country or region in which they reside. (para 5) The client’s proposed actions for impact mitigation will be developed with the informed consultation and participation of the Affected Communities of Indigenous Peoples and contained in a time-bound plan, such as an IPP, or a broader community development plan. (para 9) Free, Prior, and Informed Consent (FPIC) is an agreement on the project of a groups of “indigenous people”, and does not necessarily require unanimity.</li> <li>In the current JICAGL, it is stipulated that efforts must be made to obtain the consent of indigenous peoples in a process of free, prior, and informed consultation. The definition of FPIC was “Free, Prior, and Informed Consultation (FPIC)” in the previous WB safeguard policies, while it was changed to “Free, Prior, and Informed Consent” in ESS 7.</li> <li>FPIC does not require unanimity and may be achieved even when individuals or groups within or among affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities explicitly disagree. (ESS 7 para25)</li> </ul>	WB ESS 7 Reference to the elements of IPP
Monitoring	<ol style="list-style-type: none"> <li>Confirm if the monitoring plan was prepared.</li> <li>(Other items will be confirmed through the review of Section 3.2.)</li> </ol>	<ol style="list-style-type: none"> <li>Preparation status of Environmental Monitoring Plan <ul style="list-style-type: none"> <li>Out of 90 projects (total 100 projects minus 10 Category C projects), it was confirmed that environmental monitoring plan is prepared in all projects except for FI projects. For FI project, the institutional capacity of the financial intermediaries to manage the environmental and social issues are reviewed and thus monitoring plan for subprojects are not prepared at the review stage. As for the eight projects of Technical Cooperation for Development Planning, drafts of outline of monitoring plans were developed.</li> </ul> </li> </ol>	
Appendix 2. EIA Reports for Category A Projects	<ol style="list-style-type: none"> <li>Confirm status of EIA approval, language, information disclosure in the borrower’s country, and permission of copying</li> <li>Confirm if the EIA report includes the items specified in the JICA GL.</li> <li>Confirm whether EIA was prepared for projects that were categorized as “Category A” because of large-scale involuntary resettlement as per the JICA GL (not due to the expected environmental impacts).</li> </ol>	<ol style="list-style-type: none"> <li>Confirmation of EIA’s approval, language used, disclosure in the country, and whether photocopy is allowed <ul style="list-style-type: none"> <li>It was confirmed that EIA report is approved and disclosed, and taking photocopy is allowed in all Category A projects except one project (No.34) in which preparation of EIA was supported in E/S Loan and four projects of Technical Cooperation for Development Planning (Project Nos.39, 40, 44, 45) in which only master plan preparation was conducted. About the used language, it was confirmed that in all projects, EIA reports were written in the official language of the country and/or in a language widely used in the country.</li> <li>Some project proponents etc. disclose the reports on the website as more people have easy access to the internet. Previously, the priority was given to disclosure of the hard copy because the internet availability was not always high or it was costly for the general public in some countries. These days, however, internet becomes increasingly common and affordable in many countries.</li> </ul> </li> <li>Confirmation of whether EIA report includes the items specified in the Guidelines <ul style="list-style-type: none"> <li>For the category A projects (41 projects in total), it was confirmed that EIA reports covered all items which should be included as per the JICA GL by the time of the environmental review.</li> </ul> </li> <li>Confirmation of EIA preparation for projects categorized as “Category A” because of large-scale involuntary resettlement <ul style="list-style-type: none"> <li>Out of 90 projects (excluding 10 Category C projects), It was confirmed that there were 6 projects (Nos.2,7,11,27,28,38) that did not fall under sensitive sectors but had sensitive characteristic as large-scale involuntary resettlement, and were categorized as Category A. Thus, the EIA was prepared in all 6 projects according to the requirements of JICA GL for Category A project.</li> </ul> </li> </ol>	WB ESS 1 Annex 1 Reference to component of environmental and social impact assessment (ESIA)

Reference: Items of Current JICA GL	Survey Items Including Recommendations from WG on Review of Operation	Survey Results Background and Reasons for Discussion Points	Discussion Points (Draft)
		<ul style="list-style-type: none"> <li>Contents of ESIA and ESMP are shown in “D. Indicative Outline of ESIA” and “E. Indicative outline of ESMP”, respectively, in Annex 1 of the WB ESS 1.</li> </ul>	
Appendix 3. Illustrative List of Sensitive Sectors, Characteristics, and Areas	1. Confirm justification of “Sensitive Sectors” (especially, the scale of impacts of the project in power distribution, water supply and agriculture sectors which usually do not have significant negative impacts if the project does not have sector-related sensitive characteristics or located in a sensitive area)	1. Confirmation of justification of “Sensitive Sectors” Among the reviewed projects, projects falling under the category of sensitive sector include No.42 Kenya-Tanzania Power Interconnection Project for “power transmission and distribution lines sector”; No.29 Rengali Irrigation Project (Phase 2), No.40 Project for Study on Integrated Development of the Adjacent Zones to Yacyreta Dam Reservoir, and No.45 Project on Irrigation Scheme Development in Central and Eastern Uganda for “agriculture sector”. It was confirmed that all these projects had elements that fall into Category A in each sector requirements listed above, and in addition, these projects were classified as Category A after fully considering the project location and characteristics, etc. Overall, they were categorized as Category A because these projects are likely to have significant impacts.	
Appendix 4. Screening Format	(the screening form will be reviewed when the JICA GL are reviewed)		
Appendix 5. Categories and Items in Checklist	(the environmental checklist will be reviewed when the JICA GL are reviewed)		
Appendix 6. Items Requiring Monitoring	1. Confirm justification of monitoring items, reference standards, preparation of the monitoring plan for construction and operation phases.	1. Rational of selecting monitoring items, reference standards, differentiation of monitoring in construction and operation phases <ul style="list-style-type: none"> <li>In EIA, monitoring items for construction phase and operation phase are separately prepared in the monitoring plan.</li> <li>Among 90 projects (excluding 10 Category C projects that do not require monitoring), environmental monitoring is currently implemented for 51 projects, and submission of monitoring results was confirmed in 50 projects. On the other hand, social monitoring is being conducted in 30 projects, of which submission was confirmed in 29 projects. (One project where the submission of both environmental monitoring results and social monitoring results was not confirmed is the project which was suspended due to a security reason in the host country [No. 38].) Gaps between environmental review results and monitoring results were identified in five projects. It was mainly due to unforeseen events, including: drainage channel had to be installed because of the rise of groundwater level which was not expected in EIA (No.6); additional EIA was prepared because the planned disposal site for dredged soil was occupied by informal settlers and thus additional disposal site was required (No.11).</li> </ul>	
Others			

## **ANNEX: RECEIVED PUBLIC COMMENTS**

JICA invited the comments on the "JICA Study for Review of JICA Guidelines for Environmental and Social Considerations" draft from stakeholders between 16th October and 14th November 2019, and following comments were received.

**Table 1 Comments Received from the Public**

No.	Relevant Section	Comments
1	Impacts on society: Unfair distribution of benefits, local interest, and impacts on local economy	It would be better to start work by telling the local people before the start of the project what the project can do to address the needs of the local people. In Pokhara project now:- Unfair distribution of benefits, same local interest, and impacts on local economy.
2-1	p.2-7 “Regarding the ‘2.5 Concern about Social Environment and Human Rights’, among 100 reviewed projects, no project was found which was implemented in the countries and areas in conflict or areas where the right to basic freedom (e.g. freedom of expression) and legal remedies are restricted.” (English DFR p.2-7, Japanese DFR p.2-6)	JICA must take it into consideration a broader pattern of criminalisation and intimidation against Indonesian environmental human rights defenders, including the local farmers who oppose the Indramayu coal-fired power plant project and were forced to be in jail for 5 to 6 months due to the false charge in West Java, Indonesia. So that JICA could be aware that the freedom of expression has been at stake in Indonesia.
2-2	p. 2-14, 2-15 (4) Environmental and Social Considerations by the Project Proponent in the E/S “In addition, in case of Project No.13, land acquisition was carried out and the construction of the access road had been started during the period that the components covered by E/S loan was undertaken. It was confirmed that compensation for land was paid according to the national law prior to land acquisition, partially some bank accounts for compensation were frozen due to overpayment of the compensation, farming is permitted to continue in areas where construction has not started yet, and livelihood restoration supports are provided as per the Land Acquisition and Resettlement Action Plan (LARAP) such as vocational training on welders and mushroom cultivation promotion, and employment as project workers.”	<ol style="list-style-type: none"> <li>1. In Project No. 13 (Indramayu coal-fired power plant project in West Java, Indonesia), the land acquisition and the construction of the access road and the substation started without “social acceptability” from the local affected community, especially from tenant farmers, farm workers and fishermen.</li> <li>2. The compensation payment brought big conflict and confusion among the local affected community, as the compensation for crop was paid through landowners but not directly to tenant farmers (no proper consultation with tenant farmers about such compensation) and as the compensation standards for crop have been never disclosed/disseminated.</li> <li>3. The report said that “Farming is permitted to continue” --- It is necessary because the local tenant farmers and farm workers didn’t and won’t agree the project itself, and their life would be heavily affected and get worse if they cannot continue farming.</li> <li>4. Livelihood restoration supports are not the solution to restore such farmer’s livelihood; even though they could get vocational training on welders, there is no certain stable job in the future; mushroom cultivation promotion has been no well-planned and failed to provide net profit for such program’s beneficiaries; and employment as project workers is only temporary and is usually limited to only a part of males, but totally not for females.</li> <li>5. Before the completion of LARAP, PLN started paying the compensation for land and crops. It proves no appropriate process and participation to make the LARAP.</li> <li>6. It is not reasonable and not acceptable that JICA has continuously disbursed its E/S loan for this project, while the project itself has already caused significant damages to the local community and has violated many provisions of JICA’s Guidelines. Thus, <b><u>we strongly recommend that JICA revise the relevant provision of its Guidelines,</u></b></li> </ol>

No.	Relevant Section	Comments
		<b><u>so that JICA makes sure the fulfillment of environmental and social requirements under its Guidelines even during the implementation of its E/S loan.</u></b>
2-3	<p>p. 2-20</p> <p>Project No.13 Indramayu Coal Fired Power Plant Project (E/S) (Indonesia):</p> <p>“From October 2016 to August 2018, 300 people participated in the agricultural skills-based livelihood restoration programs and the non-agricultural skills-based programs, and the programs have been continuously provided. Additionally, PAHs were allowed to continue farming on the project sites except for access roads and substation sites.”</p>	<ol style="list-style-type: none"> <li>1. One of the villages which are mainly affected by the Indramayu coal-fired power plant is Mekarsari village in Indramayu, West Java, Indonesia. The cultural root for the most of Mekarsari villagers is farming, or cultivating land for agriculture. They have a strong bond with the land. The loss of the land due to the power plant will deprive the villagers of such cultural farming and livelihood. And such impact will lead up to the poverty of the local affected community, especially tenant farmers and farm workers.</li> <li>2. Livelihood restoration programs are not the solution to restore small farmer’s livelihood; even though they could get vocational training on welders, there is no certain stable job in the future; mushroom cultivation program as well as catfish cultivation program has been no well-planned and failed to provide net profit for such program’s beneficiaries; and employment as project workers is only temporary and is usually limited to only a part of males, but totally not for females.</li> <li>3. The report said that “PAHs were allowed to continue farming on the project sites” -- - It is necessary because the local tenant farmers and farm workers didn’t and won’t agree the project itself, and their life would be heavily affected and get worse if they cannot continue farming.</li> <li>4. The construction of the access road and the substation started without “social acceptability” from the local affected community, especially from tenant farmers, farm workers and fishermen. The access roads and substation sites must have been continuously cultivated by the local farmers till now.</li> </ol>
2-4	<p>p. 2-39, 2-40</p> <p>No. 13 Indramayu Coal Fired Power Plant Project (E/S) (Indonesia)</p> <p>“The NGO pointed out since September 2017 that it is not appropriate to arrest the local residents who are protesting against the project raised the national flag upside down. The NGO also pointed out as follows: Though the affected people’s group pointed out issues on the project and submitted letters showing objection to the project and JICA finance three times, there was no response from JICA. After the fourth letter was submitted to JICA, JICA Indonesia office had a meeting with the group. After that, one more letter was submitted from the</p>	<ol style="list-style-type: none"> <li>1. The NGO pointed out since December 2017 about the illegal arrest of the local farmers who are protesting against the project.</li> <li>2. The other information and facts here are correct.</li> </ol>

No.	Relevant Section	Comments
	group, however there was no response from JICA.”	
2-5	p. 2-50 No.13: Indramayu Coal Fired Power Plant Project (E/S), Indonesia “From October 2016 to August 2018, 300 people participated in the livelihood restoration program of ‘agricultural skills-based,’ and ‘non-agricultural skills based’. This program is being provided continuously.”	Same as the Comments 2-3.
2-6	p. 3-8, 3-9 Trends of International Aid (2) The Paris Agreement	As the report mentioned, in October 2018, Intergovernmental Panel on Climate Change (IPCC) published a special report on Global Warming of 1.5 C. It has become a common understanding that the world has no space for any new coal-fired power plant. Thus, <b><u>we strongly recommend that JICA revise the relevant provision of its Guidelines, so that JICA makes sure no more support for any new coal-fired power plant, according to the international trend.</u></b>
3	【Original Comment in Japanese】 レビュー調査報告書 p. 2-9 プロジェクトの重大な変更が生じた案件については、2件が該当した。No.4 では、後発事業である Zone B（フェーズ 2）事業は、出資区域の拡大による「重大な変更」として、実施されている。No.9 については、アクセス道路コンポーネントの設計変更が「重大な変更」とされた。	【Original Comment in Japanese】 1. No. 4 ティラワ経済特別区開発事業の Zone B について、「出資区域の拡大による『重大な変更』として、実施されている。」と記載があるため、JICA ガイドラインの「プロジェクトに重大な変更が生じた場合、改めてカテゴリ分類を行い 3.2.1 に従って環境レビューを行う。変更の概要と変更後のカテゴリ分類を公開し、主要な環境社会配慮文書を入手後速やかに公開する。」という規定に基づけば、拡大した区域への「出資」決定時に「環境レビュー」が行なわれていなくてはならない。その「出資」決定時の「環境レビュー結果」（事前評価表）はどこで公開されているのか、ご教示願いたい。また、JICA として、出資を決定した日時もご教示願いたい。 2. No. 4 ティラワ経済特別区開発事業の Zone B について、JICA は出資及び融資という 2 つの異なる形態で関与をしているが、どちらであったにせよ、大規模な非自発的住民移転を伴う大規模事業について、一つの事業の「重大な変更」という認識で開発事業を進めることが妥当であったのか、検証がなされるべきである。こうした検証は、今後、同事業で次期開発区域への拡大が行われる際の出資決定がどのように行われるべきかを考えるにあたり、極めて重要であると考えます。
4	Review report references to Projects No. 4 and No. 36 (Thilawa Special Economic Zone)	1. Report Methodology 2. Failure to acknowledge correspondence provided to JICA by and on behalf of TSEZ affected persons from 2014 to date 3. Failures to implement the JICA GLs in the TSEZ

No.	Relevant Section	Comments
		<p>a) Failure to comply with environmental and social impact assessment requirements  b) Failure to adequately consult affected villagers  c) Failure to adhere to JICA Guidelines and international standards on resettlement  i. Resettled villagers from Zone A and B have experienced serious deterioration of their living standards after resettlement  ii. The Resettlement Work Plans and EIAs for Zone A and B both did not adequately explore alternatives for displacement  iii. Affected villagers from Zone A and B did not have meaningful opportunities to participate in their resettlement processes  iv. Breach of JICA GLs on the establishment of a Grievance Mechanism  d) Concerns regarding the implementation of the objection procedure</p> <p>Please find the attached submission together with Annexures 1, 2, and 3.  (*Main topics of the submission are shown in 4-1 to 4-3. Original submission except Annexures is also attached after this table.)</p>

Comment No. 4-1 to 4-3 Original submission except Annexures and personal information

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### **Introduction**

JICA has invited public comments on its review of the implementation of the JICA Guidelines for Environmental and Social Considerations (“JICA GLs”) across its projects over the past ten years, the “JICA Study for Review of JICA Guidelines for Environmental and Social Considerations Draft Final Report” (“JICA Review” or “the Review”). The comments below are submitted by EarthRights International (EarthRights), following consultations with Thilawa Social Development Group (TSDG) and representatives of the broader Thilawa community based on the environmental and social impacts of JICA’s projects in the Thilawa Special Economic Zone (TSEZ).

The development and management of the TSEZ has violated Myanmar Law, international law, and the JICA GLs and project affected persons in the TSEZ have suffered serious environmental and social impacts as a result. JICA’s Review study, however, only makes brief cursory references to the TSEZ, and paints an inaccurate picture of the efficacy and implementation of the JICA GLs in the TSEZ. This is particularly concerning given that EarthRights and other CSOs have submitted comprehensive reports on the impacts of the TSEZ to JICA from 2014 to date which provide critical insight into the implementation of the JICA GLs.

EarthRights published a briefing note in 2014 detailing the ways in which the development and management of the TSEZ violated Myanmar Law, international law, and the JICA GLs. Broadly, EarthRights noted that JICA had failed to implement its guidelines as follows:

- a) Failure to hold stakeholders accountable under the JICA GLs as the body responsible for ensuring accountability in the implementation of its cooperation project;
- b) Inadequate analysis of human rights, environmental and social considerations;
- c) Failure to provide timely support and adequate compensation to the resettled community; and
- d) Failure to ensure that affected persons were provided with adequate information to participate in decision making.

Five years later, these same issues persist.

We submit that JICA’s reporting on the TSEZ in the Review is inadequate and that the development and impacts of the TSEZ, particularly on the livelihoods of affected persons, demonstrate that both the content and implementation of the JICA GLs need to be strengthened.

These comments are confined to specific aspects of the TSEZ, and it should be noted that any omission to directly respond to statements in the JICA Review should not be deemed to indicate our acceptance of the

report's contents.

These comments are structured as follows:

1. First, we will outline concerns about the methodology of the report.
2. Second, we will detail the key correspondence that has been provided to JICA by and on behalf of TSEZ affected persons that has not been acknowledged in the report.
3. Third, we will briefly refer to the ways in which the impacts of the TSEZ projects demonstrate that JICA's projects in the TSEZ have failed to implement JICA's Environmental and Social Guidelines in the following areas:
  - a) Environmental and social impact assessment requirements;
  - b) Consultation requirements;
  - c) Resettlement requirements: including livelihood restoration and the establishment of an operational grievance mechanism; and
  - d) Objection Procedures

## **1. Report Methodology**

The report's description of its methodology is very vague.<sup>1</sup> Members of the TSDG and the community leaders have raised the question of who the report was drafted by and what process was followed, and this is not clear from the report itself.<sup>2</sup> This leaves the transparency and independence of the report open to question, and is counter to JICA GL 2.10.2 which asserts that JICA's review process is "designed to ensure transparency and accountability".

EarthRights, the TSDG and affected community members have corresponded extensively with JICA over the years (as detailed below) regarding the social and environmental impacts of the TSEZ, yet they were not consulted in the drafting of the Review Report even though two TSEZ projects are included among the 100 projects reviewed (referred to as Project No.4 and Project No.

36 in the report). Consultation with these groups in the drafting of the report and proper engagement with all of the correspondence that has been provided to JICA regarding the impacts of the TSEZ would have led to a more accurate reflection of the implementation of JICA's guidelines. The TSDG and affected community members were also not made aware of this draft report's publications and they were not contacted directly for comments on the report.

The scope of the study is confined to 100 out of 1800 projects, yet the report does not describe precisely how these 100 projects were selected. This sample of projects may not be representative of all of JICA's projects. In the context of the TSEZ, for example, the report acknowledges the significant expansion of the project area of "Project 4" in the report from Zone A into Zone B, yet the report does not cover any of the impacts of Zone B even though Zone B consists of an area of over 2000 hectares and comes with significant impacts.

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<sup>1</sup> JICA Report, p15 (1-7).

<sup>2</sup> Comments from TSDG in a meeting with EarthRights on Tuesday, 5 November 2019.

The report also uses unclear and inconsistent language to refer to the Thilawa projects themselves, which makes it challenging to respond directly to the limited references in the report. Affected persons and EarthRights have generally referred to the project areas as Zone A and Zone B, whereas the report refers to “Class-A” (Project No. 4 in the Report) and “Phase I” (Project No. 36 in the Report). It is not clear to affected persons which project the Report itself is referring to. The comments that we provide below therefore relate to both Zone A and Zone B of the TSEZ.

## **2. Failure to acknowledge correspondence provided to JICA by and on behalf of TSEZ affected persons from 2014 to date**

JICA’s Review Report has failed to acknowledge detailed information regarding the environmental and social impacts of the TSEZ that has been provided to JICA by and on behalf of affected persons from 2014 to date. The report only acknowledges that JICA has received communication from NGOs regarding the TSEZ in two cases:

### **a) Letters regarding the categorization of Thilawa Class A and Thilawa Phase 1 Project:**

JICA classified Thilawa SEZ Class A area (Project No. 4 in the Report) as a Category A project (meaning that JICA deems it to have “significant adverse impacts on the environment and society”), while it classified the Thilawa SEZ Phase 1 Project (Project No. 36 in the Report) as a Category B project (meaning that JICA believes that the impacts of the project on the environment and society are less serious than a Category A project).

The report states that JICA received letters from NGOs on 24 May 2013 and on 28 August 2017 stating that the projects should both be considered to be Category A projects because they are closely related to each other.<sup>3</sup> The report also states that “Some affected families of Class-A who resettled said they were threatened by the government by saying “Their house will be demolished if they don’t sign an agreement document for resettlement and compensation” and “if affected people want compensation for land, people have to go to a court”” however it does not state how JICA responded to this information.

### **b) Letter requesting a meeting with JICA in April 2014**

The report states that JICA received a letter from NGOs to request a meeting with JICA about investing in the development in April 2014, but that JICA did not reply and decided to invest in the project on 23 April 2014.<sup>4</sup>

JICA has therefore failed to acknowledge extensive communication and reports from EarthRights, the TSDG and other stakeholders submitted from 2014 to date.

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<sup>3</sup> JICA Review Report, page 14.

<sup>4</sup> JICA Review Report, page 69.

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Key information sources not acknowledged by JICA in the Review Report include:

- EarthRights “Briefer on the Thilawa Special Economic Zone: An Analysis of the Affected Communities’ Rights and Remedies Under Myanmar Law and JICA’s Guidelines” published in 2014.
- A letter to JICA regarding the outcome of the TSEZ objection procedure submitted to JICA in 2014.
- A report published by Physicians for Human Rights (PHR) in 2014 on the conditions of resettled villagers from Zone A, noting that several households told PHR that they put their homes up for collateral, entitled *A Foreseeable Disaster in Burma: Forced Displacement In the Thilawa Special Economic Zone*.
- A public statement from the Thilawa community on the failure of JICA and the project proponent to take into account community voices in the EIA and Resettlement Work Plan (RWP) processes in 2016.
- Correspondence from the Community Driven Operational Grievance Mechanism (CD- OGM) Design Committee regarding the proposal for the Thilawa CD-OGM and its development from 2015 to date.
- EarthRights’ analysis of the Thilawa Complaints Management Procedure (TCMP), submitted by EarthRights to JICA in February 2018.
- A social impact report consisting of a comparative analysis of the socio-economic status of households which have been relocated by the Thilawa SEZ and those which remained in their original communities which provides insight into the impact of resettlement as a result of the TSEZ on community livelihoods, submitted to JICA by Dr. Mike Griffiths, Paung Ku, and Mekong Watch in June 2018.

Table 1 in Annexure 1 (attached) provides a list of the substantive correspondence that EarthRights, Mekong Watch, and Thilawa community members have publicised and/or have provided to JICA which offers insight into the implementation of the JICA GLs. A number of these documents are referred to below in our description of non-compliance with the JICA guidelines in specific areas.

### **3. Failures to implement the JICA GLs in the TSEZ**

#### **a) Failure to comply with environmental and social impact assessment requirements**

The JICA Review does not make any specific statements about the EIA process in the TSEZ. This is concerning given that the TSEZ failed to comply with environmental and social impact assessment requirements in numerous ways, as will be detailed below.

JICA GLs require “project proponents...[to] disclose information about the environmental and social considerations of their projects” and JICA to provide assistance.<sup>5</sup> The Guidelines define environmental impacts as “including [impacts on] air, water, soil, ecosystem, flora, and fauna”<sup>6</sup> and social impacts as

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<sup>5</sup> JICA Guidelines 2.1(1).

<sup>6</sup> *Id.* 1.3 (1)

including “migration of population and involuntary resettlement, [and] local economy such as employment and livelihood.”<sup>7</sup>

Further, the JICA GLs state that “Projects must comply with the laws, ordinances, and standards related to environmental and social considerations established by the governments that have jurisdiction over project sites (including both national and local governments).” In the context of the TSEZ, the 2012 Environmental Conservation Law and the 2014 SEZ Law are relevant. The SEZ Law imposes particularly a stringent environmental standard, requiring investors to follow “international standards and norms on environmental protection.”<sup>8</sup>

All of these JICA guideline requirements have been violated in Thilawa, as seen from the inadequacy of the EIAs for Zone A and B. First, due to the lack of clarity on the industries that will be operating in each zone, the EIAs failed to provide a reliable picture of the full range of environmental impacts that would result from the TSEZ. Second, both EIAs contained highly insufficient analyses of the impacts on livelihoods or social issues associated with resettlement.

On the first point, the EIAs for Zone A and B did not properly analyze the environmental impacts that will result from the Thilawa SEZ. International best practice requires that EIAs are focused, “provid[ing] sufficient, reliable and useful information for development planning and decision-making.”<sup>9</sup> Unfortunately, both EIAs failed to provide a reliable picture of the full range of impacts that will result from the TSEZ. For one, they failed to describe the industries that will be operating in their respective zones. Without knowing exactly what type of industries will operate in the TSEZ, it is unlikely that accurate predictions on environmental, social and economic impacts of the project were made.<sup>10</sup> Despite this inadequate assessment, JICA failed to hold the Project Proponent accountable.

On the second point, the EIAs were extremely lacking in their analyses of economic impacts caused by the TSEZ. Both EIAs simply conclude that the project would be beneficial to the local economy because it will bring more jobs, without backing this conclusion up with any evidence.<sup>11</sup> According to international best practice, a proper economic impacts analysis must consider the following variables: “duration of construction and operational periods; workforce requirements for each period and phasing of construction workforce; needs (numbers to be employed during the peak phase for construction works); skill requirements (local availability); earnings; raw material and other input purchases; capital investment;

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<sup>7</sup> *Id.* 2.3(1)

<sup>8</sup> See SEZ Law § 35.

<sup>9</sup> United Nations Environmental Programme (UNEP), “Environmental Impact Assessment and Strategic Environmental Assessment: Towards an Integrated Approach,” 2004, pg. 94, *available at* [https://wedocs.unep.org/bitstream/handle/20.500.11822/8753/Environmental\\_impact\\_assessment.pdf?sequence=3&amp%3BisAllowed=](https://wedocs.unep.org/bitstream/handle/20.500.11822/8753/Environmental_impact_assessment.pdf?sequence=3&amp%3BisAllowed=)

<sup>10</sup> Zone B EIA lists the industries currently operating in the Thilawa SEZ on Table 2.7-2. On page 7-42, the EIA states that “as of March 2016, there is no clear information about what kind of industries will move into the Thilawa SEZ Zone B but it is assumed that almost the same type of industries as in Zone A will move into Zone B.”

<sup>11</sup> See Zone B EIA, pg. 7-66; Zone A EIA, pg. 7-45.

outputs; and the characteristics of the local economy.”<sup>12</sup> Except for the first and last factor, the EIA did not provide any information on these crucial elements, nor did it provide any data on why the TSEZ is expected to have a beneficial impact on the local economy.

Given the inadequate amount of information used in the analysis for the EIAs, the Project Proponent has not conducted an adequate social impact assessment as required by JICA GLs and international best practice. JICA should have held the Project Proponent accountable on this matter yet failed to do so, yet this has not been acknowledged in the JICA Review Report.

**b) Failure to adequately consult affected villagers**

The JICA Review Report does not provide specific details on its adherence to its guidelines regarding consultation in the TSEZ area at all, therefore we wish to provide further detail and context in this regard.

In the JICA GLs, JICA states that “[d]emocratic decision-making is *indispensable* for environmental and social considerations,” and that “[i]t is important to ensure stakeholder participation, information transparency, accountability, and efficiency, in addition to respect for human rights, in order to conduct an appropriate decision-making process.”<sup>13</sup> Further, the GLs note – as one of its seven most important principles – that “JICA asks stakeholders for their participation,” “incorporate[ing] stakeholder opinions into decision-making processes regarding environmental and social considerations by ensuring the meaningful participation of stakeholders in order to have consideration for environmental and social factors and to reach a consensus accordingly.”<sup>14</sup>

For Category A projects like the TSEZ, “JICA encourages project proponents etc. to consult with local stakeholders about their understanding of development needs, the likely adverse impacts on the environment and society, and the analysis of alternatives at an early stage of the project, and assists project proponents as needed.”<sup>15</sup> Further, JICA itself is required to gather stakeholder opinions.<sup>16</sup>

None of these guidelines were properly followed in the context of the TSEZ, particularly in relation to EIA consultations and disclosure for both Zone A and B. In both processes, consultations were not effectively advertised, local stakeholders (including NGOs) were not adequately involved, participation at the consultations were insufficient, and the EIAs themselves were not disclosed in an accessible manner. JICA’s statement in the review report that “[r] Regarding approval, disclosure and availability of copying EIAs, it is confirmed that all category A projects except 5 projects [Thilawa not listed among these

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<sup>12</sup> The UNEP report on international best practice on EIAs states that “[w]ithout reliable information on these factors it is very difficult to implement an economic impact assessment. It is vital to attempt to obtain such data – if this does not occur, then not only economic impacts but also social and health impacts will not be predicted adequately.” UNEP, “Environmental Impact Assessment and Strategic Environmental Assessment: Towards an Integrated Approach,” 2004, pg. 142.

<sup>13</sup> JICA Guidelines 1.1.

<sup>14</sup> JICA Guidelines 1.4.

<sup>15</sup> JICA Guidelines 2.4.4.

<sup>16</sup> JICA Guidelines 3.1.2.3.

exceptions] fulfilled these requirements” is therefore not accurate.<sup>17</sup>

First, the EIA for Zone A failed to mention whether one of the most crucial project-related information, the draft of the EIA, was ever disclosed to the public. Without the opportunity to access the EIA draft, it is not possible for local stakeholders to have meaningfully contributed to its drafting. Furthermore, the consultations for the Zone A EIA were not adequately advertised. Zone A EIA simply states that “township officer informed to the local residence” about the consultations.<sup>18</sup> To comply with JICA’s requirement on meaningful stakeholder participation, many more means should have been employed to disclose the consultation schedule. Given the dearth of proper information-sharing, it was unsurprising that no affected villager participated in either of the consultations for the Zone A EIA.<sup>19</sup> Since none of the villagers were properly consulted, it was clear that Project Proponent failed to meet the requirement of meaningfully incorporating villagers’ views in designing the EIA and EMP for Zone A, and JICA likewise failed to meet its own requirement of involving stakeholder views in decision-making.

As for the Zone B EIA, while the report contains more evidence of participation from affected villagers, it similarly suffered from a lack of information-sharing platforms.<sup>20</sup> The EIA stated that the scoping report and draft EIA report were shared at public places, but failed to mention any media outlets or online platforms. The public places where the reports were disclosed were mainly administrative offices, not places of frequent public gatherings such as libraries and community halls.<sup>21</sup> Therefore, it is unlikely that affected stakeholders had adequate access to the information necessary to meaningfully participate in the consultations.

Furthermore, while the Zone B EIA referred to comments received on the draft EIA report,<sup>22</sup> it failed to explain what changes were made to the final EIA in response to these comments. Thus, it is unclear whether the Project Proponents actually complied with the requirement that affected villagers’ views are incorporated into the EIA, EMP, and overall decision-making process.

Lastly, in the consultations for both EIAs, civil society organizations (CSOs) were not adequately involved.<sup>23</sup> While Zone B EIA claimed that CSOs were part of the scoping and draft EIA consultations,

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<sup>17</sup> JICA Review, p 51 (2-22).

<sup>18</sup> See Zone A EIA, pg. 10-1.

<sup>19</sup> While the EIA report claimed that 6 villagers participated in the second consultation, EarthRights found that three are village administrators and the other three are village heads, all of whom are paid by the government, a project proponent. See EarthRights International, *Analysis of EIA for Phase I of Thilawa SEZ*, Nov. 2014, pg. 8, available at [https://earthrights.org/wp-content/uploads/thilawa\\_eia\\_analysis.pdf](https://earthrights.org/wp-content/uploads/thilawa_eia_analysis.pdf).

<sup>20</sup> Unlike the EIA report for Zone A, Zone B’s EIA details a greater number of consultations, provides attendance lists and a list of villagers’ comments.

<sup>21</sup> The list of public disclosure places for Zone B’s EIA can be found in “Table 11.3-5 Summary of Public Disclosure for Draft EIA Stage” of the report.

<sup>22</sup> See *id.*, Table 11.3-6 Brief Summary of Public Comments and Responses.

<sup>23</sup> The EIA Procedure lists civil society as one of the groups project proponents are required to consult. See EIA Procedure, § 50, 61.

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the attendance list did not show any CSOs participating.<sup>24</sup> Zone A EIA mentioned that an environmental consultancy company and an academic institution participated in the consultations,<sup>25</sup> but there was no evidence of participation from any of the numerous advocacy organizations actively engaged with the Thilawa SEZ. This is alarming given that the JICA Guidelines define “local stakeholders” as “affected individuals or groups (including illegal dwellers) and *local NGO*” (emphasis added).<sup>26</sup>

Altogether, it is clear that the JICA requirement of meaningful stakeholder participation was not fulfilled in the EIA processes for both Zone A and B, due to numerous problems concerning the disclosure of draft EIAs, advertising of the consultations schedule, and NGO involvement. JICA failed to hold the Project Proponent accountable for this violation, which is all the more alarming given that the TSEZ is a Category A Project that requires heightened involvement of local stakeholders.

### c) Failure to adhere to JICA Guidelines and international standards on resettlement

In the JICA Review, limited references to livelihood restoration are made<sup>27</sup> as there appear to have been insufficient livelihood analysis to date, in spite of the fact that a comprehensive social impacts analysis has been shared with JICA (Annexure 2 attached).<sup>28</sup> We refer to this report and to the JICA Review’s limited references to livelihood restoration below where relevant.

The JICA Guidelines contain extensive requirements concerning involuntary resettlement. Key requirements include: fully exploring alternatives to displacement and avoiding displacement when possible;<sup>29</sup> appropriate participation of affected people in the planning, implementation and monitoring

<sup>24</sup> On page 11-12, the Zone B EIA claims that NGOs participated in the consultations. The attendance lists in Annex 11-3 and 11-8 do not include any civil society organization representatives.

<sup>25</sup> See Zone A EIA, Table 10.2-1 and Table 10.3-1.

<sup>26</sup> JICA Guidelines 1.3.12.

<sup>27</sup> **JICA Report statements on the monitoring of compensation and livelihood restoration**

**a) Livelihood restoration for the port sub-project (Thilawa Area Phase I):**

**i)** JICA states that the project proponent states that they have completed social monitoring of the compensation payments. However, JICA says that they have not undertaken monitoring of livelihood restoration because it was difficult for them to follow up because people from project-affected households moved to different addresses after they received their compensation. JICA states that it has asked the project proponent to continue to try to follow up on livelihood restoration. (JICA Review at p39)

**ii)** JICA also states that, according to the Resettlement Action Plan, the port development section planned to promote job opportunities for project affected households. However JICA states that affected persons did not ask for this after their compensation was paid, therefore there has been no livelihood restoration. (JICA Review at p39 and p74)

**b) Compensation and livelihood restoration for the power transmission line and substation subproject:** JICA states that social monitoring of the crop compensation payment to affected households for farmland that was affected by the transmission towers was completed, and that compensation was paid without any problems. JICA states that the livelihood restoration was not conducted here because no significant impact on livelihood was expected. (JICA Report at p14)

**c) Compensation and livelihood restoration for the gas pipeline sub-project:** JICA states that monitoring for compensation payment has been implemented, but that follow up surveys for livelihood restoration monitoring were difficult because the three households were “grazers”. (JICA Report at p69)

<sup>28</sup> Mike Griffiths, Using Vulnerability mapping to measure medium term impact of relocation and resettlement by Special Economic Zones (SEZ): Thilawa SEZ, Yangon Region, Myanmar, Feb. 2018, pg. 2, available at [http://www.mekongwatch.org/PDF/Thilawa\\_Vulnerability\\_Research\\_Feb2018.pdf](http://www.mekongwatch.org/PDF/Thilawa_Vulnerability_Research_Feb2018.pdf).

<sup>29</sup> See JICA Guidelines Appendix 1(1). World Bank and Asian Development Bank guidelines on involuntary resettlement also mandate that project proponents avoid involuntary resettlement is avoided where possible. See United Nations, Basic Principles And Guidelines On Development based Evictions And Displacement, available at [https://www.ohchr.org/Documents/Issues/Housing/Guidelines\\_en.pdf](https://www.ohchr.org/Documents/Issues/Housing/Guidelines_en.pdf); World Bank (WB) Safeguard Policy, OP 4.12, Annex A, ¶2(a); Asian Development Bank (ADB) Safeguard Policy Statement (SPS) Appendix 2, Safeguards Requirement 2: Involuntary Resettlement ¶3.

of resettlement action plans;<sup>30</sup> and sufficient compensation and restoration of affected people's livelihoods.<sup>31</sup> Similar requirements are also found in guidelines from the World Bank, International Finance Corporation, and the Asian Development Bank, and JICA must "confirm" that projects do not deviate significantly from such standards.<sup>32</sup>

The resettlement process of Zone A and B have not complied with the aforementioned requirements of JICA Guidelines and international standards. Each of the requirements will be examined separately below.

**i. Resettled villagers from Zone A and B have experienced serious deterioration of their living standards after resettlement**

JICA Guidelines require that "people who must be resettled involuntarily and people whose means of livelihood will be hindered or lost must be sufficiently compensated and supported by project proponents etc. in a timely manner." Further, it notes that "[h]ost countries must make efforts to enable people affected by projects and to improve their standard of living, income opportunities, and production levels, or *at least to restore these to pre-project levels*"<sup>33</sup> (emphasis added). International best practice and Myanmar law<sup>34</sup> similarly require that affected villagers are not left in a worsened socioeconomic position after resettlement.

Contrary to JICA Guidelines, Myanmar law, and international best practice, the Project Proponent and the Myanmar Government have failed to ensure that displaced people's standards of living are maintained. It is clear from the current situation of resettled villagers that they are worse off socially and economically after resettlement. In early 2018, a detailed social impacts report (Annexure 2 attached) was conducted and compared vulnerability levels of relocated households with non-relocated ones, and found that relocated households had "significantly higher rates of vulnerability related to economic dependency, debt and lack of livelihood/income diversity."<sup>35</sup> The study, which was shared with JICA in early 2018, found

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<sup>30</sup> See JICA Guidelines Appendix 1 (3) and (4). See also United Nations, Basic Principles And Guidelines On Development based Evictions And Displacement, ¶56(I) ("The entire resettlement process should be carried out with full participation by and with affected persons, groups and communities. States should, in particular, take into account all alternative plans proposed by the affected persons, groups and communities.")

<sup>31</sup> See JICA Guidelines Appendix 1 (2). See also World Bank Safeguard Policy, OP 4.12, Annex A, ¶2(c) ("Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher."); ADB, SPS Appendix 2, Safeguard Requirement 2, ¶ A(1); International Finance Corporation (IFC), Performance Standard 2, ¶ 2.

<sup>32</sup> JICA Guidelines 2.6 (3).

<sup>33</sup> *Id.*

<sup>34</sup> The Myanmar 2014 SEZ Law requires the developer or investor to "relocate the persons so as not to lower their original standard of living" and "fulfill their fundamental needs," bearing all expenses involved in this process. See SEZ Law § 80(a)-(b); EIA Procedure §102, Annex 3, No. 12. Similarly, the EIA Procedure assigns "full legal and financial responsibility for Project Affected People (PAPs) until they have achieved socio-economic stability at a level not lower than that in effect prior to the commencement of the Project" to the Project Proponent(s). See EIA Procedure §102. If the Proponent(s) fails to restore relocated villagers to their original social conditions after resettlement, it can be penalized through a monetary fine and/or suspension of the EMP approval. See EIA Procedure, Annex 3, No. 12.

<sup>35</sup> Mike Griffiths, Using Vulnerability mapping to measure medium term impact of relocation and resettlement by Special Economic Zones (SEZ): Thilawa SEZ, Yangon Region, Myanmar, Feb. 2018, pg. 2, *available at* [http://www.mekongwatch.org/PDF/Thilawa\\_Vulnerability\\_Research\\_Feb2018.pdf](http://www.mekongwatch.org/PDF/Thilawa_Vulnerability_Research_Feb2018.pdf).

that “relocated households not only have lower levels of income, but are more likely to have expenditure in excess of annual income, and higher rates of debt and debt interest repayment rates.”<sup>36</sup> It also noted that “[d]ue to a greater reliance on food purchases, and income insufficiency, relocated households reported higher rates of food insecurity, and nearly one-third reported taking loans to meet food shortages in the past year.”<sup>37</sup> These findings, which were completed five years after the first group of villagers relocated due to the Thilawa SEZ, clearly provide quantitative and qualitative evidence that demonstrates that villagers are far from being restored to their original conditions.

In the context of livelihood restoration for “the port sub-project (Thilawa Area Phase I),” the representatives of the TSDG state that JICA’s justification for its failure to undertake monitoring of livelihood restoration, namely that it was “difficult” to do so because some people from project affected households moved after receiving their compensation,<sup>38</sup> is poor. While it is true that some people from project affected households have moved, it would be very easy for the project proponent to establish where affected persons have moved to if they made genuine attempts to do so, as friends and family in TSEZ area all aware of where others have moved to.<sup>39</sup>

The income restoration program provided to villagers has been largely unsuccessful in assisting their transition from land-based livelihoods to alternative ones. Villagers from both Zone A and B have reported that the vocational activities were not useful in finding employment.<sup>40</sup> Despite the developer’s promise that villagers will have access to abundant jobs at the SEZ, very few villagers have been able to get these jobs because of qualification barriers.<sup>41</sup> Due to increased expenses and lack of ability to find income, countless resettled villagers have been forced to borrow from high- risk lenders using their new homes as collateral, many of them eventually losing their homes.<sup>42</sup> Where JICA states in the Review Report that, in the context of the port sub-project, it did not promote job opportunities because “affected persons did not ask for this after their compensation was paid”, TSDG representatives state that this is not true as many community members applied for jobs but were not offered positions because the training that they

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<sup>36</sup> *Id.*

<sup>37</sup> *Id.*

<sup>38</sup> JICA Review Report, page 49.

<sup>39</sup> Comments from TSDG in a meeting with EarthRights on Tuesday, 5 November 2019.

<sup>40</sup> At an interview with EarthRights staff on July 26, 2019, villagers resettled from Zone B as well as community leaders, who are members of the Thilawa Social Development Group (TSDG) stated that vocational training activities has not been effective in helping resettled villagers get a job. A TSDG member stated that the message given to villagers was that it is easy to get a job at the SEZ, but this has not been the case. He discussed his son as an example, noting that he was unable to get a job at the TSEZ for three years despite having all application documents in order. He also noted that many jobs have qualification barriers which most villagers cannot meet. Resettled villagers from Zone B stated that vocational training activities, such as driving, had been offered to them, but there was low interest and not many villagers participated. They noted that even the villagers who did participate did not get a job at the SEZ.

<sup>41</sup> *See id.*

<sup>42</sup> In 2014, Physicians for Human Rights (PHR) published a report on the conditions of resettled villagers from Zone A, noting that several households told PHR that they put their homes up for collateral. Physicians for Human Rights (PHR), *A Foreseeable Disaster in Burma: Forced Displacement In the Thilawa Special Economic Zone*, November 2014, pg. 14. November 2014, pg. 16, available at <http://physiciansforhumanrights.org/library/reports/a-foreseeable-disaster-in-burma.html>. Also, in the interview on July 26, 2019 with three resettled villagers from Zone B, the interviewees noted that out of the 95 households in his resettlement village, there are only 36 households remaining. They stated that the rest had lost their homes due to being unable to pay their high-interest loans.

received did not match the qualification requirements of the jobs that were on offer.<sup>43</sup>

Despite clear indications that affected villagers from Zone A have not been restored to previous income levels, TSMC considers them to be fully restored and no longer needing income restoration support,<sup>44</sup> and JICA has failed to take action to hold the Project Proponent accountable. While income restoration activities are still underway for resettled Zone B villagers, they are offered largely the same activities as those offered to Zone A villagers,<sup>45</sup> and their income restoration status so far seems to be following a similar trajectory.<sup>46</sup> It is clear from the current situation of relocated villagers that the Project Proponent and the Myanmar Government have breached their obligation under JICA Guidelines, international best practice, and Myanmar law to ensure that resettled villagers are restored to their original conditions, failing to take full legal and financial responsibility for them.

Additionally, villagers have suffered various deprivations after resettlement, due to improperly constructed wells, latrines, and waste management facilities.<sup>47</sup> While physical conditions of the resettlement site have been improved since then, employment remains a pivotal element of resettled villagers' fundamental needs, and this need continues to be unmet. Furthermore, it is alarming that compensations promised to some villagers during the pre-relocation consultations, including the vulnerability stipend, have been allegedly unpaid, despite villagers sending multiple letters to the TSMC and MJTD.<sup>48</sup>

## **ii. The Resettlement Work Plans and EIAs for Zone A and B both did not adequately explore alternatives for displacement**

JICA Guidelines and International best practice requires project proponents to fully explore alternatives to involuntary displacement, avoiding it where possible.<sup>49</sup> The analysis of alternatives should include not only alternatives to proposed project area, but also technology, design and operation.<sup>50</sup>

<sup>43</sup> JICA Review Report, at page 79 and page 205.

<sup>44</sup> The third Social Economic Survey report released by the TSMC, which compiled information on the income restoration status of resettled villagers from Zone A, stated that resettled villagers' conditions were largely "stabilized" and many of them had found income sources. After this report, no further monitoring reports were published, and the website states that the initial vocational training program has been concluded as of June 2014. In the periodic newsletters published by the TSMC on vocational activities, no activities for resettled villagers from Zone A are included. TWA, "3rd Socio-Economic Survey (SES) on the Resettlement and Income Restoration Program for Development of Thilawa Special Economic Zone (Phase 1 Area), available at <http://irp.myanmarthilawa.gov.mm/sites/default/files/3rd%20SES%20%28English%20Version%29.pdf>.

<sup>45</sup> The RWP for Area 2-2 of Zone B states that "similar vocational training options can be offered to the PAHs of Area 2-2 East after discussions with PAHs." Essentially, the same activities have been offered to resettled villagers from Zone B, which consists of mainly driving and sewing training. See RWP, Area 2-2, pg. 42. Like resettled villagers from Zone A, Zone B villagers complained during the interviews in July 2019 that they were unable to get jobs at the SEZ and had no viable source of income.

<sup>46</sup> The aforementioned PHR report found that residents have been relocated on a plot less than half an acre. See *id.*

<sup>47</sup> For more information, see *supra* "II. Background" of this report; See also PHR, *A Foreseeable Disaster in Burma: Forced Displacement In the Thilawa Special Economic Zone*.

<sup>48</sup> At the July 2019 interview with resettled villagers from Zone B, one interviewee mentioned that he was promised a compensation package of 120,000 lakh total but have not received yet, despite having moved in 2017. He stated that he sent several letters to the TSMC and MJTD but have not received a reply.

<sup>49</sup> See *supra* note 22.

<sup>50</sup> The notion that analysis of alternatives to involuntary resettlement must involve more than just a consideration of

In both Zone A and B, Project Proponents did not properly explore alternatives to displacement. The EIA for Zone A and B both stated that alternative areas were considered for the project,<sup>51</sup> but failed to mention any alternatives for project design, technology, or operation. Further, the alternative project area analyses presented in the EIAs were inadequate. For example, the EIA for Zone A stated that alternative areas were considered but failed to mention where these areas were.<sup>52</sup> Also, it failed to compare the selected project design with the “without project” situation, contrary to international best practice.<sup>53</sup>

While Zone B’s EIA contained a more thorough analysis, including a comparison with the “no project” scenario,<sup>54</sup> it nonetheless failed to consider other ways of decreasing or avoiding involuntary displacement besides choosing alternative project areas. Also, the “no project” scenario analysis was riddled with unsubstantiated assumptions – the EIA concluded that it would be better to have the project in the proposed area rather than not because without the project, there will be disorderly development in the area, jobs would not increase, and economic development would be overall limited.<sup>55</sup> There were no figures to substantiate these projections, and the EIA failed to contemplate alternative development projects that could stimulate economic growth without involuntary displacement.

Alarming, most Resettlement Work Plans (RWPs) for Zone A and B drafted by the YRG failed to mention the consideration of any alternatives. While the RWP for Area 2-2 mentioned alternatives, it simply referred to the analysis already done in the EIA for Zone B without adding anything new.<sup>56</sup>

Considering alternative project areas is only one piece of the puzzle for exploring alternatives to displacement. Due to the inadequate analysis contained in the RWPs and EIAs, the Project Proponent have failed to comply with international best practice and JICA Guidelines, and JICA has failed to hold it accountable.

### **iii. Affected villagers from Zone A and B did not have meaningful opportunities to participate in their resettlement processes**

Contrary to international best practice and JICA Guidelines,<sup>57</sup> resettled villagers from both zones were

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alternative project areas is grounded in international best practice. For example, ADB’s sourcebook states that “Project design can reduce involuntary resettlement impacts in varied ways. Technical design elements such as alignments for roads, railways, power lines, canals, and embankments can be carefully altered to minimize their effects on heavily populated areas or agricultural lands. Rights of way can sometimes be narrowed. Infrastructure or borrow pits can be located on land of low value. Water and sewerage pipes can be run along existing road corridors. The dam height for reservoir projects might be lowered to reduce the inundation area while still providing reasonable storage. Buffer walls might be utilized to minimize noise or other environmental effects which might otherwise have led to relocation.” ADB, *Involuntary Resettlement Safeguards A Planning and Implementation Good Practice Sourcebook – Draft Working Document*, ¶66, <https://www.adb.org/sites/default/files/institutional-document/32827/files/ir-good-practices-sourcebook-draft.pdf>.

<sup>51</sup> See Zone A EIA, Section 3.2; See Zone B EIA, Section 3.3.

<sup>52</sup> See Zone A EIA, Section 3.2.

<sup>53</sup> See *id.*

<sup>54</sup> See Zone B EIA, Section 3.3.

<sup>55</sup> See *id.*

<sup>56</sup> Yangon Regional Government (YRG), Resettlement Work Plan for Area 2-2, pg. 36.

<sup>57</sup> See *supra* note 23.

not given meaningful opportunities to participate in their relocation processes. For one, they received a letter in 2013 demanding them to relocate in 14 days or spend 30 days in jail, before any consultation took place. The Project Proponent did not deem villagers' opinions as important in the resettlement process at all, attempting to unilaterally force them to vacate their homes.

While four consultations for Phase I of the Thilawa SEZ were arranged after villagers and CSOs objected, these consultations were plagued by lack of transparency and coercion. As explained earlier in this report, villagers reported that they were pressured by authorities to sign compensation agreements, given agreements that they did not understand, and were not allowed to retain copies of it after signing. Also, they stated that they were not given clear information about compensation amounts, and that compensation amounts sometimes differed among villagers.<sup>58</sup>

While some improvements were made for the consultation process of Zone B, with more detailed meeting notes and comments from villagers documented in the RWPs, it also failed to comply with international best practice. First, there have been allegations that community leaders have been barred from attending consultations since 2016.<sup>59</sup> Hence, it is possible that the consultations were not truly open forums for all villagers to participate and voice their opinions. Furthermore, while villagers noted that they were able to voice their concerns during consultations, they shared that they are now frustrated because they had been given misleading information at these meetings.<sup>60</sup> They have reported that many of the promises made during the consultations had not been fulfilled more than a year after relocation.<sup>61</sup> The lack of follow-up on commitments made at the resettlement consultations signifies that villagers did not have a meaningful opportunity to participate in their resettlement process. Without accurate information, their participation could not have been meaningful, as the feedback they gave at these meetings were based on the information presented by the developers.

Additionally, for both zones, many villagers did not have a proper opportunity comment on their RWP. Zone A's RWP simply stated that the workplan is planned to be disclosed to the public, without stating how long it will be disclosed, where it will be disclosed, and whether villagers will be able to comment.<sup>62</sup> Given this lack of details, villagers were likely unable to comment meaningfully on their RWP at all. Furthermore, while the RWPs for Zone B (Area 2-1, 2-2, 2-1 expanded) were disclosed for villagers to comment, there was a wide discrepancy in disclosure times, ranging from 40 days to 2 weeks.<sup>63</sup> Two weeks is not enough time to comment on a RWP, and hence several affected villagers did not have a meaningful opportunity to participate in the RWP drafting process.

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<sup>58</sup> For example, during the aforementioned July 2019 interview with resettled villagers from Zone B, one interviewee stated that those that had good relations with authorities got better compensation and that his compensation was calculated incorrectly, but he had no choice but to accept the incorrect, lesser amount.

<sup>59</sup> EarthRights International, Interview with three TSDG members, July 26, 2019.

<sup>60</sup> EarthRights International, Interview with resettled villagers from Zone B, July 26, 2019.

<sup>61</sup> *Id.*

<sup>62</sup> See Yangon Regional Government, "Resettlement Work Plan (RWP) for Development of Phase 1 Area Thilawa Special Economic Zone (SEZ)," Nov. 2013, pg. 38.

<sup>63</sup> The RWP disclosure period for Area 2-1 was 40 days, while the same for Area 3-1 was 2 weeks.

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Currently, the consultation process for the resettlement of villagers from Area 2-2 West of Zone B is underway. Despite the fact that nearly half the villagers from that area are Tamil speakers, all consultations and resettlement documents have been done in Burmese. Effectively, about half of the affected population has been barred from public participation in the resettlement process. Even the most basic resettlement-related information, such as the RWP, have not been presented in a manner that is understandable to a significant proportion of villagers.<sup>64</sup> Therefore, the consultation process for Area 2-2 West, too, do not seem to comply with international standards and JICA Guidelines on meaningful engagement and consultations.<sup>65</sup>

Lastly, in a recent interview with TSDG members, community leaders reported that villagers were being threatened against cooperating with NGO by MJTD and the government authorities.<sup>66</sup> This is a highly troubling development that flies directly in the face of encouraging affected villagers to share their opinions and advocate for their preferences.

To adhere to the guidelines on meaningful stakeholder participation in involuntary resettlement processes, JICA must hold the Project Proponent accountable and ensure that villagers are able to contribute meaningfully to decision-making concerning their own resettlement.

Altogether, many of relocated villagers' fundamental needs remain unmet, and JICA must urge the Project Proponent and Myanmar Government to fulfill its responsibilities under its Guidelines on involuntary resettlement.

#### **iv. Breach of JICA GLs on the establishment of a Grievance Mechanism**

Section 7.3 of "Appendix 1: Environmental and Social Considerations Required for Intended Projects" of the JICA GLs states that "appropriate and accessible grievance mechanisms must be established for affected people and their communities" in cases of involuntary resettlement.

JICA states in its Review Report that grievance mechanisms have been established in 43 of 44 Category A and Category B Projects, including Thilawa. No further information on the nature of the Thilawa grievance mechanism is provided. The report fails to acknowledge that even though community members were first relocated in Thilawa in 2013, no grievance mechanism was established in TSEZ until 2017. JICA and its project proponents were therefore operating in breach of GL Appendix Section 7.3 for a period of four years. Community members first sought to develop a grievance mechanism since in late 2014 and early 2015. In 2015, stakeholders discussed an interim mechanism, but all backed out when the

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<sup>64</sup> The RWP for Area 2-2 West has been released only in English and Burmese.

<sup>65</sup> International guidelines on resettlement require that information is presented to PAPs in a language that is understandable. *See e.g.* ADB, SPS Appendix 2, Safeguard Requirement 2, ¶15.

<sup>66</sup> Earth Rights International, Interview with TSDG Members, July 26, 2019.

community members tried to use it. So not only did the project proponent fail to have a grievance mechanism in place, but they actively rejected efforts to create one.

As JICA and the project proponents know, the failure of JICA and the project proponents to adhere to international standards and to the JICA GLs and establish an accessible and appropriate grievance mechanism for such an extended period led community members in Thilawa to establish a Design Committee who together with the TSDG began to develop a Community Driven Operational Grievance Mechanism (CD-OGM) in consultation with the broader population. The Design Committee shared a brief and proposal for the CD-OGM with JICA and the project proponent in 2016 and the CD-OGM has since been discussed extensively with stakeholders from JICA, the Thilawa SEZ Management Committee (TSMC), and Myanmar Japan Thilawa Development Limited (MJDT). However, subsequent to this process, in November 2017, the TCMC and MJDT elected to launch an entirely separate grievance mechanism, the Thilawa Complaints Management Procedure (TCMP), without consulting with the Design Committee or affected community members.

The development of the TCMP therefore appears to have actively declined to meet a core requirement of the United Nations Guiding Principles on Business and Human Rights (UNGPs), namely that a grievance mechanism should be “based on engagement and dialogue”. Beyond this, the Design Committee, the TSDG and EarthRights have a number of concerns about the TCMP as its development and its procedure fall short of international standards in numerous ways, as detailed in EarthRights’ analysis of the TCMP (Annexure 3 attached). EarthRights sent this analysis to JICA’s offices in Myanmar and in Japan in February 2018 yet the issues that it raises are not reflected in the Review Report.

This is a significant failing of the JICA Review Report. JICA GLs should be strengthened to include detailed substantive criteria to assess whether the development and substance of grievance mechanisms aligns with the UNGPs and other international standards.

In a meeting with EarthRights in November 2019, one community member stated that a complaint that he had lodged through the TCMP has gone unresolved for a full year.

In 2019, because the stakeholders refused to make improvements to the TCMP based on feedback received, EarthRights sought an external expert to review both the TCMP and the CD-OGM. EarthRights and/or other stakeholders may elect to submit supplementary comments based on this review.

#### **d) Concerns regarding the implementation of the objection procedure**

JICA acknowledges in its report that a formal objection to the “Thilawa Class A Project” was raised in 2014 and that it proceeded to the investigation by JICA Examiners. JICA states that non-compliance with its guidelines was not confirmed, but that the examiners advised JICA and the project proponents to work

to find a solution to the issues raised in the objection.<sup>67</sup> As demonstrated by the discussion above, many of the issues raised in the objection (such as loss of livelihood opportunities and a failure to incorporate community voices into decision making, among others) remain largely unresolved. One of the outcomes that followed the objection procedure was that the MJTD verbally offered three acres of common land to affected persons for the purposes of growing vegetables for home use, however a land dispute with the original owner of the land in question prevented affected persons from commencing activities on this land. This issue was raised by affected persons at an annual meeting with JICA earlier this year and JICA stated that it would revert back to affected persons, however it has not yet done so.<sup>68</sup>

JICA does not suggest any need to review its freestanding objection procedures in the Review Report. We submit that JICA should take this review opportunity to assess the objection procedures at the same time as the JICA GLs, since the objection procedures provide an important mechanism for communities to assert their rights. At the time of making this submission, we have not had the opportunity to consult with affected persons in the TSEZ regarding the nature of amendments to be made to the objection procedures based on their experience of the objection process. Should affected persons wish to make submissions, supplementary comments will be submitted on this issue at a later stage.

### **Concluding statements**

While we recognise that it would not be practical for the JICA Review Report to canvas all 100 of its review projects in this level of detail, we submit that the inaccurate and incomplete manner in which the effects of the TSEZ projects have been reviewed is problematic. The fact that the report does not paint an accurate picture of the impacts of the TSEZ projects has the effect that it fails to accurately assess the efficacy of the JICA Guidelines. This defeats the purpose of this review as a whole. Selective reporting on the implementation of the Guidelines means that key gaps in the guidelines will be obfuscated, and opportunities to strengthen the Guidelines to better align with their overall purpose will be missed.

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<sup>67</sup> JICA Report, page 205.

<sup>68</sup> EarthRights meeting with TSDG members on Tuesday, 5 November 2019.