

Environmental and social eligibility criteria for bioenergy sub-projects/sub-investments



European Bank
for Reconstruction and Development

The environmental and social (E&S) eligibility criteria in this note have been prepared to assist and support EBRD partner financial intermediaries (FIs) interested in providing financing to sponsors/developers of bioenergy sub-projects/sub-investments.

This note sets out the specific E&S criteria that FI sub-loans involving bioenergy must meet to qualify for Green Economy Transition (GET) financing. The criteria, therefore, correspond to the requirement of Performance Requirement 9 (PR9) on financial intermediaries, as set out in the EBRD's Environmental and Social Policy 2019, which states that the "EBRD may require FIs to adopt and implement environmental and social requirements, depending on the nature of the FI, its business activities, and the level of environmental and social risks and impacts associated with its portfolio and sub-projects, as applicable."¹ Prior to approval for receipt of EBRD proceeds, all bioenergy sub-projects and sub-investments are subject to review against these criteria by the Bank's Environment and Sustainability Department.

In this note, the term "sub-project/sub-investment" refers to the bioenergy sub-project/sub-investment being considered for financing, including all of its associated facilities, as defined by the EBRD 2019 Environmental and Social Policy.

This typically includes, but is not limited to, access roads, temporary sites, borrow and spoil areas, feedstock storage areas, pipelines and connection to the grid. The sub-project/sub-investment includes four temporal elements: 1) planning and siting of the facility, 2) construction, 3) operation and maintenance, and 4) decommissioning, all of which are discussed here. The eligibility criteria are specific to new or greenfield sub-project/sub-investments and extensions to or remodelling of existing facilities. The scope of the sub-project/sub-investment also includes its supply chain, as defined by PR1 of the EBRD 2019 Environmental and Social Policy.

The term "developer/sponsor" refers to the sub-borrower/investee that owns the sub-project/sub-investment and receives indirect EBRD financing.

The eligibility criteria below are organised with reference to the EBRD Performance Requirements (PRs) set out in the 2019 Environmental and Social Policy. The key issues provided below include typical sub-projects/sub-investments and technologies used in constructing a bioenergy sub-project/sub-investment, but may not be exhaustive. Proposed sub-projects/sub-investments that use atypical construction or operational methods may require additional evaluation.

Table 1. E&S eligibility criteria that FI sub-projects/sub-investments must meet to qualify for GET finance

EBRD ESP 2019	Issue	Eligibility criteria	Evidence
PR1: Assessment and management of environmental and social risks and impacts	Regulatory compliance: The sub-project/sub-investment, or its associated facilities may not have all the necessary permissions and permits required under national law.	<ul style="list-style-type: none"> The sub-project/sub-investment must comply with all requirements of national environment, health and safety, and labour laws. The sub-project/sub-investment must have obtained all applicable local planning and zoning approvals to allow for the sub-project/sub-investment development. 	<ul style="list-style-type: none"> For new developments, if required by law, the developer/sponsor has undertaken an environmental impact assessment (EIA) and the EIA has been disclosed to the public in accordance with national requirements. The developer/sponsor has obtained the required national licences and permits to build (in case of new developments) or operate (in case of existing facilities) the sub-project/sub-investment. For new developments the developer/sponsor has obtained the required local planning and zoning board approvals required to build and operate the sub-project/sub-investment.

¹ See EBRD (2019).

EBRD ESP 2019	Issue	Eligibility criteria	Evidence
PR1: Assessment and management of environmental and social risks and impacts	The sub-project/sub-investment may fall under the Category A list of Appendix 2 of the 2019 EBRD Environmental and Social Policy.	<p>The developer/sponsor has assessed and demonstrated that the sub-project/sub-investment:</p> <ul style="list-style-type: none"> • does not include installations for the manufacture on an industrial scale of substances using chemical conversion processes • does not result in the construction of motorways or lines for long-distance railway traffic • does not require pipelines, terminals or facilities for the large-scale transport of final products • is not directly associated with large-scale deforestation or primary agriculture/forestation intensification, land-use change or conversion of priority biodiversity features and/or critical habitats • does not include the construction of high-voltage overhead electrical power lines • is not intended or likely to have a perceptible impact on sensitive locations of international, national or regional importance • will not result in significant adverse social impacts on local communities or other sub-project/sub-investment-affected parties • will not involve significant involuntary resettlement or economic displacement • will not result in significant cumulative impacts together with impacts from other existing facilities, reasonably foreseeable developments and/or unplanned but predictable activities enabled by sub-project/sub-investments that may occur later or at a different location. 	<ul style="list-style-type: none"> • The developer/sponsor has established and maintained an environmental and social management system (ESMS) appropriate to and commensurate with the level of its E&S impacts and issues in line with good international practice. • If the sub-project/sub-investment falls under Category A, the developer/sponsor will conduct an ESIA that meets the requirements of EBRD PRs 1-8 and 10. • Under EBRD PR9 (Appendix A: Referral List), FI financing of any Category A sub-project/sub-investment is subject to referral to the EBRD.

EBRD ESP 2019	Issue	Eligibility criteria	Evidence
PR1: Assessment and management of environmental and social risks and impacts	<p>Feedstock supply-chain management: Supply chains for agricultural residues, energy crops and woody feedstock may be associated with significant environmental and social risks.</p>	<ul style="list-style-type: none"> The developer/sponsor will identify risks associated with its supply chain, including but not limited to biodiversity, deforestation and labour rights risks associated with feedstock production, emissions from land use, land-use change and forestry, and life-cycle greenhouse gas (GHG) emission performance. 	<ul style="list-style-type: none"> The developer/sponsor has assessed environmental and social risks associated with the cultivation, harvesting, transport, storage, pre-processing and transportation of all feedstock materials to be processed at the bioenergy installation. The developer/sponsor has determined the source (local production or international import) of the feedstock and assessed risks associated with production at the source location and transportation to the sub-project/sub-investment site. Consistent with the recast EU Renewable Energy Directive 2023/2413, the developer/sponsor can provide evidence of the protection of soil quality and soil carbon for feedstock from agricultural waste and residues. For agricultural biomass, the developer/sponsor can provide evidence that the raw material is not sourced from highly biodiverse forests. For forest biomass, the developer/sponsor can demonstrate that the country of origin has laws in place a) avoiding the risk of unsustainable harvesting and b) accounting for emissions from forest harvesting. If such evidence cannot be provided, the developer/sponsor needs to demonstrate sustainability compliance at the level of the biomass sourcing area. The developer/sponsor has evaluated the feasibility of seeking internationally recognised industry sustainability certification for its feedstock supply chain.
PR2: Labour and working conditions	<p>Sub-project/sub-investment workers may not be employed in line with national legal requirements, treated fairly or adequately protected.</p>	<ul style="list-style-type: none"> An assessment of labour and working conditions has been conducted, including human resources policies, labour management plans, equal opportunity, terms and conditions of employment, and grievance mechanisms. These aspects should be considered for all sub-project/sub-investment workers, including staff of the developer and staff of contractors, sub-contractors, intermediaries and service providers. 	<ul style="list-style-type: none"> The assessment of human resource and labour management processes for the sub-project/sub-investment has found no significant gaps. Processes are in place to identify any emerging or ongoing issues and to monitor whether management measures are effective.

EBRD ESP 2019	Issue	Eligibility criteria	Evidence
PR2: Labour and working conditions	<p>Labour management procedures: The developer/sponsor must establish labour management procedures that are contractually binding for sub-project/sub-investment contractors and sub-contractors, ensuring that all sub-project/sub-investment workers receive written employment documentation and have access to an effective grievance mechanism.</p>	<ul style="list-style-type: none"> The sub-project/sub-investment implements labour management procedures that ensure compliance with national labour and employment laws, social security laws and any collective agreements to which employing actors on the sub-project/sub-investment (developer, contractor, sub-contractor) are party. Contractors and sub-contractors are contractually bound to comply with the sub-project/sub-investment's labour management procedures, national labour and employment laws, social security laws and any applicable collective agreements, as well as the requirement for a worker grievance mechanism. Worker grievance procedures are documented and tracked. 	<ul style="list-style-type: none"> Human resources and labour management requirements have been identified through an assessment process, human resource and labour management policies, plans and processes are in place that address all labour management planning components, including those of contractors, subcontractors and intermediaries, with no significant gaps.
PR2: Labour and working conditions	<p>Supply-chain labour risks: The feedstock supply chain may be associated with risks of forced labour, child labour and harm to workers in relation to agricultural raw material production, as well as forestry.</p>	<ul style="list-style-type: none"> The developer/sponsor has a policy and/or supplier code of conduct in place that prohibits the use of forced labour and child labour in its direct suppliers' operations and includes a requirement for direct suppliers to cascade this prohibition to their sub-suppliers. 	<ul style="list-style-type: none"> The developer/sponsor provides all requisite documentation for FI review; the FI provides sub-project/sub-investment supply-chain documentation for EBRD review. The developer/sponsor has evaluated the feasibility of seeking internationally recognised industry sustainability certification for its feedstock supply chain.
PR3: Resource efficiency and pollution prevention and control	<p>The sub-project/sub-investment may, both directly and indirectly, increase local and regional economic activity, which can generate increased levels of pollution to air, water and land, and consume finite resources in a manner that may threaten people and the environment at the local, regional and global levels.</p>	<ul style="list-style-type: none"> The developer/sponsor will adopt technically and financially feasible and cost-effective measures to minimise its consumption and improve the efficiency in its use of energy, water and other resources and material inputs, and recover and re-use waste materials. The developer/sponsor will identify opportunities and integrate resource-efficiency measures and the principles of cleaner production into product design and production processes. 	<ul style="list-style-type: none"> The developer/sponsor has conducted an assessment of potential air pollutants (including but not limited to particulates (PM_{2.5}), methane and NO_x), in line with relevant legislation and best-practice guidance, depending on the scale of the bioenergy facility. The developer/sponsor has conducted an evaluation of consumables and wastes and developed a strategy to minimise energy and water usage, as well as all waste materials, and to promote the waste hierarchy for remaining waste. The developer/sponsor has anticipated the volumes of solid and liquid wastes that will have to be managed and has a strategy to manage waste through authorised companies or on-site treatment.

EBRD ESP 2019	Issue	Eligibility criteria	Evidence
PR3: Resource efficiency and pollution prevention and control	Bioenergy has the potential to reduce GHGs compared with similar fossil-fuel activities.	<ul style="list-style-type: none"> The developer/sponsor will consider alternatives and implement technically feasible and cost-effective options to avoid or minimise sub-project/sub-investment-related GHG emissions. The sub-project/sub-investment is expected to produce less than 25,000 tCO₂-equivalents (tCO₂e) annually. If not, the developer/sponsor must have completed a GHG assessment. 	<ul style="list-style-type: none"> The developer/sponsor has conducted an evaluation of emission sources and considered ways to minimise sub-project/sub-investment-related GHGs during design and operation. The developer/sponsor has demonstrated GHG emission reduction compared with a conventional fossil-fuel installation. A GHG assessment is undertaken if the sub-project/sub-investment is expected to produce more than 25,000 tCO₂e annually.
PR3: Resource efficiency and pollution prevention and control	Water-use requirements for some biofuel production facilities are high and reliant on local water supplies.	<ul style="list-style-type: none"> The developer/sponsor will demonstrate the local conditions and baseline for water availability (quality and quantity). 	<ul style="list-style-type: none"> The developer/sponsor has conducted an assessment of water-use requirements and established a management plan.
PR3: Resource efficiency and pollution prevention and control	<p>Sub-project/sub-investment site preparation and construction will disturb the ground surface and increase the likelihood of soil erosion and sedimentation, potentially polluting streams and rivers and adversely impacting aquatic life.</p> <p>The sub-project/sub-investment may present a safety hazard, including fire and explosion hazards, and the potential to release pollutants into the environment; storage of biomass may also result in contamination.</p>	<ul style="list-style-type: none"> The sub-project/sub-investment will demonstrate that sediments in stormwater will be managed in a manner that avoids or minimises impacts on streams and rivers. The sub-project/sub-investment's potential to release pollutants into the environment must be assessed and mitigation measures put in place, including an automatic monitoring system. 	<ul style="list-style-type: none"> The sub-project/sub-investment proposes the use of best management practices for soil erosion and runoff (such as sediment settling basins, silt fencing, hay bales, physical barriers, grassed swales). Where the installation falls under the EU Industrial Emissions Directive (revised 2024), emission limit values must be based on the Best Available Techniques (BATs).
PR4: Health, safety and security	Noise abatement: Construction activities (and, to a lesser extent, operations) increase local noise to an extent that can adversely impact nearby residential communities.	<ul style="list-style-type: none"> The sub-project/sub-investment will address and, when required by national regulations or international standards, include noise abatement measures to eliminate or minimise impacts on nearby communities. 	<ul style="list-style-type: none"> The selection of the sub-project/sub-investment site has maximised distance from residential communities to the greatest extent possible. An acoustic study has been conducted to evaluate impacts on nearby communities in accordance with national and international standards. Where unabated noise from the construction and operation of the bioenergy plant has been shown to present an unacceptable risk to nearby residents, abatement and management measures have been included to reduce it to acceptable levels. The site area is restricted to avoid unauthorised entrance.

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PR4: Health, safety and security	Odour nuisance: The operation of certain technologies, such as anaerobic digestion, can result in odours from some types of feedstock (such as manure) and processing activity. Other sub-project/sub-investments may require activities to dry and/or store the feedstock on site, which may generate odours and dust. Odour nuisance can adversely impact nearby residential communities.	<ul style="list-style-type: none"> The sub-project/sub-investment will address the effects of adverse odours on nearby communities and, where adverse, include measures to eliminate and minimise the effects. 	<ul style="list-style-type: none"> The selection of the sub-project/sub-investment site has maximised distance from residential communities to the greatest extent possible. Potential odour issues have been assessed to evaluate impact on nearby communities.
PR4: Health, safety and security	Traffic and road safety risks: Construction and operations present traffic and road safety risks to workers and, potentially, the affected community.	<ul style="list-style-type: none"> The sub-project/sub-investment must evaluate and monitor related risks throughout the sub-project/sub-investment lifecycle. 	<ul style="list-style-type: none"> The developer/sponsor has evaluated the effects of sub-project/sub-investment-related traffic and safety, during both construction and operations, to the community.
PR4: Health, safety and security	Workforce health and safety: Occupational health and safety hazards specific to bioenergy primarily include: exposure to fire hazards, asphyxiation and injury from contact with machinery and moving parts.	<ul style="list-style-type: none"> Workforce health and safety assessment includes all sub-project/sub-investment workers, including staff of the developer and staff of contractors, sub-contractors, intermediaries, suppliers and service providers. The sub-project/sub-investment ensures compliance with statutory and collectively agreed occupational health and safety requirements. The developer/sponsor recognises its primary responsibility to provide safe and healthy working environments for sub-project/sub-investment workers and informing, instructing, training, supervising and consulting sub-project/sub-investment workers on health and safety. 	<ul style="list-style-type: none"> An assessment has been undertaken of sub-project/sub-investment workforce health and safety issues, risks and management measures, including risks of inadequate or unsafe worker accommodation, with no significant gaps. A sub-project/sub-investment-specific occupational safety and health plan is in place; where appropriate, the plan is integrated into the sub-project/sub-investment ESMS. Processes are or will be in place to identify any emerging or ongoing sub-project/sub-investment workforce health and safety issues and risks, and to monitor whether management measures are effective. The developer/sponsor has, or will have, a procurement system in place that ensures that contractors abide by the provisions of their health and safety programme and national law.

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PR4: Health, safety and security	<p>Gender-based violence and harassment (GBVH): Female community members and workers may be at heightened risk of GBVH. Risks are heightened at sub-projects/sub-investments situated in remote areas or where there is a significant workforce influx.</p>	<ul style="list-style-type: none"> The developer/sponsor will assess sub-project/sub-investment-related gender-based violence risks, including sexual harassment, sexual exploitation and abuse, to sub-project/sub-investment-affected persons and communities. Where appropriate, the sub-project/sub-investment has clear GBVH safeguarding processes in place, including the provision of confidential channels for reporting incidents and providing support. Where required, the developer/sponsor has relied on work conducted by qualified and experienced specialists to identify and assess GBVH risks. 	<ul style="list-style-type: none"> The assessment of GBVH safeguarding processes for the sub-project/sub-investment has found no significant gaps. Processes are in place to identify any emerging or ongoing GBVH-related issues and to monitor whether safeguarding measures are effective. All site-specific GBVH risk assessment and mitigation strategies have been implemented by recognised GBVH experts.
PR5: Land acquisition, restrictions on land use and involuntary resettlement	<p>A sub-project/sub-investment may result in physical displacement (relocation or loss of shelter) and/or economic displacement (loss of assets or resources, and/or loss of access to assets or resources that leads to loss of income sources or means of livelihood) because of sub-project/sub-investment-related land acquisition and/or restrictions on land use.</p> <p>Under EBRD PR9 (Appendix A: Referral List), FI financing of any activities resulting in involuntary resettlement is subject to referral to the EBRD.</p>	<ul style="list-style-type: none"> The developer/sponsor will identify whether land acquisition and/or restrictions on land use for the sub-project/sub-investment, its components or any associated facilities² will result in physical displacement, economic displacement or loss of access to assets or resources. If the sub-project/sub-investment will result in physical or economic displacement, a resettlement action plan and/or compensation plan is required. <p>Where applicable, the sub-project/sub-investment applies a “mitigation hierarchy”, as required by the EBRD Environmental and Social Policy, as follows:</p> <ul style="list-style-type: none"> Avoid displacement and, where this is not possible, implement additional measures to minimise, mitigate and, as a last resort, compensate for potential residual adverse impacts. Forced evictions are prohibited, in line with international law. Unavoidable residual displacement impacts must be mitigated by (i) timely compensation at full replacement cost and (ii) ensuring meaningful consultation. Livelihoods must be improved or, at a minimum, restored. 	<ul style="list-style-type: none"> An assessment of the resettlement implications of the sub-project/sub-investment is undertaken early in the sub-project/sub-investment preparation stage. An alternatives analysis has been conducted to identify alternative sites and transmission routings. Where applicable, a resettlement action plan and associated processes are developed in a timely manner for sub-project/sub-investment implementation and operation. Monitoring is undertaken of implementation of the resettlement plans, and to verify that commitments made to resettled people and host communities have been delivered and are effective, and to identify any ongoing or emerging issues.

² Facilities and projects developed by separate legal entities whose viability and existence are determined by or depend exclusively on the sub-project/sub-investment and are essential for the successful operation of the sub-project/sub-investment. This may include, for example, powerlines to connect the sub-project/sub-investment to the grid where these are not part of the sub-project/sub-investment.

EBRD ESP 2019	Issue	Eligibility criteria	Evidence
PR5: Land acquisition, restrictions on land use and involuntary resettlement	Local food security: If good practices are not implemented, bioenergy production may have negative impacts on the productive capacity of land or on water availability and quality, with negative repercussions for food security.	<ul style="list-style-type: none"> The developer/sponsor will demonstrate that the bioenergy sub-project/sub-investment will not have adverse impacts on local and regional food-production patterns. 	<ul style="list-style-type: none"> The developer/sponsor has determined whether its operations are in a region of food insecurity and, if so, completed a food security assessment to identify how to maintain and enhance food security.
PR 6: Biodiversity conservation and sustainable management of living natural resources	Protected species and habitats: The siting and construction of the bioenergy plant and related transmission lines could adversely impact protected species or their habitat.	<ul style="list-style-type: none"> The sub-project/sub-investment must avoid impacts on protected species and their habitats to the greatest extent possible. The developer/sponsor has identified any potential protected species that may be affected by the proposed development in accordance with national legislation and international treaties. 	<ul style="list-style-type: none"> The developer/sponsor has relied on work conducted by qualified and experienced specialists to identify protected species that may be affected with reference to at least national regulations and International Union for the Conservation of Nature (IUCN)³ and Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) lists.⁴ An alternatives analysis has been conducted to identify alternative sites and minimise current and future impacts on protected species. Where impacts cannot be avoided, the developer/sponsor has devised a mitigation strategy to limit the effect of the development on protected species.
PR6: Biodiversity conservation and sustainable management of living natural resources	<p>Protected areas: The siting and construction of the bioenergy plant and related transmission lines could adversely impact designated national or international protected areas. Designated areas (for example, a national park, Important Bird and Biodiversity Area [IBA], a Natura 2000 or Emerald site, both official and shadow lists) are typically listed as such because they contain threatened, rare or sensitive fauna and flora.</p> <p>Under EBRD PR9 (Appendix A: Referral List), FI financing of activities that occur within or have the potential to adversely affect a protected area is subject to referral to the EBRD.</p>	<ul style="list-style-type: none"> The sub-project/sub-investment must avoid impacts on designated national or international protected areas to the greatest extent possible. The developer/sponsor has identified any designated national or international protected areas that may be affected by the proposed development, in accordance with national legislation and international treaties. 	<ul style="list-style-type: none"> The developer/sponsor has identified national or international protected areas that may be affected by the sub-project/sub-investment. If the site is located in or near to a sensitive area, such as a Natura 2000 area, the developer/sponsor must have or undertake an additional ecological survey and assessment, in line with the European Union Birds Directive (2009/147/EC),⁵ the Habitats Directive (92/43/EC)⁶ and the Bern Convention (June 1979).⁷ An alternatives analysis has been conducted to identify alternative sites and minimise current and future impacts on national or international protected areas. Where impacts cannot be avoided, the developer/sponsor has developed a mitigation strategy to limit the effects of the development on national or international protected areas and a full ESIA has been conducted per Category A (see PR1).⁸

³ See IUCN (n.d.). ⁴ See CITES (2024). ⁵ See European Union (2009). ⁶ See European Union (1992). ⁷ See European Union (1982).

⁸ See EBRD (2019).

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PR6: Biodiversity conservation and sustainable management of living natural resources	<p>Supply chain: Bioenergy feedstocks can negatively affect biodiversity and carbon stocks through direct land-use change or deforestation and unsustainable agriculture/forestry practices.</p>	<ul style="list-style-type: none"> The developer/sponsor will minimise adverse effects on the ecosystems and the biodiversity they support by using residues and waste materials as a primary source of biomass, where feasible. The developer/sponsor of biofuel production will use feedstocks produced in a sustainable manner that minimise the impacts per unit of energy produced and do not compete with the biological roles that some feedstocks play (for example, the recycling of organic matter into the soil, the protection of the soil surface and structure, and nitrogen retention and release). The developer/sponsor will meet the requirements of relevant standards and legislation, for example, the recast EU Renewable Energy Directive 2023/2413,⁹ the EU Regulation on Deforestation-free Products 2023/1115,¹⁰ the EU Regulation on Land Use, Land Use Change and Forestry 2018/841 (LULUCF),¹¹ the EU Forest Strategy 2030,¹² the EU Biodiversity Strategy for 2030,¹³ and the recast EU Energy Efficiency Directive 2023/1791,¹⁴ in relation to combined heat and power plants. 	<ul style="list-style-type: none"> The developer/sponsor has assessed its ability to meet EU principles and sustainability criteria and sought to certify its operations to such standards, as appropriate. Consistent with the recast EU Renewable Energy Directive 2023/2413,¹⁵ the developer/sponsor can provide evidence of the protection of soil quality and soil carbon for feedstock from agricultural waste and residues. For agricultural biomass, the developer/sponsor can provide evidence that the raw material is not sourced from highly biodiverse forests. For forest biomass, the developer/sponsor can demonstrate that the country of origin has laws in place a) to avoid the risk of unsustainable harvesting and b) to account for emissions from forest harvesting. If such evidence cannot be provided, the sub-project/sub-investment sponsor needs to demonstrate sustainability compliance at the level of the biomass sourcing area (consistent with the EU Regulation on deforestation-free products 2023/1115.¹⁶ The developer/sponsor has a land management plan in place. The developer/sponsor has evaluated the feasibility of seeking internationally recognised industry sustainability certification for its operations and supply chain and gives preference to purchasing living natural resources that are produced in accordance with internationally recognised principles and standards of sustainable management. The developer/sponsor has established policies, procedures and verification practices that: <ul style="list-style-type: none"> identify the origin of the supply and habitat type of the source area avoid procurement from suppliers that are contributing to significant conversion or degradation of priority biodiversity features, critical habitats and/or designated protected areas provide for an ongoing review of the sponsor's primary suppliers.

⁹ See European Union (2023a). ¹⁰ See European Union (2023b). ¹¹ See European Union (2018). ¹² See European Commission (2021).

¹³ See European Commission (2020). ¹⁴ See European Union (2023c). ¹⁵ See European Union (2023a). ¹⁶ See European Union (2023b).

EBRD ESP 2019	Issue	Eligibility criteria	Evidence
PR6: Biodiversity conservation and sustainable management of living natural resources	Genetically modified organisms and invasive species.	<ul style="list-style-type: none"> The developer/sponsor will adopt and implement a sustainable resources procurement policy, management procedure and verification system to evaluate primary suppliers. Bioenergy feedstocks that contain genetically modified organisms (GMOs) may not be used without a risk assessment, in line with all substantive standards. (Under EBRD PR9 [Appendix A: Referral List], FI financing of any activities that could result in the release of GMOs into the natural environment is subject to referral to the EBRD.) Under no circumstances will species known to be invasive be introduced into new environments to produce bioenergy feedstocks. 	<ul style="list-style-type: none"> The developer/sponsor has developed a plan to evaluate the sustainability management practices of primary suppliers and to prioritise the procurement of internationally recognised certified feedstocks where feasible. The developer/sponsor has determined whether any feedstocks contain GMOs or have the potential to be an invasive species.
PR8: Cultural heritage	<p>Sub-project/sub-investment construction may cause damage or disturbance to irreplaceable sites (areas of archaeological or historical interest to local communities), features or practices of tangible or intangible cultural heritage value.</p> <p>Under EBRD PR9 (Appendix A: Referral List), FI financing of any activities that may adversely affect sites of cultural or archaeological significance is subject to referral to the EBRD.</p>	<ul style="list-style-type: none"> The sub-project/sub-investment must avoid impacts on cultural heritage assets to the greatest extent possible. The sub-project/sub-investment complies with applicable national laws on cultural heritage, antiquities, planning and building permits, conservation areas, protected areas and other laws and regulations governing the built heritage. The developer/sponsor has identified any potential tangible and intangible heritage that may be affected by the proposed development in accordance with national legislation and international treaties and obtained clearance for the sub-project/sub-investment from the relevant authorities. The developer/sponsor has relied on work (such as an archaeological survey, as appropriate) conducted by qualified and experienced specialists to identify and assess heritage that may be affected. 	<ul style="list-style-type: none"> The sub-project/sub-investment avoids impacts on cultural heritage assets wherever possible. Where impacts cannot be avoided, the developer/sponsor has developed a mitigation strategy to limit the effect of the development on heritage. All site-specific cultural studies and mitigation strategies have been implemented by recognised archaeologists or cultural historians in accordance with international standards.

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<p>PR10: Information disclosure and stakeholder engagement</p>	<p>Identification of and engagement with stakeholders is an integral part of a sub-project/sub-investment's preparation, environmental and social assessment, and management. The scope and depth of the required stakeholder engagement and information disclosure is proportionate to the sub-project/sub-investment's environmental and social risks and impacts.</p> <p>Stakeholder engagement activities should be used to inform the contextual risks associated with the sub-project/sub-investment and the sub-project/sub-investment's social licence to operate.</p>	<ul style="list-style-type: none"> • The sub-project/sub-investment has a systematic approach to stakeholder engagement that will help the developer/sponsor build and maintain a constructive relationship with their stakeholders. • The sub-project/sub-investment provides the means for effective and inclusive engagement with sub-project/sub-investment stakeholders throughout the sub-project/sub-investment cycle. • The sub-project/sub-investment ensures that appropriate E&S information is disclosed and a meaningful consultation is held with the sub-project/sub-investment's stakeholders and, where appropriate, that feedback provided through the consultation is taken into consideration. • The sub-project/sub-investment ensures that grievances from stakeholders are responded to and managed appropriately. • The sub-project/sub-investment develops a non-technical summary outlining project impacts and monitoring to allow for meaningful stakeholder engagement, communication and provision of information on project assessment and mitigation measures. 	<ul style="list-style-type: none"> • The affected community has been identified, notified and consulted prior to the development of the facility. • For higher risks involving large-scale land acquisition or significant community concerns or complex issues, a stakeholder engagement and community liaison function is established by the developer/sponsor, with dedicated personnel. • The developer/sponsor publishes a non-technical summary for the sub-project/sub-investment and makes it available to the local community. • The sub-project/sub-investment has implemented a stakeholder engagement plan or equivalent documented process proportionate to the nature and scale of the risks, impacts and development stage of the sub-project/sub-investment, ensuring data protection and confidentiality, as well as non-reprisal, establishing processes for information disclosure, meaningful consultation, feedback on consultation and documentation, and access to the sub-project/sub-investment grievance mechanism. • An effective grievance mechanism has been developed and implemented by the developer/sponsor as early as possible in the sub-project/sub-investment cycle, to cover both the construction and operational phases of the sub-project/sub-investment. The mechanism is publicised and disclosed in a format and language that is readily understandable to the affected stakeholders. Monitoring of grievances is undertaken on a periodic basis against clear indicators. • Contractors' roles and responsibilities for receiving grievances, supporting the investigation and resolution of grievances and abiding by the sub-project/sub-investment grievance mechanism are clearly set out in the grievance procedure and stipulated in the contractor's contract.

References

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