



## ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM POLICY

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**ABBREVIATIONS AND ACRONYMS USED.**

COMSIV	COMSIP Investment Limited
COMSIP	Community Savings and Investment Promotion
E&S	Environmental and Social
EMP	Environmental Management Plan
ESMP	Environmental and Social Management Plan
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
FINES	Financial Inclusion and Entrepreneurship Scaling Project
GRM	Grievance Redress Mechanism
IFPO	Inclusive Finance and Productivity Officer
MEPA	Malawi Environmental Protection Authority

## **1. ACKNOWLEDGEMENTS**

COMSIV Limited would like to thank all those who contributed in many ways for the development of this important policy. Special thanks should go our management team and staff for the efforts made in developing this policy. The company is also thankful to Reserve Bank of Malawi and FINES Project staff for the technical support that was given throughout the entire process of the policy development. This policy has been developed to be in line with our commitment to protect the environment and also to be in compliance with the requirements of the FINES Project.

## **2. STATEMENT OF COMMITMENT**

COMSIV Limited is committed to ensuring that it complies with local, national, regional and international environmental regulations applicable to its business operations and shall integrate environmental issues in its operations, processes and decisions in the ordinary course of its business.

The company recognises that identifying and quantifying environmental risks is a most important part of its normal business process of risk management. It is for this reason that the company shall produce, on annual basis, reports of status and progress made in meeting environmental objectives.

*Tenneson Kalizga Gondwe.*

**(Board Chairperson)**

### 3. INTRODUCTION

#### 3.1 Institutional Profile

COMSIV Limited is a non-Deposit taking microfinance Institution that is wholly owned by COMSIP Cooperative limited. It came as a result of the 2016 COMSIP Cooperative Union Annual General Meeting resolution (Resolution Number 10) and the studies commissioned by the Union such as the Midterm review of the MASAF 4 Livelihood and Skills Development component and the Product and Services Needs Assessment survey which emphasized on the need for establishment of a microfinance institution to reach out to the COMSIP members.

The company started its operations in December 2018 following its successful application for operating license with the registrar of financial institutions. It was launched during the COMSIP annual General Meeting on 18<sup>th</sup> December 2018. As a subsidiary Company in the Cooperative Union, COMSIV has been mandated by COMSIP to be providing credit facilities and micro insurance services to its members. It is this mandate that spells out the clients to be served.

The operational areas of the COMSIP Cooperative Union Limited are deep rooted in rural areas across the country. Following the triple bottom line, COMSIP is involved in local development and contributes to the sustainable development of the communities it serves. With introduction of COMSIV in the financial sector, COMSIP will drive the financial inclusion agenda in the local communities where other financial institutions are less present.

#### 3.2 Purpose Of the Policy

The overall purpose of Environmental and Social Management is to understand and manage risks that arise from environmental and social concerns. The focus is on managing risks and not on avoiding risks and it is intended for encouraging responsible financing practices and not for reducing or restricting financing. However, if there are business activities that are inherently irresponsible and managing these risks are not feasible, COMSIV Limited should avoid financing those activities.

COMSIV Limited also recognizes the importance of addressing both causes and the consequences of climate change for projects it finances. In this context the company will take appropriate initiative to support such projects with no or low carbon emission, climate change mitigation projects and other climate resilient projects. The specific purposes are to:

- Examine the environmental and social issues and concerns associated with potential business activities proposed for financing or being financed; and
- Identify, evaluate and manage the environmental and social risks and the associated financial implications arising from these issues and concerns.

Some of the sources of environmental risks are air emissions, inefficient use of energy, excessive use of water, un-controlled generation and disposal of wastes, illegal discharge of untreated hazardous substances, land contamination, sound pollution etc. Some of the sources of social risks include unhealthy and unsafe working conditions, inadequate measures for community health, safety and security, exploitation of indigenous people and cultural heritage, violation of human rights etc.

#### 3.3 Scope Of The ESMS Policy

This policy shall be applicable to COMSIV limited and shall be understood together with the company's risk management policy and Loan Policy.

The environmental and social management system (ESMS) shall be applicable when assessing environmental and social (E&S) risks on all loans granted by COMSIV Limited. As much as the Environment Management Act (2017) provides a list of projects requiring and not requiring an Environmental and Social Impact Assessment (ESIA), the ESMS procedure shall apply to all projects regardless of whether or not mentioned in this law and its associated regulations.

For this reason, all loan applications will be screened to ensure that the intended use does not have negative impacts on the environment. Similarly, all loan applications will be screened to ensure that recoverability is not going to be affected by environmental issues. The loan application form shall have a question to be answered if the E&S has been taken into account in arriving at lending decisions.

### **3.4 Policy Benefits**

The policy will be a guide for the company to take into account of environment issues in its processes, operations and decisions. For this reason, loan applications can be rejected or demanded to be repaid before its tenure should it occur that the beneficiaries of the funds are negatively affecting the environment (especially under category A and B as described in section 2.2 of this policy).

Furthermore, the policy shall open up other opportunities for the company. For example, the company may wish to develop new environmentally friendly products or services, modify existing products to take environmental issues into account and many more.

### **3.5 Environmental and Social Management as Risk Management Tool**

The environment and social management policy shall not be applied in isolation. Rather, it shall be complementing other policies especially loan and risk management policies. Bearing in mind that the activities, decisions and projects funded by COMSIV limited shall have an impact on the environment, whether positive or negative, it is important for the board of directors and senior management to keep informed of various initiatives and developments in the national, local, regional and international scene on environment issues particularly those that affect the financial sector.

The environmental policy shall assist the company in identifying, measuring, monitoring and controlling credit risk, legal risk and reputation risk.

- a. **Credit Risk** would be evident where for example, borrowers have been negatively affected by environmental weather changes (bad rains leading to poor harvests, excessive rains leading to floods, etc).
- b. **Legal Risks** that can arise as a result of the company being fined or sued for not complying with environmental regulations or direct lender liability claims.
- c. **Reputation Risk** that can arise due to negative publicity when the community is of the view that the company is funding projects that have negatively affect the environment.

### **3.6 Need for Expert Services**

In cases where a more detailed and complex ESIA is required, the company shall engage the services of a professional and independent person to conduct it on its behalf before credit is granted. Results obtained from the independent expert shall be further analysed by the company to ensure that there is no bias and that they are not misleading.

### **3.7 Is Conserving the Environment Our Responsibility?**

As COMSIV limited, we recognize that we are part of the community we serve and that the company is and shall always be a good, responsible corporate citizen. The company believes that by conserving the environment, costs are also being reduced. Therefore, environmental conservation is our responsibility.

Some of the things that COMSIV limited shall do to assist in conserving the environment are:

- a. Financing environmentally friendly projects
- b. Recycling paper
- c. Proper waste management
- d. Purchasing environmentally friendly products or services
- e. Taking part in annual tree planting seasons

### **3.8 Environmental Factors**

COMSIV Limited is aware that there are many other environmental factors that can affect its operations and profitability whether directly or indirectly.

When developing new products or modifying existing ones for the market, the company shall take into account the environmental factors that exist in those markets. Some of the notable issues to be considered are:

- a. Environmental laws for the specific area of interest
- b. Weather patterns
- c. Climate change
- d. Pollution
- e. Endangered species, etc

### **3.9 Internal Communication and Training**

The Inclusive Finance and Productivity Officer (IFPO) appraising a loan application whether the borrower is Corporate or SME shall understand the E&S Risks Identification and Assessment Procedure, which provides a flow chart of procedures to be followed when identifying, assessing and monitoring environmental & social risks aspects while integrating in credit approval process. The IFPO shall then complete E&S impact assessment checklist.

Annual trainings for the entire company including specific training to all IFPO's on E&S issues shall be periodically arranged by COMSIV Limited.

## **4. ENVIRONMENTAL AND SOCIAL POLICY STATEMENT**

### **4.1 Overall Policy Statement**

COMSIV Limited is committed to promote environmentally sound and sustainable development in the full range of its credit products. The company believes that environmental and social sustainability is a fundamental aspect of achieving outcomes consistent with its Credit Policy and recognizes that projects that foster environmental and social sustainability rank among the highest priorities of its activities. In view of this, COMSIV Limited shall only finance projects and businesses that manage their social and environmental impacts in a responsible manner based on the Malawian Environment Management Act of 2017 and also in line with the World Bank's Environmental and Social Policy.

COMSIV Limited will also apply international best practices, particularly IFC Performance Standards and other international treaties and conventions which have been ratified by the country will as well be complied with during assessment and management of Environmental and Social Risks.

## **4.2 Environmental and Social Categorization**

### **4.2.1 Category A (High Risk)**

Category A (High risk) activities are those businesses/activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented.

### **4.2.2 Category B (Medium Risk)**

Category B (Medium risk) activities are those businesses/activities with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures.

### **4.2.3 Category C (Low Risk)**

Category C (Low risk) activities are those businesses/activities with minimal or no adverse environmental or social risks and/or impacts.

## **4.3 Social Aspects**

From social aspects point of view, COMSIV Limited shall observe the following for all businesses it finances:

- Provide equal opportunity to all social or gender groups in terms of employment and business relations;
- Have social acceptance from the surrounding community;
- Observe labour standards and working conditions including occupational health and safety;
- Abstain from financing businesses that use child and forced labour;
- Observe and eliminate negative impact of business on cultural heritage and involuntary resettlement;
- Abstain from financing projects and businesses that are in the Exclusion List as per Annex 1.

## **4.4 Environmental Aspects**

From environment aspects point of view, COMSIV Limited shall observe the following for all businesses it finances:

- Ensure that businesses financed observe environmental safety standards and regulatory requirements in line with country laws and international best practices;
- Observe and eliminate negative impact of business on Biodiversity Conservation and Natural Resources;
- Observe and eliminate negative impact of business on cultural heritage objects, sites and structures (e.g. Artefacts, archaeological sites, graves, and other sacred areas);
- Abstain from financing projects and businesses that are in the Exclusion List as per Annex 1.

## 5. GOVERNANCE STRUCTURE

Responsibility for implementing this Environmental and Social Management System has been assigned to the Operations Department which is found in the overall organization chart of COMSIV Limited. The purpose of the Operations Department will be to screen loan applications, oversee, supervise, manage and monitor the approved loans.

The Operations department is headed by the Head of Operations and supported by staff specializing in key functions of environmental and social risk management. The management of E&S risks will not only be the role of the Operations Department but also will involve the whole governance structure. The governance practices, processes and responsibilities by which Environmental and Social Risk are managed and controlled in COMSIV Limited are shown in Table 1.

*Table 1: Governance structure and Roles for Implementation of ESMS*

LEVEL OF GOVERNANCE	ROLES AND RESPONSIBILITIES
Board Of Directors	<ul style="list-style-type: none"> <li>• Develop policies</li> <li>• Approve policy changes proposed by management</li> <li>• Develop and establish E&amp;S risk appetite and tolerance limits for EIA Categories</li> </ul>
Senior Management	<ul style="list-style-type: none"> <li>• Implement policies approved by the board of directors</li> <li>• Propose and bring to the board, policy changes</li> <li>• Ensure that the company complies with local, national, regional and international environment regulations</li> <li>• Identify, measure, monitor and control E&amp;S risks</li> </ul>

## 6. ENVIRONMENTAL AND SOCIAL RISKS IDENTIFICATION AND ASSESSMENT

### 6.1 Objective of Environmental and Social Risk Identification and Assessment Procedure

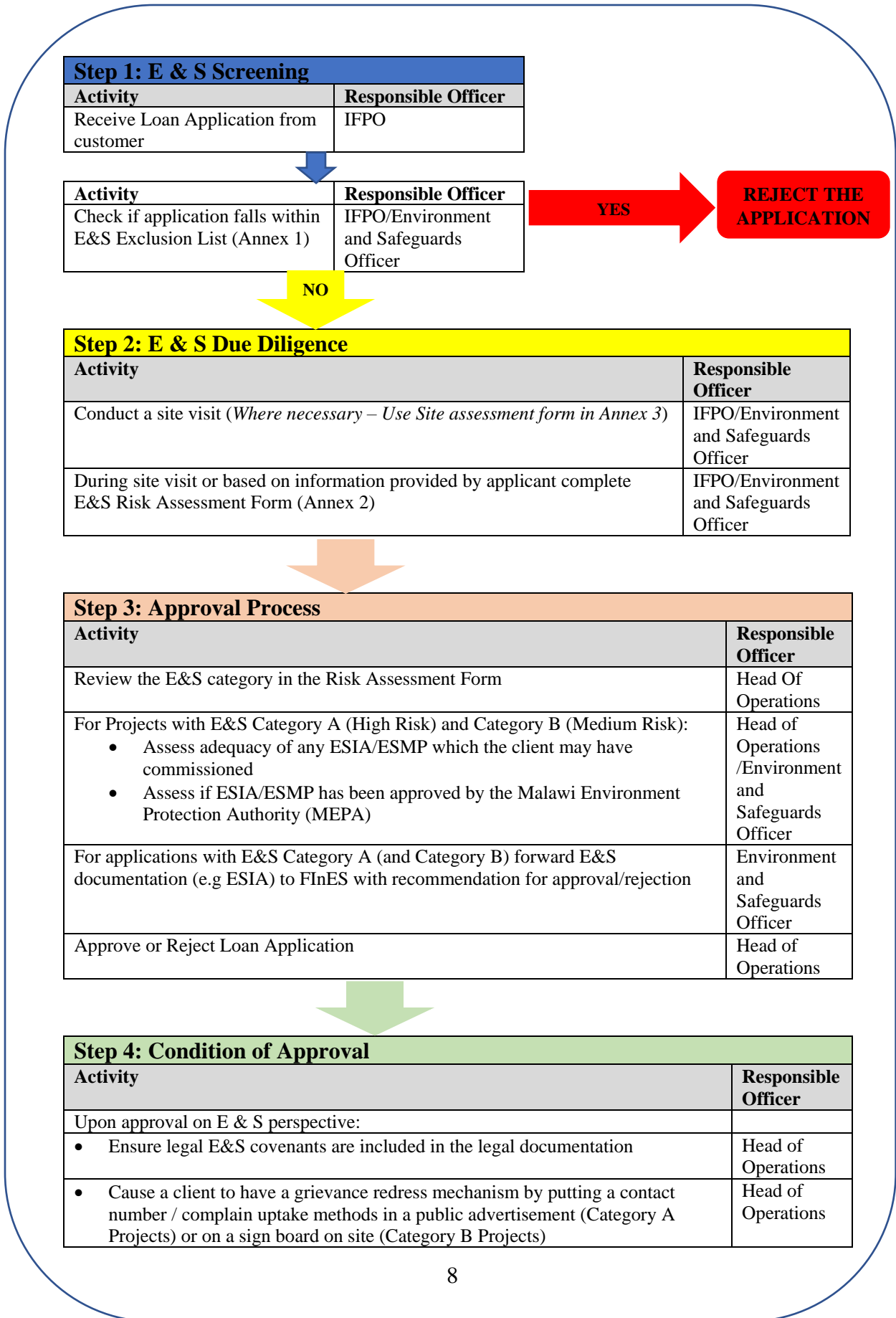
The objective of E &S risk identification and assessment procedures section is to provide a step-by-step guidance on screening, assessment, decision, control and monitoring of E&S risks with respect to transactions financed by COMSIV Limited.

The Head of Operations in the Operations Department shall be responsible for final determination of the project E&S categorization based on categorization done in the E&S risk assessment form or appraisal filled by institution officers during site visit or desktop review. Where a need arises, E&S analyst from COMSIP Cooperative Union Limited shall -review or re-visit the project site accompanied by the respective officer processing the loan. Final E&S categorization of the project will mainly base on facts collected from the submitted loan application documents and observation made during the site visit.

### 6.2 Flow Chart for E&S Risk Assessment and Monitoring Procedure

The following is a flow of activities during project appraisal and loan categorization process which includes responsible personnel/business unit and activities involved:

*Figure 1: Flow chart for E&S Risk Assessment Procedure*



## **7. ENVIRONMENTAL AND SOCIAL RISKS MONITORING AND REVIEW**

The Operations Department shall ensure that all projects financed by COMSIV Limited are kept in constant monitoring throughout the loan tenure. The main objective is to ensure that projects are implemented and operated in compliance with prevailing regulatory requirements and other international best practice. Projects shall be monitored through all stages of construction, operation and decommissioning. The monitoring shall aim at enhancing positive impacts and eliminate or minimize negative impacts of the projects as outlined during the process of Environmental and Social Impact Assessment and included in the Environmental and Social Management Plans.

Monitoring will ensure that loan covenants set in facility agreements are adhered and any failure is earlier recognized hence COMSIV Limited may agree with the client on remedial measures to be taken by the client to achieve desired level of compliance. In case the client fails to comply with the agreed remedial measures, the company may take such action and/or exercise such remedies contained in the loan facility agreements that deemed appropriate.

In case of any grievances related to E&S, the IFPO shall contact the SF unit for necessary course of action. Other project affected communities and stakeholders will report grievance as per procedure stipulated in customer complaints registers available at all COMSIV Limited branches and website. Furthermore, complaints can be raised at all grievance uptake locations as stipulated in the Grievance Redress Mechanism.

Monitoring process/activities will involve:

- i. Periodic site visits by the environmental and social risk analysts. During site visit a form ‘Post-loan Disbursement E&S Risk Monitoring checklist’ shall be filled while focusing on implementation of EMP/ESMP section as analysed in the EIA report.
- ii. For all high risks E&S projects and medium risks that need close follow up, conducting site visit and review the ‘E&S Risk Assessment Form’ to confirm/re-categorize the project proposal received from business unit.
- iii. Review and ensure compliance with grievance mechanism during site visit.
- iv. Maintain a database of approved loans from an E&S perspective–using the template for monitoring.
- v. Periodic preparation of reports to the management detailing environmental and social risk status of various projects.
- vi. Annual preparation of E&S compliance reports including mandatory Annual Environmental Performance reports.

## **8. GRIEVANCE REDRESS MECHANISM (GRM)**

### **8.1 Introduction To GRM**

COMSIV Limited operates in an open environment and has an open-door policy that enhances support, friendship and professional collaboration. The company is committed to adhering to standards and procedures of accountability and transparency in all its business operations including lending as set out in its governance policies. COMSIV Limited will continue addressing the environmental impact of its business activities, directly or indirectly with those doing business with it.

### **8.2 Purpose of Grievance Redress Mechanism**

Grievance Redress Mechanism (GRM) aims at providing guidelines on managing and responding to various project related complaints as received from project affected individual, organization or community. The procedure will apply during all main stages of project cycle, initiation, construction, operation and closure. COMSIV Limited will require its clients to have in place a grievance mechanism to be able to receive and

assist resolve project-affected parties concerns and grievances arising from the funded projects. The grievance mechanism should be appropriate for anticipated project risks and impacts. However, the interested and affected parties can resort to channel their project related grievance directly to COMSIV Limited as per the procedures outlined in section 8.5 of this Policy.

### **8.3 Objectives of GRM**

The following are major objectives of Grievance Redress Mechanism

- Ensure better safeguards mechanisms for implementation of projects.
- Resolve environmental and social grievances in the Project areas in a systematic and timely manner to safeguard interests of the company and community as a whole.
- Build up a relationship of trust amongst COMSIV Limited, project staff, affected parties and other project stakeholders.
- Ensure transparency in dealings amongst stakeholders including affected parties through a proper communication system.

### **8.4 Scope of GRM**

The GRM applies to:

- All project related complaints in connection with projects financed by COMSIV Limited under the Financial Inclusion and Entrepreneurship Scaling (FInES) Project or any other project.
- The GRM will be applied to COMSIV Limited funded projects under the FInES project or any other project regardless of the proportion of participation in the total loan agreement.

### **8.5 Procedures for Channelling Project Related Grievances**

#### **8.5.1 Receiving**

Any project affected part with reasonable belief that a project being funded as per details in section 6.4 may result or is potential to social, health or environmental risk will raise a concern and report the same for a necessary remedial action. To enable thorough evaluation and investigation process, the complainant should provide sufficient information so that timely solution for the complaint is obtained.

COMSIV Limited will receive complaints from project affected parties through the following outlines touch points:

#### **8.5.2 Call centre**

Project affected party can make a direct call to the COMSIV Limited Call Centre for reporting any project related complaints and/or queries. The company shall, for this reason, set up TNM and Airtel Malawi mobile telephone numbers as primary contacts for official business including receiving complaints. The complaint received through Call Centre will be directed to nearby branch where the project is being implemented for resolution. Branch Manager at the branch will evaluate the complaint and provide feedback to the affected party within 10 working days. Whereas the complaint has not been successfully resolved within the 10 days at branch level, the complaint shall be escalated to the head of operations for further action.

#### **8.5.3 Branch Level**

Project affected party can walk into any COMSIV Limited branch nearby a project locality for reporting a complaint. Branches have customer complaint forms which will be used to officially receive and record complaints. In case a customer complaint is not resolved at the branch level within 10 working days, the complaint shall be escalated to the Head of Operations for further action.

#### 8.5.4 Email

Project affected party can send an e-mail to of COMSIV Limited ([comsiv@comsiv.comsip.org.mw](mailto:comsiv@comsiv.comsip.org.mw)) for further action. All incoming emails will be assigned a reference number and acknowledgement containing the reference number will be sent to complainants. The complaint received through emails shall be directed to the Operations Department for resolution within 10 working days.

#### 8.5.5 Letters

Project affected party can raise complaints by sending a letter to any of COMSIV Limited 's branches and/or head office, of *Private Bag 105, Lilongwe*. The complaints received through letters shall be resolved within 10 days.

### 8.6 Coordination

The Branch Managers at branches shall be designated as key officers in charge of Grievance Redress received through the established complaints receiving touch points. At the head office, the Head of Operations shall coordinate the institutions GRM and will be the institutions focal person.

### 8.7 Escalation

Where an agreement has not been reached at branch level, the complainant will be offered an opportunity to escalate the complaint to Head Office Operations Department for further action. In case the complaint has not been closed at this level, the complainant may escalate further to the Chief Executive Officer of COMSIV Limited. The complainant is also allowed to escalate the complaint to the Reserve Bank of Malawi if not satisfied with redress by the Chief Executive officer or for remedial measures of the complaint through judicial proceeding or other non-judicial but official government avenues for redressal of the complaint.

### 8.8 Closure

Upon agreement between COMSIV Limited and the complainant on how the complaint will be resolved, minutes will be drafted and signed by them. After due implementation of the agreed solution and upon satisfaction by all parties, new minutes will be signed stating resolution and formal closing of the complaint.

### 8.9 Recording and Tracking Grievances

All COMSIV Limited branches shall maintain completed Customer Complaint forms. Keeping records of complaints collected from relevant branches will be the responsibility of the Branch Manager who will be responsible to submit the complaints to the Head office operations department.

All complaints will be centrally recorded for enabling continuous tracking of implementation of resolutions. At the end of every quarter, the complaints received will be reported to Reserve Bank together with Call Reports.

Complaint tracking system will among other information contain the following key information:

- Number of complaints/ grievances registered;
- Percentage of grievances resolved or addressed;
- Percentage of grievances resolved within stipulated time period; or time required to resolve complex complaints;
- Percentage of complainants satisfied with resolution and grievance redress process;
- Percentage of project beneficiaries that use specific uptake locations; and
- Percentage of complaints that have been forwarded to judicial system (courts of law).
- Redresses made and agreed upon actions (if any)

## **9. INFORMATION DISCLOSURE TO THE PUBLIC**

All COMSIV Limited decisions on projects/programs which will involve category ‘A’ and ‘B’ environmental and social risks as described in item (ii) below will be publicized to the general public. The company through its website or any media that it uses to communicate with the outside world will disclose the following key information:

### **9.1 Project information**

Project information shall include: Expected project beneficiaries; Project brief and purpose of the funding; Locality of the project; Total project cost; Financing structure of the project.

### **9.2 Publication of the Project’s Environmental and Social Impacts Assessment Report**

Environmental and Social Impact Assessment reports will be publicized for both category ‘A’ and ‘B’ project where timelines for disclosure will be as follows

### **9.3 Category A Projects**

COMSIV Limited will disclose the Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plan (ESMP) approved by the Malawi Environmental Protection Authority at least 20 days before making its decision.

### **9.4 Category B projects**

The company will disclose the ESIA and ESMP at least 14 days before making its decision.

### **9.5 Category C projects**

COMSIV Limited will disclose the identified E&S risks and their proposed mitigation measures, where applicable, at least 10 days before making its decision.

## **10. CONCLUSION**

COMSIV Limited is confident that a sustainable business operating environment is possible. This policy is to be reviewed after every 3) years or whenever necessary. The policy has been crafted in close conformity with national law. However, in case where the provisions of this policy are in conflict with applicable national law, the law shall take precedence.

**11. POLICY APPROVAL**

This environmental and social management policy has been approved by the board.

<b>NAME</b>	<b>POSITION</b>	<b>SIGNATURE</b>
Tenneson Gondwe	Board Chairperson	
Violet Kamwaza	Vice Board chairperson	
Masutano Mulaga	Board Member	
Pearson Soko	Board Member	
Zeros Matumba	Board Member	
Lyson Kayange	Board Member	
Goodwell Divan	Board Member	

Effective Date: 1<sup>st</sup> August 2021.

## 12. ANNEXES

### Annex 1: List of Businesses Excluded from Accessing Loans

Exclusion List outlines various businesses and purposes which cannot qualify for Credit facilities in accordance with COMSIV Limited credit policy and requirement of international treaties and standards. Once an application is received, and the proposed project falls in the category of prohibited transactions, the application should be summarily rejected.

The following are some of the businesses/projects that will not be financed by COMSIV Limited for environmental reasons.

- a) Production or trade in any product or activity deemed illegal under Malawian laws or regulations or international conventions and agreements.
- b) Production or trade in weapons or ammunitions.
- c) Gambling, casinos and equivalent enterprises.
- d) Production or trade in alcoholic beverages (excluding beer and wine).
- e) Activities targeting tobacco manufacturing, processing, or specialist tobacco distribution, and activities facilitating the use of tobacco.
- f) Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (TCIES).
- g) Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where COMSIV Limited considers the radioactive source to be trivial and/or adequately shielded.
- h) Production or trade in or use of unbounded asbestos fibres.
- i) Any activities involving significant degradation or conversion of natural and/or critical habitats and/or any activities in legally protected areas.
- j) Activities damaging to national monuments and other cultural heritage.
- k) Unsustainable fishing practices such as drift net fishing in the marine environment using nets in excess of 2.5 km in length, electric shocks, or explosive materials.
- l) Production or trade in wood or other forestry products other than from sustainably managed forests.
- m) Production or trade in pharmaceuticals, pesticides/herbicides, ozone depleting substances, polychlorinated biphenyls (PCBs) subject to international phase outs or bans.
- n) Production or activities involving harmful or exploitative forms of forced labour or hazardous child work.
- o) Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals (gasoline, kerosene, other petroleum products, textile dyes etc.).
- p) Production or activities that have adverse impacts, including relocation, on the lands, natural resources, or critical cultural heritage subject to traditional ownership or under customary use by historically underserved traditional local communities.
- q) Activities involving land acquisition and/or restrictions on land use resulting in involuntary resettlement or economic displacement.
- r) Military or police equipment or infrastructures, and equipment or infrastructure which result in limiting people's individual rights and freedom (i.e. prisons, detention centres of any form) or in violation of human rights.
- s) Activities involving live animals for experimental and scientific purposes

**Annex 2: Environmental and Social Risk Assessment Form**

<b>Part I: GENERAL INFORMATION</b>		
<b>Client/Customer Name:</b>	<b>Client/Customer Number:</b>	<b>Sector:</b>
<b>Project name (if different from Customer Name):</b>	<b>Size of Investment / Project Total:</b>	<b>If group, Total Group Exposure:</b>
<b>Location of the Project:</b>	<b>Contacts:</b>	
<b>Branch:</b> <b>Customer segment:</b>	<b>Responsible:</b>	
<b>Prepared/Updated by:</b>		
<b>Date:</b>		
<b>Brief Project Description:</b>		
	<b>Yes/No/NA</b>	<b>Additional information</b>
<b>Exclusion List</b> Is the activity on the Exclusion List? <i>Refer annex 1 of ESMS</i>  If Yes, reject the application		

<b>Part II: E&amp;S Categorization based on Activities involved</b>			
<b><u>Section I: Category A</u></b>			
<p>A proposed project is classified as Category A if is likely to have significant adverse environmental impacts that are sensitive, irreversible, diverse or unprecedented.</p> <p>Below provides an indicative list of types of projects typically classified as Category A. Decision on categorization however must be made on a case by case basis reflecting the specific local context of the projects.</p>			
<b><i>Type of Project Activity</i></b>	<b><i>Tick</i></b>	<b><i>Type of Project Activity</i></b>	<b><i>Tick</i></b>
Large-scale conversion or degradation of natural habitats;		Large-scale forestry projects including reforestation and afforestation;	
Extraction, consumption, or conversion of substantial amounts of forest;		Large-scale agricultural projects including plantations, irrigation, aquaculture, and agro-industries;	
Mineral and Other natural resources, mining (opencast and pit);		Projects that, regardless of scale or type, would have severe adverse impacts on critical or otherwise valuable natural or cultural resources;	
Direct discharge of pollutants resulting in degrading of air, water or soil;		Projects with severe adverse impacts on indigenous peoples;	
Production, storage, use or disposal of hazardous materials and wastes; Hazardous chemicals: manufacture, storage or transportation above a threshold volume;		Large-scale infrastructure such as ports and harbour development, transport (rail, road and waterways), largescale water resources management (river) basin development, water transfer); large reservoirs, hydropower and thermal power, extractive industries;	
Measurable changes in hydrologic cycle;		Projects with large resettlement components;	
Risks associated with the proposed use of pesticides and herbicides: production of commercial use;		Major urban projects involving housing development, including development of ports and harbours, airports road, rail and mass transit systems, water treatment wastewater treatment plants, solid waste collection and disposal;	
Projects with serious occupational or health risks;		Projects which pose serious socioeconomic concerns.	
Oil and Gas developments, including pipelines constructions;		Construction of dams and reservoirs	
Others (please specify)			
<p>(a) If you have checked any activities herein above then, any amount, any tenure any segment, the project is considered high Risk 'Category A;</p> <p>(b) Complete Part III</p> <p>(c) Otherwise, proceed to activities in Category B below</p>			

**Section 2: Category B**

A proposed project is classified as Category B if the potential impacts on the environmental are typically site-specific, reversible in nature; less adverse than those of Category A projects and for which mitigation measures can be designed more readily.

*(Projects in category B often differ only in scale from category A projects of the same type. Projects that finance rehabilitating or maintaining an existing infrastructure (e.g. Roads, power, transmission and irrigation networks) may have adverse impacts, but are likely to be less significant compared to a Category A project, and would be typically categorized as B.)*

Below is indicative list of projects typically classified as Category B:

<b>Type of Project Activity</b>	<b>Tick</b>	<b>Type of Project Activity</b>	<b>Tick</b>
Small-scale infrastructure projects: power transmission and distribution networks, rural electrification, mini (run-of-the-river with no major water impoundments) or micro - hydropower projects, small-scale clean fuel fired thermal power plants, renewable energy (other than hydropower)		Small-scale irrigation, drainage, agricultural and rural development projects, rural water supply and sanitation, watershed management and rehabilitation, and small-scale agro-industries, tourism (small-scale developments);	
Health care and educational service and educational delivery, repair/rehabilitation of buildings when hazardous materials might be encountered (e.g. Asbestos, stored pesticides);		Adaptation of crop farming systems to climate change including soil and water conservation techniques;	
Rural water supply and sanitation;		Forest management activities and agroforestry	
Road and small bridges rehabilitation, maintenance and upgrading, telecommunication etc.;		Small and medium-scale low emission power generation	
Energy efficiency and energy conservation;		Small-scale agriculture and tourism initiatives	
Diary operations		Food processing	
Textile Plants		Modernization of existing plants	
Others (please specify)		Cement manufacture	
(a) If you have checked any activities herein above then, any amount, any tenure any segment, the project is considered high Risk 'Category B; (b) Complete Part III (c) Otherwise, proceed to activities in Category C below			

**Section 3: Category C**

Category C project is likely to have minimal or no adverse environmental impacts. No further environmental assessment is required.

Category C includes technical assistance projects on institutional development, computerization, and trainings, among others. List below provides an indicative list of category C projects.

<i>Type of Project Activity</i>	<i>Tick</i>	<i>Type of Project Activity</i>	<i>Tick</i>
Software developments		Advisory services;	
Consulting firms		Small-scale reforestation;	
Service industries		Plans and studies;	
Planning support to integrate climate change into land use plans and development plans;		Rehabilitation of existing public facilities where disposal of waste will not be an issue;	
Public broadcasting (TV, radio, satellite), awareness raising programs;		Education, training, institutional development, capacity building;	
Monitoring programs;		Small-scale agriculture / irrigation projects	
Establishment of household and rural facility-level rainwater harvesting;		Others (please specify	
(a) If you have checked any activities herein above then, the Project is Category C.;			
(b) Complete Part III			

<b>Part III: Conclusion of the Environmental &amp; Social Risk Categorization.</b>		
<b><u>3.1 E&amp;S Risk category</u></b>		
<i>The Project is Category _____</i>		
<b><u>3.2 Reason(s) for Categorization:</u></b>		
<b><u>3.3 Is the Project prescribed by the Environment Management Act (2017) as requiring to undergo an ESIA (Refer to Annex 5 of ESMS)</u></b>		
<b><u>3.4 Complete the following:</u></b>		
	Yes/No/NA	Additional Information/Status/Remarks
<b>ESIA certificate/ESMP approval</b> from Malawi Environment Protection Authority available? <i>(Attach a copy-with its general and specific conditions.)</i>		
<b>OSHA certificate</b> available? (Attach with conditions if any).		
<b>EIA reports</b> available? (Attach with EMP/ESMP Section)		
If <b>NO</b> ESIA/ESMP Conducted does the project have <b>formal dispensation</b> from MEPA?  If Yes add a copy of the letter to the file.		
<b>Other Permits (if any, please specify)</b>		

**Annex 3: Environmental and Social Impact Assessment form**

*(To be filled by lending officer during project site visit and/or meeting with company key persons and the same should be attached with KYC and/or customer application pack.)*

SN	Check availability of the following Requirement(s)	Yes/ No/	Attach document and/or provide Status	Agreed implementation timeline
1	<p>Are the Environmental Impact Assessment (EIA) and/or Environmental Audit (EA) certificate from NEMC available?</p> <p><i>(Attach a copy-with general and specific conditions.</i></p>			
2	<p>Are the OSHA certificates available?</p> <p><i>(Attach OSHA registration of factory/workplace and OSHA compliance certificates with their conditions if any).</i></p>			
3	<p>Are the booklets for EIA and/or EA reports available?</p> <p><i>(Attach copies or capture the Environmental and Social Management Plan 'ESMP' section pages).</i></p>			
4	<p>Does a project/company have all other relevant permits/license as required by its sector/activity it operate?</p> <p><i>(Name and attach them).</i></p>			
5	<p>Does the company/project owner have a good relationship and engage/consult surrounding community to address their project related complaints/grievance?</p> <p><i>(Provide status as per information you have and attach stakeholders meeting</i></p>			

SN	Check availability of the following Requirement(s)	Yes/ No/	Attach document and/or provide Status	Agreed implementation timeline
	<i>minutes and/or any free prior informed consent- if any).</i>			
6	Are the Environmental, Gender, Social, Health, Safety and Complaints /Grievance handling policies available?  <i>(Name and attach them).</i>			
7	Are the Environmental, Social, Health and Safety officer and representatives in respective units/sections available?  <i>(Name them and explain their responsibilities).</i>			
8	How many employees does the company/project have in total? how many are women? and how many are men?			
9	Does the company provide its workers with recommended safe and healthy work environment including mandating the use of safety gear/Personal Protective Equipment (PPE)?  <i>(Mention them and explain).</i>			
10	Does the company/project generate any air, liquid or solid waste emissions, including hazardous waste if any, during construction and /or operational activities?  <i>(Explain the process to manage and monitor the emissions. Please also provide</i>			

SN	Check availability of the following Requirement(s)	Yes/ No/	Attach document and/or provide Status	Agreed implementation timeline
	<i>a copy of any effluent discharge permit issued by Basin Authority or any relevant authorities).</i>			
11	Does the company have procedure/design to address community health, safety and security issues in the context of its operations to the communities in close proximity to project/company's facilities?			
12	Are safety procedures in place to deal with hazardous material release, transport and disposal in order to avoid or to minimize exposure of local communities to those materials?			
13	Is there any involuntary land acquisition planned/happened including physical and /or economic displacement for current or proposed project investments?			

**Annex 4: Post-loan Disbursement E&S Risks Monitoring Checklist**

*(To be completed during site/project visit)*

Date of visit: \_\_\_\_\_

<b>PART I: GENERAL INFORMATION</b>	
Client name	
Client number	
Loan amount approved	
For group-Total group exposure	
Loan amount disbursed (if any)	
Type of project/Client business activity	
Location of project	
Type of raw materials used and respective quantity, including fuel, water and power	
Brief description of the type of sources of air pollution and adopted mitigation measures	
Brief description of the type of sources of noise pollution and adopted mitigation measures	
Brief description of the type of sources of water pollution and adopted mitigation measures	
Brief description of the type of sources of hazardous and other solid waste and adopted mitigation measures	

<b>PART II: LEGAL STATUS</b>		
<b>Issue</b>	<b>Yes/No/NA</b>	<b>Remarks</b>
Does the project fall under prohibited transactions/Exclusion list? <i>(Refer annex 1 of ESMS)</i>		
Does the project have the required clearance certificates?		
<ul style="list-style-type: none"> <li>Environment clearance (ESIA Certificate / ESMP Approval)</li> </ul>		
<ul style="list-style-type: none"> <li>Workplace Registration Certificate</li> </ul>		
<ul style="list-style-type: none"> <li>Local Council Business Licenses (if any)</li> </ul>		
<ul style="list-style-type: none"> <li>Others, please specify</li> </ul>		
Is the project compliant to E&S conditions or covenants (if any), or agreed action plan raised by the bank?		
Are there any changes in the client's business activities which may have an impact on the environment and social safeguards?		
Are there a regulatory investigations, fines or penalties imposed on the client's project?		
Have there been any accidents or incidents that have caused significant damage to the environment or human health and safety?		
Are there any new developments or changes in land/property use?		
Is there an operational Grievance Redress Mechanism		

<b>PART III: ACTION PLAN</b>		
<b>Issues Identified in Parts I &amp; II</b>	<b>Action Required by Client</b>	<b>Timeline</b>

**Prepare/Updated By:**

Name: \_\_\_\_\_

Designation/Position: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Annex 5: Environment Management Act List of Prescribed Projects**

As prescribed under Section 24(1) of the Environmental Management Act, the types of projects for which an environmental impact assessment may be required:

**LIST A (List of projects for which ESIA is mandatory)**

**A1. AGRICULTURE/AQUACULTURE PROJECTS**

- A1.1 Agricultural drainage projects of more than 1 ha.
- A1.2 Irrigation schemes designed to serve more than 10 ha.
- A1.3 Land development for the purposes of agriculture on greater than a 20 ha land holding.
- A1.4 Agricultural projects necessitating their resettlement of 20 or more families. Any change from one agricultural land use to another on greater than a 20 ha land holding.
- A1.5 Use of more than 1 tone of fertilizer per hectare per annum on greater than a 20 ha landholding except for lime applications
- A1.6 Use of the following concentrations of pesticides on greater than a 5 ha holding:
  - A.1.6.1 more than 5l/ha of ultra-low volume pesticides application; or
  - A.1.6.2 more than 1 l/ha of aerial application of pesticides; or
  - A.1.6.3 more than 20kg/ha for each application of granular pesticides.
- A1.7 Construction of fish-farming or ornamental pond(s) where the capacity is greater than 100 cubic metres or where there is any direct discharge from a fish pond to receiving water body.
- A1.8 Any proposal to introduce fish species in an area where they do not presently exist.

**A2. PROJECTS IN THE FOOD AND BEVERAGE PRODUCTION INDUSTRY**

- A2.1 Construction of new abattoirs or slaughtering houses with a capacity of greater than 100 animals/day and expansions to existing abattoirs or slaughtering houses to a capacity of greater than 100 animals/day.
- A2.2 Construction of new canning and bottling operation with work space of greater than 5000 square metres or expansion to an existing canning or bottling operation to a work of greater than 5000 square metres.
- A2.3 Construction of new breweries and distilleries with a production capacity of greater than 25000 litres per day, or expansions to existing breweries or distilleries to a production capacity of greater than 25000 litres per day.
- A2.4 Construction of new sugar production operations or expansions to existing sugar production operations by greater than 10%.
- A2.5 Construction or expansions to, tea or coffee processing industries.

**A3 WATER RESOURCES DEVELOPMENT**

- A3.1 Construction, or expansion of, ground water utilization projects where the utilization will be greater than 15l/s or where the well is 60m or deeper.
- A3.2 construction of new water pipelines or canals longer than 1 km, or expansion to existing water pipelines or canals by longer than 1 km, where the cross-sectional area is greater than

20 square metres and the volume of water to be carried will be greater than 50 cubic metres per second.

- A3.3 Water pumping stations adjacent to lakes, rivers, and reservoirs which withdraw more than 2 cubic metres per second.
- A3.4 Drinking water supply schemes to serve a population of greater than 10000 people, or expansions of existing schemes to serve a population water reticulation network with more than 10 kilometres of pipeline.
- A3.5 Area of greater than 100 ha, or expansion of existing reservoirs by greater than 500000 l or greater than 100 ha.
- A3.6 Construction or expansion of dams with a height of 4.5 m or higher.

**A4 INFRASTRUCTURE PROJECTS**

- A4.1 Construction of new sanitary sewerage works, or expansion of existing sanitation sewerage works, to serve a population of more than 5,000 people.
- A4.2 Construction of new storm sewerage works, or expansion of existing storm sewerage works, to drain an area of greater than 10 ha.
- A4.3 Any new sewerage outfall to a receiving water body or location of sewerage systems or septic tanks within 1 km of a water body.
- A4.4 Construction or expansion of septic tanks servicing more than 100 people 20 homes or which receive more than 100 cubic metres per day of waste water.
- A4.5 Construction of new highways and feeder roads or expansion of an existing highways and feeder roads.
- A4.6 Construction of new airport and airstrips or expansion of existing and airstrip and their ancillary facilities.
- A4.7 Construction of hospitals with a bed capacity of greater than 200 beds, or expansions of existing hospitals to a capacity of greater than beds.
- A4.8 Construction of new, or expansions to existing, railway lines.
- A4.9 Construction of new, or expansions to existing port or harbour facilities.
- A4.10 Establishment or expansion of industrial estates.

**A5 WASTE MANAGEMENT PROJECTS**

- A5.1 Establishment, or expansion, of any of the following hazardous waste management facilities.
  - A.5.1.1 incineration plant
  - A.5.1.2 off-site recovery plant
  - A.5.1.3 off-site waste disposal plant
  - A.5.1.4 off-site storage facility
  - A.5.1.5 landfill site
- A5.2 Establishment, or expansion, of any of the following municipal solid waste management facilities serving a population greater than 1,000 people:
  - A.5.2.1 landfill site
  - A.5.2.2 incineration facility
  - A.5.2.3 composting facility
  - A.5.2.4 recovery/recycling facility
  - A.5.2.5 waste depots/transfer stations
- A5.3 Establishment, or expansion of, one-site waste treatment facilities

**A6 ENERGY GENERATION, TRANSMISSION AND STORAGE PROJECTS**

- A6.1 Construction or expansion of electrical generating facilities designed to operate at greater than 4MW or, in the case of hydro-electric generating facilities, where the total head is greater than 20 m or where there is a firm flow of 100 cubic metres per second.
- A6.2 Construction of electrical transmission facilities operating at a voltage of 132 kv or greater
- A6.3 Construction or expansion of oil and gas pipelines longer than 1 km
- A6.4 Construction or expansion of storage facilities (excluding services station) for oil, gas, petrol or diesel located within 3 kilometres of commercial, industrial or residential areas and with a storage capacity of 500,000 litres or more.
- A6.5 All activities associated with nuclear power development

**A7 INDUSTRIAL PROJECTS**

- A7.1 Construction of, and expansion to, industries involving the use, manufacturing handling storage, transport or disposal of hazardous or toxic chemicals as regulated under the hazardous chemicals regulation under the Environment Management Act.
- A7.2 Construction of, or expansion to, any of the following industrial operations:
  - A7.2.1 tanneries
  - A7.2.2 pulp and paper mills
  - A7.2.3 lime plants
  - A7.2.4 cement plants
  - A7.2.5 all types of smelters
  - A7.2.6 soap and detergent plants
  - A7.2.7 fertilizer manufacturing operations
- A7.3 Construction of textile manufacturing operations (including carpet-making which consume greater than 5,000 square metres of surface area, of expansions to existing textile manufacturing operations to a capacity of more than 5,000 square metres

**A8 MINING AND QUARRYING PROJECTS**

- A8.1 All mining of minerals, expansions to mines, mining exploration activity, minerals prospecting activity, gravel pits and removal of sand or gravel from shore lines, except for those activities which have received a project specific exemption under subsection 26 (3) of the Environment Management Act signed by the Director for Environmental Affairs and co-signed by the Director of Mines.
- A8.2 Explosive manufacturing
- A8.3 Extraction of top soil or the expansion of such an operation, when the operation or the expansion is greater than 0.5 ha or when the depth of a pit to burn bricks from the top soil is deeper than 3 m.

**A9 FORESTRY PROJECTS**

- A9.1 Establishment or expansion of logging operations covering an area of greater than 50 ha.
- A9.2 Establishment of, or expansions to existing, logging operations on hill sides with a slope of greater than 10% covering an area of greater than 10 ha or any conversion of forested land with a slope of greater than 10% to another land use on greater than 10 ha.
- A9.3 Establishment of logging or conversion of forested land to another land use within the catchment area of reservoirs.
- A9.4 Establishment of forest plantations of greater than 50 ha.

**A10 LAND DEVELOPMENT, HOUSING AND HUMAN SETTLEMENT PROJECTS**

- A10.1 Establishment of, or expansion to an existing; housing development of a size greater than 5 ha or where more than 500 people are intended to be housed.
- A10.2 Resettlement programmes for 00 or more people or the creation of refugee camps intended to shelter 500 or more people.
- A10.3 Filling in water bodies for the purposes of land development where the surface area of gross fill deposit is greater than 50 ha.
- A10.4 land reclamation projects greater than 100 ha.

**A11 REMEDIAL FLOOD AND EROSION CONTROL PROJECTS**

- A11.1 Construction of breakwaters, seawalls, jetties, dikes and groynes of greater than 2 metres in height or 1 km in length to remedy shoreline erosion or flooding.
- A11.2 Construction of dams or weirs with a height of greater than 2 metres, or which divert more than 20 cubic metres per second, or a bypass channels or channel realignments to remedy riverine erosion or flooding.
- A11.3 Shoreline stabilisation projects where the shoreline involved is greater than 50m.

**A12 TOURISM DEVELOPMENT PROJECTS**

- A12.1 Construction of resort facilities and hotels with a capacity of more than 50 people, or expansions to existing facilities by a factor of greater than 50 people.
- A12.2 Construction of safari lodges and operations with a capacity of more than 50 people, or expansions to existing facilities by factor of greater than 50 people.
- A12.3 Construction of marine facilities with more than 10 boat slips, or expansion of existing marine facilities by more than 10 boat slips.
- A12.4 Development of tourism master plans which have several projects associated with them.

**A13 PROJECTS IN PROXIMITY TO OR WHICH HAVE THE POTENTIAL TO AFFECT:**

- A13.1 Area of unique historical, cultural, scientific or geographical significance or which have received some king of world heritage designation.
- A13.2 National parks, game reserves and protected areas.
- A13.3 Wetlands
- A13.4 Water bodies
- A13.5 Flood zones
- A13.6 Major sources of drinking water, including communal wells
- A13.7 Cemeteries or ancestral shrines
- A13.8 Residential, school and hospital areas, as designed in local planning documents.

**A14 MAJOR POLICY REFORMS**

For example:

- A14.1 Degazettement of Forestry Reserves
- A14.2 Changes to Zoning Plans
- A14.3 Proposed introduction of exotic species

**LIST B (List of projects for which ESIA may be required)**

**B.1 agriculture/aquaculture schemes**

**B.2 Drainage and irrigation**

B.2.1 large-scale irrigation or drainage schemes

B.2.2 drainage of wetland or wildlife habitat

**B.3 forestry and logging schemes**

**B.4 Industry**

B.4.1 large-scale industrial plants

B.4.2 industries involving the use, manufacture, Handling, storage, transport or disposal of hazardous or toxic materials

B.4.3 breweries

B.4.4 tanneries

B.4.5 agro-industries

B.4.6 pulp and paper mills

B.4.7 lime plants

B.4.8 cement plants

B.4.9 smelters other than iron and steel

B.4.10 iron and steel smelters

B.4.11 petrochemical plants

B.4.12 chemical plants

**B.5 Infrastructure**

B.5.1 industrial estates

B.5.2 major roads and highways

B.5.3 major railway lines

B.5.4 ports, harbours and lake structures

B.5.5 airports and airport facilities

**B.6 Land development**

B.6.1 reclamation and new land development

B.6.2 refugee and resettlement schemes

B.6.3 housing developments (large-scale)

B.6.4 dams and man-made lakes

B.6.5 urbanisation

**B.7 Mining**

B.7.1 mineral prospecting

B.7.2 mineral mining

B.7.3 ore processing and concentrating

B.7.4 carrying

B.7.5 brick-making

**B.8 Energy generation, transmission and use**

- B.8.1 thermal power stations
- B.8.2 hydropower schemes
- B.8.3 high voltage transmission lines
- B.8.4 major oil and gas pipelines
- B.8.5 biomass burning

**B.9 Tourism**

- B.9.1 major resort facilities and hotels
- B.9.2 marinas
- B.9.3 safari lodges and operations

**B.10 Waste treatment and disposal**

- B.10.1 municipal sewage: waste treatment plants, outfalls into aquatic systems, effluent water irrigation schemes.
- B.10.2 municipal solid waste: landfill and incineration facilities, composting and recycling plants.
- B.10.3 toxic and hazardous waste: incineration plants, recovery plants (off-site), waste water treatment plants (off-site), landfill facilities, storage facilities (off-site).

**B.11 Water Supply**

- B.11.1 ground water development for industrial, agricultural or urban water supply
- B.11.2 water withdrawals from rivers, lakes or reservoirs
- B.11.3 major water pipelines and canals
- B.11.4 cross-drainage water transfers

**B.12 health and population**

**B.13 Areas protected under legislation**

- B.13.1 forest reserves, game reserves
- B.13.2 National parks
- B.13.3 monuments and declared historical sites

**B.14 Areas containing rare or endangered flora and fauna**

**B.15 Areas containing unique or outstanding scenery**

**B.16 Tribal habitats**

- Cemeteries
- Ancestral shrines

**END**

