

E&S Eligibility Criteria for Hydro Power sub-projects/sub-investments

The Environmental and Social (E&S) eligibility criteria herein have been prepared to assist and to support EBRD's partner Financial Intermediaries (FIs) who are considering the provision of financing to sub-borrowers/investees for hydropower sub-projects/sub-investments.

These criteria set out the specific environmental and social criteria for financial intermediary sub-projects/sub-investments involving hydropower to qualify green finance attribution. As such, these criteria correspond to the requirement established in EBRD ESR9 for Financial Intermediaries, which states that "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." Prior to approval for inclusion under EBRD proceeds, all small hydropower Projects are subject to review by the EBRD's Environment and Sustainability Department against these criteria, and with reference to the [EBRD Environmental and social good practice note: Small hydropower projects](#).

In the following, the term "sub-project/sub-investment" refers to the hydropower project or investment considered for financing, including all of its associated facilities as defined by the EBRD 2024 Environmental and Social Policy (ESP). This typically includes – but is not limited to – including transmission lines, access roads, temporary sites, quarries, spoil disposal areas and others as identified during the first stages of the due diligence process. The term "developer" refers to the sub-borrower/investee that owns the hydropower sub-project/sub-investment and receives indirect EBRD financing.

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 four elements are discussed herein. This is specific to new or "greenfield" sub-projects/sub-investments and extensions to or remodelling of existing facilities.

The eligibility criteria below are organised with reference to EBRD Environmental and Social Requirements (ESRs), as defined in the EBRD 2024 Environmental and Social Policy. The key issues identified are typical of activities and technologies used in constructing a hydroelectric power plant (HEPP) but may not be exhaustive. In particular, proposed sub-projects/sub-investments in high-risk contexts may require additional evaluation.

EBRD ESP 2024	Issue	Eligibility Criteria	Evidence
ESR1: Assessment and management of environmental and social risks and impacts	<i>Regulatory Compliance:</i> The sub-project/sub-investment, or proposed sub-project/sub-investment, may not have all the necessary permissions and permits required under national law.	- The sub-project/sub-investment complies with national legal requirements relating to the environment, health and safety and labour. - The sub-project/sub-investment has obtained all applicable local planning and zoning approvals to allow for the sub-project/sub-investment development.	- The developer has undertaken an Environmental Impact Assessment (EIA) where required by national authorities and that EIA has been disclosed to the public in accordance with national requirements. - The developer has undertaken any other studies as required by national or local authorities. - The developer has obtained the required licences and permits to build and operate the sub-project/sub-investment. - In case of encroachment or anticipated impact of the sub-project/sub-investment (the plant or its grid connection) on a Natura 2000 site, an Appropriate Assessment must be prepared in line with The Birds Directive (Directive 2009/147/EC), The Habitats Directive (Directive 92/43/EC) and The Bern Convention (June 1979).
ESR1: Assessment and management of environmental and social risks and impacts	Where already operational, the sub-project/sub-investment may not comply with applicable requirements.	The facility will comply / complies with the requirements of national environment, health and safety and labour laws, the requirements set out in the EBRD Environmental and social good practice note: Small hydropower projects and, in case of category A, with applicable EBRD Environmental and Social Requirements 1-8 and 10.	- The developer has undertaken a review of compliance gaps, and has taken corrective actions where gaps were identified. - The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects - The developer has undertaken a full Environmental and Social Impact Assessment where it would be required under relevant EU directives or EBRD ESP 2024 (Annex B); that ESIA follows EU standards and has been disclosed to the

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			public in accordance with EU requirements and EBRD ESR10.
ESR1: Assessment and management of environmental and social risks and impacts	The sub-project/sub-investment (the plant or its grid connection) may fall under the Category A list set out in Annex B of the EBRD ESP (2024)	The developer has assessed and demonstrated that the sub-project/sub-investment: - Does not create a 'Large Dam' as defined by the International Commission on Large Dams (ICOLD) - Is not planned to have or likely to have a perceptible impact, including cumulative impact, on sensitive locations of international, national or regional importance (see ESR6 below) - Will not result in significant adverse social impacts to local communities or other Sub-project/sub-investment affected parties (see ESR5 below) - Will not involve significant involuntary resettlement or economic displacement (see ESR5 below)	- The developer has undertaken a full Environmental and Social Impact Assessment where it would be required under relevant EU directives or EBRD ESP 2024 (Annex B); that ESIA follows EU standards and has been disclosed to the public in accordance with EU requirements and EBRD ESR10. - Under EBRD ESR9, FI financing of any Category A sub-project/sub-investment is subject to referral to EBRD.
ESR1: Assessment and management of environmental and social risks and impacts	The sub-project/sub-investment may be developed without due consideration of cumulative impacts on the water basin resulting from existing or planned developments or programs. The sub-project/sub-investment must avoid significant cumulative impacts on a stretch of a river or the river basin as a whole arising from the development of several small and other hydropower developments and other schemes affecting the water availability	- Each new sub-project/sub-investment must consider the local conditions and baseline data, including existing, planned or permitted sub-project/sub-investments and programs related to land or water use. - An assessment must be made of the cumulative impact of the existing and planned hydro-electric power plants (HPPs) in the same catchment area. Where the proposed HPP is to be built as part of a cascade of HPPs, or in a	The Environmental Impact Assessment demonstrates that the expected overall cumulative impact of developments in the water basin (including the sub-project/sub-investment) have been assessed and are or will be mitigated to an acceptable extent.

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	and/or quality and continuity of the aquatic habitat for migratory species.	river basin where other hydropower schemes and cross-river infrastructures exist or are planned, cumulative environmental and social risks and impacts need to be assessed and mitigated in compliance with the ESP.	
ESR2: Labour and working conditions	Sub-project/sub-investment workers may not be employed in line with national legal requirements, treated fairly or adequately protected.	- 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.	- 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 if management measures are effective.
ESR2: Labour and working conditions	<i>Labour management procedures:</i> The developer must establish labour management procedures which are contractually binding on 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.	- 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 a party. - Contractors and sub-contractors are contractually bound to comply with the sub-project/sub-investment's labour	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.

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		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.	
ESR3: Resource efficiency and pollution prevention and control	<i>Waste management:</i> The developer may not have a plan to manage construction and operation wastes in compliance with national regulations and EBRD ESR3.	- All the liquid and solid wastes generated during construction must be sorted, collected and disposed/treated through authorised companies. - All the wastes captured at the intake of the hydropower scheme must be collected and disposed to an authorised site.	The developer has anticipated the volumes of wastes to be managed and has a strategy to manage wastes through authorised companies.
ESR3: Resource efficiency and pollution prevention and control	<i>Erosion control:</i> Without adequate controls, the Sub-project/sub-investment may not preserve water storage sites as a sustainable renewable resource for power generation, water supply, or flood management in the long-term	The developer has a plan to minimise erosion risks and revegetate all temporary or disposal sites after construction, including: - Maximising the re-use of spoils - Minimising the number and size of borrow areas - Appropriate collection and storage of topsoil - Revegetation of all temporary or spoils disposal sites with native species at the end of construction	- The developer has an erosion control plan in place. - Sub-project/sub-investment contractors are contractually bound to implement the plan.
ESR4: Health, safety and security	<i>Workforce health and safety:</i> Sub-project/sub-investment implementation may give rise to significant workforce health and	Workforce health and safety assessment includes all sub-project/sub-investment workers,	An assessment has been undertaken of sub-project/sub-investment workforce health and safety issues, risks, and management

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	safety risks which need to be identified and managed. These may include both exposure to physical hazards from over-exertion, slips and falls, work at height, moving machinery, dust, and confined spaces and excavations, as well as inadequate or unsafe worker accommodation.	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 recognises their 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.	measures, including risks of inadequate or unsafe worker accommodation, with no significant gaps. • A sub-project/sub-investment-specific OSH plan is in place; where appropriate, the OSH 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 if management measures are effective. • The developer 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.
ESR4: Health, safety and security	<i>Community health and safety:</i> The sub-project/sub-investment should not create or exacerbate any public health issues. Any ongoing or emerging public health issues associated with the sub-project/sub-investment are to be identified and addressed as required, in particular regarding rapid flow variations; and commitments made by the sub-project/sub-investment to implement public health measures must be fulfilled.	• The developer identifies and assesses sub-project/sub-investment-related risks and adverse impacts to the physical health and safety of sub-project/sub-investment-affected communities and develops detection, protection, prevention and mitigation measures proportionate to the impacts and risks. • The assessment should include exposure to: sub-project/sub-investment-related activities and infrastructure; changes to water flows; community interactions with workers and with security personnel; and	• A community health assessment – including needs, issues and risks for different community groups – has been undertaken with no significant gaps. • The developer has undertaken a comprehensive review of the possible rapid flow variations scenarios, evaluated the corresponding risks and put in place appropriate mitigation measures.

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		population migration into the sub-project/sub-investment area; risks of GBVH to sub-project/sub-investment workers and sub-project/sub-investment-affected persons and communities.	
ESR4: Health, safety and security	<i>Infrastructure safety:</i> Public safety risks relating to sub-project/sub-investment infrastructure must be recognised and addressed to a justifiable level of residual risk. All national legal requirements and design standards for the infrastructure and risks should be identified, documented and met.	Sub-project/sub-investment design should consider the following dam failure risks at a minimum: • Overtopping • Foundation defects • Seepage-induced erosion • Structural failure of construction materials • Inadequate monitoring and maintenance Appropriate expertise must be used for infrastructure safety-related assessments.	Dam and other infrastructure safety management plans and processes have been developed for sub-project/sub-investment implementation and operation in conjunction with relevant regulatory and local authorities and establish that: • Public safety measures are communicated. • Emergency response plans include awareness and training programmes. • Dam safety is independently reviewed.
ESR4: Health, safety and security	<i>Gender-based violence and harassment:</i> Female community members and workers may be at heightened risk of gender-based violence and harassment (GBVH). Risks are heightened at sub-projects/sub-investments situated in remote areas or where there is a significant workforce influx.	• The developer will assess sub-project/sub-investment-related gender-based violence risks of 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.	• 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 if safeguarding measures are effective. • All site-specific GBVH risk assessment and mitigation strategies have been, or are being, implemented by recognized GBVH experts.

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ESR5: Land acquisition, restrictions on land use and involuntary resettlement	The sub-project/sub-investment (the plant or its grid connection) 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) as a result of sub-project/sub-investment-related land acquisition and/or restrictions on land use.	- The developer will identify if land acquisition and/or restrictions on land use for the sub-project/sub-investment, its components or any associated facilities¹ will result in physical displacement, economic displacement or loss of access to assets or resources. - The sub-project/sub-investment avoids any involuntary physical resettlement, including through alternative design. If needed, the physical resettlement of households should be carried out through a negotiated settlement.	- The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects - An assessment of the resettlement implications of the sub-project/sub-investment is undertaken early in the sub-project/sub-investment preparation stage (covering the plant and its grid connection). - An alternatives analysis has been conducted to identify alternative sites and transmission routings. - If involuntary physical resettlement is planned, an alternative design or a negotiated approach to avoid involuntary resettlement is provided. - Monitoring is undertaken of implementation of the resettlement plans, and to verify that commitments made to resettles and host communities have been delivered and are effective, and to identify any ongoing or emerging issues.
ESR5: Land acquisition, restrictions on land use and involuntary resettlement	<i>Community livelihoods:</i> The sub-project/sub-investment must not reduce local community use of or access to either the river or the surrounding lands.	The sub-project/sub-investment does not stop or limit local communities' ability to utilise the river to provide a livelihood, as a leisure amenity or to utilise the land around the river where	- The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects - Local community uses of the river have been identified.

¹ 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 e.g. powerlines to connect the sub-project/sub-investment to the grid where these are not part of the sub-project/sub-investment.

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		they may rely on the river for irrigation purposes. The sub-project/sub-investment avoids any reduction of water availability or quality of available water to the extent that water is used by local communities as drinking water or for activities sustaining their livelihoods or that have cultural historic or significant recreational value to the local communities.	- The locally affected community has been notified and consulted prior to the development of the Sub-project/sub-investment. - The local communities have been informed of the risks associated with the construction and operation of the hydropower scheme, and adequate mitigation measures have been agreed to ensure that eligibility criteria are met.
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Protected areas:</i> The siting and construction of the hydropower plant and related transmission lines could adversely impact designated national or international protected areas. Designated areas are typically listed as such because they contain threatened, rare, or sensitive fauna and flora and the construction and operation of hydropower sub-projects/sub-investments in such areas may be detrimental to those species. Protected or conservation areas are based on official sources and include: - Legally protected areas (including candidate or adopted “Emerald” sites) - Areas proposed for protection by the national government - Internationally recognised areas including key biodiversity areas,	- The sub-project/sub-investment must avoid impacts to designated national or international protected areas to the greatest extent possible. - The developer 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. - Where the sub-project/sub-investment is planned to be carried out or is likely to have a perceptible impact, including cumulative impact in combination with other relevant past, present and reasonably foreseeable developments, on a sensitive location of international, national or regional importance, it should be categorised as “A” and subject to environmental and social	- The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects. - The developer has identified national or international protected areas that may be affected by the Sub-project/sub-investment. - An initial screening report records distances. If the sub-project/sub-investment (or any of its components) is located inside, next to or functionally connected to a conservation area, the developer identifies the extent of the additional assessments required to meet EBRD ESR6. If the project might affect a protected or conservation area, the entity in charge of that area should be consulted and the project’s risks to the conservation objectives understood before the initial screening can be passed.

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	important bird areas, and “Ramsar” sites.	impact assessment and formalised and participatory public consultation process.	- An alternatives analysis is conducted to identify alternative sites and minimize current and future impacts on national or international protected areas. - Where impacts cannot be avoided, the developer establishes a mitigation strategy to limit the effect of the development national or international protected areas and a full ESIA is conducted as per Category A (see ESR1)
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Water Flow</i> : the sub-project/sub-investment’s economic viability must be based on water flow required for the river to sustain existing environment and social needs.	- An inventory of water users that might be impacted by the sub-project/sub-investment and an aquatic biodiversity baseline is undertaken. On this basis, the flow regime required to preserve other water uses and aquatic biodiversity is defined, and the sub-project/sub-investment is designed to maintain this flow regime. - Maintain a minimum wetted channel perimeter, at all control structures, with a flow in the river that satisfies the environmental and social needs throughout the year.	- The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects - Justification must be provided in the light of the requirement to provide an adequate flow for fish, wildlife, and water quality.
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Water Quality</i> : The sub-project/sub-investment must not contribute to deterioration of water quality during construction, commissioning, or operation.	The sub-project/sub-investment has minimal impact on water quality in the head pond, bypassed reach and the reaches downstream of the tailrace and diversion dams / dykes.	- The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects - The sub-project/sub-investment has not contributed to a deterioration of water quality post-construction.

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ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Fish Passage and Protection:</i> The sub-project/sub-investment should have minimal impact on local fish populations, providing effective fish passage for local and migrating fish species and also protects fish from entrainment.	• There should be minimal loss of fish or fish habitat. • Sub-project/sub-investment preserves resident fish communities. • Sub-project/sub-investment preserves ability of fish population to reproduce and feed. • Fish passage structures shall be designed to meet the swimming capacity of the species identified during the baseline. Naturalized fish path options shall be studied first before concrete structures are proposed. • Flows in the bypassed reach and downstream of the tailrace are adequate to support aquatic and riparian species at pre-sub-project/sub-investment ranges.	• The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects • Information has been gathered on both the local and migrating fish populations. • The developer / sponsor understands the particular structure and needs of the fish within the area of the sub-project/sub-investment. • The developer / sponsor has provided adequate mitigation measures to ensure that the eligibility criteria are met.
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Watershed Protection:</i> The Sub-project/sub-investment must not negatively impact environmental conditions in the watershed.	• The sub-project/sub-investment does not affect the integrity of the existing ecosystem either upstream or downstream of the sub-project/sub-investment. • Additional components of the sub-project/sub-investment and its associated facilities – such as access roads, powerlines and generation facilities – have minimal impact on the riparian environment.	• The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects • An assessment of impacts associated with additional components has been made when evaluating the sub-project/sub-investment site selection and alternatives. • An assessment of upstream and downstream impacts has been made, including risks of poor environmental management of catchment areas by third parties, such as deforestation.

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			Adequate mitigation measures have been provided to ensure the eligibility criteria are met.
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Threatened & Endangered Species Protection:</i> The sub-project/sub-investment must not negatively impact any threatened or endangered species (at the regional, national or international level) nor any areas designated for their protection.	- The sub-project/sub-investment is not constructed on a protected or sensitive river. - The sub-project/sub-investment does not threaten or harm the habitat or migration patterns of endangered species, threatened species or species of regional concern. - The sub-project/sub-investment has no significant impact on existing wildlife habitat and populations.	- The sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects - Sensitive or protected areas on or around the river have been identified. - Endangered or threatened species present in the area of, or downstream from, the Sub-project/sub-investment have been identified, with reference at least to national regulations and to IUCN and CITES lists. - The developer has assessed the potential impact of the Sub-project/sub-investment on any such areas or species. - The developer has provided adequate mitigation measures to ensure that the eligibility criteria are met.
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Auxiliary Facilities:</i> Auxiliary facilities such as roadways to access the plant, and equipment for the transmission of electricity can, both during the construction and operational phases, create impacts on fauna and flora and people.	- Access roads, the site(s) and facilities for distribution of electricity are designed, constructed and operated so as to avoid, and where this is not possible mitigate, adverse environmental impacts. - Potential biodiversity risks of OHV power lines that connect the plant to the substation must be assessed. This assessment should inform how identified risks are mitigated.	- Auxiliary facilities have undergone appropriate impact assessment and any significant environmental or community impacts have been identified. - Any such impacts have been taken into account during siting decisions to preferably avoid, or where this is not possible, mitigate those impacts. Grid connections must be undergrounded or rerouted to avoid the impacts to the extent possible, and bird flight diverters must be installed to mitigate residual impacts.

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			Evidence of public consultations for the associated infrastructure.
ESR8: Cultural heritage	Sub-project/sub-investment construction may cause damage or disturbance to irreplaceable sites (areas of archaeological or historic interest to local communities), features, or practices of tangible or intangible cultural heritage value.	- The developer has verified whether the project is expected to be within, readily visible from, or could otherwise impact, the nearest cultural heritage sites, for example: UNESCO world heritage sites; religious or cultural sites of regional, national or international importance; or tourist sites or landscapes of regional, national or international importance. - If the project is readily visible from a cultural heritage site, design should be agreed (and modified if needed) with the entity in charge of the cultural heritage site. - 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 sub-project/sub-investment is implemented in line with the EBRD Environmental and social good practice note: Small hydropower projects. - The developer 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 authority. - The developer has relied on work (e.g. archaeological surveys as appropriate) conducted by qualified and experienced specialists to identify and assess heritage that may be affected.
ESR10: Stakeholder engagement	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 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	- The affected community has been identified, notified and consulted prior to the development of the facility. - The sub-project/sub-investment has engaged with key stakeholders, notably: the local population, land and river or water users; civil society organisations that run activities in the sub-project/sub-investment area;

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	the Sub-project/sub-investment's environmental and social risks and impacts. Stakeholder engagement activities should be used to inform the contextual risks associated with the sub-project/sub-investment and the sub-project's/sub-investment's social licence to operate.	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 meaningful consultation is held with the sub-project/sub-investment's stakeholders and where appropriate, and 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 (NTS) outlining project impacts and monitoring to allow for meaningful stakeholder engagement, communication and provision of information on project assessment and mitigation measures.	entities in charge of the potentially affected protected or conservation areas and cultural heritage sites. • For higher-risk projects involving large-scale land acquisition, or with significant community concerns or complex issues, a stakeholder engagement and community liaison function is established by the developer, with dedicated personnel. • Information on monitoring should be provided to the local stakeholders if necessary or as part of annual sustainability reporting. • The developer publishes an NTS 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 (SEP) or equivalent documented process proportionate to the nature and scale or the risks, impacts and development stage of the sub-project/sub-investment ensuring data protection and confidentiality, 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 as early as possible in the sub-project/sub-investment cycle, to cover both

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			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.