



## **SAVINGS AND CREDIT COOPERATIVE LIMITED**

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## **ENVIRONMENTAL AND SOCIAL MANAGEMENT POLICY**

Sunbird Sacco  
P.O Box 284  
Blantyre, Malawi

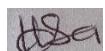
## PROCESS MANAGEMENT

Policy Owner	Risk & Compliance Officer/ Operations Manager
Department	Risk & Compliance/ Credit Department
Document level	Policy
Recommendation Level	Board: Credit and Risk Committee
Approval Level	Board of Directors

## VERSION CONTROL AND CHANGE HISTORY

Version Number	Reviewed by	Review Date	Approval Date	Approved by
1.1	Revised Policy	Dec 2024	31-12-2024	Board of Directors
1.1	Credit & Risk Committee	Dec 2024	31-12-2024	Board of Directors

Approved by:



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Board Secretary, Sunbird Sacco



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Chairman Board of Directors Sunbird Sacco

## 1. INTRODUCTION

This environmental and social policy confirms Sunbird Sacco's (SS) commitment to developing an environmental and social protection and conservation culture in both its own operating environment and with all the parties with which it has a business association, including but not limited to clients, suppliers and contractors.

SS therefore recognises environmental and social management as an important area of corporate performance and accepts that responsible business management is a crucial part of sustainable development.

This policy is aligned with the philosophy of conducting business in a responsible, fair and honest manner and in keeping with government's endeavours at protecting the environment and the social outcomes. The purpose of this document is to formalise environmental and social management in SS and to provide guidelines for the introduction, development, maintenance and exercising of proactive environmental and social management processes and procedures.

### **Guiding principles**

Sunbird Sacco

- recognizes the importance to be sensitive to the environment and social issues in its business operations.
- shall address possible risk areas and operational resource efficiencies related to its activities from facilities occupied by it.
- shall address the environmental and social impacts of its lending/financing activities in a responsible manner and develop an ESMS commensurate to the environmental and social risks and impacts from project activities on workers, affected communities and the environment.
- is committed to complying with all environmental and social legislation and regulations applicable to its operations, as well as incorporating best practice, where appropriate.
- supports the precautionary approach to environmental and social management that strives to anticipate and prevent potential environmental degradation.
- recognizes that environmental and social management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural, and social interests equitably; and recognises that, as a financial institution, its most significant environmental and risks may arise indirectly from the environmental and social impact of third parties such as its clients, investments and business partners and, although the Sacco cannot prescribe environmental and social management policies to its clients, it will encourage sound environmental and social management and compliance with legislation
- shall ensure that appropriate environmental and social information is disclosed, and meaningful consultation is held with the project's stakeholders and where appropriate, feedback provided.
- shall ensure that consultation is taken into consideration; and ensure that grievances from stakeholders are responded to and managed appropriately.
- Shall promote continuous improvement of its and clients' environmental and social performance through effective use of management systems.

## 2. DEFINITIONS

The following definitions apply:

Term	Meaning
Environment	Means the physical factors of the surroundings of the human being including land, water, atmosphere, climate, sound, odor, taste, and the biological factors of fauna and flora, and includes the cultural, social and economic aspects of human activity, the natural and the built environment
Social	Means issues which pertain to project-affected people and their communities and workers and related to socioeconomic status, vulnerability, gender, gender identity, human rights, sexual orientation, sexual exploitation, gender-based violence, child labour, cultural heritage, labour and working conditions, health and safety and participation in decision making
Vulnerable People	<p>Means people or groups of people who may be more adversely affected by project impacts than others by virtue of characteristics such as their gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views, or social status.</p> <p>Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations, such as people living below the poverty line, the landless, single-headed households, natural resource dependent communities, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or public international law.</p>
Conservation	Means the preservation of the natural resources and their protection from misuse, fire or waste;
Hazardous substance	means any chemical, waste, gas or gaseous matter, medicines, drugs, plant, animal or micro-organism which is injurious to human health or the environment
Environmental Management Act	Means the Environmental Management Act, Act No. 23 of 1996;
Policy	Means the Sacco's Environmental Policy; and
non-compliance	Means any identified violation of this policy or Statutory or regulatory duty to be reported to EGC, who will take appropriate action.

### 3. OBJECTIVES

SS recognises the importance of an integrated assessment to identify the environmental and social risks and impacts associated with projects and the client's management of environmental and social performance throughout the life of the project. A successful and efficient environmental and social management system (ESMS) promotes sound and sustainable environmental and social performance, and can lead to improved financial, environmental and social outcomes. It is a dynamic, continuous process, initiated and supported by management, and involves meaningful communication between the client, its workers, the local communities affected by the project and, where appropriate, other stakeholders

The objective of this policy is therefore to introduce environmental and social standards with which SS and its clients have to comply with when formulating business decisions and implementing its business strategies while operating from various facilities. The focus will be on ensuring that the environment and vulnerable people are protected. In doing so SS and its clients will be able to protect its assets, shareholders, stakeholders, and clients and support and promote sustainable development.

Specifically, the objectives of this policy are:

- respect and protect the fundamental principles and rights of workers.
- ensure fair treatment, non-discrimination of any kind, and equal opportunities of workers in accordance with the decent work agenda.
- establish, maintain and improve a sound worker management relationship.
- ensure compliance with national labour and employment laws and any collective agreements to which the client is a party.
- protect women and men at work, including vulnerable workers such as young workers, persons with disabilities, migrant workers and refugees, workers engaged by third parties, and workers in the client's supply chain.
- prevent the use of forced labour and child labour (as defined by the International Labour Organisation (ILO))
- ensure that accessible and effective means to raise and address workplace concerns are available to workers.
- adopt the mitigation hierarchy approach to addressing adverse impacts on human health and the environment arising from the resource use and pollution released from the project.
- avoid, minimise and manage project related GHG emissions.
- avoid, minimise and manage the risks and impacts associated with hazardous substances and materials, including pesticides; and identify, where feasible, project-related opportunities for resource efficiency improvements.

#### **4. SCOPE**

This policy:

- sets out the high-level principles of the Sunbird Sacco Board (the board) for environmental management.
- forms part of SS's operating philosophy, policies, standards and values.
- adopt a mitigation hierarchy approach to address environmental and social risks and impacts from project activities on workers, affected communities, and the environment.
- applies to all the divisions, departments, branches and business units of SS, regarding all their activities and interactions with stakeholders,
- is monitored for compliance by SS's Risk and Compliance Officer, who will report on it to the Board at least twice yearly. This document is to be reviewed at least once every two years by the Board to ensure alignment with other SS's policies and its continued relevance to SS's operations.

#### **Social and Environmental Management System (Annexure 1)**

This policy incorporates SS's Social and Environmental Management System, which may be customized, provided that:

- the Social and Environmental Management System will support business activities that contribute to a sustainable development under category of the SEMS.
- the Social and Environmental Management System will comply with the national and local legislative framework.
- SS shall harness resources essential for the implementation and control of SS's Social and Environmental Management System.

SS is committed to improving its Social and Environmental Management Systems on a continuing basis, recognising the need for conducting internal environmental reviews and reporting on progress made in achieving its targets in respect of the integration of environmental considerations into its business practices.

## **5. ROLES AND RESPONSIBILITIES**

### **Sunbird Sacco Board of Directors**

The Board is ultimately responsible for ensuring that an appropriate structure and process are in place to manage social and environmental risk effectively. A member of the board should be appointed to oversee SS's social and environmental risk/sustainability issues.

### **Risk, Internal Control and Compliance**

SS's Risk and Compliance function is responsible for:

- Coordinating reporting of environmental and social performance information.
- Providing support to the business units regarding decisions involving potential environmental and social risk.
- Ensuring the continued existence of an annual review of the environmental and Social Management policy.
- Monitoring legislative changes and developments and ensuring these are integrated into the policy.
- Monitoring compliance with the policy and reviewing the performance of SS against set targets; and
- ensuring employees are made aware of their roles and responsibilities in environmental and social matters through business communications and appropriate training.

### **Internal Audit**

Internal Audit is to conduct periodic reviews to provide independent assurance to the audit committee and executive management that the principles of this policy and the standard operating procedures are being followed and that environmental and social management is being appropriately assessed and undertaken around SS.

### **Management Board and Divisional Heads**

Management Board and Divisional heads' responsibilities in respect of the Environmental and Social Policy are:

- ensuring that the divisional activities are aligned to the Environmental and Social Policy and SEMS.

- ensuring that activities impacting on the environment within a division comply with applicable legislation.
- providing resources for the divisional implementation of the Social and Environmental Management System; and
- feeding information through to central management structures, as required for reporting and assessment purposes.

## **6. LINKS TO OTHER SS's POLICIES AND ASSOCIATED DOCUMENTS**

- Sunbird Sacco Occupational Health and Safety Policy.
- Code of Conduct.

Annexures to the Environmental Policy:

- Annexure 1: Social and Environmental Management System (SEMS)

# **ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS PROCEDURES**

## **Section 1: Introduction**

### **1.1 Institution Profile**

Sunbird Savings and Credit Cooperative Society was registered in 1992. Originally, membership was drawn only from Sunbird Tourism Limited, but it opened its common bond to recruit members from all sectors of Malawi. Sunbird SACCO is licensed and regulated by the Reserve Bank of Malawi (which is the SACCO Regulatory Authority in Malawi) and is affiliated to Malawi Union of Savings and Credit Cooperatives, MUSCCO, as the apex body.

Sunbird SACCO exists to promote a saving culture among its members through savings mobilization and the provision of affordable and flexible financial products and services through a dedicated and well-trained workforce with a view to maximising shareholders' returns.

### **1.1 Purpose of the Environmental and Social Management**

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, Sunbird Sacco should avoid financing those activities.

Sunbird Sacco also recognizes the importance of addressing both causes and the consequences of climate change for projects it finances. In this context, the Sacco 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, gender-based violence, child labour, safety and security, exploitation of indigenous people and cultural heritage, violation of human rights etc.

### **1.2 Application of Environmental and Social Management System**

The environmental and social management system (ESMS) shall be applicable when assessing environmental and social (E&S) risks on all loans granted by Sunbird Sacco. 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.

### **1.3 Internal Communication and Training**

Credit officer (CO) 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. Loans officer shall then complete E&S impact assessment checklist available in annex 3. The Procedure is self- explanatory which can serve as training material to all lending officers. Annual trainings for the entire Sacco including specific training to all lending officers on E&S issues are periodically arranged by Sunbird Sacco.

## **Section 2: Environmental and Social Policy Statement**

### **2.1 Overall Policy Statement**

Sunbird Sacco is committed to promote environmentally sound and sustainable development in the full range of its credit products. Sunbird Sacco 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, Sunbird Sacco 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 Saccos Environmental and Social Policy. Sunbird Sacco 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.

### **2.2 Environmental and Social Categorization**

#### **2.2.1 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.

#### **2.2.2 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.

#### 2.2.3 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.

### 2.3 Social aspects

From social aspects point of view, Sunbird Sacco 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 vulnerable people like child, elderly 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.

### 2.4 Environmental aspects

From environment aspects point of view, Sunbird Sacco 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.

## Section 3: 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 Sunbird Sacco. 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 Operations Officer supported by staffs specializing in key functions of environmental and social risk management. The management of E&S risks will not only be the role of Operations Department but will involve the whole governance structure. The

governance practices, processes and responsibilities by which Environmental and Social Risk are managed and controlled in Sunbird Sacco are shown in Table 1.

Table 1: Governance structure and Roles for Implementation of ESMS

<b>Level</b>	<b>Function / Committee</b>	<b>Role and Responsibility</b>
<b>Board</b>	Board of Directors	<ul style="list-style-type: none"> <li>• The Board is ultimately responsible for ensuring that an appropriate structure and process are in place to manage social and environmental risk effectively</li> </ul>
<b>Executive</b>	Management Board	<ul style="list-style-type: none"> <li>• ensuring that the divisional activities are aligned to the Environmental and Social Policy, SEMS and Sector Policies.</li> <li>• ensuring that activities impacting on the environment within a division comply with applicable legislation.</li> <li>• providing resources for the divisional implementation of the Social and Environmental Management System; and</li> <li>• feeding information through to central management structures, as required for reporting and assessment purposes.</li> </ul>
	Risk Management Committee	
	Risk Management	<ul style="list-style-type: none"> <li>• Coordinating reporting of environmental performance information.</li> <li>• Providing support to the business units regarding decisions involving potential environmental/social risk.</li> <li>• Ensuring the continued existence of an annual review of the environmental and Social Management policy.</li> <li>• Monitoring compliance with the policy and reviewing the performance of SS against set targets; and</li> <li>• ensuring employees are made aware of their roles and responsibilities in environmental and social matters through business communications and appropriate training.</li> </ul>

	Compliance	<ul style="list-style-type: none"> <li>Monitoring legislative changes and developments and ensuring these are integrated into the policy.</li> </ul>
Audit		<ul style="list-style-type: none"> <li>To conduct periodic reviews; to provide independent assurance to the audit committee and executive management that the principles of this policy and the SPM are being followed and that environmental and social management is being appropriately assessed and undertaken around SS.</li> </ul>

## **Section 4: Environmental and Social Risks Identification and Assessment**

### **4.1 Objective of Environmental and Social risk identification and assessment Procedures**

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 Sunbird Sacco.

The Credit Committee 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, Risk and Compliance Officer from Sunbird Sacco 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 be based on facts collected from the submitted loan application documents and observation made during the site visit.

### **4.2 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:

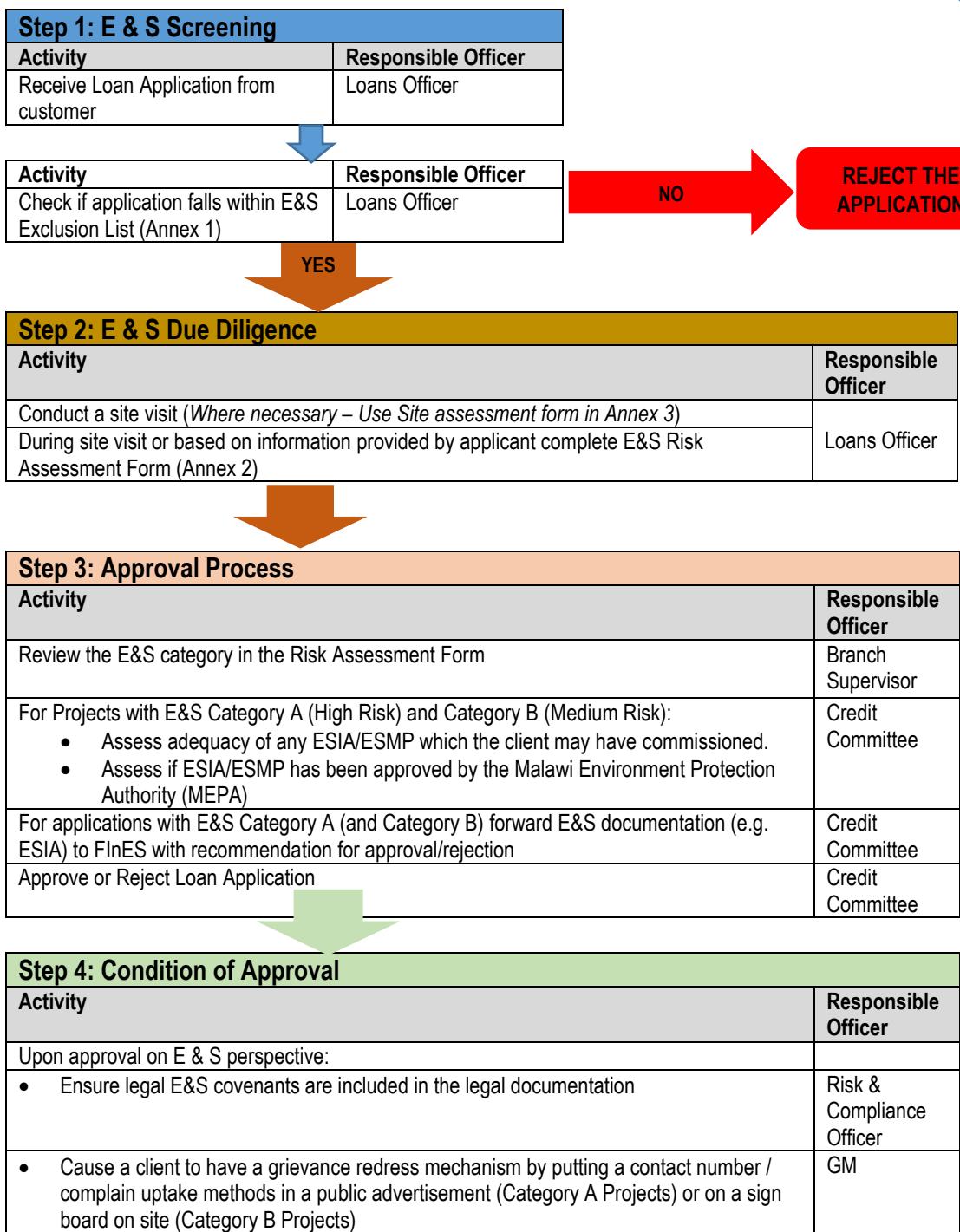


Figure 1:Flow chart for E&S Risk Assessment Procedure

**Note:** - Most of the products and services offered by SS are under Category C, i.e. low risk and as such, upon application, the CC must immediately proceed with loan assessment unless otherwise.

## **Section 5. Environmental and Social Risks Monitoring and Review.**

The Operations Department shall ensure that all projects financed by Sunbird Sacco 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 Sunbird Sacco 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, Sunbird Sacco 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 Loans Officer shall contact the operations department 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 Sunbird Sacco 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:

Periodic site visits by the environmental and social risk analysts. During site visit a form available in annex 4 'Post-loan Disbursement E&S Risk Monitoring checklist' shall be used while focusing on implementation of EMP/ESMP section as analysed in the ESIA report.

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.

Review and ensure compliance with grievance mechanism during site visit.

Maintain a database of approved loans from an E&S perspective—using the template for monitoring in annex 4

Periodic preparation of reports to the management detailing environmental and social risk status of various projects.

Annual preparation of E&S compliance reports including mandatory Annual Environmental Performance reports.

## **Section 6: Grievance Redress Mechanism (GRM)**

### **6.1 Introduction**

Sunbird Sacco operates in an open environment and has an open-door policy that enhances support, friendship and professional collaboration. Sunbird Sacco 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. Sunbird Sacco will continue addressing the environmental impact of its business activities, directly or indirectly with those doing business with Sunbird Sacco

### **6.2 Purpose of the GRM**

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. Sunbird Sacco 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 project. 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 Sunbird Sacco as per the procedures outlined in section 6.5 of this Procedure.

### **6.3 Objectives of the 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 Sunbird Sacco and community as a whole.

Build up a relationship of trust amongst Sunbird Sacco project staff, affected parties and other project stakeholders.

Ensure transparency in dealings amongst stakeholders including affected parties through a proper communication system.

### **6.4 Scope of the GRM**

The GRM applies to;

All project related complaints in connection with projects financed by the Financial Inclusion and Entrepreneurship Scaling (FInES) Project.

The GRM will be applied to FInES funded projects regardless of the proportion of participation in the total loan agreement.

## **6.5 Procedures for channelling the project related grievances.**

### **6.5.1 Receiving:**

Any project affected party 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, complainant should provide sufficient information so that timely solution for the complaint is obtained.

Sunbird Sacco will receive complaints from project affected parties through the following outlines touch points:

#### **6.5.1.1 Call Centre**

Project affected party can make a direct call to the Sunbird Sacco Call Centre for reporting any project related complaints and/or queries. The complaint received through Call Centre will be directed to nearby branch where the project is being implemented for resolution. The *Customer Service/Help Desk* at the branch will evaluate the complaint and provide feedback to the affected party within 10 working days. Whereas the complaint has not been successful resolved within the 10 days at branch level, the complaint shall be escalated to the *Operations Officer* for further action.

#### **6.5.1.2 Branch**

Project affected party can walk into any Sunbird Sacco 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 *Operations Officer* for further action.

#### **6.5.1.3 Email**

Project affected party can send an e-mail to of [sunbirdsacco@gmail.com](mailto:sunbirdsacco@gmail.com) 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 Branch Supervisor for Blantyre for resolution within 10 working days.

#### **6.5.1.4 Letter**

Project affected party can raise complaints by sending a letter to any of Sunbird Sacco branches and/or head office, of Sunbird Sacco, P.O Box 284, Blantyre. The complaints received through letters shall be resolved within 10 days.

#### **6.5.1.5 Website**

Sunbird Sacco's website, of [www.sunbirdsacco.com](http://www.sunbirdsacco.com) provides a host of services for customers. Project affected party can also report complaints through the website. Sunbird Sacco will acknowledge receipt by sending back a reference number to the complainant. The Sunbird Sacco shall work out the complaint within 10 days and respond back to the complainant.

#### 6.5.2 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 of *Call Centre* shall coordinate the institutions GRM and will be the institutions focal person.

#### 6.5.3 Escalation

Where an agreement has not been reached at branch level, the complainant will be offered an opportunity to escalate the complaint to Sunbird Sacco 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 General Manager of Sunbird Sacco. If the complainant is still not satisfied with the outcome of the redress by the GM, the complaint can be made to the Reserve Bank of Malawi (RBM) through its Grievance Redress Committee (GRC) for remedial action. The World Bank GRM is also available to the complainants or any of their stakeholders to seek redress if their grievances are about the RBM.

#### 6.5.4 Closure

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

### 6.6 Recording and Tracking

All Sunbird Sacco branches shall maintain completed Customer Complaint form as shown in annex 6. Keeping records of complaints collected from relevant branches will be the responsibility of the Operations Officer. All complaints will be centrally recorded for enabling continuous tracking of implementation of resolutions.

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).

## **Section 7: Information Disclosure to The Public**

In compliance with the regulatory requirement and best practice, this policy will be disclosed on the company website to make it available to the public.

All Sacco 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. Sunbird Sacco through its website will disclose the following key information:

### **(i) 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.

### **(ii) 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;

#### **(a) Category A projects**

Sunbird Sacco 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 Sunbird Sacco decision.

#### **(b) Category B projects**

Sunbird Sacco will disclose the ESIA and ESMP at least 10 days before Sunbird Sacco decision.

#### **(d) Category C projects**

Sunbird Sacco will disclose the identified E&S risks and their proposed mitigation measures, where applicable, at least 5 days before Sunbird Sacco decision.

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

All projects seeking finance under this scheme will be subjected to initial screening for their environmental and social (E&S) risks. The annexed Exclusion List below is the first tool that Sunbird Sacco will use to sieve applications for projects that can be financed under this scheme.

Therefore, the Exclusion List outlines various businesses and purposes which cannot qualify for Credit facilities in accordance with Sunbird Sacco 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.

- Production or trade in any product or activity deemed illegal under Malawian laws or regulations or international conventions and agreements.
- Production or trade in weapons or ammunitions.
- Gambling, casinos, and equivalent enterprises.
- Production or trade in alcoholic beverages (excluding beer and wine).
- Activities targeting tobacco manufacturing, processing, or specialist tobacco distribution, and activities facilitating the use of tobacco.
- Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (CITES).
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where [Sunbird Sacco (Malawi)] considers the radioactive source to be trivial and/or adequately shielded.
- Production or trade in or use of unbounded asbestos fibres.
- Any activities involving significant degradation or conversion of natural and/or critical habitats and/or any activities in legally protected areas.
- Activities damaging to national monuments and other cultural heritage.
- 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.
- Production or trade in wood or other forestry products other than from sustainably managed forests.
- Production or trade in pharmaceuticals, pesticides/herbicides, ozone depleting substances, polychlorinated biphenyls (PCBs) subject to international phase outs or bans.
- Production or activities involving harmful or exploitative forms of forced labour or hazardous child work.
- 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.).
- 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.
- Activities involving land acquisition and/or restrictions on land use resulting in involuntary resettlement or economic displacement.

- 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.
- Activities involving live animals for experimental and scientific purposes.

## Annex 2: Environmental & Social Risk Assessment Form

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

<b>Part II: E&amp;S Categorization based on Activities involved</b>			
<b>Section 1: Category A</b>			
A proposed project is classified as Category A if is likely to have significant adverse environmental impacts that are sensitive, irreversible, diverse or unprecedented.			
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.			
<b>Type of Project Activity</b>	<b>Tick</b>	<b>Type of Project Activity</b>	<b>Tick</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), large-scale 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)			
If you have checked any activities herein above then, any amount, any tenure any segment, the project is considered high Risk 'Category A'; Complete Part III Otherwise, proceed to activities in Category B below			

**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:

Type of Project Activity	Tick	Type of Project Activity	Tick
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	
If you have checked any activities herein above then, any amount, any tenure any segment, the project is considered high Risk 'Category B';			
Complete Part III			
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.

<b>Type of Project Activity</b>	<b>Tick</b>	<b>Type of Project Activity</b>	<b>Tick</b>
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)	

If you have checked any activities herein above then, the Project is Category C.;  
Complete Part III

**Part III: Conclusion of the Environmental & Social Risk Categorization.****3.1 E&S Risk category**

*The Project is Category \_\_\_\_\_*

**3.2 Reason(s) for Categorization:****3.3 Is the Project prescribed by the Environment Management Act (2017) as requiring to undergo an ESIA (Refer to Annex 5 of ESMS)****3.4 Complete the following:**

	Yes/No/NA	Additional Information/Status/Remarks
<b>ESIA certificate/ESMP approval</b> from Malawi Environment Protection Authority available? (Attach a copy with its general and specific conditions.)		
<b>OSHWA related certificate(s)</b> available? (Attach with conditions if any).		
<b>ESIA reports</b> available? (attach with EMP/ESMP Section)		

If <b>NO</b> ESIA/ESMP Conducted does the project have <b>formal dispensation</b> from Malawi Environmental Protection Authority (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 loans 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 and Social Impact Assessment (ESIA) and/or Environmental Audit (EA) certificate from Malawi Environmental Protection Authority (MEPA) available?</p> <p><i>(Attach a copy-with general and specific conditions.</i></p>			
2	<p>Are the Occupational Safety, Health and Welfare Act (OSHWA) related certificates available?</p> <p><i>(Attach OSHWA registration of factory/workplace and OSHWA compliance certificates with their conditions if any).</i></p>			
3	<p>Are the booklets for ESIA 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	Does the company/project owner have a good relationship and engage/consult surrounding community to address their project related complaints/grievance?  <i>(Provide status as per information you have and attach stakeholders meeting 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 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	
Brief description of the type of safety concerns and adopted 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? (Refer annex 1 of ESMS)		
Does the project have the required clearance certificates?		
Environment clearance (ESIA Certificate / ESMP Approval)		
Workplace Registration Certificate		
Local Council Business Licenses (if any)		
Others, please specify		
Is the project compliant to E&S conditions or covenants (if any), or agreed action plan raised by the Sacco?		
Are there any changes in the client's business activities which may have an impact on the environment and social safeguards?		
Are there any 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		
Have any complaints/grievances been raised relating to the project?		

<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 and Social 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 51/ha of ultra-low volume pesticides application; or
  - A.1.6.2 more than 1 1/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 will 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 networks with more than 10 kilometres of pipeline.

A3.5 Area of greater than 100 ha, or expansion of existing reservoirs by greater than 500000 1 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 Explosives 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 kind 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



## Annex 6. Complaints Reporting Template