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RSB ESMP (environmental and social management plan) Guidelines

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Note on the use of this document

These guidelines are designed to help the operator understand the RSB ESMP process.

The guidelines should be read together with the RSB impact assessment guidelines (RSB-GUI-01-002-01) which will provide a map book through the various processes required to complete the RSB impact assessment process.

These guidelines can be used by the auditor to get a better understanding of key-aspects to be considered during certification process.

These guidelines were developed in collaboration with:
Coastal & Environmental Services
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Guidelines for Environmental and Social Management Plan (ESMP)

1 INTRODUCTION

The RSB Environmental and Social Management Plan (ESMP) is a living organic document that is constantly updated and improved as the project progresses.

2 PURPOSE OF THE ESMP:

- Ensuring compliance with the RSB standard
- Ensuring compliance with national regulatory authority stipulations and guidelines which may be local, provincial, national and/or international;
- Ensuring that there is sufficient allocation of resources on the project budget so that the scale of ESMP-related activities is consistent with the significance of project impacts;
- Realising environmental and social goals and objectives for the project;
- Verifying environmental and social performance through information on impacts as they occur;
- Responding to changes in project implementation not considered in the impact assessment process thus far;
- Responding to unforeseen events; and
- Providing feedback for continual improvement in environmental performance.

In order to achieve the ESMP objectives, the scope of an ESMP should include the following:

- Definition of the environmental and social management objectives to be realized during the life of a project (i.e. pre-construction, construction, operation and/or decommissioning phases) in order to enhance benefits and minimise adverse environmental & social impacts.
- Description of the detailed actions needed to achieve these objectives and timeframes, including how they will be achieved, by whom, by when, with what resources, with what monitoring/verification, and to what target or performance level. Mechanisms must also be provided to address changes in the project implementation, emergencies or unexpected events, and the associated approval processes.
- Clarification of institutional structures, roles, communication and reporting processes required as part of the implementation of the ESMP.
- Description of the link between the ESMP and associated legislated requirements.
- Description of requirements for record keeping, monitoring, reporting, review, auditing and updating of the ESMP

3 MONITORING

Monitoring is a key component of the ESMP. To do this, data must be collected at agreed intervals, which will depend a lot on the nature of the activity and threshold being monitored and what is prescribed in the P & Cs and minimum requirements.

4 MITIGATION MEASURES AND THE ESMP

In order to comply with RSB Principle 2, it is essential that the impact assessment process results in an Environmental and Social Management Plan (ESMP). This plan needs to ensure compliance with all the RSB principles. It will be based firstly on the mitigation measures recommended in the various specialist studies, but in addition there are management actions that apply to all biofuels projects (according to RSB principles). Examples are Principles 4 (Human rights) and 11 (Technology). It also needs to provide guidelines on how the impact of the project will be monitored over time, and how the ESMP can be revised if there are changes to the project.

In some cases, biofuel operations may not be required to undertake an ESIA or RESA, but will always need to develop an ESMP to ensure compliance with the RSB principles. This may be the case for biofuel developments that, for instance, simply entail a switch from existing crops to a biofuel crop and where the screening process has not triggered any specialist impact studies. In these cases, the ESMP would follow the same process and content as recommended below, but would need to indicate how and when the baseline data will be obtained. This data should be collected as early as possible.

Mitigation measures should be part of design and implementation to ensure that the project is environmentally and socially acceptable and sustainable. Mitigation measures reduce negative impacts and enhance positive impacts (SCBD 2006). Mitigation measures can include:

- Avoidance (or prevention)
- Mitigation (Considering changes to various aspects of the proposed development)
- Compensation (associated with residual impacts)

Avoidance should always be given priority and compensation is a last resort. Sometimes, even compensation is not possible. In this case, the proposed development may be rejected due to unmitigable impacts (SCBD 2006).

The ESMP is a tool that provides the developers with instructions on activities when implementing the project. This plan needs to cover all the phases of the project (construction, operational and decommissioning), and must contain environmental and social objectives.

Mitigation measures can be separated into those that will be done immediately as required by the RSB minimum requirements and those that will be done over a specified time period, in accordance with the progress requirement of the RSB. However, described mitigation measures must be specific and time dependent in order to make them auditable. Given that it is not always possible to foresee all possible impacts and eventualities; the ESMP should not be viewed as a prescriptive and inflexible document but should be regularly updated to remain aligned with the project as it progresses from construction to operation and, finally to decommissioning. These updates should be done alongside a continued stakeholder engagement process where the impact assessment process indicates that impacts will be felt on neighbouring communities or even on a regional basis. The RSB standard requires, in particular that some reports are produced annually or periodically, and they can be integrated into the ongoing and continuous process of implementing the ESMP.

Environmental and Social Management must become a continuous process to ensure that environmental impacts are mitigated throughout the project life cycle (DEAT, 2004). This requires environmental monitoring and the establishment of an Environmental and Social Management System (ESMS). The ESMS provides a systematic framework and approach to minimise risks and control

environmental and social aspects. The ESMS is part of the ESMP.

It is a cyclical process to achieve continuous improvement in social and environmental performance (EPA, 1995a). To achieve continuous improvement, a list of potential impacts; a set of operational procedures for monitoring, controlling and reducing impacts, and recording the results; and a procedure for internal audits of the procedures is required.

During the ESIA the ESMPs needs to be prepared for specific areas of management functions such as solid waste management, outgrower management or resettlement policy/plan. Figure 1 below provides an illustration of the link between Environmental Management Systems, Environmental & Social Management Programmes and Environmental & Social Management Plans. In practice all of these are consolidated into an integrated ESMP. In Figure 1 ESMPs are illustrated as being prepared for isolated and distinct functions.

In cases where biofuel projects are developed in regions of poverty, or if the project will result in some voluntary resettlement or there may be potential food security impacts, then there will be a need to develop a Resettlement Action Plan (RAP) (principle 12) and a Social Development Plan (principle 5) during the implementation phases of the project. The process of developing these plans needs to be a process of negotiation (based on Free Prior & Informed Consent - FPIC) involving all stakeholders.

A RAP requires a complete census of the affected households. It is not practical for these plans to be completed unless the project will definitely go ahead. The census is costly and proponents will only proceed if assurance of project approval is given. The RAP usually takes place after approval. However, certification cannot be awarded unless a RAP is in place and plans, as agreed by the stakeholders, are available for its implementation in a time bound way.

In regions of poverty, the ESMP should have social development plans that will ensure that the biofuel operation will improve the local socio economic situation. It should also make recommendations on the development of a RAP. If a preliminary policy document on Resettlement is needed for RSB accreditation then a Resettlement Framework Policy could be developed in consultation with the developers and affected parties to provide direction for the RAP. It should be noted that only voluntary resettlement complies with the RSB principles.

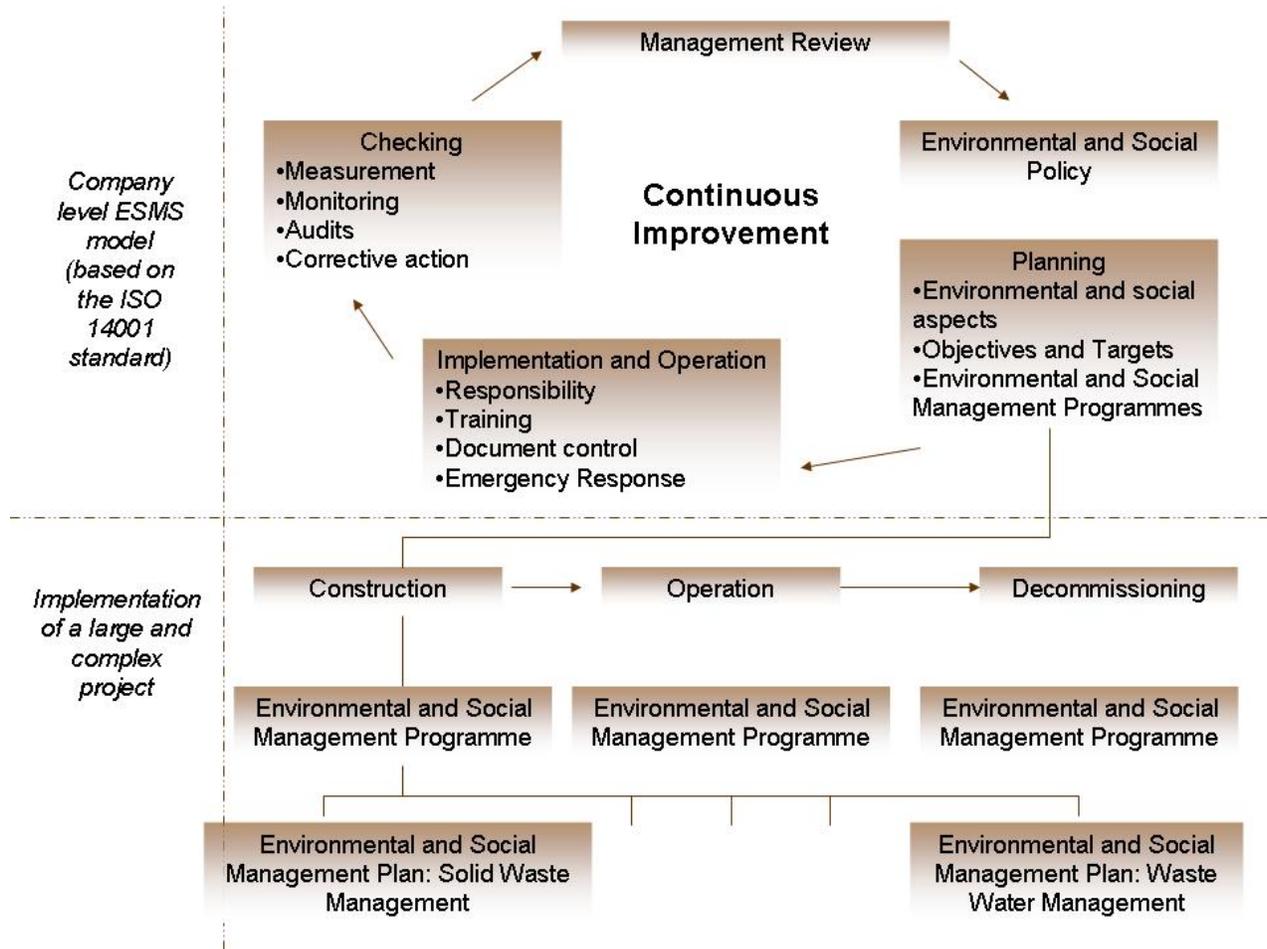


Figure 1: Illustration of the hierarchical link between an Environmental Management System (EMS) (for an organisation), the Environmental Management Programme (which fits within the EMS) and the Environmental & Social Management Plan (which fits within the Environmental Management Programme) (Source: Lochner and Rossouw, 2004)

5 MONITORING PLAN

The monitoring process is an essential component of continual improvement. Monitoring is also necessary for compliance with principle 2 and it is essential for the certification status. Consequently, an ESMP for a biofuel project needs to include a Monitoring Plan (MP) even if this is not required in the national environmental regulations.

The purpose of recommending monitoring programmes is to ensure that information gaps are addressed (where these exist) and to detect potential problems as early as possible when they arise. Monitoring programmes may need to be recommended for the pre-construction, construction, operational and/or decommissioning phases of a project.

Recommendations for monitoring programmes should include the specific questions to be answered, the frequency of monitoring, responsibility for carrying out monitoring and analysis, targets and

indicators to be used in monitoring, significance thresholds, responsibility for implementing adaptive management responses when required, as well as reporting and audit requirements.

Environmental monitoring provides the data for checking and revising the ESMP. By instituting regular monitoring, environmental & social impacts can be detected early and remedial action implemented (EPA, 1995b). The process for establishing a monitoring programme consists of the following actions:

- specify management objectives;
- specify monitoring objectives;
- identify the scope of monitoring;
- recommend appropriate monitoring technology;
- specify how the information collected should be used in decision-making;
- define the spatial boundaries and select map scales and sites for observation, measurement or sampling;
- select key indicators for direct measurement, observation or sampling;
- define how the data will be analysed and interpreted and how it should be presented in monitoring reports;
- define the precision and accuracy required in the data;
- consider compatibility of data to be collected with historical data and with related contemporary data.
- set minimum requirements for monitoring.

The monitoring actions need to fit within the ESMP, monitoring programme and performance assessment, as shown in the Figure below.

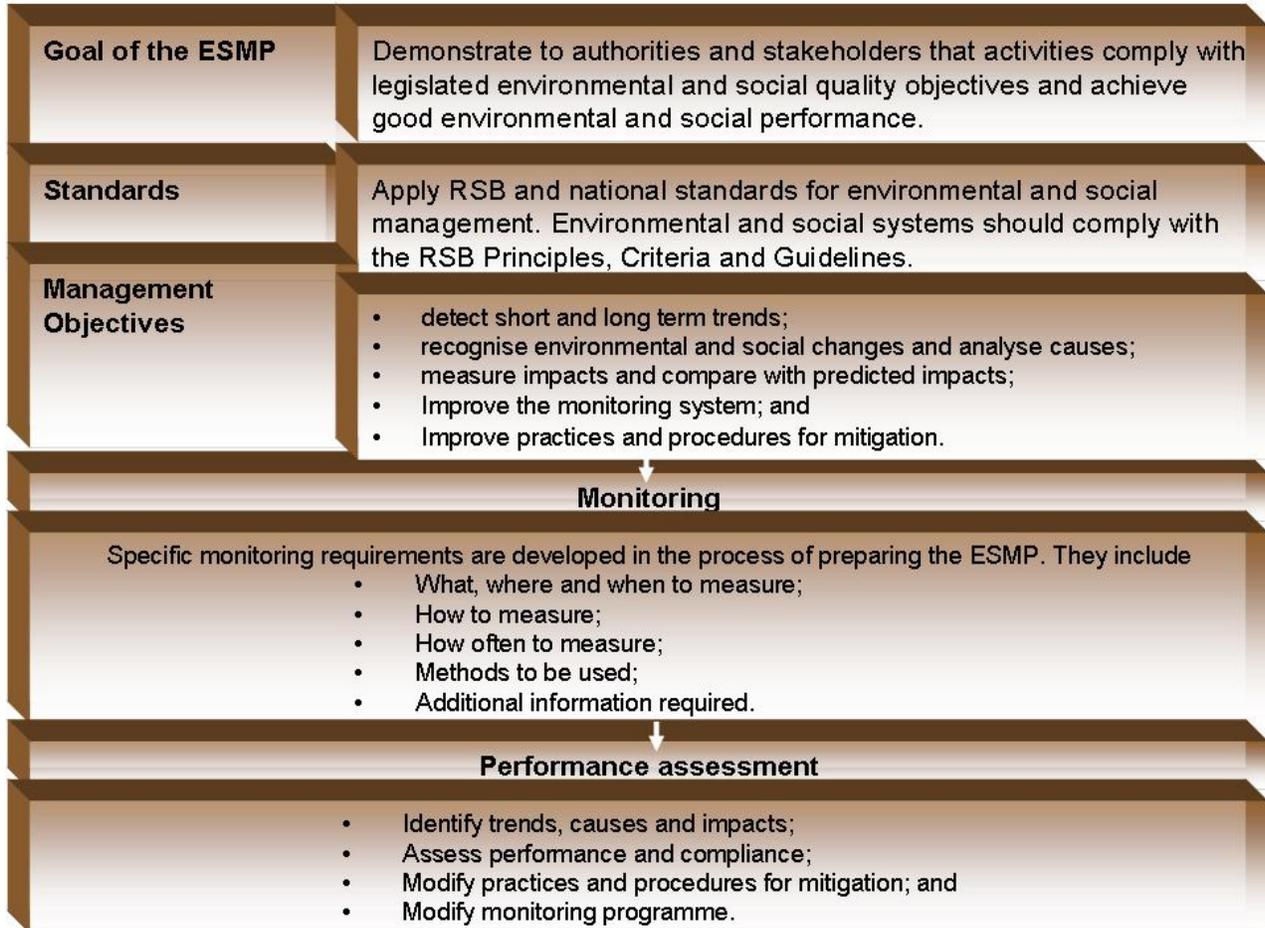


Figure 2: Framework process for developing the ESMP and monitoring programme (adapted from EPA, 1995b)

The monitoring programme should detect trends to enable intervention measures to achieve good environmental performance.

Within each environmental component or specialist area (e.g. groundwater, terrestrial ecology and SIA) there are appropriate techniques for collection, analysis and interpretation of data. The criteria for effective data collection, management and reporting include:

- realistic sampling programme (temporal, spatial and point data);
- collection of quality data;
- compatibility of new data with historical data;
- cost effective data collection;
- quality control in measurement and analysis;
- appropriate databases to capture, store, retrieve and display the data; and
- reporting for internal management and external auditing.

As in the case of the ESMP, the MP should not be viewed as prescriptive and inflexible. RSB principles, criteria or indicators may change over time and indicators will be developed of a regional nature also. In addition, previously unpredicted impacts may arise that need to be monitored. However, it is important to be able to compare results from each round of monitoring. Changes in the methods used could potentially undermine comparisons and monitoring the long-term trends.

6 STRUCTURE & CONTENT OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Although there is no universally accepted standard format for ESMPs, the format needs to fit the circumstances in which the ESMP is being developed (World Bank, 1999). According to the World Bank (1999) ESMPs should contain the following:

- **Summary of Impacts:** Summarise predicted negative environmental impacts. This should be reported against the RSB principles, criteria and indicators.
- **Description of mitigation measures:** The ESMP identifies feasible and cost effective mitigation measures to reduce environmental impacts to acceptable and legal levels. Mitigation measures should be described in detail and be accompanied by designs, equipment descriptions, and operating procedures. Mitigation measures must be aligned with RSB requirements
- The **technical aspects** of implementing the mitigation measures should be described.
- **Description of monitoring programme:** Environmental and social performance monitoring should be designed to ensure that mitigation measures are implemented. The monitoring programme should clearly indicate the linkages between impacts, indicators to be measured, measurement methods and definition of thresholds that will signal the need for corrective actions.
- **Institutional arrangements:** Responsibilities for mitigation and monitoring actions should be clearly defined.
- **Legal enforceability:** The key legal considerations in ESMPs are the legal framework for environmental and social protection.
- **Implementation schedule and reporting procedures:** Document timing, frequency, and duration of mitigation. The measures should be specified in an implementation schedule, linked to the overall project. Progress reports of mitigation and monitoring measures should also be clearly specified, as well as procedures for dealing with project changes.
- **Cost estimates:** Costs should be calculated for both the initial investment and recurring expenses for implementing the mitigation measures.

The suggested structure and content of the Environmental & Social Management Plan is presented below.

Table1: Proposed Content and Structure of the ESMP

#	Section Title	Contents of Draft Report
1	Introduction	Explain the context and purpose of the Report
2	Background information	This section should describe the project in brief, as well as outline the impact assessment process followed.

#	Section Title	Contents of Draft Report
3	Details of the ESMP (project specific)	This section should provide details of the Environmental and social Assessment Practitioner (ESAP) as well as their expertise. It should describe the scope of the ESMP and provide definitions of terms.
4	Project Description	This section should describe the project, or alternatively cross reference to the project description in the ESIA or RESA.
5	Description of the Affected Environment	This section should briefly describe the social and natural environment of the project area, or alternatively cross reference to this description in the ESIA or RESA.
6	Environmental and Social Policies, legislation & standards	This section should outline applicable environmental and social policies and guidelines, and define the environmental and social objectives and targets for the project. It should also outline the applicable legislation.
7	Structure, content and implementation schedule for specific ESMP's	This section describes the scope of the various ESMPs that will be required to deal with specific topics (waste etc), for the construction, operation and closure phases of the project. Detailed ESMPs can be prepared after impact assessment is completed, once project approval is gained and sufficient detail about the project is available to develop environmental and social management specifications.
8	Organisational & administration requirements for Environmental & Social management	This section should outline the roles and responsibilities of each of the required positions for the ESMP. These roles should include the role of the proponent, the contractor, the designated environmental officer(s), environmental control officer(s), among others. It should also outline the procedure for reporting, environmental, social, health and safety training and preparations for emergencies.
9	Environmental & Social Monitoring Programme	At this stage in the ESIA process only broad guidelines on the suitable indicators for monitoring, and general approaches to use for monitoring need to be developed. More specifics, as outlined in the Figure above can be developed once site specific information and project detail has been confirmed. Often details about the project change as a result of the ESIA or conditions of approval, and hence the nuts and bolts of the monitoring programme should only be developed once finality is achieved.
8	Conclusions	This section should summarise the ESMP
9	Annexures	This section should include any additional material not included in the main report. This could include an example of safety and environment training material, as well as environmental complaint and incident registers.