





MINUTES OF THE LOCAL PROJECT APPRAISAL COMMITTEE FOR THE "NATIONALLY APPROPRIATE MITIGATION ACTIONS (NAMA) FOR INTEGRATED WASTE MANAGEMENT AND BIOGAS IN UGANDA" PROJECT HELD ON 31ST AUGUST 2017 AT IMPERIAL ROYALE HOTEL, KAMPALA

IN ATTENDANCE

NO	NAME	SEX	TITLE/ORGANISATION	PHONE	EMAIL
1	Maris Wanyera (Chair)	F	Director Debt and Cash Policy Ministry of Finance, Planning and Economic Development	0752426456	maris.wanyera@finance. go.ug
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27	Michael Ahimbisibwe	М	Ag. Principal Energy Officer/ Ministry of Energy and Mineral Development	0752996710	mahimbisibwe@energy.go.ug
28	Daniel Omodo McMondo	М	Programme Analyst Energy and Environment / UNDP	0772289140	daniel.omodo@undp.org

AGENDA

- 1. Prayer
- 2. Adoption of the Agenda
- 3. Self-introductions
- 4. Communication from the Chair and Co-chair
- 5. Presentation of the Project document on NAMA for Integrated Waste Management and Biogas in Uganda and discussions.
- 6. Presentation of the Social and Environmental Screening report and discussions.
- 7. Approval decisions
- 8. Closure of the meeting

MINUTES

Min	Key issues raised / Discussion	Key recommendation	Responsible Institution(s)
Min. 01	A prayer was said.		
Min. 02	Adoption of the AgendaThe Agenda was adopted without any changes		All
Min. 03			All
Min 04	Communication from the Chair		•

Min. 04 Communication from the Chair

The Chairperson of the Meeting (Ms. Maris Wanyera) said that the purpose of the meeting was to secure endorsement of the project entitled NAMA on Integrated Waste management and Biogas production in Uganda by stakeholders.

She underscored the importance of proper waste management in realizing green growth and sustainable industrial development objectives for Uganda and she congratulated the Ministry of Energy and Mineral Development and other Responsible Partners for the successful design of the project.

She thanked UNDP for the continued support to Government of Uganda in mobilizing, delivering and reporting on development finance especially under environment and Climate change finance. She appealed to stakeholders to provide input into the final stakeholder consultation before the project is approved by the Government.

She confirmed commitment from the Ministry of Finance, Planning and Economic Development and the Global Environment Facility (GEF) Operational Focal Point to support the final approval process for project implementation.

She observed since the project was in the field of environmental management, it would help address the prevailing waste management problems in the urban areas.

Communication remarks from the UNDP Co-Chair

The Co-Chair Mr. Thomas Ole-Kuyan appreciated the adequate representation of key stakeholders drawn from waste management sub sector and said that it was procedural for UNDP to undertake a Local Project Appraisal Committee meeting with the aim of formally approving any project.

He highlighted the importance for participation of stakeholders in support of the project and said that certain challenges normally face project implementation and utilization of resources. The problem of resource utilization was affecting many institutions for instance, at the national level, Government of Uganda was reported to have utilized only 70% of funds allocated to it in the previous Financial Year.

Min. 05: Presentation of the Project	Key Recommendation	Responsible
document	·	Institution
The project was presented by Mr. Michael		
Ahimbisibwe, Acting Principal Energy Officer		
in the Bioenergy Division of the Ministry. (See		
detailed presentation in Annex 1).		
Key issues discussed after presentation of the Project document		
(i) Integration of the project with NEMA		
Municipal Waste Compost programme.		
It was clarified that the project preparation		
process was consultative and involved		
feasibility studies to ensure that project		
integrated ongoing initiatives including the		
compositing of waste into manure and avoid		
duplication of effort and overlap.		
(ii) Monitoring, reporting and Verification	Develop a comprehensive	Ministry of
The project is complex and requires a clear	MRV as part of the	Energy
MRV to ensure easy tracking of electricity	implementation plan	
generated from the project.		Ministry of
(iii) Distribution of project funds between components and co-financing	Ensure that more resources go	Ministry of Energy
components and co-jinancing	to on ground investments as	Energy
The meeting underscored the importance of	per project document.	
allocation more resources to on-ground		
investment and less on technical assistance and		
upstream activities. It was clarified that		
Component 1 on policy and institutional		
frameworks was allocated a relatively small		
budget worth USD 250,000 compared to the		
total project budget worth USD 3,070,030.		
Nature of co-financing: UNDP committed cash	NEMA pledged to provide in-	
co-financing of USD 900,000 towards scale up in phase 2 while so financing from other	kind expertise for Component	
in phase 2 while co-financing from other partners such as KCCA and NWSC was either	1, help in conducting reviews, monitoring and formulating	
in-kind or parallel financing to on-going projects	policies, regulations and	
in kind of parallel matching to on-going projects	byelaws for example on	
	oyenaws for example off	

 (iv) Project implementation schedule: How is implementation of the different components linked UNDP observed that Component 1 Serves to create an enabling environment for the waste management, Component 2 will focus on piloting biogas electricity. UNDP clarified that the NAMA Biogas project was designed based on generating off take fees under a business 	tipping fees in line with the Polluter Pays Principle. There was need for proper siting of the biogas reactors to ease movement of liquid and solid waste.	
modelplusawarenesscreationunderComponent 1.(v)Waste availability, collection sites and transportationMembersunderscoredtheimportanceof	Develop an incentive mechanism to encourage sorting waste at household level or collection centers.	KCCA, Jinja Municipal Council/District and other Municipalities
ensuring sustainable supply of quality waste as feedstock to the biogas digesters. It was noted that during the project design phase, availability of waste was assessed and found sufficient.	Integrate private waste collectors and neighboring urban centers in the waste stream to ensure sustainable supply	Municipalities.
 (vi) Stakeholder consultation and participation The project has many stakeholders and there is need for a clear mechanism of coordination. Design of the project was inclusive and very consultative in nature which should be maintained during implementation. 	The project will establish multi-stakeholder platforms to secure wider participation of various stakeholders and avoid duplication.	MEMD
(vii) Project inception The meeting appealed for ensuring implementation of activities start early and avoid delays in recruitment and procurement processes. Project management team was advised to initiate recruitment process and procurement of equipment	Agree on procurement and recruitment modalities and prepare equipment specifications before end of September	MEMD and UNDP
(viii) Project sustainability The meeting observed that there was need to develop a clear business model that provides for vertical integration and creates linkages with other sectors of the economy such as agriculture	Urban authorities to review their structures to provide staff to deal with Municipal Solid Waste.	KCCA and participating Urban Authorities.

to utilize waste sludge as manure. The project could facilitate a south to south learning exchange in Ghana to look at use of sludge for briquettes. It was reported that the Uganda Support to Municipal Infrastructure Development (USMID) project had supported Municipalities to prepare guidelines for waste management, however the byelaws were not yet	Undertake capacity assessment of local governments/urban authorities in waste management to determine areas of capacity building as part of project inception activities. Ensure co-financing	MEMD/NEM A
complete and Jinja had not received financial support.	commitments are tracked and Explore opportunities to support Municipalities on awareness creation, involvement of youth, women and equipment during project implementation.	
	Build the capacity of the Implementing Partner and Responsible Partners to the project in financial management and accountability procedures in line with their regulations for ease of implementation	UNDP
Min 06: Presentation of Project Social and Environmental Safeguards Report.	Key Recommendation	Responsible Institution
The Project SES report was presented by Daniel Omodo McMondo as detailed in Annex 2.		
Key issues discussed after presentation of the project SES Report Undertaking site specific social and environmental assessments: There was an observation that EIAs and M&E plans take so long to be approved and there is need for proper timelines on when this was to be done.	The Social and Environment Screening Report was approved	
Min. 07 Decision Considering the above discussion and agreed way forward, the Chairperson sought endorsement for approval from partners. A motion to endorse and approve the project was provided by representatives of Jinja Municipal Council, Urban Authorities Association of Uganda, Mbale Municipal Council, Kakira Sugar Limited and the National Environment Management Authority (NEMA because it fits into the NEMA Strategic Plan). There were no reservations to the approval of the project.	Finalize project documents and facilitate signing by the Minister of Finance, Planning and Economic Development and other partners	Finalize project documents and facilitate signing by the Minister of Finance, Planning and Economic Development and other partners

Minute 08: 1	Next Steps and Closure	
1	Share minutes of the meeting with KCCA and NWSC	UNDP
2	Finalize project document and facilitate signing by partners	UNDP
3.		UNDP/MEM
	November	D
4.	Prepare and sign Memoranda of understanding and letters of	UNDP/MEM
	agreement between UNDP, Ministry of Energy and Partners	D.
	before end November	
5.	Initiate procurement and recruitments to ensure early project	MEMD
	implementation start	
6.	Constitute project board/steering committee	
Closure of th	ne Meeting	

In her closing remarks the Chairperson highlighted importance of implementing projects on time to avoid returning funds to donors when Ugandans need services. She noted that Ministry of Finance, Planning and Economic Development is concerned about delayed implementation of projects and appealed for observing activity timelines to ensure completion in 5 years as per approval. Partners should complete inception phase activities in 2017 to ensure that full implementation starts in early 2018. She underscored the importance of transparence and accountability in ensuring value for money. She appealed for UNDP to provide refresher training for Implementing and responsible partners on project management and use of UNDP policies and procedures to avoid delays in planning and reporting. She reiterated commitment of government and Ministry of Finance in ensuring that project implementation is smooth.

There being no other business, the meeting was adjourned at 1:00 pm

Ms. Maris Wanyera

Director Debt and Cash Policy Ministry of Finance, Planning and **Economic Development**

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Mr. Thomas Ole - Kuyan

Deputy Country Director (Operations)

United Nations Development Programme

Date:

Date:

27 Sept 2017

Minutes of LPAC meeting for the NAMA on Integrated Waste Management and Biogas project in Uganda held on 31st Aug 2017



Basic facts about the Project

- Project duration: 2017 2022 (5 Years)
- ► Total budget: US\$ 16,958,030 (including GEF/ UNDP cash = US\$ 3,070,030 and Co-financing US\$ 13,888,000)
- Implementing modality: National Implementation Modality(NIM).
- Executing Agency: United Nations Development Programme
- Implementing partner: Ministry of Energy and Mineral Development
- ▶ Responsible parties: NEMA, MWE, MoLG, MLHUD, NWSC,

MFPED, KCCA, ERA, PSFU, UECCC, UIA)

Linkages: Vision 2040, UNDAF, CPD, NDP II, SDGs.

Overall objective: "To improve waste management practices in towns and municipalities through the introduction of integrated waste management for biogas energy generation".

Overall target : The lifetime tonnes of CO_2 eq reduction of 1,803,000 tonnes of CO_2 eq. Including 260,000 tonnes of CO_2 eq from renewable electricity production and 1,542,000 tonnes CO_2 eq from methane reduction the GHG reductions

Project Formulation Process

- It was a highly consultative process.
- Endorsement letter -.
- GEF approval of Project Identification Form (PIF)/ concept note and Project Preparation Grant Approval -
- Project preparation Inception workshop / stakeholder consultation workshop on 31st March 2016 in Kampala.
- Draft Project document validated on 10th November 2016.
- Project document submitted to GEF Sec end of March 2017.
- Project document was cleared by GEF Secretariat on 2nd August 2017

Development Context

Progress

Existence of relevant policies, institutions and laws

Development Challenges

- Unplanned settlements
- Pollution
- Land degradation,
- Climate change impacts
- Biodiversity loss

Bottlenecks Low levels of awareness,

- Inconsistent policies
- relevant for implementation
 Poor practices of municipal waste management. 90% of
- population rely on fuelwood for their energy needs.Weak institutional
- veak institutional coordination and implement,
 Inadequate Monitoring and Evaluation mechanisms



Target beneficiaries and geographi

- focus
- Primary beneficiaries shall be men and women citizens of Uganda who shall Integrated waste management and Biogas project.
- Secondary beneficiaries shall be relevant Ministries, Departments, Agencies and Non-state actors whose capacity will be strengthened.
- Project will start with 3 selected pilot sites with a plan to scale up to five municipalities selected from Kampala, Jinja, mbale, Mbarara, Guly and Masaka that have sufficient waste for MSW-based biogas projects.

Overall Results Frame

Objective and Outcome Indicators	Baseline	Mid-term Target	End of Project Target	Assumptions
Indicator 1: Achieved direct GHG emission reductions by pilot biogas energy plants and replication (ton CO2eq/yr)	0 ton CO2eq/yr;	1,790 tonnes CO2eq/yr	13,000 tonnes CO2eq/yr	Sustained commitment of nationa authorities and provincial and municipal stakeholders.
Indicator 2: Extent to which implementation of comprehensive measures – plans, strategies, policies, programmes and budgets – to achieve low-emission development objectives has improved ¹	1. No policy or strategy for climate change is in place or major development policies/strategies have marginal emphasis on climate change	3. Policy/ strategy proposed and consultations on-going (quality is good and addresses the main climate change mitigation issues related to the biogas sector)	 Strong policy/ strategy adopted and institutional capacity for implementing key policy directives strengthened with adequate budget allocation 	Project activities can be implemented as planned. Adequate technical and operational performance of installed biogas systems.
Indicator 3: Number of public-private partnerships exploiting MSW-based biogas established (#)	0	2	3	

Project results (Cont'd)

	strengthening and c	olishing enabling market conditions, institutional capacity building for improved waste management and pased biogas systems
	Output 1:	Key activities
	Enhanced capacity of municipalities to develop waste management plans and manage municipal solid waste and wastewater in a more sustainable manner	 1.1 Capacity development of waste sector stakeholders on Integrated waste management. 1.2 Support the design and development of IWM plans and introduction of Municipal Solid Waste disposal / off-taker fees. 1.3 Promotion of MSW biogas technology among municipalities, project developers, industry and the general public. 1.4 Integration of MSW-biogas in national policies, programmes and incentives. 1.5 Multi stakeholder platforms on waste management and biogas established
	Budget	USD 250,000
		eporting increased awareness of Biogas technology, and capacity to a result of the projects awareness raising and capacity development

5 municipalities supported to gather quality data related to the quantity and composition of waste streams and develop IWM Plans including provision for MSW biogas
5 policy and regulatory proposals developed and adopted to support municipal IWM

Results (Cont'd)

Component 2: Demonstration and investment in integrated wastewater treatment and biogas plants

	Output 2	Key activities
	Biogas and WWT plants using MSW feedstock and sewage sludge procured	 2.1 Design Business models for biogas digester systems for a range of plant sizes 2.2 Execute feasibility studies permitting procedures and final engineering plans and formalize responsibilities of project partners
1	and fully operational	2.3 Technical support and training for pilot projects.2.4 Facilitate and secure investment financing for the 3 plants2.5 Procure and construct or modify biogas demonstration plants.
۱	Budget	USD 1,180,000
1	B 1 1	

Project results:

- 2.9MW installed electricity generating capacity of MSW-based biogas pilot projects
- 20,300 MWh/yr annual volume of electric energy produced by biogas pilots.
- US\$ 11.5m financing mobilized for investment in MSW-based biogas energy systems.

Results (Cont'd)

Component 3: Scale up the use of biogas technologies in other municipalities

Output 3	Key activities	
Biogas technology replicated in other potential municipalities in the country based on lessons learnt and success of the demonstration	 3.1 Expand business model and concept to at least 5 additional locations; 3.2: Integrate Biogas technology for energy generation into the national renewable energy and MEMD programmes. 3.3 Develop and implement mid and long-term strategy for the replication of biogas projects. 3.4 Develop facility/ approach to attract investment into waste management sector. 3.5 Formulate guidelines on waste management practices, document and disseminate best practices. 	
Budget	USD 1,397,965	
Project results: • 5 conceptual proposals for MSW-based biogas energy projects established		

- 5 conceptual proposals for MSW-based biogas energy projects established.
- 1 biogas strategy adopted as a relevant option for MSW based biogas energy.
- Grant/ technical assistance fund and approach to attract investment into MSWbased biogas sector established.
- US\$900,000 Grants disbursed from the fund (either for technical assistance or investment).

Results (Cont'd)

Component 4: Knowledge management and monitoring and evaluation

Output 4	Key activities	
Replication and scaling up of project results supported by lessons learned and success of demonstration projects.	 4.1 Establish project website. 4.2 Update guidelines on waste management practices, document and disseminate best practices. 4.3 Integrate Biogas technology for energy generation and lessons learned from pilot projects into the national renewable energy and MEMD programmes. 4.4 Project monitoring including annual, mid term reviews and terminal evaluation 	
Budget	USD 138,730	
 Project results: Project website established and updated Guidelines on waste management practices established, updated and 		

- Guidelines on waste management practices established, updated a disseminated
- Lessons learned and best practices documented and disseminated
- National renewable energy and MEMD programmes updated based on lessons learned and best practices documented
- Project monitoring carried out.

Cash budget summary

Result Description	GEF	Cash co-financing	Total
Total	2170,030	900,000	3,070,030
Component 1:	250,000		250,000
Component 2:	1,180,000		1,180,000
Component 3	497,965	900,000	1,397,965
Component 4	138,730		138,730
Project Management	103,335		103,335

Project sustainability

- The proposed project will develop capacities of towns and municipalities to plan and manage waste more effectively. Business models will focus on operations and maintenance and enhancing revenue streams. Partnerships will be forged with well established technology providers.
- Social sustainability will be promoted through maximizing local participation in the development and application of needed systems.
- Project will generate lessons learned and best practices on MSW-based biogas for energy generation for replication and scale up. As one of top priority NAMAs, this project shall focus on efforts to attract international financial assistance for scale-up.
- Financial sustainability shall be enhanced through a financial mechanisms. IFIs showed particular interest in funding large scale/ high tech biogas products if investment grants and technical assistance were provided. In 4th year a grant and technical assistance fund will be established. An independent committee shall be established to consider these grants.

Project management arrangemen



Next steps

- Local Project Appraisal Committee minutes finalized and signed copy sent to UNDP/GEF-Regional Office in Addis after-LPAC no later than 8th Sept 2017
- Financial clearance and Delegation of Authority (DoA) issued by no later than 15th Sept 2017
- Project document signed by not later than 30th Sept 2017.
- Project team recruited and Inception and launch organized within 2 months from the project start (ProDoc signature date) by 30th November 2017





Part A. Integrating Overarching Principles to Strengthen Social and Environmental Sustainability

1. Integration of Human rights

- · Participation of right holders and duty bearers in project activities including CSOs;
- Project will establish grievance redress processes through a multi stakeholder platform to strengthen the accountability of the most vulnerable groups and individuals affected by the Project both directly and indirectly.
- Monitoring Reporting and Verification (MRV) system that will be set up by the Project will include social, environmental and financial indicators to safeguard the improvement of the individuals and local communities, with an emphasis on the most vulnerable groups and individuals identified.

Finally, the mechanisms established in this report will help to strengthen the enforcement of existing laws governing the waste sector in order to fulfil public services while promoting the vulnerable groups and their human rights involved to achieve such task.

Part A. Integrating Overarching Principles to Strengthen Social and Environmental Sustainability

2. Mainstreaming Gender and women empowerment

- This project has been given a gender marker score of: 'GEN2: gender equality as significant objective.'
- There are a range of key gender issues that have been identified in the waste sector in general including:
 - many women employed in the informal waste sector in and around urban areas;
 - few women in decision-making positions in the waste sector;
 - women's voices about proper and integrated waste management often go unheard, yet they are very often the people dealing (generating and informally recovering) with household and institutional solid waste;
 - lack of control over income and limited skills in solid waste recovery and reuse results in women's inability to invest and participate in waste management solutions or even access the benefits from resources recovered from waste after recycling
- to ensure that proposed strategies are EMPOWERING for women, men and other vulnerable social groups the following activities will be undertaken or implemented:
 - Stakeholder engagement plan will include the identification of and consultation with women's and men's groups involved in solid and liquid waste generation and sourcing within the identified sites throughout the project phases.

Mainstreaming gender (Cont'd)

- Identify constraints to women's and vulnerable social groups' participation (such as lack of skills, poor mobilization) and develop strategies to minimize them and enhance their participation.
- Women are often marginalized and excluded from other forms of formal participation in the waste recovery and reuse economy; often, they are reduced to pickers for middle men dealing in marketable plastics and metal wastes. Positive discrimination (quotas) for women's participation during specific phases of the project such as at the generation and sourcing of organic solid wastes (as promoters or guides of resource separation) will be implemented as part of the project.
- As the implications of gender in the informal waste management sector in Uganda are not fully understood or appreciated, a gender assessment has been conducted during Project preparation to fully gauge the gender implications in the waste resource recovery process, identify possible interventions that can meaningfully improve and enhance women's participation, and develop specific indicators and targets related to gender equality. Preliminary indicators include increase in women's participation in integrated waste management (IWM) activities such as resource separation at collection and generation centres, improvement of income of women employed as resource separation promoters and numbers of women included in the downstream recovered resource (power) process
- Local community leadership structures will be integrated into project implementation design and the design provides for the inclusion of women (1/3) in such committees including the ESMP related activities.

Mainstreaming gender and women empowerment (Con'd)

- Special assistance programs or interventions will be arranged for at least three women's and other vulnerable social groups such as the youth and how such groups can be co-opted during the franchise and distribution of resources recovered (Prepaid Energy Token Cards).
- Waste sector jobs during the construction of the biogas plant will be reserved for local youth and women's groups. Some will also be trained in basic technology and skills for constructing and maintaining domestic biogas plants.
- Adequate budget provisions for women, men and vulnerable social groups' participation in the project implementation at relevant levels have been included in this project proposal (see the budget).
- Gender Impact Assessment (GIA) is part of the project evaluation.
- Preparation of specific investment interventions will include along the whole project cycle special attention for vulnerable groups, especially women and girls, who face multiple and intersecting forms of discrimination in the waste sector recovery and reuse processes.

Part A. Integrating Overarching Principles to Strengthen Social and Environmental Sustainability (cont'd)

3. Environmental sustainability:

- The project is primarily focused on environmental sustainability and it seeks to address a critical environmental problem of greenhouse gas emissions, waste water pollution, and general environmental degradation due to improper and inadequate management and treatment of municipal liquid and solid waste in municipalities in Uganda. Most waste streams are poorly managed right from generation to disposal and there are noticeable uncontrolled and open flows directly into the environment without any treatment. Open dumping and burning of solid waste are a common practice in many parts of the country, resulting in the uncontrolled release of pollutants to soil, surface water, ground water, and air. Additionally, improper waste management impacts on the health of the local communities in several ways implying additional risks. This is particular relevant to the poorer communities and the informal waste picker sector due, for example, to their dependence on the waste as a source of income.
- By introducing integrated waste treatment and biogas plants in the three selected locations (with potential for scaling up to additional sites) the Project will improve solid and liquid waste management through recovery and reuse and will reduce loca air pollution, water pollution, and GHG emissions.
- The Project will also strengthen the environmental management capacity of local and central government, supports implementation of the national public health and environmental commitments and commitments to climate change mitigation.
- It should be noted that no activities that could cause harm may proceed until assessments are undertaken and management plans are in place for specific sites.

Part B. Identifying and Managing Social & Environmental Risks

Type of risk	Risks Assessed	Impact - Moderate to High	Mitigation measures
Social	Marginalized groups e.g. Waste pickers may be affected by introduction of Biogas technology. Women may also not be included in decision making	Low	Conduct ESIA/ESMP. Some waste pickers to be employed by the project. Gender assessment specific to each site was done. Gender management plan and consultation/ communication plan will be developed. Develop strategy for skills building of marginalized groups. Project management structures to provide 1/3 women on committees.
Social	Physical displacement likely to happen	Low	SIA/SMP as part of ESIA/EMP
Social	Local communities not typically consulted or included in project design	Moderate	Establish multi-stakeholder platform with consultation/ communication plan & strategy

Part B. Identifying and Managing Social & Environmental Risks (Cont'd)

Type of risk	Risks Assessed	Impact - Moderate to High	Mitigation measures
Social / Environ mental	Low technical capacity for implementation of a Biogas technology of this scale may pose a challenge to meet security and obligations of duty bearers	High	Technical assistance incorporated in project budget for duty bearers and security personnel
Environ mental	Potential modification or adverse impact on of natural and or critical habitats due to construction, operation and decommissioning phases	Low	EIA to be conducted for each site and EMPs will be prepared
Environ mental / social	Occupational health and safety risks due to working conditions, biological and chemical hazards	High	Risk is likely to be moderate if a systematic M&E plan is implemented to include the use of devices. ESIA and ESMP will be prepared.
Environ mental / Social risk	Potential Hazardous waste for treatment in future	Moderate	During Project implementation this level of risk is likely to be low if a systematic M&E plan is implemented. An EIA and EMP will be developed as part of ESIA/ESMP.
	Release of pollutants to the environment	Moderate	The Environmental Impact Assessment and Environmental Management Plan will be developed as part of a comprehensive ESIA / ESMP.

