

Inherent E&S risks/impacts categorisation system

E&S in the transaction cycle

Category	Hints and tips	Examples
<p>Low inherent E&S risks/adverse impacts: Client activities with minimal or no adverse E&S risks or impacts. E&S risks and impacts are generally limited to common issues such as occupational health and safety, labour standards and, in some cases, energy efficiency in office environments.</p>	<p>Still require basic E&S DD.</p>	<p>The following businesses/activities are generally considered low risk:</p> <ul style="list-style-type: none"> • office-based businesses; • professional services (e.g. law firms, management consultants, accountants); <p>Note – where certain service activities have significant indirect impacts (e.g. the project finance services of some banks), the indirect impacts should be taken into account in the overall risk rating.</p>
<p>Medium inherent E&S risks/adverse impacts: Client activities with the potential for limited adverse E&S risks or impacts that are few in number, generally site specific, largely reversible, and readily addressed through well-known mitigation measures.</p>	<ul style="list-style-type: none"> • It may be helpful to sub-divide the ‘medium’ category into ‘medium-high’ and ‘medium-low’ to avoid a situation where most of the portfolio falls into the same category (i.e. ‘medium’), despite differences in E&S risks and impacts. • ‘Medium-low’ and ‘medium-high’ could be divided on the basis of the scale and diversity of the risks and impacts identified. • Consider appointing external specialists to assist with the DD, particularly if the transaction is medium-high risk and/or if the financial institution staff have a limited capacity and/or understanding of the aspects of the sector (particularly in the case of ‘medium-high’ risk transactions). 	<p>Examples of typical medium E&S risk sectors, but, due to the details of the actual company or project, could be elevated to a higher risk category include:</p> <p>Infrastructure</p> <ul style="list-style-type: none"> • Smaller-scale dams, reservoirs, forestry and agriculture. • Smaller infrastructure or industrial developments (e.g. light industrial parks) • Moderate construction (usually renovation or expansion within an existing business footprint) • Small to medium scale upgrades to existing infrastructure. • Telecommunications • Tourism and hospitality • Hospitals and medical facilities of small to medium scale. • Smaller-scale power facilities (refer to ‘high’ risk threshold) • Medium-scale, road-based logistics companies for non-hazardous cargo <p>Manufacturing</p> <ul style="list-style-type: none"> • Food and beverage processing • Manufacturing of fast-moving consumer goods • Injection moulding • Textiles • Automobile components (small scale)

Category	Hints and tips	Examples
<p>High inherent E&S risks/adverse impacts: Client activities with significant adverse E&S risks/impacts that are diverse, irreversible or unprecedented. Impacts cannot be mitigated, or can be mitigated but only at significant cost. Clients that trigger extensive application of IFC Performance Standards, typically including IFC Performance Standards 5, 6, 7 and/or 8.</p>	<ul style="list-style-type: none"> • These transactions are not necessarily ‘no-go’ deals. The main implication of the ‘high’ risk categorisation is that the financial institution will need to deal with significant and potentially complex matters during the transaction cycle. Depending on the terms entered into with the FI’s investors (especially if they include DFIs such as CDC), high-risk transactions may also require information disclosure to its investors/lenders prior to transaction. • These transactions would typically involve hiring external consultants. Refer to CDC Guidance: Working with consultants. • Irrespective of the sector, transactions in this category would typically include some or all of the following: <ul style="list-style-type: none"> ○ major labour and working conditions and/or pollution prevention concerns (e.g. child labour risks or major air emissions); ○ significant, potential adverse impacts on the health, safety, security and/or livelihood of local communities (e.g. resettlement); ○ significant, potential adverse impacts on biodiversity and ecosystem services (e.g. significant impacts on critical habitats); ○ significant, potential adverse impacts on indigenous peoples and/or cultural heritage. 	<p>The following sectors are usually considered to be ‘high’ risk. Depending on project specifics, the E&S risks and impacts of individual projects may be considered to be ‘medium’. See ‘hints and tips’ for further advice on transactions that may warrant a ‘high’ risk categorisation (irrespective of the sector).</p> <p>Infrastructure</p> <ul style="list-style-type: none"> • Railways, ports, harbours and terminals, airports, toll roads and long-distance pipelines • Large dams, new or existing thermal or run-of-the-river power plants (>50MW) and wind parks (>100MW) • Waste management/waste treatment facilities <p>Oil and gas</p> <ul style="list-style-type: none"> • Offshore/onshore oil and gas development • Liquefied natural gas facilities <p>Large-scale primary production (plants/animals)</p> <ul style="list-style-type: none"> • Forestry and plantations • Agriculture and aquaculture <p>Heavy manufacturing/chemicals</p> <ul style="list-style-type: none"> • Cement and lime and glass manufacturing • Foundries, steel mills and base metal smelting and refining. • Pulp and paper mills • Coal, natural gas and oleochemicals processing • Pesticides and nitrogenous and phosphate-based fertiliser production • Petroleum refining and large-volume, petroleum-based polymers and/or organic chemicals manufacturing • Large-volume, inorganic compounds manufacturing • Textiles (large scale) <p>Mining</p> <ul style="list-style-type: none"> • Mining, both open-pit and underground. Brownfield expansions may be considered as ‘medium’ risk in some circumstances

Abbreviations: DD, due diligence; DFI, development finance institution; E&S, environmental and social; IFC, international finance corporation.