

GUIDELINE FOR INFORMATION

2024





The guideline, developed by **Civic IDEA** with the support of **CAPS Unlock**, provides an in-depth overview of the environmental and social policies adopted by major international financial institutions (IFIs) to promote responsible and sustainable development. It covers the frameworks established by the following IFIs:

World Bank (WB)

Asian Development Bank (ADB)

European Bank for Reconstruction and Development (EBRD)

European Investment Bank (EIB)

Asian Infrastructure Investment Bank (AIIB)

The guidebook outlines the policies these institutions require borrowers to follow, ensuring that projects minimize negative impacts on communities and the environment. It emphasizes sustainability by mandating comprehensive risk assessments and the implementation of safeguards to address issues such as biodiversity loss, pollution, and social disruption. A core focus is placed on transparency, stakeholder engagement, and responsible project management throughout the entire development process.

**The information is sourced from the official websites of international financial institutions and is based on their published guidelines.*



WORLD BANK

**The World Bank. (n.d.).
Environmental and Social Policies.
worldbank.org.**

The webpage overviews the environmental and social policies the World Bank implements for borrowing organizations and countries. Document The World Bank obliges all borrowers to follow Environmental and Social Safeguards Policies and Environmental and Social Frameworks.

The World Bank. (2005). OP 4.00 - Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank-Supported Projects. thedocs.worldbank.org.



The document concludes following approaches of the World Bank toward the use of borrower systems:

- ❖ The World Bank's environmental and social safeguard policies are aimed at avoiding, mitigating, or minimizing adverse environmental and social impacts of projects supported by the Bank.
- ❖ The Bank supports the development and effective application of borrower systems, subject to certain conditions, as a way to build borrower capacity beyond individual project settings.
- ❖ The Bank considers a borrower's environmental and social safeguard system to be equivalent to the Bank's if it is designed to achieve the objectives and adhere to the applicable operational principles, as set out in Table A1.
- ❖ The borrower is responsible for achieving and maintaining equivalence, as well as acceptable implementation practices, track record, and capacity, in accordance with the Bank's assessment.
- ❖ The Bank is responsible for determining the equivalence and acceptability of borrower systems and for appraising and supervising pilot projects that use these systems.
- ❖ To promote transparency and facilitate accountability, the Bank makes public its intent to use country systems in a proposed pilot operation, updates this information as project development proceeds, and ensures that relevant project-related environmental and social safeguard documents are disclosed in a timely manner before project appraisal formally begins.

The World Bank. (1999). OP 4.01 - Environmental Assessment. [thedocs.worldbank.org.](https://thedocs.worldbank.org/)

The World Bank's OP 4.01 Environmental Assessment outlines the process and requirements for assessing the environmental impacts of projects proposed for Bank financing. The policy mandates that environmental assessments (EAs) are conducted to ensure that projects are environmentally sound and sustainable, thereby improving decision-making.

Projects are categorized into four types based on their potential environmental impacts:



A

Category A for significant adverse impacts



B

Category B for less adverse impacts

Category C for minimal or no impacts



C

Category FI for projects involving financial intermediaries.



FI

The borrower is responsible for public consultation and disclosure of EA findings, especially for Category A and B projects. The policy also emphasizes the need to strengthen the borrower's capacity for EA-related functions when necessary. During project implementation, compliance with agreed environmental measures is monitored and reported to the Bank. Additionally, the policy provides guidance on handling projects in urgent need of assistance or facing capacity constraints, allowing for flexibility in such cases.



**The World Bank. (2015).
Environmental Action Plans.
thedocs.worldbank.org.**

The document "OP 4.02 Environmental Action Plans" outlines the World Bank's policy for supporting borrower countries in creating and implementing Environmental Action Plans (EAPs). These plans address major environmental issues, their causes, and necessary policies and actions to mitigate them. EAPs are country-specific and aim to integrate environmental considerations into broader economic and social development strategies. The World Bank encourages governments to involve multidisciplinary teams and secure broad public participation, including input from NGOs, during the preparation of these plans. Draft EAPs should be made available for public review to ensure transparency and inclusiveness. Completed EAPs should be disseminated to aid agencies and the public. The World Bank integrates information from EAPs into its Country Partnership Framework and uses it to guide project and program development.

**The World Bank. (2001). OP 4.04 -
Natural Habitats.**
thedocs.worldbank.org

The OP 4.04 Natural Habitats document outlines the World Bank's commitment to conserving natural habitats as an essential part of sustainable development. The Bank supports protection, maintenance, and rehabilitation of natural habitats through economic and sector work, project financing, and policy dialogue, advocating for a precautionary approach to natural resource management. In project design and implementation, the Bank prioritizes projects that integrate natural habitat conservation and ecological function maintenance, and does not support projects that significantly convert or degrade critical natural habitats unless no feasible alternatives exist. When environmental assessments indicate significant impacts, projects must include acceptable mitigation measures such as habitat retention, restoration, and the establishment of protected areas. The document also emphasizes the importance of involving local communities and NGOs in planning, implementing, and monitoring projects, ensuring their views, roles, and rights are considered. Finally, the Bank seeks to enhance national and local institutional capacities for effective environmental management through project components that build practical field expertise.



The World Bank. (1998). OP 4.09 - Pest Management.
[thedocs.worldbank.org.](https://thedocs.worldbank.org/)

The OP 4.09 - Pest Management document outlines the World Bank's strategy for assisting borrowers in managing agricultural and public health pests. The Bank promotes the use of biological and environmental control methods, reducing reliance on synthetic chemical pesticides, and integrates pest management issues into the project's environmental assessment. The Bank evaluates the country's regulatory framework and institutional capacity for safe pest management and incorporates measures to strengthen this capacity if needed. In agriculture, the Bank supports Integrated Pest Management (IPM) approaches, such as biological control and resistant crop varieties, and may finance pesticide purchases under IPM. For public health, the Bank prioritizes environmental methods for pest control but may fund pesticides if necessary. The Bank sets criteria for pesticide selection, ensuring minimal human health risks, effectiveness against target species, and minimal impact on non-target species and the environment. It mandates that pesticides meet specific safety standards and does not finance highly hazardous products unless safe usage conditions are assured.



The World Bank. (2005). OP 4.10 - Indigenous Peoples. **thedocs.worldbank.org**

The World Bank's policy (OP 4.10) regarding Indigenous Peoples, emphasizes their dignity, human rights, and cultural preservation in development projects. It highlights the necessity of free, prior, and informed consultation with affected Indigenous communities for any Bank-financed projects, ensuring their broad support. Projects must aim to avoid adverse effects on Indigenous communities and provide culturally appropriate benefits. The policy acknowledges the vulnerability of Indigenous Peoples due to their distinct cultural ties to land and resources, often making them marginalized. It also addresses the complex process of identifying Indigenous Peoples and emphasizes consultation, social assessment, and preparation of Indigenous Peoples Plans (IPP) or Planning Frameworks (IPPF) for project implementation. Additionally, the text discusses special considerations such as land rights, commercial development, physical relocation, and involvement in development planning to promote Indigenous Peoples' rights and sustainable development.

The World Bank. (2006). OP 4.11 - Physical Cultural Resources.
thedocs.worldbank.org

The World Bank (OP 4.11) outlines policies regarding the protection and management of physical cultural resources in development projects. It defines physical cultural resources and emphasizes their scientific, historical, economic, and cultural significance. The objective of the policy is to assist countries in avoiding or mitigating adverse impacts on physical cultural resources resulting from Bank-financed projects, ensuring compliance with national legislation and international agreements. Physical cultural resources are addressed within the environmental assessment process, including screening, impact assessment, and formulation of mitigating measures and management plans. The policy emphasizes consultation with relevant stakeholders and disclosure of findings, while also addressing scenarios of urgent need or capacity constraints and the use of country systems and capacity-building measures.

The World Bank. (2001). OP 4.12 - Involuntary Resettlement. **[thedocs.worldbank.org.](https://thedocs.worldbank.org/)**

The document outlines the World Bank's policy (OP 4.12) regarding involuntary resettlement in development projects, emphasizing the risks of economic, social, and environmental upheaval if not properly managed. It aims to minimize involuntary resettlement and, where unavoidable, ensures affected persons are meaningfully consulted and provided with compensation and assistance to improve their livelihoods. The policy covers direct impacts such as land acquisition, loss of shelter, assets, or income sources, as well as restrictions on access to protected areas. It applies to all project components causing involuntary resettlement, irrespective of financing sources, and requires thorough planning, implementation, and monitoring of resettlement activities. Special attention is given to vulnerable groups, including indigenous peoples, and strategies for land-based resettlement are preferred when feasible. The Bank provides support to strengthen resettlement policies, capacities, and financing for both investment and standalone resettlement projects.



The World Bank. (2002). OP 4.36 - Forests. **thedocs.worldbank.org**

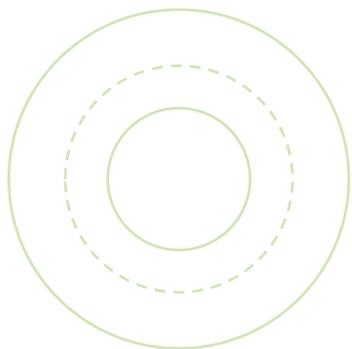
The document outlines the World Bank's policy (OP 4.36) regarding forests, emphasizing their crucial role in poverty reduction, sustainable development, and environmental protection. It aims to assist borrowers in integrating forests into economic development while safeguarding environmental services and values. The policy applies to projects impacting forest health, people's rights and welfare related to forests, and those aiming to change forest management. The Bank does not finance projects leading to significant forest conversion or degradation unless rigorous analysis demonstrates substantial overall benefits. It also sets criteria for financing commercial harvesting and plantation projects, emphasizing responsible forest management and community participation. Projects involving forest resources must undergo environmental assessments, and preference is given to community-level management approaches. Additionally, the design of such projects considers the development of markets for non-timber forest products and related services.





The World Bank. (2001). OP 4.37 - Safety of Dams.
thedocs.worldbank.org

The World Bank's policy on the safety of dams (OP 4.37) emphasizes the responsibility of dam owners to ensure safety throughout a dam's life, regardless of funding or construction status. The Bank is particularly concerned about the safety of both new dams it finances and existing dams on which its projects rely. For new dams, the Bank requires experienced supervision during design and construction, along with the implementation of specific safety measures. It distinguishes between small and large dams, with different requirements for each category. Large dams necessitate reviews by independent experts and the preparation of detailed plans and safety inspections. Existing dams or those under construction are subject to evaluation and necessary remedial work to meet safety standards, with the Bank's involvement depending on the project's scope and hazard level. Policy dialogue with countries includes discussions on strengthening institutional frameworks for dam safety programs.



**The World Bank. (2001). OP 7.60 –
Projects in Disputed Areas.
thedocs.worldbank.org.**

The World Bank's policy (OP 7.60) regarding projects in disputed areas acknowledges the potential sensitivity and complexity of such situations. If a project is proposed in an area under dispute, the Bank ensures that the issue is addressed early on to avoid prejudicing any involved parties. The Bank may proceed with supporting a project in a disputed area if the concerned governments agree that it can move forward without affecting the claims of any disputing party. Project documentation for such areas includes discussions on the nature of the dispute and disclaimers stating the Bank's neutrality regarding territorial claims. The Legal Vice Presidency prepares relevant sections of project documentation to ensure compliance with the policy.



The World Bank. (2001).
OP 7.50 - Projects on
International Waterways.
thedocs.worldbank.org.

The World Bank's Operational Policy (OP 7.50) regarding projects on international waterways was last revised in March 2012, updating its applicability and procedures. It covers various types of international waterways and projects, including hydroelectric, irrigation, and navigation initiatives. The policy emphasizes the importance of cooperation among riparian states and encourages appropriate agreements or arrangements to manage these waterways effectively. Notification procedures are outlined to ensure transparency and address objections from other riparian states. Exceptions to the notification requirement are detailed, including ongoing schemes and projects related to tributaries. The policy also dictates the presentation of project loans to the Executive Directors, emphasizing considerations of international aspects and responses from riparian states.



**The World Bank. (n.d.).
Environmental and
Social Framework.
worldbank.org.**

The Environmental and Social Framework (ESF) consists of a Vision for Sustainable Development; ten Environmental and Social Standards (ESSs), which set out the requirements that apply to Borrowers; an Environmental and Social Policy for Investment Project Financing (IPF), which sets out the requirements that apply to the Bank; and a Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.

The World Bank, & International Bank for Reconstruction and Development. (2017). A Vision for Sustainable Development. In: World Bank Environmental and Social Framework. thedocs.worldbank.org.

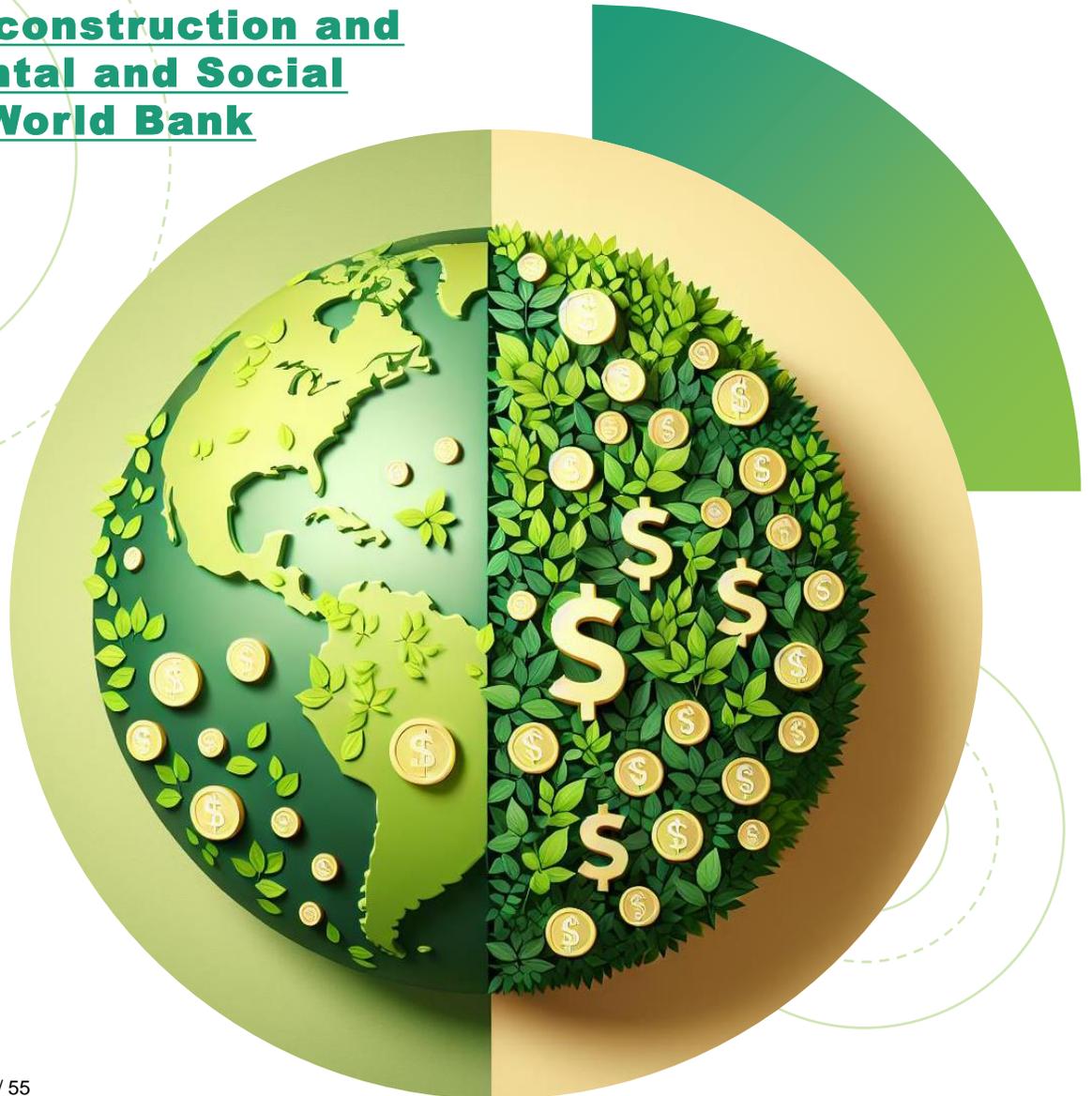
The World Bank Group Strategy aims to end extreme poverty and promote shared prosperity by emphasizing economic growth, inclusion, and sustainability. It commits to environmental sustainability and climate change mitigation, recognizing the need for sustainable development to protect future generations. Social development and inclusion are critical, ensuring that all people, including the disadvantaged, can benefit from development processes. The Bank integrates environmental and social sustainability into all its activities, from global issues like climate change to sector strategies and country dialogues. At the project level, it focuses on minimizing adverse impacts, conserving resources, promoting health and safety, and maximizing stakeholder engagement. The Bank seeks to go beyond "do no harm" by identifying and incorporating potential development opportunities into projects, fostering cooperation with borrowers, donors, and other stakeholders to achieve sustainable development outcomes.

The World Bank, & International Bank for Reconstruction and Development. (2017). Borrower Requirements - Environmental and Social Standards 1-10. In: World Bank Environmental and Social Framework. thedocs.worldbank.org.

The World Bank's Environmental and Social Standards (ESS) set out responsibilities for borrowers to manage environmental and social risks throughout the project lifecycle to achieve sustainable outcomes. ESS1 focuses on assessing and managing these risks, while ESS2 emphasizes fair treatment and safe working conditions for workers. ESS3 addresses resource efficiency and pollution management, and ESS4 ensures community health and safety, particularly for vulnerable groups. ESS5 aims to minimize involuntary resettlement impacts, and ESS6 focuses on biodiversity conservation and sustainable management of natural resources. ESS7 protects the rights and livelihoods of Indigenous Peoples, and ESS8 safeguards cultural heritage. ESS9 requires financial intermediaries to manage environmental and social risks in their portfolios, and ESS10 highlights the importance of stakeholder engagement and information disclosure for project success.

The World Bank, & International Bank for Reconstruction and Development. (2017). World Bank Environmental and Social Policy for Investment Project Financing. In: World Bank Environmental and Social Framework. thedocs.worldbank.org.

The Environmental and Social Policy for Investment Project Financing by the World Bank establishes mandatory requirements for projects seeking Bank support. It emphasizes the importance of meeting Environmental and Social Standards (ESSs) through the implementation of an Environmental and Social Commitment Plan (ESCP). Borrowers are obligated to diligently implement measures outlined in the ESCP within specified timeframes and allow for adaptive management of project changes. The Bank will apply the World Bank Policy on Access to Information for document disclosure and require Borrowers to conduct environmental and social assessments in accordance with ESS1. Borrowers must prepare projects to meet ESS requirements in a timely manner, considering potential risks and impacts, capacity, and necessary mitigation measures. The Bank will review the adequacy of Environmental and Social Management Systems (ESMS) to monitor risks and impacts of Financial Intermediary subprojects.





**The World Bank. (2021).
Addressing Risks and Impacts on
Disadvantaged or Vulnerable
Individuals or Groups.**
worldbank.org.

The Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups provides guidance to Bank staff on identifying and mitigating risks for individuals or groups who may be disadvantaged or vulnerable. It emphasizes the importance of considering specific risks and impacts faced by disadvantaged or vulnerable individuals during project preparation and implementation. The directive outlines the requirements for establishing arrangements for environmental and social assessments, including consultation with stakeholders and the development of a Stakeholder Engagement Plan. In cases where applying the directive could expose individuals or groups to harm, the Operations Environmental and Social Review Committee provides advice on project continuation. The directive also highlights the need for an Environmental and Social Commitment Plan to address risks and impacts on disadvantaged or vulnerable individuals, which is attached to the legal agreement. Updates to the directive in March 2021 expanded the list of those considered disadvantaged or vulnerable, reflecting a commitment to inclusivity and equity in project-financing.

WORLD BANK

ADB

EBRD

EIB

AIIB



ADB

ASIAN
DEVELOPMENT
BANK

Asian Development Bank. (2009). Safeguard Policy Statement. adb.org.

The Asian Development Bank (ADB) mandates a structured environmental assessment process to evaluate potential environmental impacts and risks of projects, considering direct, indirect, cumulative, and differential impacts on vulnerable groups. This process includes analyzing these impacts throughout the project cycle and ensuring compliance with applicable laws. ADB requires an Environmental Management Plan (EMP) that details mitigation measures, monitoring, emergency response procedures, and performance indicators to address adverse impacts and adapt to project changes. Meaningful consultation with affected people is mandatory, with information disclosure and grievance mechanisms to ensure transparency and stakeholder participation. ADB also emphasizes biodiversity conservation and natural resource management by assessing project impacts and proposing measures to avoid, mitigate, or compensate for adverse effects. Pollution prevention and control must align with international standards, focusing on minimizing emissions, waste, and hazardous materials. These policies ensure the sustainability of ADB-financed projects and adherence to best practices in environmental and social risk management.



Asian Development Bank. (2009).
Environment Policy of the
Asian Development Bank.
adb.org.

The Asian Development Bank (ADB) requires environmental assessments for proposed projects to identify potential impacts and risks on physical, biological, socioeconomic, and cultural resources. It involves examining project alternatives and documenting the rationale, including the "no project" option. An Environmental Management Plan (EMP) must be prepared, detailing mitigation measures, monitoring, reporting requirements, institutional arrangements, capacity development, cost estimates, and performance indicators. Meaningful consultation with affected people, including women, is mandatory, with a grievance redress mechanism established early in the project. Draft and final environmental assessments and EMPs must be disclosed to affected people and stakeholders. The EMP must be implemented and monitored, with results and corrective actions documented and disclosed. ADB policies also prohibit project activities in critical habitats without meeting specific conditions and require pollution prevention and control technologies, community health and safety measures, and sustainable management of natural resources.

The World Bank, & International Bank for Reconstruction and Development. (1999). Pollution Prevention and Abatement Handbook 1998.

ifc.org

The Asian Development Bank requires that Environmental policies must be conducted in full compliance with the international standards and approaches laid out in the World Bank's Pollution Prevention and Abatement Handbook. The World Bank Group mandates that emissions levels for projects be justified through environmental assessment (EA) and documented if deviations occur. Dilution of emissions to meet guidelines is prohibited, and maximum emissions levels should be achieved for at least 95% of operational time. Pollution control systems must be well-maintained, without bypass devices except for emergencies, and efforts should focus on reducing the total mass of pollutants rather than transferring them to another medium. Continuous monitoring of control devices, treatment plants, and emissions is required to maintain compliance. Projects must adhere to World Bank policies emphasizing pollution prevention, cleaner production technologies, and good management practices. Host countries are encouraged to establish enforceable environmental standards and permitting procedures, and to strengthen institutions and training to ensure compliance with environmental standards.

WORLD BANK

ADB

EBRD

EIB

AIIB



EBRD

EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT

Environmental and Social Policy (ESP) ebrd.com

The Environmental and Social Policy is a crucial governance policy of the EBRD, guiding its dedication to "environmentally sound and sustainable development" across all investment and technical cooperation activities. It outlines the practical implementation of this commitment in projects. The Policy and Performance Requirements underwent a comprehensive review process, involving extensive internal and external consultations over eighteen months, culminating in a 45-day public consultation and in-person events in eight countries. Approved on 25 April 2019 by the EBRD Board of Directors, these policies apply to projects started after 1 January 2020. The Policy is scheduled for another review in 2024. This document ensures that the EBRD's projects adhere to high environmental and social standards.



The Performance Requirement (PR) underscores the significance of integrated assessments to identify and manage environmental and social risks and impacts throughout a project's lifecycle. A robust Environmental and Social Management System (ESMS) fosters sustainable performance and can lead to improved outcomes across financial, environmental, and social domains. This dynamic process involves meaningful communication between stakeholders, including the client, workers, and affected communities. The PR outlines client responsibilities in assessing and managing environmental and social risks and impacts, aiming to adopt a mitigation hierarchy approach and promote continuous improvement in performance. Applicable to all EBRD-financed projects, the PR necessitates clients to identify and manage risks through project design, construction, operations, and closure. Projects are categorized based on potential impacts, with requirements tailored accordingly. Requirements encompass environmental and social assessment, stakeholder engagement, management systems, and project monitoring and reporting, emphasizing accountability, transparency, and continuous improvement throughout the project lifecycle.

**EBRD Performance Requirement 1:
Assessment and Management of
Environmental and Social Risks and Impacts**
<https://www.ebrd.com/environmental-and-social-policy.pdf> page 13-15





EBRD Performance Requirement 3: Resource Efficiency and Pollution Prevention and Control

<https://www.ebrd.com/environmental-and-social-policy.pdf> page 20-23

The Performance Requirement (PR) details a project-level approach for addressing climate impacts, greenhouse emissions, resource management, and pollution prevention. It emphasizes using the mitigation hierarchy, the "polluter pays" principle, and integrating the concept of Circular Economy. The objectives include adopting strategies to mitigate adverse impacts on health and the environment, managing GHG emissions, handling hazardous substances, and improving resource efficiency. The PR applies to all EBRD-financed projects, requiring clients to integrate these practices into their Environmental and Social Management Systems (ESMS) and plans (ESMP). Resource efficiency involves identifying cost-effective measures to minimize resource consumption and waste, while pollution prevention focuses on applying best available techniques and adhering to relevant environmental standards. Additionally, the PR stresses the importance of managing water use efficiently and mitigating the cumulative impacts of water abstraction on local ecosystems.



EBRD Performance Requirement 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

<https://www.ebrd.com/environmental-and-social-policy.pdf> page 35-38

BIODIVERSITY CONSERVATION ASSESSMENT OF RISKS AND IMPACTS:

- The assessment process evaluates risks and impacts on biodiversity and ecosystem services, considering factors like habitat loss, invasive species, overexploitation, and climate change.
- It identifies potential opportunities, risks, and impacts early in the project lifecycle and evaluates mitigation measures' effectiveness and feasibility.

THE PROTECTION AND CONSERVATION OF BIODIVERSITY, PRIORITY BIODIVERSITY FEATURES, AND CRITICAL HABITATS:

- The PR outlines conditions for projects impacting priority biodiversity features and critical habitats, emphasizing no net loss and preferably net gain of biodiversity.
- It mandates a critical habitat assessment, and if significant impacts are identified, the client must meet specific conditions or redesign the project to avoid impacts.

LEGALLY PROTECTED AND INTERNATIONALLY RECOGNIZED AREAS OF BIODIVERSITY VALUE:

- Projects affecting legally protected or internationally recognized areas must identify and assess potential impacts and mitigate them to ensure conservation objectives are not compromised.

INVASIVE ALIEN SPECIES:

- The PR requires proactive measures to prevent the introduction of invasive alien species and mitigate risks associated with their spread.

SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES:

- Projects involving primary production of living natural resources must comply with national regulatory requirements and adopt sustainable management practices.
- Requirements cover various aspects such as land use, invasive species, animal husbandry, antibiotic use, and GMOs.

SUPPLY CHAINS:

- Clients must assess and address biodiversity risks in their supply chains, including procurement practices and verification of the origin and sustainability of natural resource commodities.

Overall, the PR emphasizes proactive assessment, mitigation, and sustainable management practices to conserve biodiversity and ensure the sustainable use of living natural resources across project lifecycles.



EBRD Performance Requirement 7: Indigenous Peoples
<https://www.ebrd.com/environmental-and-social-policy.pdf>
page 39-41

This Performance Requirement (PR) underscores the significance of recognizing and respecting the rights and livelihoods of indigenous peoples in project planning and implementation. Indigenous peoples often face marginalization and vulnerability due to limitations in their economic, social, and legal status, making them particularly susceptible to adverse project impacts. Moreover, indigenous peoples possess unique knowledge and abilities that can contribute to sustainable development. Governments have a crucial role in safeguarding the rights of indigenous peoples, while clients are tasked with assessing and mitigating potential project impacts on indigenous communities. This includes meaningful consultation and, under specific circumstances, obtaining free, prior, and informed consent (FPIC). The objectives of this PR include ensuring respect for indigenous peoples'

dignity, rights, cultures, and livelihoods, while also promoting sustainable development opportunities.

The scope of application outlines the criteria for identifying indigenous peoples and emphasizes the need for actions to be managed in accordance with relevant PRs. Assessment processes aim to identify and mitigate impacts on indigenous peoples, with a focus on their vulnerability and unique ties to their lands and resources.

Meaningful consultation with indigenous communities is essential, involving their representative bodies and respecting customary laws and decision-making processes. FPIC is required in situations directly affecting indigenous lands, resources, or cultural heritage. In cases of relocation, alternatives must be explored, and fair compensation provided.

Compensation and benefit-sharing mechanisms should be fair and culturally appropriate, aiming to improve indigenous peoples' standards of living and foster sustainability. Grievance mechanisms should be accessible and culturally appropriate, ensuring indigenous peoples have avenues for recourse.

Overall, this PR emphasizes the importance of respecting indigenous peoples' rights, engaging them meaningfully throughout the project lifecycle, and addressing their specific needs and concerns. Collaboration with governments and adherence to cultural sensitivities are key to achieving the objectives outlined in this PR.



EBRD GREEN CITIES
<https://ebrdgreencities.com/green-cities/about/>

EBRD Green Cities takes a broad approach to identifying and prioritising environmental challenges and connecting them with infrastructure investments and policy measures



Consultation on the review of Environmental and Social Policy <https://ebrd.com/esp-aip-overview.html>

the European Bank for Reconstruction and Development (EBRD) is committed to promoting environmentally sustainable development and transparency in its operations. To ensure its Environmental and Social Policy (ESP) and Access to Information Policy (AIP) remain up-to-date and reflective of emerging contexts, the Bank conducts a review of these policies every five years.

The current review cycle began in 2023, with updated versions of the ESP and AIP expected to be prepared and published in 2024

EUROPEAN INVESTMENT BANK



European Investment Bank (EIB) Environmental Policies

The European Investment Bank provides extensive information on their environmental policies and projects through various official platforms

Practical Steps to Access Information:

Visit the EIB Environmental and Social Principles and Standards Page: [EIB Environmental and Social Standards](#).

Explore the EIB Project Database: Search for specific projects and their environmental assessments: [EIB Project Database](#).

Review Publications: Access various reports and publications related to environmental and social standards: [EIB Publications](#).

EIB Environmental and Social Standards. [eib.org](https://www.eib.org).

The page outlines the EIB's commitment to environmental sustainability and social well-being. Visitors can find detailed guidelines and principles that the EIB follows to ensure environmental and social sustainability in their projects.

EIB Group Environmental and Social Policy. [eib.org](https://www.eib.org).

The database provides detailed information on specific projects, including environmental assessments and social impact evaluations. It is an essential resource for stakeholders looking for comprehensive data on EIB-funded projects.

EIB Environmental and Social Standards Overview. [eib.org](https://www.eib.org).

This repository contains various documents, including environmental and social sustainability reports, environmental action plans, and other relevant publications. It offers insights into the EIB's strategic approach and the outcomes of their initiatives.



Environmental and Social Impact Assessments (ESIAs). [eib.org](https://www.eib.org).

Comprehensive reports analyzing the potential environmental and social impacts of specific EIB-funded projects, including baseline environmental conditions, predicted impacts, and proposed mitigation measures.

Environmental and Social Data Sheets (ESDS). [eib.org](https://www.eib.org).

Summaries of the environmental and social risks and impacts associated with specific projects, providing a concise overview of the main findings from the ESIs.

EIB Sustainability Report 2022. [eib.org](https://www.eib.org).

Annual reports reviewing the EIB's overall performance in maintaining environmental and social sustainability, offering insights into the bank's strategic approach and the outcomes of their initiatives.

WHAT TO EXPECT

Transparency:

The EIB provides open access to detailed and comprehensive information about the environmental and social implications of its projects. Stakeholders can expect thorough documentation and clear explanations of the policies and procedures in place.

Comprehensive Data:

Extensive and detailed data on environmental baselines, predicted impacts, and mitigation strategies. This data helps stakeholders understand the full scope of potential environmental and social impacts.

Stakeholder Involvement:

Information on how stakeholders, including affected communities, are involved in the assessment process. The EIB emphasizes the importance of stakeholder engagement and provides mechanisms for feedback and participation.

Regulatory Compliance:

Assurance that projects comply with both EIB standards and local environmental regulations. The EIB ensures that all projects meet stringent environmental and social criteria.



EIB Complaints Mechanism

The primary and direct mechanism for appeals regarding EIB-financed projects is the EIB Complaints Mechanism. This mechanism allows stakeholders to raise concerns about environmental, social, and governance impacts of EIB operations.

Individuals or groups can submit complaints directly to the EIB through their official complaints mechanism. This process ensures that grievances are addressed in a structured and formal manner.

Steps for Filing a Complaint:

1

Identify the Issue: Clearly document the environmental or social harm caused by the EIB-funded project.

2

Gather Evidence: Collect relevant data, photos, witness statements, and any other supporting documents.

3

Submit to EIB Complaints Mechanism: File the complaint through the EIB's official channels.

4

Seek External Support: If necessary, contact Bankwatch or the relevant OECD NCP for additional support and to amplify the issue.

How to Submit a Complaint:

Online Form: Complaints can be submitted through the EIB Complaints Form <https://www.eib.org/en/about/accountability/complaints/submit/index.htm>

Email: Complaints can also be sent via email to complaints@eib.org.

Mail: Physical complaints can be mailed to:

Copy code: **Complaints Mechanism Office European Investment Bank 98-100, boulevard Konrad Adenauer L-2950 Luxembourg**

External Appeal Mechanisms

If the issue is not resolved satisfactorily through the EIB's internal mechanism, or if external oversight is preferred, there are several international mechanisms available:

Bankwatch Network

The Bankwatch Network monitors the activities of international financial institutions like the EIB to ensure that their investments do not harm the environment or local communities. They provide support to communities affected by projects. Affected parties can seek assistance and guidance from [Bankwatch Network](#), which can help in raising awareness and applying pressure on the EIB

OECD National Contact Points (NCPs)

OECD NCPs serve as a platform for resolving issues arising from the impact of multinational enterprises on society, including those related to environmental harm. Complaints related to multinational enterprises, including those financed by the EIB, can be lodged with the NCP of the country where the issue occurred. For Kazakhstan, stakeholders can approach the relevant NCP for assistance. More information can be found on the OECD NCP website.

External Appeal Mechanisms Additional Resources

EIB Accountability and Complaints:

Detailed information on the complaints mechanism can be found on the EIB Accountability and Complaints page.

Environmental and Social Impact Assessments:

Access detailed assessments and reports through the EIB Project Database.

Central Asian NGOs interested in environmental issues can access various international networks and organizations.

Here are some examples and how and where they can join:

	EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE (EITI)	UNITED NATIONS ENVIRONMENT PROGRAMME (UNEP)	GLOBAL ENVIRONMENT FACILITY (GEF)	INTERNATIONAL UNION FOR CONSERVATION OF NATURE (IUCN)	REGIONAL ENVIRONMENTAL CENTER FOR CENTRAL ASIA (CAREC)
Description:	EITI promotes the open and accountable management of oil, gas, and mineral resources.	UNEP is the leading global environmental authority that sets the global environmental agenda.	GEF provides grants to developing countries and countries with economies in transition for projects related to biodiversity, climate change, international waters, land degradation, the ozone layer, and persistent organic pollutants.	IUCN is a membership union uniquely composed of both government and civil society organizations. It provides public, private, and non-governmental organizations with the knowledge and tools to help human progress, economic development, and nature conservation.	CAREC promotes cooperation among Central Asian countries in addressing environmental challenges.
Link:	EITI	UNEP	GEF	IUCN	CAREC
How to Join:	NGOs can join by visiting the EITI website, where they can find guidance on becoming a supporting or implementing country, or as a supporting company or NGO.	NGOs can explore opportunities to collaborate with UNEP through its various programs and partnerships. Information on how to engage can be found on the UNEP website.	NGOs can participate in GEF projects through national entities (e.g., Ministry of Environment) or international NGOs working in partnership with the GEF.	NGOs can join IUCN as members or partners. Information on membership and partnership opportunities can be found on the IUCN website.	NGOs from Central Asia can become members or participate in projects and activities. Information on membership and project participation can be found on the CAREC website.



AIIB

Asian Infrastructure Investment Bank

Asian Infrastructure Investment Bank. (2021). **Environmental and Social Framework.** **aiib.org**

The Asian Infrastructure Investment Bank (AIIB) mandates a comprehensive environmental and social assessment process to evaluate the potential impacts and risks associated with projects. This includes analyzing direct, indirect, cumulative, and differential impacts, especially on vulnerable groups, throughout the project lifecycle. The AIIB requires the preparation of an Environmental and Social Management Plan (ESMP) that outlines mitigation measures, monitoring protocols, emergency response procedures, and performance indicators. It emphasizes meaningful consultation with affected communities, ensuring information disclosure and grievance mechanisms to promote transparency and stakeholder participation. AIIB's policies also highlight the importance of biodiversity conservation and natural resource management, focusing on the assessment of project impacts and the development of measures to avoid, mitigate, or compensate for adverse effects. Pollution prevention and control measures must align with international standards, aiming to minimize emissions, waste, and hazardous materials. These policies ensure the sustainability of AIIB-financed projects and adherence to best practices in environmental and social risk management.





Asian Infrastructure Investment Bank. (2019). Environmental and Social Policy. **aiib.org**

The AIIB requires environmental assessments for proposed projects to identify potential impacts and risks on physical, biological, socioeconomic, and cultural resources. This involves examining project alternatives, including the "no project" option, and documenting the rationale. An Environmental and Social Management Plan (ESMP) must be prepared, detailing mitigation measures, monitoring, reporting requirements, institutional arrangements, capacity development, cost estimates, and performance indicators. Meaningful consultation with affected communities, including women, is mandatory, and a grievance redress mechanism must be established early in the project. Both draft and final environmental assessments and ESMPs must be disclosed to affected communities and stakeholders. The ESMP must be implemented and monitored, with results and corrective actions documented and disclosed. AIIB policies also prohibit project activities in critical habitats unless specific conditions are met and require pollution prevention and control technologies, community health and safety measures, and sustainable management of natural resources.



International Mechanisms for Environmental Cases:

Bank Information Center (BIC):

Provides resources and support to communities affected by development projects financed by international financial institutions, including AIIB.

Website: <https://bankinformationcenter.org/>

OECD Environmental Performance Reviews:

Assesses countries' progress in achieving their domestic and international environmental policy commitments.

Website: <https://www.oecd.org/environment/country-reviews/>

Contact Details for AIIB:

AIIB Headquarters:

Address: B-9 Financial Street, Xicheng District, Beijing 100033, China

Phone: +86 10 8358 0000

Email: info@aiib.org

Website: <https://www.aiib.org>

Networking to International Cooperations:

Extractive Industries Transparency Initiative (EITI):

Promotes open and accountable management of oil, gas, and mineral resources.

Website: <https://eiti.org/>

Joining International Organizations:

To join international organizations like EITI, NGOs should demonstrate their commitment to transparency, sustainable development, and compliance with the organization's standards.

Membership applications usually require submitting detailed documentation on the organization's governance, funding, and operational procedures.

When and In What Cases to Contact AIIB for Environmental Issues

Understanding AIIB's Environmental Focus

The Asian Infrastructure Investment Bank (AIIB) is a multilateral development bank that supports infrastructure projects in Asia and beyond. AIIB focuses on sustainable development and aims to foster economic development by investing in infrastructure that is environmentally sustainable, energy-efficient, and socially inclusive.

KEY SECTORS OF AIIB INVESTMENTS:

ENERGY:

- Renewable energy projects (solar, wind, hydro)
- Energy efficiency projects
- Power transmission and distribution systems

TRANSPORTATION:

- Roads and highways
- Railways
- Urban public transportation systems
- Ports and airports

WATER:

- Water supply and sanitation
- Wastewater treatment
- Integrated water resources management

TELECOMMUNICATIONS:

- ICT infrastructure
- Broadband connectivity

URBAN DEVELOPMENT:

- Affordable housing
- Urban regeneration projects
- Smart city initiatives

WHEN TO CONTACT AIIB

ENVIRONMENTAL ISSUES AND PROBLEMS:

Environmental Impact and Assessment (EIA) Issues:

- Inadequate or incomplete environmental impact assessments
- Lack of stakeholder consultation and participation
- Inadequate mitigation measures for identified environmental risks

Pollution and Hazardous Materials:

- Air, water, or soil pollution caused by AIIB-financed projects
- Inadequate handling and disposal of hazardous materials

Biodiversity and Natural Resource Management:

- Negative impacts on biodiversity and ecosystems
- Destruction of critical habitats
- Non-compliance with conservation measures

Social Issues Related to Environmental Impacts:

- Displacement and resettlement without proper compensation or rehabilitation
- Impacts on indigenous communities and their traditional lands

BUSINESS TYPES AND PROJECTS TO FOCUS ON:

Renewable Energy Projects:

- Solar and wind farms
- Hydropower plants
- Geothermal energy projects

Large-Scale Infrastructure Projects:

- Highways, bridges, and tunnels
- Rail and metro systems
- Airport expansions

Urban Development Projects:

- Construction of residential complexes
- Urban regeneration and redevelopment projects
- Smart city projects

Water Management Projects:

- Large-scale water supply systems
- Wastewater treatment facilities
- Flood control and irrigation projects

AIIB ACTION PLAN 2023 (September)

Central Asian countries can contact AIIB to utilize their Climate Action Plan in the following cases:

1. Seeking financing for sustainable infrastructure projects related to climate mitigation and adaptation.
2. Developing climate-positive policies and regulatory frameworks to attract investments and support from AIIB.
3. Exploring opportunities for private sector involvement in climate-related initiatives.
4. Collaborating with AIIB to access expertise, resources, and funding for projects that align with the bank's climate goals.
5. Engaging with AIIB to enhance resilience against climate impacts and promote sustainable development in the region.

How to Contact AIIB



Contacting AIIB for Environmental Issues:

Project-Specific Grievances:

- o Directly contact the project's grievance redress mechanism (GRM) if available. This is typically managed by the project implementer and aims to resolve issues at the local level.
- o Email: grievances@aiib.org (specify the project and the issue in detail).

Independent Accountability Mechanism:

- o For unresolved or serious grievances, contact AIIB's Project-affected People's Mechanism (PPM), which is an independent body that addresses concerns and complaints.
- o Email: ppm@aiib.org
- o Website: https://www.aiib.org/en/about-aiib/who-we-are/role-of-law/.content/index/_download/AIIB-Directive-on-the-Environmental-and-Social-Framework-2023.pdf

General Environmental Concerns:

- o If the issue is not resolved at the project level or if it is a general concern about AIIB's environmental policies, contact AIIB's Environmental and Social Framework team.
- o Email: esf@aiib.org

Additional Resources:

- o AIIB's Environmental and Social Framework documentation: https://www.aiib.org/en/policies-strategies/strategies/.content/index/_download/AIIB-Corporate-Strategy.pdf
- o General inquiries: info@aiib.org

Recommendations on What to Include in Your Communication



When contacting AIIB regarding environmental issues, ensure you include the following details:

Project Name and Location: Clearly specify the project and its geographic location.

Nature of the Issue: Describe the environmental problem or concern in detail, including any specific incidents or ongoing issues.

Impact and Evidence: Provide information on how the issue is affecting the environment and local communities. Include any evidence such as photos, reports, or testimonies.

Previous Actions Taken: Mention any previous attempts to resolve the issue, including interactions with project implementers or local authorities.

Requested Action: Clearly state what action you are seeking from AIIB, such as mitigation measures, further assessment, or community engagement.



Institutions for Appealing

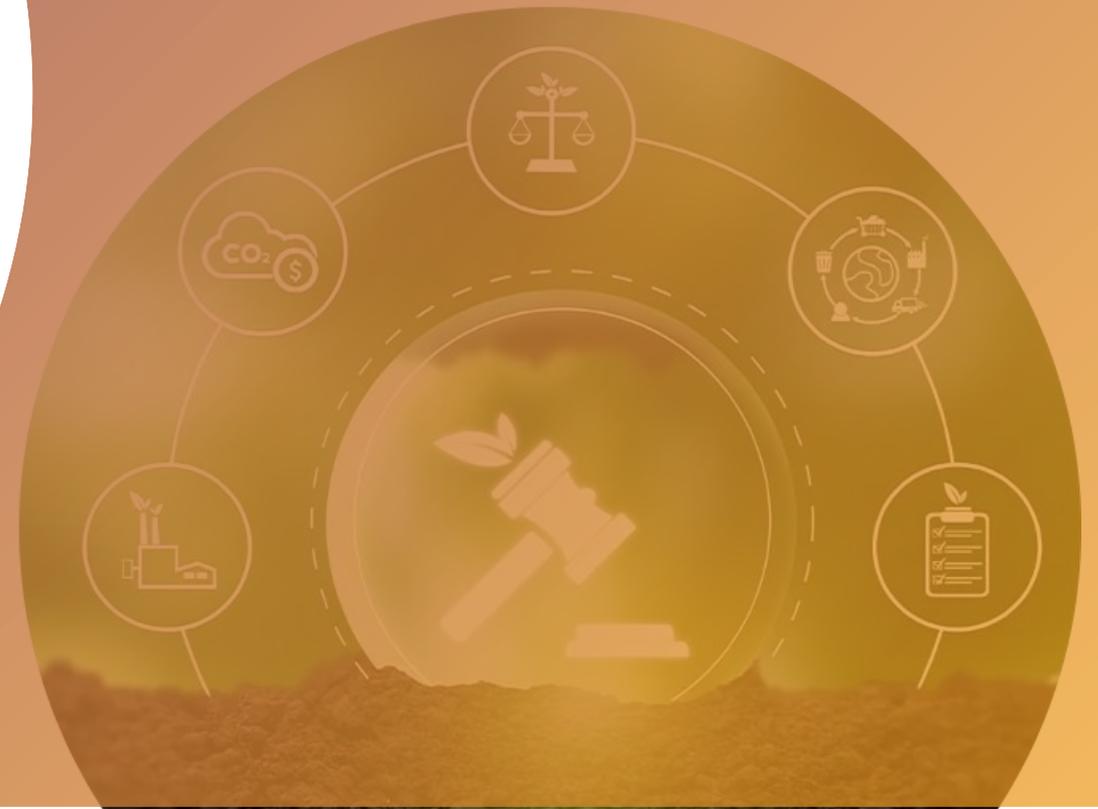
WORLD BANK

EBRD

ADB

EIB

AIIB





WORLD BANK

World Bank Accountability Mechanism. (n.d.). World Bank.

<https://accountability.worldbank.org/en/home>

The Accountability Mechanism is an independent complaint mechanism for the people or organizations damaged by the projects funded by the World Bank.

ADB

ASIAN DEVELOPMENT BANK

**Asian Development Bank. (2003).
Review of the Inspection Function.
Establishment of the new ADB
accountability mechanism.
adb.org.**

The current mechanism for appeal in Asian Development Bank (ADB) is called the Inspection Function. This mechanism was established in 1995 by ADB's Board of Directors and provides a forum for project beneficiaries to appeal to an independent body relating to ADB's compliance with its operational policies and procedures in ADB-assisted projects.

[Inspection Function >>>](#)

The Inspection Function has three main elements:

The Board Inspection Committee (BIC) which is made up of a panel of experts appointed for three years and approved by the Board of Directors. BIC receives and reviews requests for inspection and makes recommendations to the Board of Directors on whether to authorize an inspection.

The Inspection Informal Seminar which is held twice a year to review the operations of the BIC and the Inspection Function. The seminar is attended by ADB staff and the members of the BIC.

The Inspection Panel is appointed by the BIC to oversee investigations of alleged non-compliance. It is an independent body which reports directly to the Board of Directors. The panel operates under a set of rules and procedures that govern its work. Its main task is to investigate whether ADB has complied with its operational policies and procedures in the specific cases of ADB-assisted projects.

The current Inspection Function process has several stages:

Request for Inspection: Any individual or community with a direct interest and who has been or is likely to be materially and adversely affected by an ADB-assisted project, can file a request for inspection. The request must be submitted in writing and must meet certain requirements such as providing evidence of a breach of ADB policies. The complaint must be submitted within a reasonable time frame after the alleged violation.

Eligibility: Once the request for inspection was received, a staff "coordinator" position reviews the initial complaint along with the legal department to determine whether it meets the initial eligibility requirements. If the request appears eligible, the president assigns a member from the panel roster to review the claim and determine whether it is substantive or frivolous. If the request is deemed non-substantive or frivolous, and the ADB board concurs, the requester is informed that ADB management will not be asked to form a response and that an investigation is not warranted.

The inspection process: If the panel decides that an inspection is warranted, it conducts an investigation to determine whether there has been a non-compliance. The panel receives information and evidence for the project and consults widely with stakeholders to gather all relevant information. The panel prepares a report on its findings, conclusions, and recommendations. The report is submitted to the Board of Directors and the management of ADB, who must inform the Board of Directors on the actions taken in response.

The requests for compliance review must be in writing and specifically addressed to the "Secretary, Compliance Review Panel."

The working language of the ADB accountability mechanism is English, but requests may be submitted in any of the official or national languages of ADB's DMCs if the requester is unable to provide an English translation.

Requests will be accepted by mail, facsimile, electronic mail, or hand delivery to the Secretary, CRP at ADB headquarters.



EBRD

EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT

IPAM, or Independent Project Accountability Mechanism **ebrd.com**

IPAM is the EBRD's grievance mechanism handling complaints about environmental, social, and disclosure issues related to the Bank's investments. The EBRD implements policies like the Environmental and Social Policy (ESP), Access to Information policy (AIP), and Project Accountability Policy (PAP) to ensure sustainable development in projects. Independent from the Bank's management, IPAM addresses complaints through Problem Solving, fostering consensual solutions, and Compliance Review, investigating adherence to standards. Mandated to engage internal and external stakeholders, IPAM promotes awareness and understanding of its policies. It actively interacts with affected communities and civil society organizations to ensure safe access. Additionally, IPAM shares insights and guidance with Bank management based on lessons learned from its casework.

[More>>>](#)

How and who can submit complaint

Complaints concerning EBRD Projects can be lodged by individuals and civil society organizations directly affected by the project. Under certain circumstances, IPAM may consider complaints from non-affected civil society organizations, but only for compliance review after careful evaluation. IPAM's review window spans from project approval to 24 months post-EBRD's financial disengagement. Unapproved project-related complaints are redirected to Bank management. IPAM serves as a last resort; individuals are encouraged to first address concerns with project developers or the Bank's project team. Confidentiality can be requested if there are concerns of reprisal when contacting IPAM directly. <https://www.ebrd.com/ipam-complaint.html>

IPAM Case Registry

The IPAM Case Registry lists all complaints registered since IPAM became effective on 1st July 2020 as well as those legacy cases that were active on that date. It also provides access to case summaries, and all public documents issued by IPAM as well as links to case-related EBRD projects. <https://www.ebrd.com/ipam-cases>

Promoting access

IPAM conducts outreach among internal and external stakeholders to ensure awareness and understanding of its purpose, functions, and activities. This effort is driven by principles of accessibility, predictability, and transparency, aiming to provide clear procedures, indicative time frames, and regular progress updates. The Outreach Strategy 2021-2024 aligns with the Project Accountability Policy and incorporates UN Guiding Principles on Business and Human Rights criteria to assess effectiveness. Annually, IPAM implements outreach activities aimed at enhancing accessibility, visibility, and transparency, progressively advancing towards its goals. <https://www.ebrd.com/ipam-promoting-access.html>

More about plans to promote access and raise awareness amongst internal and external stakeholders:

<https://www.ebrd.com/documents/ipam/ipam-outreach-strategy-20212024.pdf>

Annual reports

PAM annually publishes a comprehensive report detailing managed cases, outcomes, outreach efforts, and key trends, inviting feedback via ipam_comms@ebrd.com. The focus is on providing remedies through Problem-Solving, exemplified by two successful agreements in 2023. The Case Portfolio spans 23 active cases across 13 countries, predominantly in transport, manufacturing, and energy sectors. Noteworthy are compliance findings regarding two road projects amidst the review of EBRD's Environmental and Social Policy.

Additionally, emphasis is placed on promoting safe access, engaging stakeholders, and fostering knowledge exchange to enhance the mechanism's effectiveness.

<https://www.ebrd.com/ipam-annual-reports.html>



EUROPEAN INVESTMENT BANK

The European Investment Bank (EIB) Group has a structured complaints mechanism that allows individuals and organizations to appeal against the activities of the bank. For more detailed information on the EIB Group Complaints Mechanism, you can visit their complaints mechanism website:

<https://www.eib.org/en/about/accountability/complaints/process/index.htm>

https://www.eib.org/attachments/lucalli/20220201_complaints_mechanism_annual_report_2022_en.pdf

[who can appeal/how to appeal >>>](#)

Who Can Appeal:

ANY MEMBER OF THE PUBLIC:

This includes individuals, organizations, and civil society groups who may be affected by EIB Group projects or activities.

EUROPEAN OMBUDSMAN:

Handles complaints from EU citizens or residents and can also open inquiries on its initiative for non-EU citizens or residents.

How to Appeal:

SUBMITTING A COMPLAINT:

- Complaints can be submitted through various means including letter, fax, email, or via a web-based complaints form.
- The complaint should be related to the EIB Group's projects or activities, such as environmental and social impacts, governance issues, or access to information.

COMPLAINTS HANDLING PROCESS:

Step 1: **Complaint Submission:** The EIB acknowledges receipt of the complaint within 10 working days.

Step 2: **Registration and Admissibility:** The complaint is reviewed to determine if it is within the scope of the EIB Group's activities and if it is admissible.

Step 3: **Handling Process:**

- **Standard Procedure:** A detailed inquiry is conducted within 40 working days.
- **Simplified Procedure:** For less complex cases.
- **Prevention Procedure:** Aimed at resolving issues before they escalate.

- **Extended Procedure:** For complex cases requiring detailed investigation, with an initial assessment conducted within 60 working days and a detailed investigation within 140 working days.

- **Collaborative Resolution:** Mediation and dialogue facilitated to reach a mutual agreement.

Step 4: **Outcome:**

- A conclusions report or mediation report is prepared, outlining findings and recommendations.

FOLLOW-UP AND MONITORING:

- The EIB monitors the implementation of recommendations and agreements to ensure compliance and resolution of the issues raised.

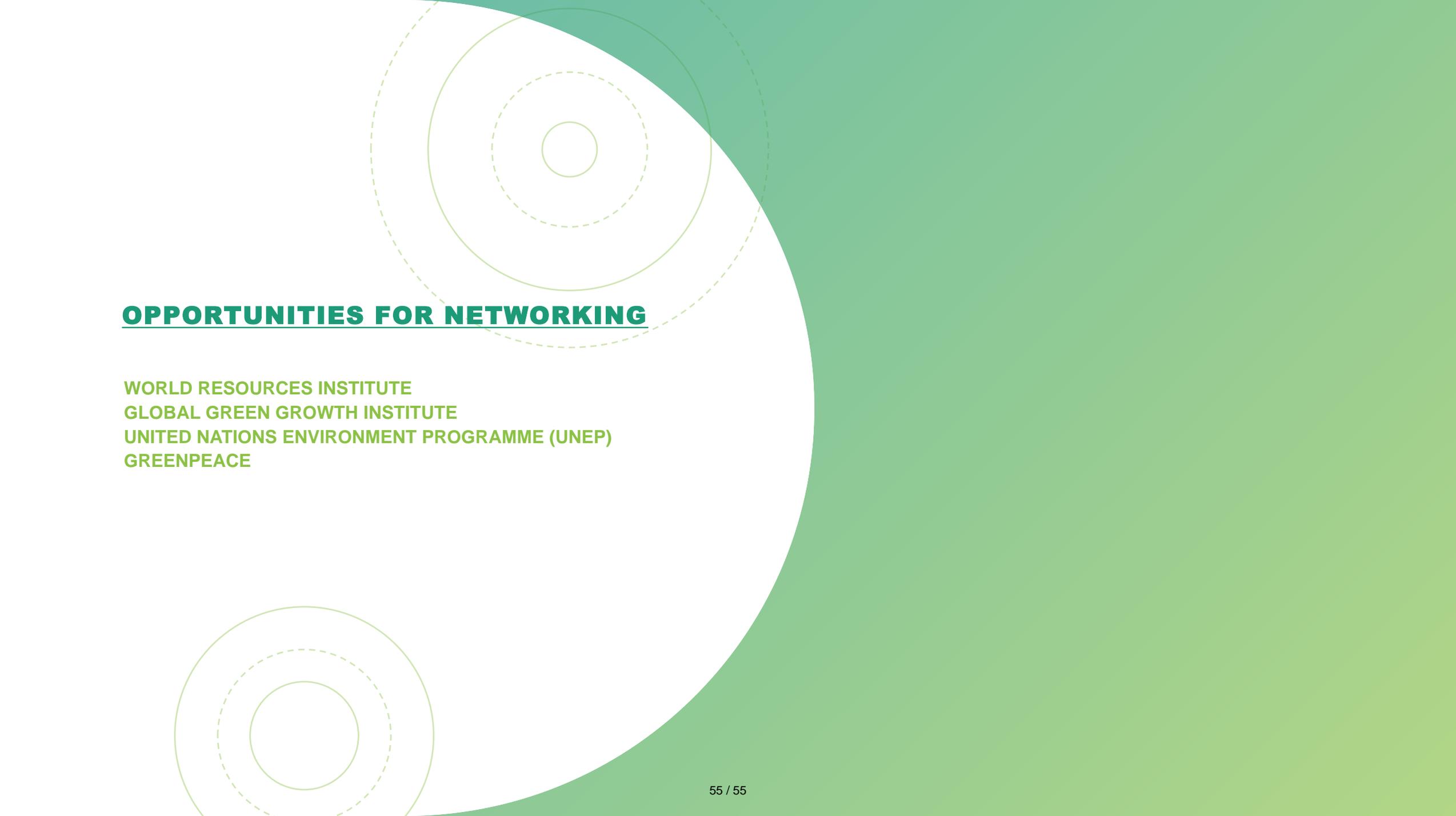


AIIB

ASIAN INFRASTRUCTURE INVESTMENT BANK

As an autonomous division of the AIIB, the Complaints-resolution, Evaluation and Integrity Unit (CEIU) was founded in 2016 as a component of the organization's Board of Directors-created Oversight Mechanism. The main duties of CEIU are to: (i) evaluate the Bank's ongoing and completed investment portfolio based on a selective basis in order to determine its quality and results (for completed projects); (ii) act as the central point for external requests or complaints regarding adherence to AIIB's Environmental and Social Policy (ESP) under the Project-affected People's Mechanism (PPM) Policy; and (iii) look into cases of fraud and corruption related to projects in accordance with the Policy on Prohibited Practices.

[https://www.aiib.org/en/about-aiib/who-we-are/complaints-resolution-evaluation-integrity-unit/introduction/index.html#:~:text=The%20Project%20Daffected%20People's%20Mechanism%20\(PPM\)%20is%20the%20complaints,AIIB's%20failure%20to%20implement%20its](https://www.aiib.org/en/about-aiib/who-we-are/complaints-resolution-evaluation-integrity-unit/introduction/index.html#:~:text=The%20Project%20Daffected%20People's%20Mechanism%20(PPM)%20is%20the%20complaints,AIIB's%20failure%20to%20implement%20its)



OPPORTUNITIES FOR NETWORKING

WORLD RESOURCES INSTITUTE
GLOBAL GREEN GROWTH INSTITUTE
UNITED NATIONS ENVIRONMENT PROGRAMME (UNEP)
GREENPEACE