

The Environmental and Social Norms of the Islamic Development Bank

Environmental and Social Norm 3 (ESN3): Resources Efficiency and Pollution Prevention and Management



Acronyms and Abbreviations

AESR Annual Environmental and Social Report

ACHPR African Commission on Human and Peoples Rights

AMR Anti-microbial Resistance

BC Black Carbon

BMP Biodiversity Management Plan
CBD Convention on Biological Diversity
CBO Community Based Organization
CDD Community-Driven Development
CHMP Cultural Heritage Management Plan

CO₂ Carbon Dioxide

CITES Convention on the International Trade in Endangered Species

CSO Civil Society Organization
DLI Disbursement Linked Indicator
DUC Dam Under Construction

EHSGs World Bank Group Environmental, Health and Safety Guidelines

ESDD Environmental and Social Due Diligence
ESIA Environmental and Social Impact Assessment
EITI Extractive Industries Transparency Initiative
EPRP Emergency Preparedness and Response Plan

ES Environmental and Social

ESA Environmental and Social Assessment

ESP Environmental and Social Plan

ESMP Environmental and Social Management Plan ESMS Environmental and Social Management System

ESNs Environmental and Social Norms

FAO Food and Agriculture Organization (of the UN)

FI Financial Intermediary

FPIC Free, Prior and Informed Consent

GBV Gender-Based Violence GCF Green Climate Fund GHG Greenhouse Gas GM Grievance Mechanism

GMO Genetically Modified Organism
GIP Good International Industry Practice

HIA Health Impact Assessment

HSMP Health and Safety Management Plan HVRMs Highly Vulnerable Rural Minorities

IDEV Independent Development Evaluation Department

IFCInternational Finance CorporationIFIInternational Financial InstitutionILOInternational Labour Organization

IPPIndigenous Peoples PlanIPMIntegrated Pest ManagementIRMIndependent Recourse MechanismISSIntegrated Safeguards System

IUCN International Union for the Conservation of Nature

IVM Integrated Vector Management LIMP Labour Influx Management Plan **LMPs Labour Management Procedures** Multilateral Financial Institution MFI NGO Nongovernmental Organization Non-Sovereign Operation NSO Operation and Maintenance O&M OHS Occupational Health and Safety

OP Operational Policy



OS Environmental and Social Operational Safeguard

POPs Persistent Organic Pollutants
PMP Pest Management Plan
PPP Public-Private Partnership
RAP Resettlement Action Plan
RBF Results-Based Financing

RCIP Riparian Communities Involvement Plan

RHA Risk Hazard Assessment
RMC Regional Member Country
SDGs Sustainable Development Goals
SEAH Sexual Exploitation and Harassment
SEP Stakeholder Engagement Plan

SESA Strategic Environmental and Social Assessment

SO Sovereign Operation SPV Special Purpose Vehicle TA Technical Assistance

UNDRIP United Nations Declaration on the Rights of Indigenous Peoples



Introduction

- 1. The Environmental and Social Norm 3 (ESN3) recognizes that economic activities often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable.
- 2. This ESN sets out the requirements to address resource efficiency and pollution prevention and management¹ throughout the project life cycle in a manner consistent with Good International Industry Practice (GIIP).
- 3. Throughout the different phases of the project's lifecycle planning and design, construction, commissioning, operations and decommissioning the Client is required to assess and evaluate resource- efficiency and pollution-prevention techniques and implement them, taking into consideration their technical and financial feasibility and cost-effectiveness.
- 4. As part of project preparation, in the environmental and social assessment the Client/evaluates the potential impacts of pollutant discharges and resulting ambient concentrations to the environment, considering potential receptors, and assesses risks and impacts related to the following:
- Environmental / ecological carrying capacity.
- Land use (current and future), soils, and agriculture.
- Surrounding communities and poverty conditions.
- Local, regional, and transboundary potential impacts.
- Proximity to environmentally sensitive areas and populations.
- Proximity to surface and groundwater sources.
- Current and future water body use.
- Potential cumulative impacts.

¹ The term "pollution" is used to refer to both hazardous and non-hazardous chemical pollutants (including persistent organic pollutants-POPs-), in the solid, liquid, or gaseous phases, and includes other components such as thermal discharge to water, emissions of short- and long-lived climate pollutants, nuisance odors, noise, vibration, radiation, electromagnetic energy, and the creation of potential visual impacts including light.



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Objectives

The objectives of ESN3 are as follows:

- To promote the sustainable use of resources, including energy, soil, water and raw materials.
- To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution² from project activities.
- To avoid or minimize project-related emissions of short and long-lived climate pollutants³.
- To avoid or minimize generation of hazardous and non-hazardous waste.
- To minimize and manage the risks and impacts associated with pesticide use.

Scope of Application

5. The applicability of this ESN is established during the environmental and social assessment described in ESN1. Resource conservation and pollution prevention and/or management will be a primary consideration during the concept design, preparation, and implementation phases of a project cycle.

Requirements

- 6. The Client shall include resource-efficiency and pollution-prevention principles in the project activities or initiatives in accordance with the principles of cleaner production⁴.
- 7. The Client will consider ambient conditions and apply technically and financially feasible resource efficiency and pollution prevention measures in accordance with the mitigation hierarchy. The measures will be proportionate to the risks and impacts associated with the project and consistent with GIIP; in the first instance; the IsDB guidance notes.

⁴ Cleaner production refers to the concept of integrating pollution reduction into the production process and design of a product. This involves continuous application of an integrated preventive environmental strategy to processes, products, and services to increase overall efficiency and reduce risks to humans and the environment through the conservation of raw materials, water and energy and through the reduction or elimination of the use of toxic and hazardous raw materials. Cleaner production can also mean taking advantage of renewable energy sources (IFC EHS Guidelines (Guidance note No. 3) and UNEP).



² 'Pollution' includes materially significant man-made introductions to the environment and includes light, sound, vibration, solid, liquid and gaseous matter whether hazardous or not. It thus includes wastepaper and plastic.

³ This includes all GHGs and black carbon (BC).

8. The client will provide adequate arrangements for implementation of project-related GHG reduction and climate change adaptation and resilience measures, with capacity enhancement where necessary.

A. Resource Efficiency

9. The Client will implement technically and financially feasible measures for improving efficient consumption of energy, water and raw materials, as well as other resources. Such measures will integrate the principles of cleaner production into product design and production processes to conserve raw materials, energy and water, as well as other resources. In designing products, the life cycle will be considered to integrate techniques aiming to avoid, or minimize waste, by applying the circular economy principles and practices wherever technically and financially feasible. Where benchmarking data are available, the Client will make a comparison to establish the relative level of efficiency.

Energy Use

10. The efficient use of energy is an important way in which the Client can contribute to sustainable development. When the project is a potentially significant user of energy, in addition to applying the resource efficiency requirements of this ESN, the Client will adopt measures specified in the EHSGs to optimize energy usage, to the extent technically and financially feasible.

Water Use

- 11. When the project is a potentially significant user of water⁵ or will have potentially significant impacts on water quality, in addition to applying the resource efficiency requirements of this ESN, the Client will adopt measures, to the extent technically and financially feasible, that avoid or minimize water usage so that the project's water use does not have significant adverse impacts on communities, other users and the environment. These measures include, but are not limited to, the use of additional technically feasible water conservation measures within the Clients operations, the use of alternative water supplies, water consumption offsets to maintain total demand for water resources within the available supply, and evaluation of alternative project locations.
- 12. For projects with a high-water demand that have potentially significant adverse impacts on communities, other users or the environment, the following will apply:
- A detailed water balance will be developed, maintained, monitored and reported periodically.
- Opportunities for improvement in water use efficiency, including water reuse, will be identified and implemented.
- Specific water use (measured by volume of water used per unit production) will be assessed.
- Operations must be benchmarked to available industry standards of water use efficiency.
- The Client will assess, as part of the environmental and social assessment, the potential cumulative impacts of water use upon communities, other users and the environment and will identify and

⁵ Environmental flow includes classical ecological flow and the optimal needs of downstream communities, including for their economic activities and domestic consumption.



Implement appropriate mitigation measures.

Environmental Flow⁶

- 13. For projects that affect water resources, the client avoids significantly altering flow regimes in ways that prevent water resources from fulfilling their functions for important upstream and downstream ecosystems and their services to local communities. The client therefore assesses and manages environmental flows for the conservation and sustainable use of biodiversity and ecosystem services. In addition to environmental flows, the assessment needs to give equal attention to other aspects of the aquatic ecosystem, such as sedimentation and the viability of fisheries.
- 14. The client ensures that flows are maintained so that they are optimally managed to allow for the multipurpose use of water, including water's ecological functions, and the integrity of river systems and wetlands. The member country (or group of countries) in which the project takes place is responsible for ensuring compliance through its appropriate water resources management agency.
- 15. The client ensures that the environmental and social assessment uses appropriate methodologies to address the issue of environmental flows according to best practice, including the recommendations of the World Commission on Dams. Before beginning any waterflow project, the client conducts a participatory water needs audit to determine, in consultation with relevant stakeholders who depend on the river flows for various needs, the minimum baseline ecological flow requirements.
- 16. Environmental flow analysis and management are carried out to the extent feasible in the context of river basin planning, so that the basin's entire water balance—now and in the future—is the framework in which environmental flows are determined. If no river basin plan exists, it is especially important that the project-based analysis consider the value of water across social, economic and environmental objectives so that these objectives are not jeopardized by an individual project or the cumulative impacts of multiple projects. The client will send notification, mentioning the risks and impacts and the appropriate measures being taken, to riparian countries whose territories and needs will be affected by the project as evidenced by the environmental and social assessment.

Raw Material Use

17. When the project is a potentially significant user of raw materials, in addition to applying the resource efficiency requirements of this ESN, the Client will adopt measures⁷ specified in the EHSGs and other GIIP to support efficient use of raw materials, to the extent technically and financially feasible.

⁷ These measures can include reuse or recycling of materials. The Client will reduce or eliminate the use of toxic or hazardous raw materials



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⁶ Whilst the significance of the amount of water used is contextual, a threshold of 5,000 liters per day is a commonly used

Soil

- 18. ESN3 recognizes soil as an important resource. The client will protect soils by implementing measures to avoid and, where avoidance is not possible, minimize soil degradation and erosion in a project.
- 19. For an agriculture project, the client will, where technically and financially feasible, implement measures consistent with sustainable and/or regenerative farming by protecting and enhancing soil quality and, in cases where soil is already degraded, restoring it.

B. Pollution Prevention and Management

- 20. The Client will apply pollution prevention and control measures consistent with national legislation and standards, applicable international conventions, and internationally recognized standards and good practice, particularly the EHS Guidelines.
- 21. When national legislation and regulations differ from the standards and measures presented in the EHS Guidelines, the Client is required to achieve whichever is more stringent. However, if less stringent levels or measures are appropriate to specific project circumstances, the Client will provide full and detailed justification for any proposed alternatives through the environmental and social assessment process. This justification should demonstrate that the choice of any alternate performance level is consistent with the overall requirements of this ESN and GIIP.
- 22. The Client will avoid the release of pollutants or, when avoidance is not feasible, minimize and control the concentration and mass flow of their release using the performance levels and measures specified in national law or the EHSGs, whichever is most stringent. This applies to the release of pollutants to air, water and land due to routine, non-routine, and accidental circumstances, and with the potential for local, regional, and trans-boundary impacts.
- 23. Where the project/activities to be supported by the Bank involve historical pollution⁸ the Client will establish a process to identify the responsible party, in accordance with national law, to take part in determining parties to be involved in and finance any necessary remediation. If the historical pollution could pose a significant risk to human health or the environment, the Client will undertake a health and safety risk assessment⁹ of the existing pollution that may affect communities, workers and the environment. Any remediation of the site will be undertaken in accordance with national law and GIIP, whichever is most stringent¹⁰.
- 24. To address potential adverse impacts on human health and the environment, ¹¹ the Client will consider relevant factors, including, for example: (a) existing ambient conditions; (b) in areas

¹¹ Such as air, surface and groundwater and soils.



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⁸ In this context historical pollution is defined as pollution from past activities affecting land and water resources for which no party has assumed or been assigned responsibility to address and carry out the required remediation.

⁹ Such assessment will follow a risk-based approach consistent with GIIP, in the first instance the EHSGs.

¹⁰ If one or more third parties are responsible for the historical pollution, the Client will consider seeking recourse from such parties so that such pollution is appropriately remediated. The Client will implement adequate measures so that historical pollution at the site does not pose a significant risk to the health and safety of workers and communities.

already impacted by pollution, the remaining assimilative capacity ¹² of the environment; (c) existing and future land use; (d) the project's proximity to areas of importance to biodiversity; (e) the potential for cumulative impacts with uncertain and/or irreversible health consequences; and (f) impacts of project-related climate change issues.

25. In addition to applying resource efficiency and pollution control measures as required in this ESN, when the project/activity has the potential to constitute a significant source of emissions in an already degraded area, the Client will consider additional strategies and adopt measures that avoid or minimize negative effects. These strategies include, but are not limited to, evaluation of alternative locations for the project or activities.

Management of Air Pollution¹³

- 26. As part of the environmental and social assessment, the Client will characterize and estimate sources of GHG emissions related to the project or activities¹⁴. This will include an estimate of gross GHG emissions resulting from the project, providing that such estimation is technically and financially feasible. Where the Client does not have the capacity to develop the estimate of GHG emissions, the Bank may provide assistance to the Client¹⁵. For projects that have diverse and small sources of emissions (for example, community-driven development projects) or where emissions are not likely to be significant (for example, projects in education and social protection), GHG estimations will not be required.
- 27. The Client will consider project alternatives and implement technically and financially feasible and cost-effective options¹⁶ to avoid or minimize GHG emissions during the design, construction, and operation of the project or activities.

Assessment of Climate Change Impacts and Effects

As part of the environmental and social assessment, the Client will characterize and estimate sources of GHG emissions related to the project or activities¹⁷. This will include an estimate of gross GHG emissions resulting from the project, providing that such estimation is technically and financially feasible. Where the Client does not have the capacity to develop the estimate of GHG emissions, the

¹⁷ For the purposes of such estimate, the Client may utilize national methodologies accepted in the context of international agreements on climate change, with the agreement of the Bank.



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¹² Assimilative capacity refers to the capacity of the environment for absorbing an incremental load of pollutants while remaining below a threshold of unacceptable risk to human health and the environment.

¹³ 'Air pollution' refers to the release of air pollutants (often associated with the combustion of fossil fuels), such as nitrogen oxides (NOx), sulfur dioxide (SO2), carbon monoxide (CO), particulate matter (PM), as well as other contaminants including GHGs.

¹⁴ Cost-effectiveness is determined according to the capital and operational cost and financial benefits of the options considered over the life of the project.

¹⁵The options for reducing or preventing air pollution may include a combination of approaches such as: enhancing energy efficiency, process modification, selection of fuels or other materials with less polluting emissions, and application of emissions control techniques. Options for reducing GHG emissions may include alternative project locations; adoption of renewable or low carbon energy sources; alternatives to refrigerants with high global warming potential; more sustainable agricultural, forestry and livestock management practices; the reduction of fugitive emissions and gas flaring; and carbon sequestration and storage; sustainable transport alternatives; and proper waste management practices.

¹⁶ For the purposes of such estimate, the Client may utilize national methodologies accepted in the context of international agreements on climate change, with the agreement of the Bank.

Bank may provide assistance to the Client¹⁸. For projects that have diverse and small sources of emissions (for example, community-driven development projects) or where emissions are not likely to be significant (for example, projects in education and social protection), GHG estimations will not be required.

- 29. The Client will consider project alternatives and implement technically and financially feasible and cost-effective options¹⁹ to avoid or minimize GHG emissions during the design, construction, and operation of the project or activities.
- 30. The client will undertake a climate risk assessment to: (i) establish the climate risk context of a project; (ii) assess the direct and indirect climate risks to a project and the potential for the project to generate increased climate change vulnerability and/or exposure of project-affected persons; and (iii) identify and develop climate change adaptation and resilience measures to address identified climate risks of a project. The scope of the assessment will include, as applicable, the climate change vulnerability of project-affected persons, physical assets, communities, institutions, and ecosystems associated with all stages of a project, relevant time frames, and climate scenarios. The level of detail of the climate risk assessment is proportionate to the nature and scale of the potential risks and based on the data, information, and models available at the time of IsDB's project appraisal or final credit approval.
- 31. The client will, in consultation with IsDB, choose and integrate climate change adaptation and resilience measures where technically and financially feasible and proportionate to the nature and scale of a project during the concept design and project preparation phase.

Management of Hazardous and Non-Hazardous Wastes

- 32. In the early stages of the project and in accordance with applicable international treaties and best practices, the Client will identify the potentially hazardous waste to be generated throughout the project's lifecycle and determine cost-effective alternatives for its use and/or environmentally sound disposal.
- 33. The Client will avoid the generation of hazardous and non-hazardous waste. Where waste generation cannot be avoided, the Client will minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. Where waste cannot be reused, recycled or recovered, the Client will treat, destroy, or dispose of it in an environmentally sound and safe manner that includes the appropriate control of emissions and residues resulting from the handling, storage and processing of the waste material.

¹⁹ Options for reducing GHG emissions may include alternative project locations; adoption of renewable or low carbon energy sources; alternatives to refrigerants with high global warming potential; more sustainable agricultural, forestry and livestock management practices; the reduction of fugitive emissions and gas flaring; and carbon sequestration and storage; sustainable transport alternatives; and proper waste management practices.



¹⁸ Depending on the capacity of the Client, the type of the project and the basis on which financing is being provided to the Client, this assistance may involve the Bank carrying out the GHG estimation on behalf of the Client, for example in fragile and states, working with Client counterparts and using project information provided by the Client. The Bank can also provide technical assistance to the Client in the use of the methodologies established by the Bank so that Client competency is strengthened in this respect.

34. If the generated waste is considered hazardous²⁰, the Client will comply with existing requirements for management (including storage, transportation and disposal) of hazardous wastes including national legislation and regulation, and applicable international conventions, including those relating to transboundary movement. Where such requirements are absent, the Client will adopt GIIP alternatives for its environmentally sound and safe management and disposal. When third parties conduct hazardous waste management, the Client will use contractors that are reputable and legitimate enterprises licensed by the relevant government regulatory agencies and, with respect to transportation and disposal, obtain chain of custody documentation to the final disposal destination. The Client will ascertain whether licensed disposal sites are being operated to acceptable standards and, the Client will use acceptable and approved sites. Where licensed sites are not being operated to acceptable standards, the Client will minimize waste sent to such sites and consider alternative disposal options, including the possibility of developing its own recovery, treatment or disposal facilities at the site or elsewhere.

Management of Chemicals and Hazardous Materials

- 35. If significant production, use or generation of hazardous materials or waste cannot be avoided, the Client, in consultation with potentially affected workers and communities, will prepare a management plan taking a whole life cycle approach (transport, handling, storage, recycling and disposal), and incorporating, as appropriate, preventative and contingency measures and management and reporting practices. In particular, the Client should look at opportunities to recycle waste and reuse material by preparing a recycling and reutilization plan identifying recyclable material and assessing the potential for reinjection of waste in the process. If third parties are to be used for hazardous waste management and disposal, the Client evaluates their legitimacy and legality for conducting hazardous waste management activities and obtains the chain-of-custody documentation. Hence, the Client is responsible for ensuring that the third party complies with the rules of the Basel Convention.
- 36. The client shall respect any limitations²¹ on the production, trade or use of chemicals and hazardous materials subject to international bans, restrictions or phase-outs for which the host country has ratified, approved, acceded, or accepted obligations related to the elimination, reduction, or phase out of such chemicals under an international agreement or convention²².
- 37. The Client will minimize and control the release and use of hazardous materials²³. The production, transportation, handling, storage, and use of hazardous materials for project activities will be assessed through the environmental and social assessment. The Client will consider less hazardous substitutes where hazardous materials are intended for use in manufacturing processes or other operations.
- 38. Where projects involve recourse to pest management measures, the Client will give

²³ These materials may include chemical fertilizer, soil amendments and chemicals other than pesticides.



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²⁰ As defined by the EHSGs and relevant national law.

²¹ Unless for an acceptable purpose as defined by the conventions or protocols or if an exemption has been obtained by the Client

²² Such as the obligations found in the Stockholm Convention on Persistent Organic Pollutants (POPs) and the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade.

preference to integrated pest management (IPM)²⁴ or integrated vector management (IVM)²⁵ approaches using combined or multiple methods. The environmentally safe procurements, distribution, storage, use and disposal of pesticides and their packaging are to be considered with respect to this ESN as well as ESN1, 2 and 4.

- 39. In the procurement of any pesticide the Client will assess the nature and degree of associated risks, taking into account the proposed use and the intended users.26The Client will not use any pesticides or pesticide products or formulations unless such use is in compliance with the EHSGs. In addition, the Client will also not use any pesticide products that contain active ingredients that are restricted under national law, applicable international conventions or their protocols or that are listed in, or meeting, the criteria of their annexes, unless for an acceptable purpose as defined by such conventions, their protocols or annexes, or if an exemption has been obtained by the Client under such conventions, their protocol or annexes, consistent with Client commitments under these and other applicable international agreements. The Client will also not use any formulated pesticide products that meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies²⁷. For any other pesticide products that poses other potentially serious risk to human health or the environment and that are identified in internationally recognized classification and labeling systems, the Client will not use pesticide formulations of products if: (a) the country lacks restrictions on their distribution, management and use; or (b) they are likely to be used by, or be accessible to, lay personnel, farmers, or others without training, equipment, and facilities to handle, store, and apply these products properly.
- 40. The following additional criteria apply to the selection and use of such pesticides: (a) they will have negligible adverse human health effects; (b) they will be shown to be effective against the target species;
- (c) they will have minimal effect on non-target species and the natural environment. The methods, timing, and frequency of pesticide application are aimed to minimize damage to natural enemies. Pesticides used in public health programs will be demonstrated to be safe for inhabitants and domestic animals in the treated areas, as well as for personnel applying them; (d) their use will take into account the need to prevent the development of resistance in pests; (e) where registration is required, all pesticides will be registered or otherwise authorized for use on the crops and livestock, or for the use patterns, for which they are intended under the project.
- 41. The Client will ensure that all pesticides used will be manufactured, formulated, packaged, labelled, handled, stored, disposed of, and applied according to relevant international standards and codes of conduct (such as the Food and Agriculture Organization (FAO)

²⁷ This includes pesticides classified as Class 1a (extremely hazardous), lb (highly hazardous) or II (moderately hazardous).



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²⁴ IPM refers to a mix of farmer-driven, ecologically based pest control practices that seeks to reduce reliance on synthetic chemical pesticides. It involves: (a) managing pests (keeping them below economically damaging levels) rather than seeking to eradicate them;

⁽b) integrating multiple methods (relying, to the extent possible, on nonchemical measures) to keep pest populations low; and (c) selecting and applying pesticides, when they have to be used, in a way that minimizes adverse effects on beneficial organisms, humans, and the environment.

²⁵ IVM "is a rational decision-making process for the optimal use of resources for vector control. The approach seeks to improve the efficacy, cost-effectiveness, ecological soundness and sustainability of disease-vector control."

²⁶ This assessment is made in the context of the environmental and social impact assessment.

International Code of Conduct on the Distribution and Use of Pesticides), as well as the EHSGs.

42. For any project involving significant pest management issues²⁸ or any project contemplating activities that may lead to significant pest and pesticide management issues²⁹, the Client will prepare a Pest Management Plan (PMP)³⁰. A pest management plan will also be prepared when proposed financing of pest control products represents a large component of the project or Client activities³¹.

³¹ This is when financing of substantial quantities of pesticides is envisaged. A pest management plan is not required for the procurement or use of impregnated bed nets for malaria control, or of insecticides for intra-domiciliary spraying for malaria control identified in internationally recognized classification systems.



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²⁸ Such issues would include: (a) migratory locust control; (b) mosquito or other disease vector control; (c) bird control; (d) rodent control, etc.

²⁹ Such as: (a) new land-use development or changed cultivation practices in an area; (b) significant expansion into new areas; (c) diversification into new crops in agriculture; (d) intensification of existing low-technology systems; (e) proposed procurement of relatively hazardous pest control products or methods; or (f) specific environmental or health concerns (e.g., proximity of protected areas or important aquatic resources; worker safety).

³⁰ Depending on the nature and the scale of the risks and impacts of the project, the elements of a PMP may be included as part of the ESMP and preparation of a stand-alone PMP may not be necessary.