Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 02/05/2021 | Report No: ESRSC01745

BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
World	OTHER	P175657	
Project Name	COVID-19 ENERGY ACCESS RELIEF FUND		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Energy & Extractives	Investment Project Financing		3/17/2021
Borrower(s)	Implementing Agency(ies)		
SIMA – Social Investment Managers and Advisors, LLC	SIMA		

Proposed Development Objective

The proposed Development Objective is to protect and maintain energy access and jobs during the COVID-19 pandemic by providing relief funds to energy access cmpanies delivering off-grid solar, mini grid and clean cooking energy services in developing countries.

Financing (in USD Million)	Amount
Total Project Cost	2.20

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

he COVID-19 Energy Access Relief Fund (EARF) is a global fund established by multiple public and private financiers as a unified response to COVID-19's threat to the survival of the nascent energy access industry, and preservation of energy access gains achieved in the past decade. EARF will offer concessional financing to energy access companies to address the severe credit squeeze and reduction of market demand that they face because of the pandemic, in exchange for their commitment to maintain jobs and continue serving their customers, in particular the poor and vulnerable households.

The EARF borrowers will be companies that distribute clean energy products and services such as solar lanterns, solar home systems, microgrid electricity or clean cookstoves to end-user customers. The end-users are typically low-income households and small or micro-businesses in rural and peri-urban areas with no or unreliable access to an electricity grid or other sources of clean energy or electricity. The borrowers will need to demonstrate that they are creditworthy, have sound business models that in absence of COVID-19 would make their businesses viable, that they do not have alternative access to relief funding, and that the EARF support would fill in their liquidity gap to withstand the crisis. The companies will use proceeds from the loans to finance their operating costs (primarily staff costs), and in the case of smaller companies also working capital and inventories. EARF will be managed by a professional fund manager with a demonstrated competency and track record in debt financing in the energy access, in particular off-grid solar, sector. Social Investment Managers and Advisors, LLC (SIMA), a US-based fund manager established in 2015 – was competitively selected for this task.

The Project will contribute with a recipient executed grant from ESMAP of US$2.2 million to the capitalization of EARF (US$ 1.96 million, Component 1) and to incremental operating expenses incurred by SIMA, including SIMA's environmental, social and other due diligence (US$0.24 million, Component 2).

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will provide financing to energy access companies (SMEs) and their customers, who include poor households and microbusinesses in rural and peri-urban areas of developing countries including in Sub-Saharan Africa and South Asia. Companies in other regions including East Asia, the Pacific Islands and Caribbean may also be considered. Given the participation of private companies, the IFC Performance Standards apply, and the instrument required by appraisal is the ESMS.

The fund will not finance investments/ companies deemed as substantial or high risk as defined by the ESF. However, the Fund may support companies and subprojects categorized as B in line with the IFC PSs. The investments to be funded are expected to mostly be low risk (IFC Category C) yet there might potentially be a limited number of moderate risk (IFC Category B) with medium to low risk. The exclusion list of the ESMS will clarify this categorization.

The key E&S risks in the project are expected to be related to used batteries and e-waste management and local capacity to address sustainable disposal of used batteries and e-waste. While at individual project level, these are expected to be limited in magnitude, and manageable if relevant regulation and procedures are implemented, they may manifest themselves prominently and frequently across a large number of small projects or companies. Stakeholder engagement and consumer awareness by the energy access companies will be crucial to management of E&S risks especially those related to used batteries and e-waste management.

The energy access companies that the EARF will finance include mini-grids, clean cooking, solar productive use equipment as well as off-grid solar standalone (SHS, pico-PV lighting) servicing households and other customers. Their revenues can come from manufacturing, trading, distributing, selling, maintaining, servicing, and repairing these products/ installations. The companies are expected to mainly operate in in rural and peri-urban areas, be mainly SME, although companies with larger revenues (up to USD50 million) can be included. Following closure of the fund, the EARF will be actively advertised and companies will have the opportunity to apply to the fund for a loan. As such, the fund will include a diverse range of companies operating across a range of geographies which will be fully defined only following the screening and selection of companies to receive loans.

The fund has, so far, received applications from 205 energy access companies. Of these, 90 companies have been shortlisted which includes 39 larger (revenue of USD 500,000 to USD 50 mn) and 51 smaller companies (revenues of USD 75,000 -500,000). The other key features of the current pipeline are:

- The average loan size requested is USD 590,000k. 33 companies asked for loans more than UDS 500,000, the remaining transactions are below USD 500,000.
- 72% of the applications come from Sub Saharan Africa, 10% from Asia Pacific, the rest is global (i.e. operating in more than one region).
- Out of the shortlisted companies, 60 are active in SHS and pico-PV, 41 in solar productive use, 29 in mini-grid, and 27 in clean cooking (note that a company could be distributing more than one technology, which is why aggregate numbers do not match the total of shortlisted).

The Project is expected to result in climate benefits by avoiding and reducing carbon dioxide equivalent emissions through safeguarding access to renewable energy systems. In its absence, the off-grid customers could revert to traditional lighting sources, such as kerosene lamps, which are a source of CO2 emissions and black carbon. In addition, it is anticipated that the EARF will help maintain local green jobs, including for women, which would continue to enable climate mitigation and energy access activities in rural markets post COVID-19. These climate benefits have been acknowledged by the Green Climate Fund, which has approved co-financing.

D. 2. Borrower's Institutional Capacity

The fund will be managed by SIMA - Social Investment Managers and Advisors. SIMA already has an Environmental and Social Management System (ESMS) in place developed in line with the IFC PSs, which it has been implementing for its other funding activities. Drawing from its existing ESMS, SIMA has developed an ESMS specific to the EARF keeping in mind challenges presented by the ongoing COVID-19 pandemic.

To ensure effective ESMS implementation, SIMA will strengthen its internal E&S capacity through: (i) ensuring that SIMA's team includes an E&S specialist/s; (ii) assigning a Managing Partner responsible for E&S risk management; and (iii) training investment analysts who will be responsible to carry out ESDD in line with the ESMS for the EARF. When required, SIMA may also refer to external E&S consultants for further support.

The capacity of companies accessing EARF to manage E&S risks proportionate to the scale of their activities will be determined as part of the screening application process undertaken by SIMA. However, given that the fund will not finance high or substantial risk activities as per ESF gaps in such capacity requirements are expected to be minimal.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Moderate

Funding will be used to support companies providing and installing individual off-grid solar systems and clean cooking appliances, and small solar PV mini grids, with a focus on maintaining access of the existing customers, rather than supporting new investments. Under the project, no construction of physical infrastructure is envisaged at this stage.

The potential environmental risks are expected to be moderate as EARF will support investment types with limited potential environmental impacts. The waste stream of subprojects will comprise battery waste (Li-ion and lead-acid batteries) and used batteries and e-waste such as panels, printed circuit boards, wires, etc. Some equipment used in off grid solar products and mini-grids may have some hazardous elements including lead, polymers and cadmium. These require special handling and management. These hazardous materials, if not collected, handled and disposed of well, would pollute soil and groundwater sources that may cause significant community health risks.

The main environmental risks are primarily related to used batteries and e-waste and safe disposal of equipment, especially batteries, relevant aspects of labor issues including OHS, water use, and gender. Used batteries and e-waste contain materials that are considered toxic, which are harmful to the environment and human health if not properly managed. These risks assume greater significance in the absence of national regulations on used batteries and e-waste management in African countries and service providers in many countries. As a result, SIMA will provide specific guidance to its borrowers on used batteries and e-waste management.

The risks will be managed by SIMA's careful evaluation of E&S risk management systems of the applicant companies and agreeing on mitigation measures as required. The companies will be expected to have in place an adequate ESMS to be able to manage multiple small subprojects and integrate overall E&S sustainability into their operations. The companies will be expected to provide regular E&S reports to SIMA.

SIMA has an established ESMS, which is now being adapted to the COVID-19 conditions for the EARF, in close coordination with all participating DFIs, including the World Bank and IFC. SIMA has trained analysts to carry out E&S due diligence and an E&S consultant on call for complex E&S issues.

The EARF will not support companies and subprojects categorized as A and B in line with the IFC PSs. This requirement will be included in the Financing Agreements signed between the Bank and SIMA as well as in the EARF specific ESMS.

Social Risk Rating Moderate

The social risk rating is considered to be moderate as the project will be financing activities which have a limited capacity to result in significant social impacts. As outlined above, funding will focus on maintaining access of the existing customers, rather than supporting new investments which will further limit the potential for any impacts.

Social risks that may occur include exclusion from project benefits of vulnerable groups including women, indigenous people and those in remote rural areas. Significant impacts associated with land acquisition are not expected as the EARF will mainly finance existing operations which will not require civil works. However, the ESMS will include provisions for land acquisition as well as a reputational risk assessment regarding approaches to historical land acquisition, such that companies that have been involved in forced evictions are excluded including on land under the traditional ownership of indigenous peoples. To further minimize these risks Projects classified as substantial or high risk (Category A or B) will not be supported by the EARF as per the financing agreements. Despite the aim of the EARF

to provide relief funding to save jobs, labor risks including reduced pay and retrenchment are a risk given challenges with the flow of funds in many companies which will be addressed through the ESMS.

Stakeholder engagement, including with consumers, may also be challenging given the nature of the project and due to Covid-19. Companies will be expected to have in place adequate social management measures to address these risks including Covid-19 secure methods to engage with relevant stakeholders as needed.

The fund specific ESMS will address any potential social risks and includes exclusion and screening criteria to avoid significant land take or impacts to indigenous people. SIMA will train their investment officers and analysts to identify these risks and ensure that the companies have adequate measures in place or if needed develop plans to address social risks.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The ESS1 is applicable to the project. The key E&S risks in this project are related to: (i) E&S capacity of the fund to assess, manage and monitor E&S activities and performance of its borrowers; and (ii) absence of regulations on used batteries and e-waste management in developing and notably African countries and poor management and disposal of used batteries and e-waste in general. To address these key risks, the fund will implement the following mitigation measures that also address COVID issues especially regarding public consultation and stakeholder engagement:

- The fund shall develop and implement an ESMS to ensure compliance with the E&S requirements which include an exclusion list, national regulatory requirements and follows IFC Performance Standards and relevant Good International Industry Practice (GIIP) such as WHO technical guidance developed for addressing COVID-19.
- Train its investment analysts in implementing the ESMS. For projects with more complex E&S issues, an E&S specialist consultant will be engaged;
- Develop guidance on used batteries and e-waste management as part of the ESMS and mandate all borrowers to adopt the guidance and implement used batteries and e-waste management practices in line with the guidance;
- Require borrowers to develop and implement an ESMS, appropriate to nature and scale of business, to manage E&S risks and impacts of their operations; and
- Require its borrowers to implement stakeholder engagement and consumer awareness plan.

ESS1 and ESS9 require that the core implementing agency (SIMA as the FI) has a system in place for assessing and managing E&S risks and impacts in its operations. In this project, this is to be achieved by developing a fund specific ESMS building on SIMAs existing ESMS. The ESMS incorporates, as appropriate for the project circumstances, relevant principles and elements of an ESMS described in ESS1 and ESS9, more specifically (i) environmental and social policy; (ii) procedures for the identification, assessment and management of the environmental and social risks and impacts; (iii) E&S screening criteria; (iv) organizational capacity; (v) monitoring and reporting; and (vi) external communications mechanism. The ESMS will ensure that project-specific E&S risks and impacts are adequately

addressed. Such a system will include processes and implementation capacity within the multilevel project structure to manage key identified E&S risks and impacts. Applicable E&S Requirements for companies as defined in the ESMS will be incorporated in financing agreements.

The draft ESMS has the following key elements:
(i) institutional E&S policy and procedures that incorporate the E&S requirements including the exclusion list, national laws and international standards
(ii) self- assessment questionnaire for solar companies must be filled out and submitted by all companies that apply for funding as part of the screening process.
(iii) assessing current E&S performance and pre-existing Environment & Social Due Diligence (ESDD) reports of the energy access companies that are existing clients of SIMA.
(iv) responsibilities for implementing the ESMS.

Given that the EARF will finance private sector companies, the ESMS has been developed in line with the requirements of the IFC Performance Standards 2012 and updated to reflect COVID considerations.

As the project funds will be provided to support off-grid solar lending (specified end use of funds) the ESMS requirement will be applied to SIMA at the institutional level in terms of their ability to ensure adequate E&S risk management due diligence, monitoring and reporting policies, processes, and capacity covering entities availing their credit lines within the EARF.

As the project funds will be provided to companies, SIMA will require these companies to develop and implement an ESMS, appropriate to the scale and nature of their operations. As part of its ESDD of borrowers, SIMA will review their ESMS and their capacity to implement the ESMS and manage E&S risks and impacts in their operations. SIMA will ensure that the ESMS of its borrowers incorporate guidance on used battery and e-waste management, and stakeholder engagement.

The ESMS will also incorporate an external communication mechanism/ grievance mechanism at SIMA level that will accept and address complaints and concerns regarding relevant operations in a manner accessible and understandable for affected parties. The grievance mechanism is currently under development and will be finalized as part of the ESMS. A Grievance mechanism must be required for SIMA in the Financing Agreement and shall be approved by the Bank.

The project will develop an ESMS for the fund which will apply to project funds only and include requirements for the identification and management of environmental and social risks as well as stakeholder engagement. The project will also prepare an Environmental and Social Commitment Plan (ESCP) to address the management of E&S risks by SIMA.

Areas where "Use of Borrower Framework" is being considered:

Not applicable

ESS10 Stakeholder Engagement and Information Disclosure

The project is being developed in the backdrop of COVID-19 with the objective of providing liquidity support to energy access companies. The ongoing pandemic's impact on these companies underlines the importance of

providing relief funding urgently. The design of the Project was informed by a large-scale virtual survey of off-grid solar customers, carried out by 60 Decibels. The survey included more than 25 000 households that are not connected to the grid but own an off-grid solar device, to provide insights on how low-income households in developing economies are coping with the Covid-19 pandemic. The survey revealed that the economic shock induced by the pandemic is putting severe financial stress on households and about 20% were struggling to make regular energy service payments. The survey also showed that the off-grid households have highly valued their access to electricity during the pandemic. 27% of the respondents said they are using their system more frequently and 92% said their quality of life has improved since they purchased the system. Customers are also predominantly very happy with the continued service provided by companies, despite the added challenge of limited abilities to communicate and engage consumers in person. The results of the 60 Decibels survey can be found at: https://app.60decibels.com/covid-19#explore .

ESS10 is relevant and the ESMS will include requirements for Stakeholder Engagement by companies in line with the requirements of ESS10. Requirements for engagement by SIMA are limited to ensuring knowledge and awareness of the fund and as outlined above providing access to a grievance redress mechanism.

The ESMS will outline the stakeholder engagement requirements of companies who access the funds including identification of stakeholders, methods of engagement, timing and reporting requirements. Companies will also need to demonstrate that a grievance mechanism in line with the scale of their operations is in place. For off-grid companies, stakeholders are likely to include consumers who use the products as well as local community representatives especially in rural areas while mini-grid companies may also need to consider neighboring communities and land owners/users.

Traditional stakeholder engagement methods are difficult to deploy in the current circumstances. Therefore, the project, as part of its ESMS, will explore various options for engaging stakeholder in line with the evolving nature of the pandemic. Engagement will be informed by WHO's "COVID-19 Strategic Preparedness and Response Plan Operation Planning Guidelines to Support Country Preparedness and Response" (2020) and the World Bank's "Technical Note: Public Consultations and Stakeholder Engagement in WB- supported operations when there are constraints on conducting public meetings" (March 20, 2020).

In addition to the requirements for stakeholder engagement, all borrowers will be required to implement consumer awareness program with specific focus on hazards associated with poor disposal of used batteries and e-waste. The awareness program would also focus on making consumers aware of options available to them for safe disposal. The requirement for this is included in the guidance on used batteries and e-waste management which part of the fund's draft ESMS.

The ESMS will also require companies to have a grievance redress mechanism in place proportionate to the scale and size of the risks of their activities which is accessible and responsive in a timely manner.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

This ESS is relevant as SIMA and the energy access companies it will support will have to manage the working conditions of their own workforce in accordance with relevant aspects of national law and ESS2 on Labor and Working Conditions. The Financing Agreements signed between SIMA and its borrowers will outline requirements related to labor and working conditions including on issues related to pay and working conditions, code of conduct for workforce and retrenchment which may result from workforce planning associated with the Covid-19 pandemic.

ESS3 Resource Efficiency and Pollution Prevention and Management

This ESS is relevant to the project. Although the project will not involve any construction activities, the ongoing operations of energy access companies will create environmental concerns associated with used batteries and e-waste management.

The concern is linked to the weak capacity in developing countries to manage used batteries and e-waste due to lack of policies, effective regulation and physical infrastructure for collection, recycling and disposal of used batteries and e-waste. While improper waste disposal can result in several environmental impacts, safe disposal of used batteries and e-waste can create an opportunity for creation of 'green jobs' especially in the informal sector through the entire waste value chain from collection, and recycling to final disposal of used batteries and e-waste.

The use on solar home systems requires ambitious safety standards, for which consumer awareness needs to be created. Different off-grid solar companies have different ambitions and practices to tackle the challenges that proper end-of-life batteries management poses, principally take back of products, identification of local reliable recyclers to work with and financing of collection and recycling operations, etc. Some companies will be better than others with regard to used batteries and e-waste management.

The project can take any opportunities including small RETFs as this one to build the relevant capacity and to promote responsible used batteries and e-waste management and best practices in the off-grid sector and the mini-grids.

SIMA will support EARF borrowers to develop and maintain responsible used batteries and e-waste policies and procedures, by (i) setting up mandatory requirements for essential used batteries and e-waste measures, and (ii) providing guidance and capacity building to the Borrowers on adopting emerging good practices, drawing on the World Bank's General EHS Guidelines and Good International Industry Practices (GIIP) as represented by GOGLA's e-waste toolkit. More specifically, the suggested approach is as follows:

- Enhance SIMA's ESMS on used batteries and e-waste by requiring:(i) to adhere to and ensure that the relevant national laws and regulations (waste management, air quality emissions, etc.) are followed by EARF borrowers in the respective countries; (ii) include specific contract clauses committing borrowers to address risks factors from used batteries and e-waste management; (iii) add used batteries and e-waste management elements in SIMA's procedures; and (iv) built capacity, and raise consumer awareness about the hazards of used batteries and e-waste and recommend sustainable means of disposal/management.

- To promote best practice in used batteries and e-waste management, require companies to have used batteries and e-waste management plans, standard operating procedures for handling and storage; specifying requirements to foster longevity of batteries, including battery management software and adoption of lithium-based ones; and promote stakeholder engagement on the used batteries and e-waste management (e.g., train locals/communities to work in producer - authorized repair centers).

- SIMA's ESMS to include draft template Standard Operation Procedures / Waste Management Guidelines.

In addition to the measures listed above, SIMA would require its borrowers, as part of their used batteries and e-waste management plan, to partner with local responsible recycling companies to safely collect and dispose of used battery and used batteries and e-waste collection. Where such responsible recycling companies do not exist, the borrowers would be encouraged to consider establishing end-of-life management service for used battery and used batteries and e-waste. This, however, may not be feasible for all borrowers as some of them have small operations.

The operation has important benefits for the reduction of GHG emissions given the use of renewable energy (such as solar power for lighting stations, battery storage for backup power, etc.). According to ESS3, the project will need to undertake GHG accounting using an agreed methodology during project preparation. The approach to GHG accounting will be detailed in the appraisal stage ESRS.

ESS4 Community Health and Safety

ESS4 is relevant but community health, safety, and security risks are expected to be minimal given that the project is supporting existing operations which will not require civil works. Companies interaction with communities is likely to be limited mainly to consumers. Off-grid solar companies will be required to align with World Bank's General EHS Guidelines and GIIP such as those included in GOGLA requirements which include requirements for provision of safe products and fair and respectful treatment of consumers including prohibited behaviors. While there are also risks of equipment malfunction these are likely to be limited and localized. The borrowers will be required to adhere to robust quality standards (Lighting Global or equivalent), including honoring the mandatory warranties which should ensure that equipment provided is of a good quality.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Given the focus on existing companies and companies and exclusion criteria for the project, land acquisition by companies supported by the EARF is expected to be minimal. However, ESS5 is considered to be relevant as the ESMS will include screening criteria related to any proposed land acquisition along with the requirements for the development of Resettlement Action Plans. Furthermore, the reputational risk search will identify any companies which have been involved in forced land acquisition historically.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This ESS is not relevant to the project as impacts on biodiversity or living natural resources are not currently expected since support will be provided to households. There are yet possible risks of improper management of end-of-life non-grid solar products (batteries) if they are disposed of in nature or water resources that are protected.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This ESS is not relevant as negative impacts on indigenous peoples (IPs) are not generally anticipated as a result of the project. As outlined above reputational risk screening will be undertaken to identify any historical issues associated with impacts on IPs. Screening will also need to ensure that IPs are not excluded from Project benefits i.e. that companies located in areas where IPs are located are not excluded from financing and/ or do not pass these benefits on to IPs.

ESS8 Cultural Heritage

This ESS is not relevant as impacts on Cultural Heritage are not currently expected since support will be provided mainly to existing operations and households. Screening will identify any potential or existing risks to cultural heritage based on the location of project sites.

ESS9 Financial Intermediaries

SIMA a private financial entity will act as the fund manager and will receive financing from the Bank (in the form of a Grant) which it will use to provide financing to energy access companies. The fund will finance energy access companies which will be required to meet the requirement of the ESMS developed for the fund in line with the requirements of the IFC Performance Standards given that the companies are private sector.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

The EARF involves financing from 14 other financing institutions including CDC, DFC, FMO, Acumen, IFC, GCF, and several foundations who are appraising the project against the requirements of the IFC Performance Standards. Regardless, a formal common approach is not being considered for this Project.

B. Proposed Measures, Actions and Timing (Borrower's commitments)

Actions to be completed prior to Bank Board Approval:

The Fund Manager will have to develop an ESMS and ESCP for the EARF and the same shall have to be approved by the Bank.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

The borrower will have to maintain its current ESMS, including adequate capacity; conduct timely E&S due diligence relevant to the project, require its borrowers to implement an ESMS, used batteries and e-waste management guidelines, stakeholder engagement & consumer awareness and provide WB with periodic E&S reporting in agreed format.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 01-Mar-2021

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: SIMA – Social Investment Managers and Advisors, LLC

Implementing Agency(ies)

Implementing Agency: SIMA

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Dana Rysankova
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