

# E&S Due Diligence of the HSBC India Framework

## Introduction

India faces a dual challenge in its energy sector: rapidly growing demand and continued dependence on fossil fuels. While significant progress has been made on installing non-fossil capacity, more than double its current renewable capacity is necessary to meet its 2030 NDC target.

This sub-project establishes a framework between the Green Guarantee Company (GGC) and HSBC India to provide credit guarantees for renewable energy generation and clean energy supply chain manufacturing (the 'transactions'). The HSBC India Framework (the 'Framework') is designed to streamline guarantee issuance for HSBC India's lending to the end borrowers, by setting standard terms and restrictions. The Framework is a sub-project to the Green Guarantee Company (FP197) programme approved by GCF.

The focus of this E&S Due Diligence (ESDD) is the HSBC India and GGC policies and procedures governing the Framework, which will be adopted to assess the E&S risks and impacts of the transactions funded under the Framework.

## Risk Category

The designated risk category for the Framework is Category I-2, as the beneficiary of the guarantee is a financial intermediary (HSBC India), investing in renewable energy and clean energy supply chain transactions. In addition to HSBC India's screening process, GGC will be screening each transaction under the Framework for alignment with the GGC Environmental & Social Management System and Operational Manual (GGC ESMS), eligibility criteria under the GGC Guarantee Policy and Exclusion List (all documents approved by GCF under the funding proposal).

The proposed transactions under the Framework are expected to involve business activities with potential limited adverse environmental and social risks, and impacts that are few in numbers, generally site-specific, largely reversible, and readily addressed through mitigation measures. Those transactions are expected to be classified under Category B.

## Environmental and Social (E&S) Risk Assessment

The HSBC risk management team will identify transactions that are in scope using the Equator Principles and the HSBC Sustainability Risk Policies. The transactions will also meet the GGC eligibility criteria (GGC Guarantee Policy and Exclusion List), which will be included in the Framework. Transaction documentation used for the risk assessment includes (but not limited to) the E&S Impact Assessment (ESIA) for Category B transactions, the E&S Management System (ESMS) and the E&S Management Plan (ESMP) where applicable.

GGC will assess the E&S risks and impacts of the transactions in accordance with the GGC ESMS, which requires alignment with applicable local and national E&S laws and regulations, the IFC Performance Standards (2012), the World Bank Environmental, Health and Safety Guidelines and sector specific guidelines, and the core labour conventions of the International Labour Organisations (ILO). Approvals from the GGC Impact and Credit Committees will be required for each transaction under the Framework.

Where gaps are identified, mitigation and corrective actions will be recorded in the E&S Action Plan (aligning with the template in the GGC ESMS) and the Equator Principles Action Plans (EPAPs), forming part of the loan agreement between HSBC and the end borrower.

In addition, for higher risk Category B transaction, there will be oversight of the transaction by the HSBC EP subject-matter-experts. Independent E&S Consultant will be appointed to undertake and produce the E&S Due Diligence (ESDD) on the transaction.

## Compliance Review of HSBC E&S Management System and Policies

The sustainability and ESG related policies presented by HSBC are in alignment with the GGC ESMS, and adequate in managing the Category B or C transactions expected under this Framework. Where there are differences with the GGC ESMS, the more stringent requirements will be applied. HSBC is also a GCF accredited entity and their E&S management system that is applicable to the Framework is expected to be acceptable.

- HSBC ESMS: The HSBC Sustainability Risk Policies (February 2025) explains the HSBC risk management framework and means of implementation. The policies focus on mitigating reputational, credit, legal and other risks related to environmental and social impacts. HSBC is a signatory to the Equator Principles (EP)<sup>1</sup> (adopted in 2003), which means the IFC Environmental and Social Performance Standards (IFC PS) are adopted as the safeguard mechanism. This aligns with the requirements of the GGC ESMS.
- Labour and working conditions (IFC PS2): In addition to the Sustainability Risk Policies and the EP, HSBC has policies that safeguard their staff and working conditions. The policies<sup>2</sup> include, but not limited to, the Health and Safety Policy, Mental Health Policy, HSBC Human Rights Statement, Modern Slavery Act, Remuneration practices and governance, and Whistleblowing arrangement. This aligns with the GGC ESMS.
- Stakeholder engagement: engagement will occur at the transaction level under the Framework, in a structured and culturally appropriate manner with all relevant stakeholders, meeting the requirements of the EP and the GGC ESMS. Details of the stakeholder engagement, in terms of the plan of engagement, the process and the outcome will be reviewed by HSBC and GGC as part of the approval process.
- Grievance redress mechanism: HSBC in India has a grievance reporting system and a Grievance Redressal Policy that sets out the means of raising grievances and the process

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<sup>1</sup> [The Equator Principles EP4 July2020](#)

<sup>2</sup> [ESG reporting centre | HSBC Holdings plc](#)

of handling complaints from stakeholders through a structured framework<sup>3</sup>. There are multiple levels for escalating the grievance including escalation to the Reserve Bank of India Ombudsman scheme. This provision aligns with the EP requirements. At the transaction level, separate grievance mechanism will be established by the end borrowers and provisions for the mechanism will be reviewed by GGC as part of the approval process.

- Safeguarding against SEAH (sexual exploitation, abuse and harassment): The HSBC Human Rights Statement<sup>4</sup> describes their approach on protecting human rights and focusing on areas that are most relevant to their operations and supply chains. Being the signatory of the EP, the Framework will comply with the requirements of IFC Performance Standard (PS) in particular PS4 (Community Health, Safety, and Security), which includes requirements to safeguard against SEAH. As part of the transaction screening process, GGC will review the end borrower's safeguarding mechanism and where gaps are identified, corrective actions will be agreed and recorded in a transaction specific E&S Action Plan (ESAP).
- E&S responsibilities and accountabilities: the HSBC Board takes overall responsibility for ESG strategy, overseeing executive management in developing the approach, execution and associated reporting. Underneath the Board level governance, at the management level, the ESG Committee has oversight of the ESG strategy and policies, including overseeing and monitoring progress on commitments, deliverables and targets, and reporting to the Board<sup>5</sup>.
- Gender positive impact: HSBC has a diversity and inclusion policy at the board level, with targets for female representation on the Board of Directors and holding senior board positions. At the transaction level, GGC will explore opportunities to achieve gender positive impacts using the findings in the GGC Gender Assessment (approved by GCF during the funding approval) for the energy sector and specifically for India. Where appropriate, gender positive actions will be included as part of the action plan for the end borrowers.

## Monitoring and Reporting

- E&S performance monitoring and reporting: transaction level E&S performance will be reported by the end borrowers, as required by the GGC ESMS, to demonstrate responsible business operations and practices are being implemented. The nature of the monitoring will depend on the E&S risks of the transactions under the Framework.

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<sup>3</sup> [Feedback and Complaints | Help and Support - HSBC IN](#)

<sup>4</sup> HSBC Human Rights Statement available online at: <https://www.hsbc.com/-/files/hsbc/who-we-are/pdf/230710-hsbc-human-rights-statement.pdf?download=1>

<sup>5</sup> From the Annual Report and Accounts 2024 (see pages 42-84 for ESG disclosures). Available online at: <https://www.hsbc.com/-/files/hsbc/investors/hsbc-results/2024/annual/pdfs/hsbc-holdings-plc/250219-annual-report-and-accounts-2024.pdf?download=1>

Higher risk Category B transactions will require independent monitoring and reporting by an independent E&S consultant, as per the EP.

- Major Incident reporting: as required by the GGC ESMS, the Framework will include the need for monitoring and reporting on major incidents and grievances raised at the transaction level. The process and timeline in responding to such reporting, after the incident/event/accident is reported to GGC, will align with the GGC ESMS.

## Annex A (Transaction Scorecard)

As part of the transaction screening by GGC, the completed Transaction Scorecard (template in the GGC ESMS) is included below to document the outcome of the go/no-go assessment.

Scorecard Criteria	Go / No Go / Pending	Comments
1. The transaction <b>is developed by an Eligible Borrower</b> and <b>meets</b> GGC's Exposure Limit defined in its Guarantee Policy.	Go	<p>End borrowers under the HSBC India Framework will be private sector entities, qualifying as "Eligible Borrowers" per GGC's Guarantee Policy. GGC's exclusions will apply to the Framework. GGC will confirm end borrower classification, ownership structure, and compliance with counterparty eligibility requirements.</p> <p>The maximum individual transaction size is USD 50 million, representing 50% of GGC's Total Claim Paying Resources, consistent with the single-obligor exposure cap in the policy.</p>
2. The transaction <b>meets</b> GGC's Sector and Country Criteria as defined in its Guarantee Policy and <b>falls within</b> GGC's eligible sectors, result areas, or industries.	Go	<p>Framework transactions will target renewable energy generation and clean energy supply chain investments in India. Eligible asset classes will include solar, wind, geothermal, bioenergy, marine energy, transmission and distribution infrastructure, and storage, in line with the Guarantee Policy. Hydropower and other excluded activities will be explicitly excluded per policy.</p> <p>This meets the sector criteria for GHG mitigation in the Energy sector (GCF MRA 1).</p> <p>India is on the DAC List of ODA Recipients and is designated as a GGC priority country.</p>
3. Requisite documents are <b>in place</b> to assess adherence to the Climate Bonds Initiative (CBI) Standard and Certification requirements.	Go	GGC will ensure that the transactions under the Framework meet asset specific criteria compliant with CBI Standard.
4. The Eligible Borrower has <b>considered</b> potential positive environmental and social outcomes in the documentation, with targets in place, and has linked them to the SDGs.	Go	Opportunities to create positive outcomes will be explored and identified for implementation on a transaction by transaction basis. GGC will confirm whether the end borrower has considered expected E&S benefits, established measurable targets, and mapped them to relevant SDGs. If absent, GGC will assess whether such documentation is required in the context of the transaction and include the action in the ESAP, if appropriate.
5. The Eligible Borrower has <b>considered</b> potential gender-inclusive outcomes.	Go	The gender positive impact and gender-responsive targets will be developed and included in the Framework. Transactions with opportunities to create gender positive impact will have the relevant KPIs for their monitoring and reporting. The gender inclusive impact will be in alignment with GGC's Gender Assessment and Gender Action Plan.
6. The Eligible Borrower has <b>considered</b> ESG compliance, has completed appropriate documentation to date and is expected to engage on all outstanding actions.	Go	The Equator Principles, HSBC Sustainability Risk Policies and the GGC ESMS are applicable to the Framework and are safeguard mechanism to all transactions under the Framework. For the approval of the loan, the end borrower will be required to demonstrate ESG compliance and complete all appropriate documentation and commit to undertaking outstanding actions.

## Annex B (Assessment of HSBC Policies)

Comparison of HSBC Sustainability Risk Policies with GCF Revised Environmental and Social Policy (VI. General requirements for environmental and social risk management), which underpins the GGC Environmental & Social Management System and Operational Manual (GGC ESMS).

	HSBC	Notes
<b>Accreditation</b>	- HSBC was accredited on 8 March 2017.	<ul style="list-style-type: none"> <li>- As per the <a href="#">GCF website</a>, HSBC is yet to execute an Accreditation Master Agreement (AMA) with GCF and hence has no track record with regard to GCF programs / projects.</li> <li>- As more than 9 years have passed since accreditation, GCF accreditation requirements have seen many improvements and changes.</li> </ul>
<b>Environmental and social management system (ESMS)</b>	- Introduction to HSBC's Sustainability Risk Policies dated February 2025 is intended to help external stakeholders to understand HSBC's broader risk management framework, HSBC's policies and how HSBC seeks to implement them.	<ul style="list-style-type: none"> <li>- Please refer to the URL below. <a href="https://www.hsbc.com/who-we-are/esg-and-responsible-business/managing-risk/sustainability-risk">https://www.hsbc.com/who-we-are/esg-and-responsible-business/managing-risk/sustainability-risk</a></li> </ul>
<b>Screening and risk categories</b>	- HSBC adopted the Equator Principles (EP) on 4 September 2003.	<ul style="list-style-type: none"> <li>- The interim Environmental and Social Safeguards (ESS) of the GCF are the International Finance Corporation's Environmental and Social Performance Standards.</li> <li>- EP categorisation is based on the International Finance Corporation's (IFC) environmental and social categorisation process. Therefore, HSBC is very familiar with the process.</li> </ul>
<b>Environmental and social due diligence (ESDD)</b>	- HSBC has been an ardent Equator Principles Financial Institution (EPFI) since September 2003.	<ul style="list-style-type: none"> <li>- Below is an excerpt from the EP. <i>The Equator Principles are intended to serve as a common baseline and framework for financial institutions to identify, assess and manage</i></li> </ul>

	<ul style="list-style-type: none"> <li>- HSBC has conducted ESDD to the projects it finances applying EP framework.</li> </ul>	<i>environmental and social risks when financing Projects</i>
<b>Environmental and social assessment</b>	<ul style="list-style-type: none"> <li>- IFC requires its clients to apply the Performance Standards (PS) to manage environmental and social risks and impacts.</li> <li>- As the EP employs the PS as its standards when conducting environmental and social assessment, HSBC is at home with applying the PS to the projects it finances.</li> </ul>	<ul style="list-style-type: none"> <li>- HSBC also has its own sector policies, which can be found on this site: <a href="#">Sustainability risk   Managing risk   HSBC Holdings plc</a></li> <li>- These policies will be applied in tandem with the EP.</li> </ul>
IFC PS1: Assessment and Management of Environmental and Social Risks and Impacts	<ul style="list-style-type: none"> <li>- Introduction to HSBC's Sustainability Risk Policies dated February 2025 is the basic document describing HSBC's ESMS.</li> <li>- The EP also provides a framework for E&amp;S risk assessment and stakeholder engagement.</li> </ul>	<ul style="list-style-type: none"> <li>- The EP provides a framework for E&amp;S risk assessment and stakeholder engagement.</li> </ul>
IFC PS2 to PS8	<p>Relevant policies include, but not limited to the following (at <a href="#">ESG reporting centre   HSBC Holdings plc</a>):</p> <ul style="list-style-type: none"> <li>- Health and Safety Policy</li> <li>- Mental health policy</li> <li>- HSBC Human Rights Statement</li> <li>- HSBC statement on whistleblowing arrangements</li> <li>- Modern Slavery Act</li> <li>- HSBC Forestry Policy</li> <li>- HSBC Agricultural Commodities Policy</li> <li>- HSBC World Heritage Sites and Ramsar Wetlands Policy</li> <li>- HSBC Energy Policy</li> <li>- HSBC Mining and Metals Policy</li> </ul>	<ul style="list-style-type: none"> <li>- The HSBC policies are applicable to their internal operations and/or the main financing products offered by HSBC.</li> <li>- As the signatory to the EP, the IFC Performance Standards will be applicable to all financings for projects within the HSBC India Framework (as transaction value is expected to be between USD 35-100million).</li> </ul>

	<ul style="list-style-type: none"> <li>- HSBC Thermal Coal Phase-Out Policy</li> </ul>	
<b>Environmental and social management plan (ESMP)</b>	<ul style="list-style-type: none"> <li>- As per Principle 4 of the EP, for all Category A and Category B Projects, the EPFI will require the client to develop and / or maintain an Environmental and Social Management System (ESMS).</li> <li>- Further, an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.</li> </ul>	<ul style="list-style-type: none"> <li>- HSBC, being an EPFI, will have to require the client to develop an ESMP for projects it finances. Note that Category A projects will not be financed under the HSBC India Framework.</li> <li>- Principle 4 of the EP states that where the applicable standards are not met to the EPFI's satisfaction, the client and the EPFI will agree to an Equator Principles Action Plan (EPAP). The EPAP is intended to outline gaps and commitments to meet EPFI requirements in line with the applicable standards.</li> <li>- HSBC will therefore require the client to agree to an EPAP where necessary.</li> </ul>
<b>Monitoring and reporting</b>	<ul style="list-style-type: none"> <li>- As per Principle 9 of the EP, for all Category A and, as appropriate, Category B projects, in order to assess project compliance with the EP after Financial Close and over the life of the loan, the EPFI will require independent monitoring and reporting.</li> <li>- In addition, the EP states that any monitoring performed by a multilateral or bilateral financial institution, or an OECD Export Credit Agency may be taken into account.</li> </ul>	<ul style="list-style-type: none"> <li>- To be EP compliant, HSBC should require independent monitoring and reporting for higher risk Category B projects. The selection of these projects will be agreed with GGC during the transaction screening stage.</li> </ul>
<b>Stakeholder engagement</b>	<ul style="list-style-type: none"> <li>- As per Principle 5 of the EP, for all Category A and Category B projects, the EPFI will require the client to demonstrate effective stakeholder engagement, as an ongoing process in a structured and culturally appropriate manner, with affected communities, workers and,</li> </ul>	<ul style="list-style-type: none"> <li>- All projects affecting Indigenous Peoples (IP) will be subject to a process of ICP and will need to comply with the rights and protections for IP contained in relevant national law, including those laws implementing host country obligations under international law.</li> <li>- IFC PS 7 paragraphs 13-17 detail the special circumstances that require the</li> </ul>

	<p>where relevant, other stakeholders .</p> <ul style="list-style-type: none"> <li>- For projects with potentially significant adverse impacts on affected communities, the client will conduct an Informed Consultation and Participation (ICP) process. This process should be free from external manipulation, interference, coercion and intimidation.</li> </ul>	<p>Free, Prior and Informed Consent (FPIC) of affected Indigenous Peoples</p> <ul style="list-style-type: none"> <li>- It is not envisaged that the transactions under the HSBC India Framework will trigger the need to apply IFC PS7. In the unlikely event of unavoidable negative impacts on IP, the above IFC PS7 guidance and the framework within the GGC ESMS will be applicable.</li> </ul>
<b>Grievance redress mechanisms</b>	<ul style="list-style-type: none"> <li>- As per Principle 6 of the EP, for all Category A and, as appropriate, Category B projects, the EPFI will require the client, as part of the ESMS, to establish effective grievance mechanisms which are designed for use by affected communities and workers, as appropriate, to receive and facilitate resolution of concerns and grievances about the project's environmental and social performance.</li> </ul>	<ul style="list-style-type: none"> <li>- As per the GCF Revised Environmental and Social Policy, the approach of GCF is to provide for grievance and redress at GCF, accredited entity, and activity levels.</li> <li>- The EP requires the client to establish a grievance redress mechanism at activity levels.</li> <li>- HSBC India has a grievance redress mechanism (<a href="#">Non Demat Accounts   Feedback and Complaints - HSBC IN</a>) and a similar mechanism will also be requested at the transaction level, as required by the GGC ESMS.</li> </ul>

✓ The table below illustrates possible gaps in the HSBC policies.

	HSBC	Notes
<b>Gender Policy</b>	<ul style="list-style-type: none"> <li>- HSBC does not have a specific gender policy that is applicable to the financial products offered by HSBC.</li> <li>- There is gender relevant information in <a href="#">HSBC's inclusion strategy</a>, which provides targets for female representation at the board level.</li> </ul>	<ul style="list-style-type: none"> <li>- The lack of a Gender Policy at HSBC entity level can be addressed through GGC exploring gender positive impacts on a transaction-by-transaction basis. As GGC will have influence over the reporting and monitoring strategy, gender positive initiatives and KPIs can be considered and agreed with HSBC and the end borrowers.</li> </ul>
<b>Revised policy on the prevention and protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH Policy)</b>	<ul style="list-style-type: none"> <li>- HSBC does not have a specific policy on SEAH.</li> <li>- In the HSBC Energy Policy, HSBC is committed to identify, assess and manage risks and impacts related to human rights. Since 2018, a Human Rights Steering Committee, comprising senior representatives of relevant business areas and functions, has overseen the development of HSBC's commitments, policies and procedures. Executive responsibility rests with the Group Executive Committee, which has primary accountability for human rights issues.</li> </ul>	<ul style="list-style-type: none"> <li>- The lack of <a href="#">SEAH Policy</a> may prove unfavourable for HSBC.</li> <li>- This will be addressed by adopting GGC's ESMS process in identifying SEAH risks, requiring end borrower to put in place mitigation measures, and GGC to monitor and report progress and performance across the tenor of the transaction.</li> </ul>

### Annex C (Environmental and Social Action Plan)

This Environmental and Social Action Plan (ESAP) is produced as a result of assessing the HSBC Sustainability Risk Policies with GCF Revised Environmental and Social Policy, which underpins the GGC Environmental & Social Management System and Operational Manual (GGC ESMS). The gaps identified in the HSBC policies are recorded below, with the proposed mitigation action and timeframe.

Ref. Number	Reference Standard / Law / Regulation	Type of Finding	Issue	Action	Deadline	Priority	Cost Implication	Completion Indicator	Responsible Person
	<i>(Indicate the relevant reference standard / law / regulation e.g. IFC Performance Standard 1)</i>	<i>(E&amp;S Compliance / Value Add / Impact)</i>	<i>Summarised description of the specific risk or gap identified.</i>	<i>Recommendation to avoid, minimise or manage the issue identified.</i>	<i>(Period of time to complete action)</i>	<i>(Low, Medium or High)</i>	<i>(Most likely cost and reasonable worst case)</i>	<i>(Deliverables or items to be provided showing that the correction action has been undertaken)</i>	<i>(Assign responsibility to appropriate personnel)</i>
	GGC Gender Action Plan	Impact	HSBC does not have a gender policy	Applying GGC Gender Assessment and Gender Action Plan (documents available at <a href="#">Green Guarantee Company</a> )	Before the operation of the HSBC India Framework	Medium	Minimal	HSBC India Framework includes gender positive impact metrics for monitoring (where appropriate)	GGC Impact Team
	SEAH Policy	E&S compliance	HSBC does not have a specific policy on SEAH	Applying GGC ESMS on identifying and managing potential SEAH risk	Before the operation of the HSBC India Framework	High	Minimal	HSBC India Framework adopting GGC ESMS for E&S risk management.	GGC Portfolio Team

## Annex D (Renewable/Clean Energy Sector E&S Risks)

The table below provides an overview of typical key E&S risks, mitigation measures and opportunities for transactions involving renewable/clean energy generation or product manufacturing.

As the details of each transaction under the HSBC India Framework are not yet available, these E&S risks are sector typical and aim to provide examples of risks that may arise during the transaction screening process by GGC and HSBC.

[Note: the risk rating, proposed mitigation and the costing/timing shown on the table below are all indicative, and will be subject to the details of each transaction]

Aspect	Risk Identification	Risk Rating	Proposed Mitigation Measure	Costing & Timing
E&S Management Systems (of end borrower)	ESMS not align with IFC PS1	<i>Medium</i>	Produce a new ESMS or supplement existing ESMS to bring alignment with IFC PS1	Before Financial Close (FC) or 3-6 months after FC (depending on project risk)
	Lack of transaction level grievance redress mechanism (IFC PS1)	<i>High</i>	Develop means of raising grievance that is accessible and comprehensible to local stakeholders, including ability to be anonymous.	Before FC
Environment	Impact on biodiversity of project location (IFC PS6)	<i>Low-High</i>	Apply avoidance measures where possible. Undertake baseline and impact assessments, and collaborate with local environmental authority for mitigation measures.	Before FC
	Waste management (IFC PS3)	<i>Low - Medium</i>	Implement water management plan, including drainage and water treatment facility if necessary. E-waste management plan, recycling or reuse where possible	Before FC
	Climate risk	<i>Medium - High</i>	Undertake climate risk assessment, especially for areas that are prone to flood risk.	Before FC
Health & Safety (H&S)	Gender based violence (GBV) due to high influx of labour (IFC PS4)	<i>Low-Medium</i>	Establish policy against GBV and provide mandatory training to all staff and contractors	Before Financial Close (FC) or 3-6 months after FC (depending on project timeframe)

	Increase traffic affecting community (IFC PS4)	<i>Medium</i>	Prepare traffic management plan that identify and mitigate traffic risks	Before Financial Close (FC) or 3-6 months after FC (depending on project timeframe)
	Inadequate fire safety provisions (IFC PS1 and PS4)	<i>Medium to High</i>	Undertake fire risk assessment and ensure fire safety compliance with local regulations.	Before FC
Social	Forced labour at supply chain level (IFC PS2)	<i>High</i>	Requiring supplier to maintain ethical sourcing practices and provide evidence of compliance. Undertake supply chain study and mapping, and produce supply chain management plan.	Before FC
	Physical or economic displacement due to land acquisition (IFC PS5)	<i>High</i>	Stakeholder engagement, prepare Livelihood Restoration Plan and/or Resettlement Action Plan to ensure that affected people are appropriately compensated in line with IFC PS5	Before FC
	Water consumption (IFC PS3)	<i>Medium - High</i>	Undertake water supply assessment to ensure supply to local communities not affected. Otherwise, consider alternative water supply source	Before FC
Summary of E&S Opportunities		<ul style="list-style-type: none"> <li>- Creating green jobs for local community and benefiting local economy.</li> <li>- Create gender policy that promotes female employment.</li> </ul>		