

Disability & World Bank Safeguards Campaign Revised OP 4.01

OP 4.01 - Environmental Assessment

These policies were prepared for use by World Bank staff and are not necessarily a complete treatment of the subject.

OP 4.01
January, 1999

Note: OP/BP 4.01 *Environmental Assessment*, were revised on April 2013 to take into account the recommendations in “*Investment Lending Reform: Modernizing and Consolidating Operational Policies and Procedures*” (R2012-0204 [IDA/R2012-0248]), which were approved by the Executive Directors on October 25, 2012. As a result of these recommendations, OP/BP 10.00, *Investment Project Financing*, have been revised, among other things, to incorporate and expand parts of OP/BP 8.00, *Rapid Response to Crises and Emergencies*, and to incorporate OP/BP 8.30, *Financial Intermediary Lending* and OP/BP 13.05, *Supervision*, (which have accordingly been retired). OP/BP 4.01 have consequently been updated to reflect these changes.

Additional information related to these statements is provided in the *Environmental Assessment Sourcebook* (Washington, D.C.: World Bank, 1991) and subsequent updates available from the Environment Sector Board, and in the *World Bank Group Environment, Health and Safety Guidelines (EHSGs)*.¹ Other Bank statements that relate to the environment include OP/BP 4.02, *Environmental Action Plans*; OP/BP 4.04, *Natural Habitats*; OP 4.07, *Water Resources Management*; OP 4.09, *Pest Management*; OP/BP 4.10, *Indigenous Peoples*; OP/BP 4.11, *Physical Cultural Resources*; OP/BP 4.12, *Involuntary Resettlement*; OP/BP 4.36, *Forests*; and OP/BP 10.00, *Investment Project Financing*.

Questions may be addressed to the Safeguard Policies Helpdesk in OPCS (Safeguards@worldbank.org).

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1. The Bank² requires environmental assessment (EA) of projects proposed for Bank financing to help ensure that they are: (a) environmentally and socially sound, (b) inclusive (Indigenous Peoples, gender, persons with disabilities, and intergenerational)³, (c) universally accessible to the maximum extent possible, and (d) sustainable; ~~and thus, to~~ improve decision making.
2. EA is a process whose breadth, depth, and type of analysis depend on the nature, scale, and potential environmental and social impact of the proposed project, recognizing that piecemealing a project into subprojects to avoid the significance of impacts is not acceptable.⁴ EA evaluates a project's potential environmental and social risks and impacts in its area of influence;⁵ examines project alternatives; identifies ways of improving project selection, siting, planning, design, and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental and social impacts and enhancing positive impacts; and includes the process of mitigating and managing adverse environmental and social impacts throughout project implementation. The Bank favors preventive measures such as changes in proposals to incorporate universal design features⁶ over mitigatory or compensatory measures, whenever feasible.
3. EA considers natural and social aspects in an integrated way. EA takes into account the natural environment (air, water, and land); human health and safety; social aspects (e.g., involuntary resettlement, Indigenous Peoples, ~~and~~ physical cultural resources, and emerging peoples issues);⁷ and transboundary and global environmental aspects.⁸ ~~EA considers natural and social aspects in an integrated way.~~ It also takes into account the variations in project and country conditions; the findings of country environmental and social studies; national environmental action plans; national social and human rights plans; national, regional, and local universal design concepts plans for the inclusion and accessibility of the country's Indigenous Peoples, women, children, older persons, and persons with disabilities; the country's overall policy framework, national legislation, and institutional capabilities related to the environment and social aspects; and obligations of the country, pertaining to project activities, under relevant international environmental and human rights treaties and agreements. The Bank does not finance project activities that would contravene such country obligations, as identified during the EA.⁹ EA is initiated as early as possible in project processing and ~~is integrated~~ is closely with pertinent data from

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other~~the~~ economic, financial, institutional, social, and technical analyses foref a proposed project as is practicable.

4. The borrower is responsible for carrying out the EA. For Category A projects,¹⁰ the borrower retains independent EA experts not affiliated with the project to carry out the EA.¹¹ For Category A projects that are highly risky or contentious or that involve serious and multidimensional natural environmental and social concerns, the borrower should normally also engage an advisory panel of independent, internationally recognized environmental specialists able to advise on all aspects of the project relevant to the EA, especially those issues involving Indigenous Peoples, women, children, older persons, persons with disabilities, and other groups that may experience different forms of discrimination and/or disproportion of the effects.¹² The role of the advisory panel depends on the degree to which project preparation has progressed, and on the extent and quality of any EA work completed, at the time the Bank begins to consider the project.

5. The Bank advises the borrower on the Bank's EA requirements. The Bank reviews the public consultation/disclosure process, findings, and recommendations of the EA to determine whether they provide an adequate basis for processing the project for Bank financing, such as inclusion and accessibility for all potentially affected parties in the project's area of influence as per paragraph 14 and 15 below. When the borrower has completed or partially completed EA work prior to the Bank's involvement in a project, the Bank reviews the EA to ensure its consistency with this policy. The Bank may, if appropriate, require additional EA work, including public consultation and disclosure (see para. 14 and 15).

6. The *Pollution Prevention and Abatement Handbook*¹³ describes pollution prevention and abatement measures and emission levels that are normally acceptable to the Bank. However, taking into account borrower country legislation and local conditions, the EA may recommend alternative emission levels and approaches to pollution prevention and abatement for the project. The EA report must provide full and detailed justification for the levels and approaches chosen for the particular project or site.

EA Instruments

7. Depending on the project, a range of instruments can be used to satisfy the Bank's EA requirement: environmental impact assessment (EIA),¹⁴ regional or sectoral EA, strategic environmental and social assessment (SESA), environmental audit, hazard or risk assessment, environmental management plan (EMP)¹⁵ and environmental and social management framework (ESMF).¹⁶ EA applies one or more of these instruments, or elements of them, as appropriate. When the project is likely to have sectoral or regional impacts, sectoral or regional EA is required.¹⁷

Environmental Screening

8. The Bank undertakes environmental screening of each proposed project to determine the appropriate extent and type of EA. External consultation may be used by the Bank to help in determining initial level of effects and EA type. The Bank classifies the proposed project into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental and social impacts.

(a) *Category A*: A proposed project is classified as Category A if it is likely to have significant adverse environmental impacts that are sensitive,¹⁸ diverse, or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works. The significance of the impacts may be determined by a smaller subgroup of effects that have significant impact even though on a broader scale the effects are not (e.g., project area impacts as compared to more confined impacts such as those on a smaller group like Indigenous Peoples, women, or persons with disabilities). EA for a Category A project examines the project's potential negative and positive environmental impacts, compares them with those of feasible alternatives (including the "without project" situation), and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental and social performance

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and sustainability (see para. 1). For a Category A project, the borrower is responsible for preparing a report, normally an EIA (or a suitably comprehensive regional or sectoral EA) that includes, as necessary, elements of the other instruments referred to in para. 7.

(b) *Category B*: A proposed project is classified as Category B if its potential adverse environmental and social impacts on human populations or important areas of the natural ~~environmentally important areas~~--including wetlands, forests, grasslands, and other natural habitats--are less adverse than those of Category A projects. These impacts are site-specific; few if any of them are irreversible; and in most cases mitigatory measures can be designed more readily than for Category A projects. The scope of EA for a Category B project may vary from project to project, but it is narrower than that of Category A EA. Like Category A EA, it examines the project's potential negative and positive environmental and social impacts and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental and social performance. The findings and results of Category B EA are described in the project documentation (Project Appraisal Document and Project Information Document).¹⁹

(c) *Category C*: A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental or social impacts. Beyond screening, no further EA action is required for a Category C project.

(d) *Category FI*: A proposed project is classified as Category FI if it involves investment of Bank funds through a financial intermediary, in subprojects that may result in adverse environmental or social impacts.

EA for Special Project Types

Projects Involving Subprojects

9. For projects involving the preparation and implementation of annual investment plans or subprojects, identified and developed over the course of the project period during the preparation of each proposed subproject, the project coordinating entity or implementing institution carries out appropriate EA according to country requirements and the requirements of this policy.²⁰ The Bank appraises and, if necessary, includes in the SIL components to strengthen, the capabilities of the coordinating entity or the implementing institution to (a) screen subprojects, (b) obtain the necessary expertise to carry out EA, (c) review all findings and results of EA for individual subprojects, (d) ensure implementation of mitigation measures (including, where applicable, an EMP), and (e) monitor environmental and social conditions during project implementation.²¹ If the Bank is not satisfied that adequate capacity exists for carrying out EA,²² all Category A subprojects and, as appropriate, Category B subprojects--including any EA reports--are subject to prior review and approval by the Bank.

Projects Involving Financial Intermediaries

10. For a project involving a financial intermediary (FI), the Bank requires that each FI screen proposed subprojects and ensure that subborrowers carry out appropriate EA for each subproject (see footnote 22). Before approving a subproject, the FI verifies (through its own staff, outside experts, or existing environmental and social institutions) that the subproject meets the environmental and social requirements of appropriate national and local authorities and is consistent with this OP and other applicable environmental and social policies of the Bank.²³

11. In appraising a proposed FI operation, the Bank reviews the adequacy of country environmental and social requirements relevant to the project and the proposed EA arrangements for subprojects, including the mechanisms and responsibilities for environmental screening and review of EA results. When necessary, the Bank ensures that the project includes components to strengthen such EA arrangements. For FI operations expected to have Category A subprojects, prior to the Bank's appraisal each identified participating FI provides to the Bank a written assessment of the institutional mechanisms (including, as

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necessary, identification of measures to strengthen capacity) for its subproject EA work.²⁴ If the Bank is not satisfied that adequate capacity exists for carrying out EA (see footnote 22), all Category A subprojects and, as appropriate, Category B subprojects--including EA reports--are subject to prior review and approval by the Bank.²⁵

Projects in Situations of Urgent Need of Assistance or Capacity Constraints under OP 10.00

12. The policy set out in OP 4.01 normally applies to projects processed under paragraph 11 of OP/BP 10.00, *Investment Project Financing*. However, when compliance with any requirement of this policy would prevent the effective and timely achievement of the objectives of such a project, the Bank may (subject to the limitations set forth in paragraph 11 of OP 10.00) exempt the project from such a requirement. The justification for any such exemption is recorded in the project documents. In all cases, however, the Bank requires at a minimum that (a) the extent to which the situation of urgent need of assistance or the capacity constraints were precipitated or exacerbated by inappropriate environmental and social practices be determined as part of the preparation of such projects, and (b) any necessary corrective measures be built into either the project or a future lending operation.

Institutional Capacity

13. When the borrower has inadequate legal or technical capacity to carry out key EA-related functions (such as review of EA, environmental and social monitoring, inspections, or management of mitigatory measures) for a proposed project, the project includes components to strengthen that capacity.

Public Consultation

14. For all Category A and B projects proposed for IBRD or IDA financing, during the EA process, the borrower consults project-affected groups and reputable local nongovernmental organizations (NGOs) about the project's environmental and social aspects and takes their views into account. When local NGO expertise, especially concerning emerging areas, is not considered adequate to the satisfaction of the Bank then such expertise is to be sought regionally, nationally, or internationally (see footnote 22). Consultation is to ensure accommodations are made for inclusion and accessibility both physically and socially for persons with disabilities to facilitate the fullest participation of affected and interested parties (see paragraph 15). The borrower initiates such consultations as early as possible and as part of the initial contact informs the parties on how the determination of the EA Category was made. For Category A projects, the borrower consults these groups at least twice: (a) shortly after environmental screening and before the terms of reference for the EA are finalized; and (b) once a draft EA report is prepared. In addition, the borrower consults with such groups throughout project implementation as necessary to address EA-related issues that affect them.²⁶

Disclosure

15. For meaningful consultations between the borrower and project-affected groups and local NGOs on all Category A and B projects proposed for IBRD or IDA financing, the borrower provides relevant material in a timely manner prior to consultation and in a form and language that are understandable and universally accessible to the groups being consulted. The communication process should offer information that assures it is available through multiple forms and facilities accessible to the greatest number of people interested or possibly affected by a project. Accessibility should respect diversity and dignity of all peoples and use measures as appropriate such as accepted local language, culturally sensitive, and for persons with disabilities through appropriate means as Braille, tactile communication, large print, audio, plain-language, human-reader, internet technology, and physically accommodating facilities for access to the information.²⁷

16. For a Category A project, the borrower provides for the initial consultation a summary of the proposed project's objectives, description, and potential impacts; for consultation after the draft EA report is prepared, the borrower provides a summary of the EA's conclusions. In addition, for a Category A project, the borrower makes the draft EA report available at a public place accessible to project-affected groups

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and local NGOs as described in paragraph 15. If local NGO expertise is not sufficient as per paragraph 14, notification and access to the draft EA is to be provided to the appropriate regional, national, or international representative NGO(s) to ensure proper disclosure and opportunity to comment. For projects described in paragraph 9 above, the borrower/FI ensures that EA reports for Category A subprojects are made available in a public place accessible to affected groups and local NGOs the same as any other Category A project.

17. Any separate Category B report for a project proposed for IDA financing is made available to project-affected groups and local NGOs as described in paragraph 15. If local NGO expertise is not sufficient as per paragraph 14, notification and access to the draft EA is to be provided to the appropriate regional, national, or international representative NGO(s) to ensure proper disclosure and opportunity to comment. Public availability in the borrowing country and official receipt by the Bank of Category A reports for projects proposed for IBRD or IDA financing, and of any Category B EA report for projects proposed for IDA funding, are prerequisites to Bank appraisal of these projects.

18. Once the borrower officially transmits the Category A EA report to the Bank, the Bank distributes the summary (in English) to the executive directors (EDs) and makes the report available through its InfoShop and upon request through the country Public Information Centers (PICs) per the requested form such as Braille, large print, audio, human-reader, or internet technology, and in a physically accommodating facility for access to the information. Once the borrower officially transmits any separate Category B EA report to the Bank, the Bank makes it available through its InfoShop and upon request through the country Public Information Centers (PICs) per the requested form such as Braille, large print, audio, human-reader, or internet technology, and in a physically accommodating facility for access to the information.²⁸ Where the requests are beyond the borrower's expertise, in cooperation with the Bank, an appropriate expert(s) is sought from civil society, non-governmental, and/or disabled persons organizations, or any other individual/organization able to supply such needed expertise (see footnote 22). If the borrower objects to the Bank's releasing an EA report through the World Bank InfoShop, Bank staff (a) do not continue processing an IDA project, or (b) for an IBRD project, submit the issue of further processing to the EDs.

Implementation

19. During project implementation, the borrower reports on (a) compliance with measures agreed with the Bank on the basis of the findings and results of the EA, including implementation of any EMP, as set out in the project documents; (b) the status of mitigatory measures; and (c) the findings of monitoring programs. The Bank bases supervision of the project's environmental aspects on the findings and recommendations of the EA, including measures set out in the legal agreements, any EMP, and other project documents.²⁹

1. World Bank Group Environment, Health and Safety Guidelines (EHSGs) have replaced the 1998 Pollution Prevention and Abatement Handbook (PPAH). Guidelines as to what constitutes acceptable pollution prevention and abatement measures and emission levels in a Bank financed project can be found in the EHSGs. For complete reference, consult the *World Bank Group Environment, Health and Safety Guidelines*. Please check the website [www1.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/IFC+Sustainability/Sustainability+Framework/Environmental,+Health,+and+Safety+Guidelines/] for the most recent version.
2. "Bank" includes IBRD and IDA; "EA" refers to the entire process set out in OP/BP 4.01; "~~loans~~" includes ~~IDA credits and IDA grants~~; "~~borrower~~" includes, ~~for guarantee operations, a private or public project sponsor receiving from another financial institution a loan guaranteed by the Bank; and~~ "project" covers all operations financed by ~~the Investment Project Financing or Bank guarantees ("project" does not cover operations supported by Development Policy lending (for which the environmental provisions are set out in OP/BP 8.60, Development Policy Lending), or operations supported by Program for Results Financing (for which environmental provisions are set out in OP/BP 9.00, Program for Results Financing) and also includes projects and components funded under the Global Environment Facility. The project is described in the Loan/Credit/Grant Agreement.~~ This policy applies to all components of the project, regardless of the source of financing.
3. There are two major EA objectives for reviewing potential program or project effects on Indigenous Peoples, women, children, persons with disabilities, older persons, and others that may suffer disproportionately in effects and benefits: (1)

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- ensure adverse impacts do not inhibit their ability to live as independently and participate as fully in all aspects of life in society, especially for persons with disabilities who are represented in all peoples across the world and whom are at even more risk from the elements of poverty; and (2) ensure that these groups are not overlooked and share equitably in any and all benefits, particularly when such benefits enhance their independence and inclusion into the local community and society as a whole. For persons with disabilities whom are present in all groups of society see Article 9 of the Convention On The Rights of Persons With Disabilities.
4. Even though the project as a whole may be considered to have insignificant impacts, the effects on a subgroup of the project may be significant such as where the small numbers of Indigenous Peoples within a project area may make them more vulnerable to impacts as with women, persons with disabilities, children, and older persons subgroups which are even more susceptible to the effects of poverty. For the natural environment an example would be the cutting of a small stand of forest where from the larger countrywide perspective it is insignificant but from a local impact it is the last stand of forest having significant effects on the immediate area population.
 5. For definitions, see Annex A. The area of influence for any project is determined with the advice of environmental and social specialists and set out in the EA terms of reference.
 6. "Universal design" means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design (this does not exclude the use of assistive devices for particular groups of persons with disabilities where this is needed). Universal design as it applies to natural environment proposals means design that may accommodate multiple uses of the environmental resource being used while maintaining the intent of sustainability.
 7. Emerging peoples issues may include but are not limited to areas important to stakeholders such as human rights; labor and occupational health and safety; gender; persons with disabilities; the free, prior, and informed consent of Indigenous Peoples; and, land tenure. Also See OP/BP 4.12, *Involuntary Resettlement*; OP/BP 4.10, *Indigenous Peoples*; and OP/BP 4.11, *Physical Cultural Resources*; and the United Nations *Convention on the Rights of Persons With Disabilities*.
 8. Global environmental issues include climate change, ozone-depleting substances, pollution of international waters, and adverse impacts on biodiversity.
 9. This policy contributes to the Bank's mission of poverty reduction and sustainable development by ensuring that the development process fully respects the dignity, human rights, economies, and cultures of different countries while ensuring all people within those countries share in fundamental freedoms and accessibilities to the physical, social, economic and cultural environment; to health and education; to information and communication; to productive work and livelihood; and the political process.
 10. For screening, see para. 8.
 11. EA is closely integrated with the project's economic, financial, institutional, social, and technical analyses to ensure that (a) environmental considerations are given adequate weight in project selection, siting, and design decisions; (b) the interrelationship of all these aspects is understood; and (bc) EA does not delay project processing. However, the borrower ensures that when individuals or entities are engaged to carry out EA activities, any conflict of interest is avoided. For example, when an independent EA is required, it is not carried out by the consultants hired to prepare the engineering design or implement the social measures.
 12. The panel (which is different from the dam safety panel required under OP/BP 4.37, *Safety of Dams*) advises the borrower specifically on the following aspects: (a) the terms of reference for the EA, (b) key issues and methods for preparing the EA, (c) recommendations and findings of the EA, (d) implementation of the EA's recommendations, and (e) development of environmental and social management capacity. Special attention is given to any person who may be exploited, marginalized, discriminated against, or impoverished through the project's design and implementation with particular consideration to Indigenous Peoples, women, children, older persons, persons with disabilities, and other such groups who are commonly disproportionately affected and most vulnerable to the detrimental effects of poverty.
 13. See footnote 1.
 14. Environmental impact assessment (EIA) is used for projects and subprojects to identify and assess the potential natural environmental and social impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures (see paragraphs 1-3 of this Policy).
 - 3-15. Environmental management plan (EMP) is used for projects to ensure (Error! Bookmark not defined.) the measures to be taken during the implementation and operation of a project to eliminate, offset, or reduce to acceptable levels the adverse natural environmental and social impacts; and (Error! Bookmark not defined.) the actions needed to implement these measures (see paragraph 3 of this Policy).
 - 4-16. These terms are defined in Annex A.
 - 5-17. Annexes Guidance on the use of sectoral and regional EA is available in EA Sourcebook Updates 4 and 15.
 - 6-18. A potential impact is considered "sensitive" if it may be irreversible (e.g., lead to loss of a major natural habitat) or raise issues covered by OP 4.04 *Natural Habitats*; OP/BP 4.10, *Indigenous Peoples*; OP/BP 4.11, *Physical Cultural Resources* or OP 4.12, *Involuntary Resettlement*.
 - 7-19. When the screening process determines, or national legislation requires, that any of the environmental and social issues identified warrant special attention, the findings and results of Category B EA may be set out in a separate report. Depending on the type of project and the nature and magnitude of the impacts, this report may include, for example, a limited environmental and social impact assessment, an environmental/social mitigation or management plan, an environmental/social audit, or a hazard assessment. For Category B projects that are not in environmentally or socially sensitive areas and that present well-defined and well-understood issues of narrow scope, the Bank may accept alternative approaches for meeting EA requirements: for example, environmentally and socially sound design criteria, siting criteria, or pollution standards for small-scale industrial plants or rural works; environmentally and socially sound siting criteria, construction standards, or inspection procedures for housing projects; or environmentally and socially sound operating procedures for road rehabilitation projects. Whether standard or alternative approach is used, all measures considered must incorporate universal design concepts to the maximum extent practicable (see footnote 6).

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- ~~8-20.~~ In addition, if there are sectorwide issues that cannot be addressed through individual subproject EAs (and particularly if the project is likely to include Category A subprojects), the borrower may be required to carry out sectoral EA before the Bank appraises the project.
- ~~9-21.~~ Where, pursuant to regulatory requirements or contractual arrangements acceptable to the Bank, any of these review functions are carried out by an entity other than the coordinating entity or implementing institution, the Bank appraises such alternative arrangements; however, the borrower/coordinating entity/implementing institution remains ultimately responsible for ensuring that subprojects meet Bank requirements.
22. In areas of complex or emerging issues such as Indigenous Peoples, women, children, older persons, and persons with disabilities that are commonly overlooked, affected disproportionately, and/or more vulnerable to the detrimental effects of poverty often can exceed local expertise requiring use of reputable expertise sanctioned by internationally recognized resources such as the United Nations which has developed a list of accredited NGOs for women, children, persons with disabilities, and overall human rights.
- ~~10-23.~~ The requirements for projects involving FI are derived from the EA process and are consistent with the provisions of para. 1-6 of this OP. The EA process takes into account the type of finance being considered, the nature and scale of anticipated subprojects, and the environmental and social requirements of the jurisdiction in which subprojects will be located.
24. Any FI included in the project after appraisal complies with the same requirement as a condition of its participation.
25. The criteria for prior review of Category B subprojects, which are based on such factors as type or size of the subproject and the EA capacity of the financial intermediary, are set out in the legal agreements for the project.
- ~~11-26.~~ For projects with major social components, consultations are also required by other Bank policies--for example, OP/BP 4.10, *Indigenous Peoples*, and OP/BP 4.12, *Involuntary Resettlement*.
27. See footnote 6.
- ~~12-28.~~ For a further discussion of the Bank's disclosure procedures, see *The World Bank Policy on Access to Information* which as of July 1, 2010, replaced *The World Bank Policy on Disclosure of Information*. Specific requirements for disclosure of resettlement plans and Indigenous Peoples development plans are set out in OP/BP 4.10, *Indigenous Peoples*, and OP/BP 4.12, *Involuntary Resettlement*.
- ~~13-29.~~ See OP/BP 10.00, *Investment Project Financing*.

Annex A – Definitions

Annex B – Content of an Environmental Assessment Report for a Category A Project

Annex C – Environmental Management Plan