Contents

7. Environmental Legislative and Regulatory Framework

7.1 Introduction

Presently environmental legislation in Kenya is provided in over 77 statutes. In order to provide a structured approach to environmental management in Kenya, the EMCA was enacted on January 14th 2000 as a framework law and contains provisions for the ESM of proposed and ongoing Projects respectively in Kenya. With the coming into force of the EMCA, the environmental provisions within the sectoral laws were not superseded; instead the environmental provisions within those laws were reinforced to better manage Kenya's ailing environment. Under the EMCA a number of institutions were created and the following section provides a brief outline on the institutional framework of the EMCA. Given later in this chapter is a brief outline of some of the main sectoral laws associated with the proposed type of project.

7.2 Institutional framework of the EMCA

In order to operationalize the Act, the EMCA established various administrative structures. These included the NEC, the NEMA, the PCC, the NEMA Board, Provincial and District Environment Committees, the SERC and the National Environment Tribunal amongst others.

The apex body under the Act is the NEC which amongst other things is charged with the responsibility of developing the national environmental policy in Kenya as well as to set annual environmental goals and objectives.

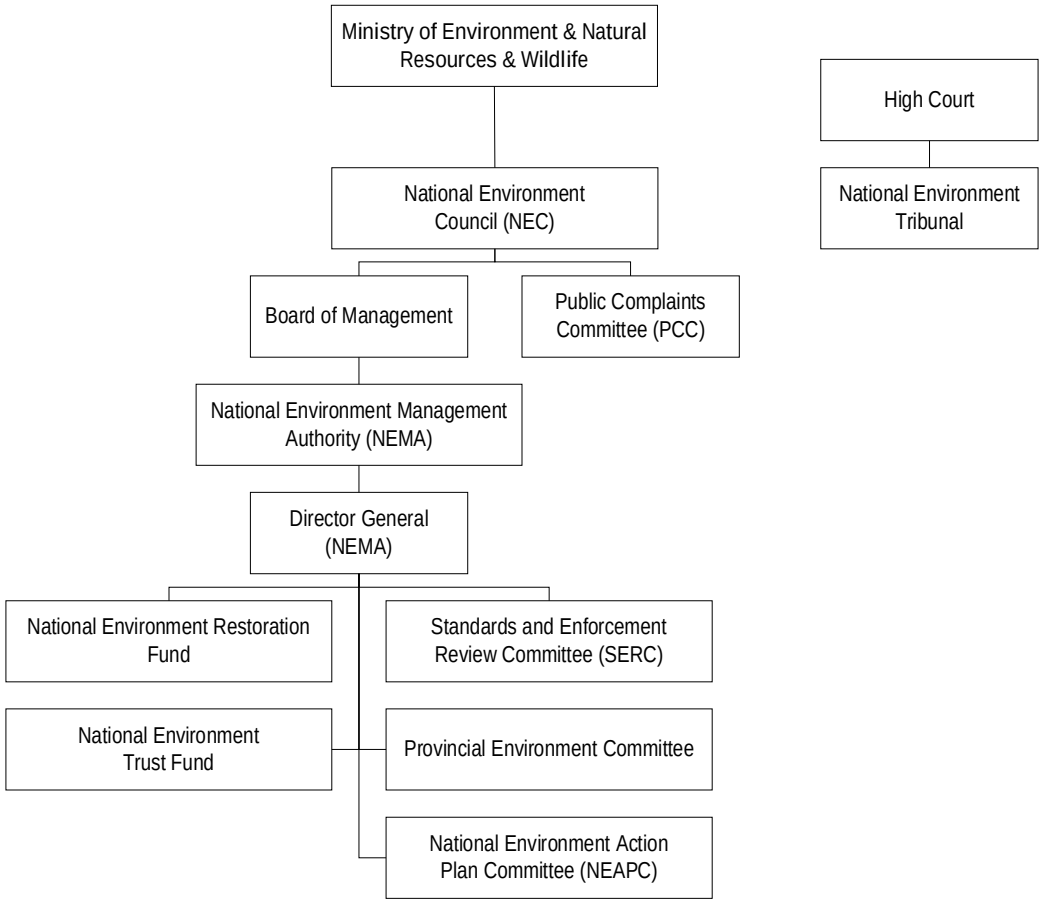
The NEMA is the organ that has been established to exercise general supervision and coordination over all matters relating to the environment in Kenya. Further the NEMA is the Government's principal instrument in the implementation of all policies relating to the environment.

The PCC was formed to investigate environmental complaints against any person, submit their findings/recommendations to the NEC and to submit periodic reports of its activities to the NEC.

The SERC has been established under the Act to advise the NEMA on the criteria and procedures for the measurement of environmental quality in Kenya. Environmental quality relates to air quality, wastewater quality, waste quality, noise quality, land use quality, etc. Additionally the SERC is required to recommend to the NEMA minimum environmental quality standards for all environmental parameters for which subsidiary legislation is or has been promulgated.

The institutional framework of the EMCA is shown in **Figure 7-1** indicating the management structure of various organs under the Act.

Figure 7-1: Institutional Framework under the EMCA



7.3 Subsidiary legislation under the EMCA

7.3.1 L.N. 101: EIA/EA Regulations 2003

On June 13th 2003, the Minister for Environment and Mineral Resources promulgated Legal Notice 101: Environment (Impact Assessment and Audit) Regulations, 2003 as provided for under section 147 of the EMCA. These regulations provide the framework for undertaking out EIAs and EAs in Kenya by NEMA licensed Lead Experts and Firm of Experts. The EIA/EA Regulations also provide information to project proponents on the requirements of either an EIA or EA as required by the EMCA. This ESIA Study has been undertaken in accordance with the requirements of the above legislation.

7.3.2 L.N. 120: Water Quality Regulations, 2006

The above regulation was promulgated on September 4th 2006 and became effective on July 1st 2007. This regulation provides for the sustainable management of water used for various purposes in Kenya. For industries in Kenya, the regulation requires that Proponents apply for an "Effluent Discharge License" annually for discharging process wastewater either into the environment, aquatic environment or public sewers. For discharges into the environment and aquatic environment, the Proponent needs to apply directly to the NEMA. For discharges into public sewers, the Proponent needs to apply for the license to the relevant local authority. The regulation contains discharge limits for various environmental parameters into public sewers and the environment. For the proposed project, **Table 7-1** indicates the maximum discharge limits of various environmental quality parameters. Non-compliance with any provision of the regulation carries a penalty of not more than KShs 500,000.

Table 7-1: Effluent Discharge Standards for Power Plants

Parameter	Permissible Limits for Discharge into the Environment	Permissible Limits for Discharge into Public Sewers
TSS	30mg/l	250mg/l
pH	6.5 – 8.5	6 – 9
Fecal coliforms	30 counts/100ml	-
Oil & grease	Nil	10mg/l
Temperature	Based on ambient $\pm 3^0$C	20 – 35^0C
Color/dye/pigment	15 Hazen units	<40 Hazen units
Total phosphorous	-	-
Flow	-	-
Chromium VI	0.5mg/l	0.05mg/l
Copper	1.0mg/l	1.0mg/l
Zinc	0.5mg/l	5mg/l
Residual chlorine	0.1	-
Tin	-	-

The proposed project will need to be in compliance with these regulations during the construction and operational phases respectively.

7.3.3 L.N. 121: Waste Management Regulations, 2006

The Waste Management Regulations were promulgated on September 4th 2006 and became effective on July 1st 2007. This regulation is comprehensive and covers the management of various kinds of waste in Kenya. For the Proponent it is expected that there will be hazardous and non-hazardous wastes that will be generated periodically during the construction and operational phase of the project respectively. Generally it is a requirement that a waste generator now segregates their waste (hazardous and non-hazardous) by type and then disposes the wastes in an environmentally acceptable manner.

Under the regulation, it is a requirement that waste is transported using a vehicle that has an approved "Waste Transportation License" issued by the NEMA. Wastes generated in Kenya must be disposed off in a licensed disposal facility. Such a facility will require annual environment audits to be undertaken by NEMA registered Lead Experts.

It is a requirement under the regulation for a Proponent to install at their premises anti-pollution equipment for treatment of various types of wastes. The treatment options shall be approved by the NEMA in consultation with the relevant lead agency.

The regulation contains definitions of hazardous wastes in the Fourth Schedule. The regulation requires that prior to generating any hazardous waste, a Proponent shall undertake an EIA Study and seek approval from the NEMA. Labeling of hazardous wastes is now mandatory under the regulation and the specific labeling requirements are provided in Rule 18. The treatment options for hazardous waste disposal provided in Rule 19 include incineration or any other option approved by the NEMA.

Hazardous wastes which may require being exported trans-boundary will require complying with the Basel Convention and Rules 20 – 23 respectively.

The regulation also contains several forms some of which will be applicable to the Proponent for completion prior to discharging their wastes during the construction and operational phases respectively of the project.

7.3.4 L.N. 61: Noise and Excessive Vibration Control Regulations, 2009

In May 2009, the Minister for Environment and Mineral Resources promulgated the above regulations for management of noise and excessive vibration. The general prohibition states that no person shall make or cause to be made any loud, unreasonable, unnecessary or unusual noise which annoys, disturbs, injures or endangers the comfort, repose, health or safety of others and the environment. The regulations further provide factors that will be considered in determining whether or not noise and vibration is loud, unreasonable, unnecessary or unusual. For fixed installations, excessive vibration under these regulations is defined as any vibration emanating from the source and exceeds 0.5cm/s.

Rules 5 and 6 of the regulations define noise levels for various types of activities that generate noise. The first schedule to the regulations defines permissible noise levels and is reproduced below.

Zone		***Sound Level Limits (dBA) (Leq, 14h)***		***Noise Rating Level (NR) (Leq, 14h)***	
		Day	***Night***	***Day***	***Night***
A.	Silent Zone	40	35	30	25
B.	Places of Worship	40	35	30	25
C.	Residential:				
	Indoor	45	35	35	25
	Outdoor	50	35	40	25
D.	Mixed residential (with some commercial and places of entertainment)	55	35	50	25
E.	Commercial	60	35	55	25

The regulation further stipulates that a noise license will be required during the construction and operational phase of a project if there will be equipment that will produce noise during these two phases.

The EPC contractor shall apply for a noise license from the NEMA during the construction phase of the project. The fourth schedule of the regulations is the application for a noise license while the fifth schedule provides a description of the noise permit that the NEMA will grant the EPC contractor.

7.3.5 Licenses and Permits required under the EMCA

The Minister for Environment has promulgated a number of regulations to further operationalize the EMCA. These include:

- Legal Notice 120: The Environment Management and Coordination (Water Quality) Regulations 2006;
- Legal Notice 121: The Environment Management and Coordination (Waste Management) Regulations 2006; and
- Legal Notice 61: The Environment Management and Coordination (Noise and Excessive Vibration Pollution) (Control) Regulations, 2009.

The SERC is in the process of drafting new regulations to manage environmental quality in Kenya emanating from diverse industrial activities. These regulations will provide the framework for managing Kenya's environmental quality in a sustainable manner.

Once the regulations are promulgated Proponents will be required to apply for relevant licenses depending on the types of activities carried out by them. Currently the Ministry of Environment has promulgated Water Quality, Waste Management and Noise and Excessive Vibration regulations respectively. These are discussed above. Some of the licenses required to be maintained annually by Proponents include:

- Effluent Discharge License (for wastewater discharges);
- Waste License (for transport, treatment and disposal of wastes);
- Noise License (for noise and excessive vibrations).

The three promulgated regulations apply to the proposed project; the implication of the three subsidiary pieces of legislation on the proposed project has been discussed above.

7.4 The Energy Act, 2006

The Energy Act, 2006 is presently the primary legislation in Kenya that contains provisions for the management of the energy sector. The subsidiary legislation to operationalize the Act is yet to be developed but is expected to stipulate stringent HSE licensing requirements for all types of energy related activities such as the proposed project. A key aspect under this piece of legislation is the requirement for any energy sector project to undergo a full EIA Study such as for the proposed project.

The Act which was promulgated in 2006 with an effective date of July 1st 2007 contains several HSE provisions for the environmentally sound management of the energy sector. These are highlighted below and the Proponent will be required to comply with the provisions highlighted in the Act.

Section 90 of the Act requires a Proponent to seek permission to construct a power plant from the Energy Regulatory Commission (ERC). The application for permission must be accompanied by various documents including an ESIA Study of the project. Once the application and supporting documentation is filed, the ERC will communicate their decision within 45 days of the date of submission of the application.

Section 91 (1) (b) of the Act requires a Proponent to ensure compliance with the requirements of the EMCA.

Section 98 of the Act requires the Proponent to comply with HSE standards set by the ERC.

Section 102 (h) (m) (v) empowers the Minister responsible for Energy to promulgate regulations for the environmentally sound management of energy sector related facilities and infrastructure.

7.5 Occupational Safety and Health Act, 2007 (OSHA)

This Act of Parliament was enacted to provide for the health, safety and welfare of persons employed in workplaces, and for matters incidental thereto and connected therewith.

Part II of the Act provides the General Duties that the Occupier must comply with respect to health and safety in the workplace. Such duties include undertaking S&H risk assessments, S&H audits, notification of accidents, injuries and dangerous occurrences, etc. A number of sections under this part shall be applicable to the proposed project.

Part III of the Act provides the Administrative framework for supervision of the Act.

Part IV deals with the enforcement provisions that the DOHSS has been provided with under the Act. It discusses the instances when Improvement and Prohibition Notices can be issued as well as the powers of OSH officers. This part of the Act will be mandatory for the Occupier to comply with for the proposed project.

Part V of the Act requires all workplaces to be registered with the DOHSS. This part will be applicable for the proposed project as the Occupier will have to apply for registration of their project with the DOHSS on completion of the construction phase and before the operational phase of the project.

Part VI of the Act gives the requirements for occupational health provisions which include cleanliness, ventilation, overcrowding, etc. This part of the Act will apply to the Occupier especially during the operational phase of the project.

Part VII of the Act contains provisions for the safe operation of machinery and includes all prime movers and transmission equipment. Additionally this part includes the safe operation of cranes, chains, ropes, lifting tackles, pressure vessels and their statutory examination by DOHSS Approved Persons. This part of the Act will apply to the Occupier during the operational phase of the project.

Part VIII of the Act contains provisions for general safety of a workplace especially fire safety. This part of the Act will apply to the proposed project during the design, construction and operational phases respectively of the project.

Part IX of the Act deals with Chemical Safety. This will be applicable to the proposed project as it will handle and transport hazardous materials. The Occupier will be required to have MSDS sheets for all chemicals handled in the workplace including labeling all receptacles containing such hazardous materials.

Part X of the Act deals with the General Welfare conditions that must be present during the operational phase of the project. Such conditions include first aid facilities, supply of drinking water, etc.

Part XI of the Act contains Special Provisions on the management of health, safety and welfare. These include work permit systems, PPE requirements and medical surveillance. All sections of this part of the Act will be applicable to the proposed project during the operational phase.

Part XII of the Act deals with Special Applications such as platforms erected over water and workplaces where steam boilers or hoists and lifts are used. This part of the Act may not be applicable to the proposed project.

Part XIII of the Act stipulates the various fines and penalties associated with non-compliance of the Act. It includes those fines and penalties that are not included in other sections of the Act and will be important for the Occupier to read and understand the penalties for non-compliance with S&H provisions.

Part XIV of the Act is the last section of the Act and contains miscellaneous provisions which are not covered elsewhere. Most of the sections under this part of the Act will be apply to the proposed project and it in the interest of the Occupier to read, understand and ensure compliance with it.

Some of the important subsidiary legislation which operationalizes the Act and is applicable to the proposed project is described below.

7.6 Subsidiary legislation under OSHA

7.6.1 L.N. 31: The Safety and Health Committee Rules 2004

These rules came into effect on April 28th, 2004 and require that an Occupier formalize a Safety and Health (S&H) Committee if there are a minimum of 20 persons employed in the work place. The size of the S&H Committee depends on the number of workers employed at the place of work.

For the Proponent and Contractor, the Occupational Safety and Health Act and the S&H Committee Rules 2004 are important as they require compliance with the following measures:

- Posting of an Abstract of the Factories and Other Places of Work Act in key sections of each area of the factory or other workplace;
- Provision of first aid boxes in accordance with Legal Notice No. 160 of 1977;
- Ensuring that there are an appropriate number of certified first aiders trained by an approved institutions and that the certification of these first aiders is current;
- Provision of a General Register for recording amongst other things all incidents, accidents and occupational injuries;
- Appointment of a S&H Committee made up of an equal number of members from management and workers based on the total number of employees in the company;
- Training of the S&H Committee in accordance with these rules;
- Appointment of a S&H management representative for the Proponent;

The S&H Committee must meet at least quarterly, take minutes, circulate key action items on bulletin boards and may be required to send a copy of the minutes to the DOHSS provincial office.

Appropriate recordkeeping including maintenance of all current certificates related to inspection of critical equipment such as cranes, air compressors, lifts, pulleys, etc. Such inspections need to be undertaken by a competent person certified by the Director of the DOHSS.

7.6.2 L.N. 24: Medical Examination Rules 2005

These rules provide for Occupiers to mandatorily undertake pre-employment, periodic and termination medical evaluations of workers whose occupations are stipulated in the Second Schedule of the Act and the First Schedule of the Regulation. The workers are to undergo medical evaluations by a registered medical health practitioner duly registered by the DOHSS.

It will be incumbent on the EPC Contractor to ensure that Material Safety Data Sheets (MSDSs) for chemicals used in the construction and operational phase are studied for toxicological and epidemiological information. If any of these products present negative impacts to human health, the workers exposed to the chemicals will be required to undergo medical examinations in accordance with the above Rules.

7.6.3 L.N. 25: Noise Prevention and Control Rules 2005

These rules were promulgated for work related noise exposures on March 10th 2005 and apply to workplaces in Kenya. The regulation is applicable to the project as there will be noise potentially generated by construction equipment that may exceed the permissible noise levels given below. The regulation sets the permissible level for noise in any workplace as follows:

- 90 dB(A) over an 8-hour TWA period over 24-hours; and
- 140 dB(A) peak sound level at any given time.

In addition to the above the regulation sets community noise levels emanating from a workplace as follows:

- 50 dB(A) during the day; and
- 45 dB(A) at night.

If noise levels exceed the above permissible levels, the Occupier is required to develop, rollout and implement a written hearing conservation program which should include the following sections as a minimum:

- Noise Survey;
- Education and training;
- Engineering noise control methods;
- Hearing protection requirements;
- Posting of notices in noisy areas;
- Audiometric testing methods and frequencies for those exposed to high noises; and
- Annual program review.

The Proponent is to ensure that any equipment brought to a site in Kenya for use shall be designed or have built in noise reduction devices that do not exceed 90 dB(A). The Proponent shall request the supplier of the machine or equipment for its noise characteristics.

There is also a requirement for a Proponent to medically examine those employees that may be exposed to continuous noise levels of 85 dB(A) as indicated in Regulation 16. If found unfit, the occupational hearing loss to the worker will be compensated as an occupational disease.

It is expected that during the construction phase of the project, there may be plant and equipment that exceeds the threshold levels of noise stipulated under the Rules. It will therefore be incumbent on the EPC contractor and their sub-contractors to ensure that their equipment is serviced properly and/or use equipment that complies with the threshold noise values given above. Alternatively the EPC contractor will be required to develop, rollout and implement a written hearing conservation program during the construction phase.

7.6.4 L.N. 59: Fire Risk Reduction Rules, 2007

These rules were promulgated by the Minister for Labor on April 16th 2007 and apply to all workplaces. The rules apply to the proposed project in several ways as enumerated below.

Regulation 5 requires Proponents to ensure that fire resistant materials are used for construction of new projects. A number of minimum specifications of materials are provided in the regulation.

Regulation 6 requires that all flammable materials to be stored in appropriately designed receptacles.

Regulation 7 requires that all flammable storage tanks or flammable liquid containers be labeled with the words "Highly Flammable" in English or Kiswahili. It is therefore practical for the Proponent to use a system similar to the HMIS system (NFPA 704 standard) of labeling their product tanks. The regulation requires a Proponent to consult the product's MSDS for appropriate labeling requirements.

Regulation 8(3) requires a Proponent to have a spill prevention, response and countermeasures plan (SPRCC). This is important given the nature of the project and products to be handled by it.

Regulation 16 requires Proponents to ensure that electrical equipment is installed in accordance with the respective hazardous area classification system. It is also a requirement that all electrical equipment is inspected 6-monthly by a competent person and the Proponent is required to keep records of such inspections.

Regulation 17 requires Proponents to clearly delineate fire escape exits. The regulation provides for the minimum standards to be applied in marking out all fire escape exits.

Regulations 20 – 23 require Proponents to have trained firefighting teams within their premises. The above regulations provide for the minimum number of fire team members based on the total number of employees that may be present at any given time within the Proponent's premises. Each of the fire team members must undergo a training course in fire fighting to be provided by a DOHSS approved institution. The DOHSS may develop a curriculum for this training including the minimum number of contact hours required.

Regulation 22 provides a description of the functions of a fire fighting team. Regulation 23 requires Proponents to mandatorily undertake fire drills at least once a year.

Regulations 24, 26 and 27 refer to the communication system to be employed by Proponents for alerting staff. All premises must have properly marked assembly points and suitable means of alerting workers about a fire. Regulation 27 specifically requires Proponents to display "No Smoking" signs wherever flammable vapors may be present.

Regulation 28 requires Proponents to install fire detection systems in their premises. Such systems must be connected to audible and visual flashing devices and the system must be maintained regularly to ensure its integrity at all times.

Regulations 29 – 31 refer to the installation and maintenance of fire fighting systems in workplaces. Fire extinguishers are to be mounted at least 60cm above ground while a fire hose reel must be located within a radius of 30m. The fire fighting system shall be maintained annually by a competent person and records maintained by the Proponent. Fire extinguishers shall be hydrostatically tested once every 5 years. Any fire extinguisher that does not pass a hydrostatic test or is damaged mechanically shall be put out of service. Regulation 31 provides the types of fire fighting appliances required for different flammable and combustible materials and the minimum distances between firefighting appliances that must be maintained.

Regulation 32 requires Proponents to color code all their pipelines according to the product being conveyed by them. All fire water pipes will be colored in red. Additionally this regulation provides for the color coding to be adopted for fire extinguishers.

Regulation 33 requires Proponents to have adequate fire water storage capacity. As a minimum this regulation requires Proponents to have at least $10m^3$ of dedicated fire water storage capacity.

Regulation 34 requires Proponents to develop, rollout and implement a comprehensive written Fire Safety Policy. This policy should contain a Fire Safety Policy Statement signed by the CEO, a Fire Safety Policy Manual and a brief summary of the Fire Safety Policy of the company.

Regulation 35 requires a Proponent to notify the nearest OSH area office of a fire within 24 hours of its occurrence and a written report sent to the Director of DOHSS within 7 days.

Regulation 36 requires Proponents to undertake annual fire safety audits by a DOHSS registered fire safety auditor and submit a report to the DOHSS within 14 days. The definition of a fire safety audit includes a fire risk assessment. The cost of undertaking fire safety risk assessments and fire safety audits shall be borne by the Proponent.

7.6.5 L.N. 60: Hazardous Substances Rules, 2007

These rules were promulgated by the Minister of Labor on April 16th 2007 and apply to the Proponent as they are expected to handle chemicals that can potentially expose their employees to hazardous substances.

The Rules state that the Proponent shall ensure that where chemicals come into contact with employees, the exposure limits set out in the First Schedule of the Regulations are not exceeded. Where employees may be exposed to two or more chemicals in the workplace the Proponent shall work out the combined exposure using the narrative given in the Second Schedule of the Regulations. The Minister of Labor is empowered to change the exposure limits given in the First Schedule of the Regulations.

It is the responsibility of the Proponent to ensure that all employees exposed to chemicals in the workplace are protected adequately from exposure to hazardous substances that may be present in them using the hierarchy of hazard control methods. Such methods include elimination of the chemicals, substitution of the chemicals with less hazardous ones, engineering controls, administrative controls, use of PPE and emergency response planning. If engineering controls are applied, the Proponent will undertake the maintenance and testing of the engineering controls once every 24 months by a DOHSS licensed Engineering Controls Examiner who will submit his report to the Director DOHSS within 30 days.

Regulation 11 requires Proponents to ensure that their employees are adequately protected from radioactive substances. For example if radiography is used to check the integrity of pipe welds the Proponent will be required to issue a permit-to-work (PTW) for such work.

Regulation 12 – 15 requires Proponents to have a Hazard Communication program implemented at their workplace. The Proponent is required to maintain an inventory of all MSDSs for the chemicals stored in their workplace. As a minimum the MSDS shall comply with the format indicated in the Third Schedule of the Regulations and will be disclosed fully to the employees handling the chemical by the Proponent. All unused, obsolete or expired chemicals must be disposed off in an environmentally sound manner. All containers containing chemicals must be labeled appropriately as indicated in the MSDS for that chemical. Training of employees on the hazards associated with handling chemicals safely in the workplace will be provided at the Proponent's cost.

Regulation 16 requires the Proponent to monitor chemical exposure levels in the workplace annually by engaging a DOHSS registered Air Quality Monitor. The cost of the exposure monitoring survey will be borne by the Proponent. The Air Quality Monitor shall submit a report to the DOHSS Director within 30 days.

Regulation 19 requires Proponents that use hazardous chemicals in the workplace to subject those employees exposed to medical examinations in accordance with the requirements of Legal Notice 24: The Factories and Other Places of Work (Medical Examination) Rules 2005.

7.7 Physical Planning Act, Chapter 286

The Physical Planning Act was promulgated for the preparation and implementation of physical development plans and connected purposes. This Act which was promulgated in 1996 requires the Proponent of a Project to submit an ESIA Study to the respective local authority if in the opinion of the local authority the Project is anticipated to have adverse environmental impacts (Section 36 of the Act).

7.8 IFC Performance Standards

In addition to meeting the requirements of Kenyan laws and regulations, the proposed project will be required to comply with the requirements of the lenders, specifically the International Finance Corporation (IFC). The IFC has developed eight performance standards (PS) on social and environmental sustainability as follows:

Performance Standard 1: Social and Environmental Assessment and Management System

Performance Standard 2: Labor and Working Conditions

Performance Standard 3: Pollution Prevention and Abatement

Performance Standard 4: Community Health, Safety and Security

Performance Standard 5: Land Acquisition and Involuntary Settlement

Performance Standard 6: Biodiversity Conservation and Sustainable Natural Resource Management

Performance Standard 7: Indigenous Peoples

Performance Standard 8: Cultural Heritage

Performance Standard 1 establishes the importance of:

(i) Integrated assessment to identify the social and environmental impacts, risks, and opportunities of projects;

(ii) Effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them ; and

(iii) The client's management of social and environmental performance throughout the life of the project.

Performance Standards 2 through 8 establish requirements to avoid, reduce, mitigate or compensate for impacts on people and the environment, and to improve conditions where appropriate. While all relevant social and environmental risks and potential impacts should be considered as part of the assessment, Performance Standards 2 through 8 describe potential social and environmental impacts that require particular attention in emerging markets. Where social or environmental impacts are anticipated, the client is required to manage them through its Social and Environmental Management System consistent with Performance Standard 1.

Of the eight IFC performance standards, PS1 – 4 will apply to the proposed project and the EPC Contractor will be required to be in compliance with the latest version of these standards.

In addition the above performance standards, the IFC has developed general and specific HSE guidelines for projects that are financed by them. Subsequently the proposed project will be undertaken in compliance with relevant sections of the following IFC Guidelines:

- General EHS Guidelines;

- EHS Guidelines for Thermal Power Plants; and
- OHS Guidelines.

An annex at the end of this ESIA Study contains the IFC's EHS Guidelines for Thermal Power Plants as well as the OHS Guidelines which the project will need to be in compliance with throughout its life cycle. The General EHS Guidelines can be downloaded by the Proponent or the EPC contractor from the IFC website www.ifc.org.