

## 2. Social and Environmental Screening Template

### Project Information

**Table 14:** Project Information

<i>Project Information</i>	
1. Project Title	Preparatory Activities for the Programme “Energy Efficiency in Central Government Buildings”
2. Project Number	00118272
3. Location (Global/Region/Country)	Republic of Serbia

### Part A. Integrating Overarching Principles to Strengthen Social and Environmental Sustainability

**Table 15:** Integrating overarching principles to strengthen social and environmental sustainability

QUESTION 1: How does the project integrate the overarching principles in order to strengthen social and environmental sustainability?
<i>Briefly describe in the space below how the project mainstreams the human-rights based approach</i>
The project will promote energy efficiency with an emphasis on improving and scaling up the energy efficiency investments and related energy management practice in selected CGBs. Therefore, project will enhance availability, accessibility and quality of services related to energy efficiency and building management for all. More efficient and environmentally friendly building management can contribute to the advancement of the quality of life and rights to safe and clean environments for all, while also creating new employment and business opportunities. In addition, during its implementation, the project will contribute to the improvement of transparency and accountability of local governance and provide opportunities for meaningful public participation in decision making.
<i>Briefly describe in the space below how the project is likely to improve gender equality and women’s empowerment</i>

Gender-related aspects have and will be considered by including gender-specific indicators into the project results framework, collecting gender-disaggregated data on the project impact during its implementation and specifically encouraging female experts to participate in project implementation. Project activities will ensure gender balance and will be implemented with a gender-sensitive approach so that there is a meaningful participatory process for engaging women's voices. Should at any point during the implementation, the monitored data indicate that either gender is significantly underrepresented among project beneficiaries and stakeholders, the project team would investigate the issue and introduce specific measures within the framework of adaptive management. It will be ensured that project is scored 1 as per the Atlas Gender Marker.

***Briefly describe in the space below how the project mainstreams environmental sustainability***

Mainstreaming environmental sustainability is in the core of project strategy by introducing and providing tools for environmentally sustainable management of all targeted public buildings in Serbia. By improving their energy efficiency, the project will effectively reduce Serbia's greenhouse gas emissions and help the country meet its commitments under the Paris Climate Agreement, while also contributing to the sustainable development of goals dealing with affordable and clean energy (SDG 7), sustainable cities and communities (SDG 11) and climate action (SDG 14).

**Part B. Identifying and Managing Social and Environmental Risks**

**Table 16:** Social and environmental risks (identification and mitigation)

<p><b>QUESTION 2: What are the Potential Social and Environmental Risks?</b></p> <p><i>Note: Describe briefly potential social and environmental risks identified in Attachment 1 – Risk Screening Checklist (based on any “Yes” responses). If no risks have been identified in Attachment 1 then note “No Risks Identified” and skip to Question 4 and Select “Low Risk”. Questions 5 and 6 not required for Low Risk Projects.</i></p>	<p><b>QUESTION 3: What is the level of significance of the potential social and environmental risks?</b></p> <p><i>Note: Respond to Questions 4 and 5 below before proceeding to Question 6</i></p>			<p><b>QUESTION 6: What social and environmental assessment and management measures have been conducted and/or are required to address potential risks (for Risks with Moderate and High Significance)?</b></p>
<p><b>Risk Description</b></p>	<p><b>Impact and Probability (1-5)</b></p>	<p><b>Significance (Low, Moderate, High)</b></p>	<p><b>Comments</b></p>	<p><b>Description of assessment and management measures as reflected in the project design. If ESIA (Environmental and Social Impact Assessment) or SESA (Strategic Environmental and Social Assessment) is required to note that the assessment should consider all potential impacts and risks.</b></p>
<p>Risk 1: The outcome of the projects could affect the operating process in CGB.</p> <p>During their EER, buildings will be closed. This could potentially restrict the availability of basic services provided within these buildings, which may harm especially marginalized individuals or groups who depend on the provision of these services. (Principle 1.3)</p>	<p>I = 4 P= 2</p>	<p>Moderate</p>	<p>This risk may materialize if the closing of a public building for EER limits people’s access to the services it has provided before.</p>	<p>As an essential part of the EER planning, the Government and UZZPRO need to ensure the continuation of similar services at an alternative location, which is still easily accessible also to marginalized individuals or groups. Detailed explanation about the arrangements to mitigate the associated risk needs to be included in the project plan before they can be approved for implementation.</p>

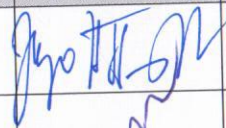

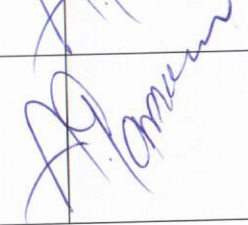
<p>Risk 2: The project might potentially reproduce discriminations against women, especially with regards to their participation in the design and implementation of the Project or access to opportunities and benefits provided by project outcomes. (Principle 2.2)</p>	<p>I = 1 P = 1</p>	<p>Low</p>	<p>The participation of women may not be adequately ensured, when, for instance, engaging designers or energy auditors in projects specific activities. Based on the experience from similar projects, there are still somewhat fewer women than men, who are engaged as designers or energy managers/auditors. The number of women who hold a designer license is sufficient, therefore the gender balance could be obtained.</p>	<p>The Project will facilitate and closely monitor that women have access to equal opportunities for engaging in EER of CGB, in their capacity as licensed designers and energy auditors. This will also be closely monitored by collecting gender-specific data on the stakeholders involved in project activities as well as on the direct project beneficiaries.</p>
<p>Risk 3: The outcome of the project may be sensitive or vulnerable to potential impacts of climate change (Principle 3, Standard 2.2)</p>	<p>I = 4 P = 2</p>	<p>Moderate</p>	<p>In planning the EER, there is a need to consider not only the current climate conditions but also the projected changes in average temperatures, precipitation and winds and eventual extreme weather conditions such as heatwaves, heavy rains or stormy winds, which may put more stress on the building envelope or thermal conditions inside the buildings.</p>	<p>In the repair and EER plans of each building, the projected future impact of climate change with different scenarios has to be taken fully into account, when assessing and calculating, for instance, the requirements for maintaining comfortable thermal conditions inside the buildings or strength of the building outdoor structures to the extreme weather conditions.</p>
<p>Risk 4: The outcome of the project could pose safety risks.  The elements of construction, operation or decommissioning during the project's implementation may pose potential safety risks to local communities (Principle 3, Standards 3.1, 3.2 and 3.4)</p>	<p>I = 4 P = 2</p>	<p>Moderate</p>	<p>This risk is not fundamentally different from the risks associated with any other building construction works within the cities, but in any case, should be properly monitored and managed during the project implementation stage.</p>	<p>As an essential part of planning the EER, the local authorities need to ensure that the related works are not posing any safety risks for the population as required also by the Serbian laws. Detailed explanation about the arrangements to mitigate this risk needs to be included in project plans before they can be approved for implementation.</p>
<p>Risk 5: The outcome of the project could pose the risks related to occupational health and safety during the EER works and that the employment opportunities provided by the project may fail to comply with national and international labour standards (Principle 3, Standards 3.7 and 3.8)</p>	<p>I = 4 P = 2</p>	<p>Moderate</p>	<p>This risk is not fundamentally different from the risks associated with any other ongoing construction works, but in any case, should be properly monitored and managed during the project implementation stage.</p>	<p>Occupational Health Management Protocol will be produced to be an inherent part of each set of EECGB Programme preparatory documents. The Project will also produce an action plan and promotion materials to support, in particular companies and individuals involved in the EER works, as of how to undertake preventive measures to ensure occupational safety of workers. As part of the project design, trainings and awareness-raising will be organized for stakeholders and practitioners to better understand safety issues associated with EER of old buildings.</p>

Risk 6: The proposed project may result in interventions that would potentially adversely impact sites, structures, or objects with historical, cultural, artistic, traditional or religious values (Principle 3, Standard 4 .1)	I=4 P=2	Moderate	Many public buildings in need of EER have historical, cultural and/or architectural values, which the planned EER works may put at risk, if not properly taken into account.	All EER works of objects of historical, cultural or architectural value(s) need to be carefully planned in close co-operation with the experts and authorities with a duty to protect these values, while also taking into account the views of different civil society organizations affiliated with the subject. No permission for the requested EER works shall be given before it can be ensured that the eventual historical, cultural and architectural values of the targeted building have adequately been ensured.
Risk 7: The proposed measures and EER projects may generate waste that is harmful to the environment and human health, if not properly managed and disposed of. (Principle 3, Standards 7.1 and 7.2)	I = 3 P = 3	Moderate	The EER of old buildings may always produce waste which, if not properly stored, treated and disposed of, may pose a risk to the environment.	The project will mitigate this risk by having a requirement for all investments supported by the project to include an adequate waste management plan within the project design. All proposals should also have a broader impact assessment, which besides waste issue shall also address the other identified risks.
<b>QUESTION 4: What is the overall project risk categorization?</b>				
Select one (see <a href="#">SESP</a> for guidance)			Comments	
<i>Low Risk</i> <input type="checkbox"/>				
<i>Moderate Risk</i> <input checked="" type="checkbox"/>			Given that no high-risk element was identified during this pre-screening, the project as a whole can be assessed as a moderate risk project.	
<i>High Risk</i> <input type="checkbox"/>				
<b>QUESTION 5: Based on the identified risks and risk categorization, what requirements of the SES are relevant?</b>				
Check all that apply			Comments	
<i>Principle 1: Human Rights</i>			X	
<i>Principle 2: Gender Equality and Women's Empowerment</i>			<input type="checkbox"/>	
<i>1. Biodiversity Conservation and Natural Resource Management</i>			<input type="checkbox"/>	
<i>2. Climate Change Mitigation and Adaptation</i>			X	

	3. <i>Community Health, Safety and Working Conditions</i>	X	
	4. <i>Cultural Heritage</i>	X	
	5. <i>Displacement and Resettlement</i>	<input type="checkbox"/>	
	6. <i>Indigenous Peoples</i>	<input type="checkbox"/>	
	7. <i>Pollution Prevention and Resource Efficiency</i>	X	

### Final Sign Off

**Table 17:** Final sign off

<i>Signature</i>	<i>Date</i>	<i>Description</i>
QA Assessor		UNDP staff member responsible for the project, typically a UNDP Programme Officer. The final signature confirms they have "checked" to ensure that the SESP is adequately conducted.
QA Approver		UNDP senior manager, typically the UNDP Deputy Country Director (DCD), Country Director (CD), Deputy Resident Representative (DRR), or Resident Representative (RR). The QA Approver cannot also be the QA Assessor. The final signature confirms they have "cleared" the SESP prior to submittal to the PAC.
PAC Chair		UNDP chair of the Project Appraisal Committee (PAC). In some cases, PAC Chair may also be the QA Approver. The final signature confirms that the SESP was considered as part of the project appraisal and considered in recommendations of the PAC.

### 3. Social and Environmental Risk Screening Checklist- SESP Attachment

**Table 18:** Social and environmental risk screening checklist

<b>Checklist Potential Social and Environmental Risks</b>		
<b>Principles 1: Human Rights</b>		<b>Answer (Yes/No)</b>
1.	Could the project lead to adverse impacts on the enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalized groups?	No
2.	Is there a likelihood that the project would have inequitable or discriminatory adverse impacts on affected populations, particularly people living in poverty or marginalized or excluded individuals or groups? <sup>34</sup>	No
3.	Could the project potentially restrict availability, quality of and access to resources or basic services, in particular to marginalized individuals or groups?	Yes
4.	Is there a likelihood that the would exclude any potentially affected stakeholders, in particular, marginalized groups, from fully project participating in decisions that may affect them?	No
5.	Is there a risk that duty-bearers do not have the capacity to meet their obligations in the project?	No
6.	Is there a risk that rights-holders do not have the capacity to claim their rights?	No
7.	Have local communities or individuals, given the opportunity, raised human rights concerns regarding the project during the stakeholder engagement process?	No
8.	Is there a risk that the project would exacerbate conflicts among and/or the risk of violence to Project-affected communities and individuals?	No
<b>Principle 2: Gender Equality and Women’s Empowerment</b>		
1.	Is there a likelihood that the proposed project would have adverse impacts on gender equality and/or the situation of women and girls?	No
2.	Would the project potentially reproduce discriminations against women based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?	No
3.	Have women’s groups/leaders raised gender equality concerns regarding the project during the stakeholder engagement process and has this been included in the overall project proposal and in the risk assessment?	No
4.	Would the project potentially limit women’s ability to use, develop and protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services? <i>For example, activities that could lead to natural resources degradation or depletion in communities who depend on these resources for their livelihoods and well being</i>	No
<b>Principle 3: Environmental Sustainability:</b> Screening questions regarding environmental risks are encompassed by the specific Standard-related questions below		
<b>Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management</b>		

<sup>34</sup> Prohibited grounds of discrimination include race, ethnicity, gender, age, language, disability, sexual orientation, religion, political or other opinion, national or social or geographical origin, property, birth or other status including as an indigenous person or as a member of a minority. References to “women and men” or similar is understood to include women and men, boys and girls, and other groups discriminated against based on their gender identities, such as transgender people and transsexuals.



1.1	Would the project potentially cause adverse impacts to habitats (e.g. modified, natural, and critical habitats) and/or ecosystems and ecosystem services?  <i>For example, through habitat loss, conversion or degradation, fragmentation, hydrological changes</i>	No
1.2	Are any project activities proposed within or adjacent to critical habitats and/or environmentally sensitive areas, including legally protected areas (e.g. nature reserve, national park), areas proposed for protection, or recognized as such by authoritative sources and/or indigenous peoples or local communities?	No
1.3	Does the project involve changes to the use of lands and resources that may have adverse impacts on habitats, ecosystems, and/or livelihoods? (Note: if restrictions and/or limitations of access to lands would apply, refer to Standard 5)	No
1.4	Would project activities pose risks to endangered species?	No
1.5	Would the project pose a risk of introducing invasive alien species?	No
1.6	Does the project involve the harvesting of natural forests, plantation development, or reforestation?	No
1.7	Does the project involve the production and/or harvesting of fish populations or other aquatic species?	No
1.8	Does the project involve significant extraction, diversion or containment of surface or groundwater?  <i>For example, construction of dams, reservoirs, river basin developments, groundwater extraction</i>	No
1.9	Does the project involve the utilization of genetic resources? (e.g. collection and/or harvesting, commercial development)	No
1.10	Would the project generate potential adverse transboundary or global environmental concerns?	No
1.11	Would the project result in secondary or consequential development activities which could lead to adverse social and environmental effects, or would it generate cumulative impacts with other known existing or planned activities in the area?  <i>For example, a new road through forested lands will generate direct environmental and social impacts (e.g. felling of trees, earthworks, potential relocation of inhabitants). The new road may also facilitate encroachment on lands by illegal settlers or generate unplanned commercial development along the route, potentially in sensitive areas. These are indirect, secondary, or induced impacts that need to be considered. Also, if similar developments in the same forested area are planned, then cumulative impacts of multiple activities (even if not part of the same project) need to be considered.</i>	No
<b>Standard 2: Climate Change Mitigation and Adaptation</b>		
2.1	Will the proposed project result in significant <sup>35</sup> greenhouse gas emissions or may exacerbate climate change?	No
2.2	Would the potential outcomes of the project be sensitive or vulnerable to potential impacts of climate change?	Yes
2.3	Is the proposed project likely to directly or indirectly increase social and environmental vulnerability to climate change now or in the future (also known as maladaptive practices)?  <i>For example, changes to land use planning may encourage further development of floodplains, potentially increasing the population's vulnerability to climate change, specifically flooding</i>	No
<b>Standard 3: Community Health, Safety and Working Conditions</b>		
3.1	Would elements of project construction, operation, or decommissioning pose potential safety risks to local communities?	Yes

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<sup>35</sup> In regard to CO<sub>2</sub>, 'significant emissions' corresponds generally to more than 25,000 tons per year (from both direct and indirect sources). [The Guidance Note on Climate Change Mitigation and Adaptation provides additional information on GHG emissions.]



3.2	Would the project pose potential risks to community health and safety due to the transport, storage, and use and/or disposal of hazardous or dangerous materials (e.g. explosives, fuel and other chemicals during construction and operation)?	Yes
3.3	Does the project involve large-scale infrastructure development (e.g. dams, roads, buildings)?	No
3.4	Would failure of structural elements of the Project pose risks to communities? (e.g. collapse of buildings or infrastructure)	Yes
3.5	Would the proposed project be susceptible to or lead to increased vulnerability to earthquakes, subsidence, landslides, erosion, flooding or extreme climatic conditions?	No
3.6	Would the project result in potential increased health risks (e.g. from water-borne or other vector-borne diseases or communicable infections such as HIV/AIDS)?	No
3.7	Does the project pose potential risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction, operation, or decommissioning?	Yes
3.8	Does the project involve support for employment or livelihoods that may fail to comply with national and international labour standards (i.e. principles and standards of ILO fundamental conventions)?	Yes
3.9	Does the project engage security personnel that may pose a potential risk to health and safety of communities and/or individuals (e.g. due to a lack of adequate training or accountability)?	No
<b>Standard 4: Cultural Heritage</b>		
4.1	Will the proposed project result in interventions that would potentially adversely impact sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture (e.g. knowledge, innovations, practices)? (Note: projects intended to protect, and conserve Cultural Heritage may also have inadvertent adverse impacts)	Yes
4.2	Does the project propose utilizing tangible and/or intangible forms of cultural heritage for commercial or other purposes?	No
<b>Standard 5: Displacement and Resettlement</b>		
5.1	Would the project potentially involve temporary or permanent and full or partial physical displacement?	No
5.2	Would the project possibly result in economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	No
5.3	Is there a risk that the project would lead to forced evictions? <sup>36</sup>	No
5.4	Would the proposed project possibly affect land tenure arrangements and/or community-based property rights/customary rights to land, territories and/or resources?	No
<b>Standard 6: Indigenous Peoples</b>		
6.1	Are indigenous peoples present in the project area (including the project area of influence)?	No
6.2	Is it likely that the project or portions of the project will be located on lands and territories claimed by indigenous peoples?	No
6.3	Would the proposed project potentially affect the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples (regardless of whether indigenous peoples possess the legal	No

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<sup>36</sup> Forced evictions include acts and/or omissions involving the coerced or involuntary displacement of individuals, groups, or communities from homes and/or lands and common property resources that were occupied or depended upon, thus eliminating the ability of an individual, group, or community to reside or work in a particular dwelling, residence, or location without the provision of, and access to, appropriate forms of legal or other protections.

	<p>titles to such areas, whether the Project is located within or outside of the lands and territories inhabited by the affected peoples, or whether the indigenous peoples are recognized as indigenous peoples by the country in question)?</p> <p><i>If the answer to the screening question 6.3 is "yes" the potential risk impacts are considered potentially severe and/or critical and the project would be categorized as either Moderate or High Risk.</i></p>	
6.4	Has there been an absence of culturally appropriate consultations carried out with the objective of achieving FPIC on matters that may affect the rights and interests, lands, resources, territories and traditional livelihoods of the indigenous peoples concerned?	No
6.5	Does the proposed project involve the utilization and/or commercial development of natural resources on lands and territories claimed by indigenous peoples?	No
6.6	Is there a potential for forced eviction or the whole or partial physical or economic displacement of indigenous peoples, including through access restrictions to lands, territories, and resources?	No
6.7	Would the project adversely affect the development priorities of indigenous peoples as defined by them?	No
6.8	Would the project potentially affect the physical and cultural survival of indigenous peoples?	No
6.9	Would the project potentially affect the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices?	No
<b>Standard 7: Pollution Prevention and Resource Efficiency</b>		
7.1	Would the project potentially result in the release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts?	Yes
7.2	Would the proposed project potentially result in the generation of waste (both hazardous and non-hazardous)?	Yes
7.3	<p>Will the proposed project potentially involve the manufacture, trade, release, and/or use of hazardous chemicals and/or materials? Does the project propose the use of chemicals or materials subject to international bans or phase-outs?</p> <p><i>For example, DDT, PCBs and other chemicals listed in international conventions such as the Stockholm Conventions on Persistent Organic Pollutants or the Montreal Protocol</i></p>	No
7.4	Will the proposed project involve the application of pesticides that may have a negative effect on the environment or human health?	No
7.5	Does the project include activities that require significant consumption of raw materials, energy, and/or water?	No

## 4. Risk Analysis

**Table 19:** Risk analysis

No.	Description	Date identified	Type	Probability & Impact	Countermeasures / Mitigation response	Owner	Submitted, updated by	Last Update	Status
1.	Risk of the Republic of Serbia stopping its negotiations to join the European Union and therefore making energy-efficiency less of a priority.		Political	P = 2 I = 5	Even in the unlikely event that negotiations were stopped or even cancelled, energy-efficiency is likely to remain as a priority for the government, because of its significant cost-savings potential across the economy. This risk is considered low and is mitigated by the fact that the Government has already made a decision to apply for EUR 40 mil sovereign guarantee loan to finance the EER of the first 28 CGB.	Project Board, PIU			
2.	Forthcoming elections (April 2022) could affect the pace of project implementation due to possible reshuffling of the Government and substantial staff change in beneficiary institutions.		Political	P = 4 I = 4	This risk is considered high and is mitigated by the detailed planning of project activities immediately after the signing of the Project Document in a way that most of the activities foreseen in the transition period will not be affected by the possible changes in beneficiary institutions	Project Board, PIU			
3.	MCTI failing to adopt the new regulations concerning energy efficiency in buildings which shall prescribe the national minimum energy performance requirements for buildings in line with Article 4 of Directive 2010/31/EU.		Legislative	P = 3 I = 3	The very essence of the ERPCGB programme is to upgrade CGBs to meet these requirements, so failing in its setting could jeopardize the Programme. This risk is considered moderate and is mitigated by the fact that the MCTI has already been working on the preparation of new regulations. MME, UZZPRO and PIU will closely monitor the progress of work and coordinate future steps with MCTI.	Project Board, PIU			

No.	Description	Date identified	Type	Probability & Impact	Countermeasures / Mitigation response	Owner	Submitted, updated by	Last Update	Status
4.	The Government does not have the financial resources to provide necessary additional funding to support the proposed EER under CEB loan.		Financial	P = 2 I = 3	This risk considered low with medium impact and is mitigated by the fact that the Government has already decided to apply for EUR 40 mil sovereign guarantee loan to finance EER of the first 28 CGB, and that donors (the Kingdom of Spain, Republic of Slovakia) have already expressed their interest to contribute to Government efforts. In addition, Government EE fund has recently been increased so in case of need missing funds will be allocated from EE fund.	Project Board			
5.	Due to technical problems with the planned EE investments and technologies used, the trust of the key stakeholders on the proposed measures is lost.		Technology	P = 2 I = 5	The promoted technologies are already considered to be technically mature technologies, so the risk of their technical failure due to the early stage of their technical development is considered as low. This does not detract, however, from the importance of adequate quality control of both products and installations at all stages of implementation.	Project Board, PIU, Beneficiaries			
6.	The planned energy efficiency investments to be implemented under EECGB Programme (such as building and lighting retrofits) may generate waste, which, if not properly managed, may be disposed in an environmentally not sound manner.		Environmental risk	P = 3 I = 5	The project will mitigate this risk by having a requirement for all investment proposals seeking project support to include an adequate waste management plan incorporated into the project design. Environmentally sound waste management as it relates to the implementation of different EER works and disposal of related materials and appliances will be an issue to be addressed also when supporting the Serbian municipalities to prepare their municipal energy efficiency action plans	Project Board, PIU, Beneficiaries			
7.	Lack of adequate co-ordination and co-operation between the institutions of		Organizational	P = 3 I = 5	This risk is considered from medium to high due to the large number of institutions that use CGB. The project seeks to mitigate this risk by intensive communication and information exchange	Project Board, PIU,			

No.	Description	Date identified	Type	Probability & Impact	Countermeasures / Mitigation response	Owner	Submitted, updated by	Last Update	Status
	the central government MME, UZZPRO and MCTI which implement the project on behalf of Government.				activities through the project.	Beneficiaries			
8.	Lack of adequate co-ordination and co-operation institutions of the central government, namely MME, UZZPRO and MCTI as project implementing institutions on one side, and institutions that use CGBs on the other side, to effectively reach the stated goals.		Organizational	P = 3 I = 5	This risk is considered from medium to high due to a large number of institutions involved in project coordination. The project seeks to mitigate this risk by intensive communication and information exchange activities through the project.	Project Board, PIU, Beneficiaries			
9.	Inadequate local capacity of the central government employees to effectively understand the need for EER of CGBs and envisaged measures.		Operational	P = 4 I = 5	This risk is considered from medium to high due to a large number of employees in CGB. The strong focus of the project on communication with employees in institutions that use CGBs is expected to mitigate this risk.	Project Board, PIU, Beneficiaries			