

Environmental and Social Impacts Questionnaire

Environmental and social impact considerations are an important aspect of NZEC's assessment of export credit transactions.

NZEC adheres to the OECD's Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence, which describes measures to address the potential environmental and social impacts of projects for which export credit support is requested. See: <http://www.oecd.org/trade/topics/export-credits/environmental-and-social-due-dilligence/>

NZEC requires applicants to provide sufficient information to enable NZEC to undertake a reasonable evaluation of environmental and social risks and corresponding mitigation measures. The documentation expected depends on the type of support requested, the nature of the exports or project to be undertaken, and the role of the New Zealand exporter / applicant.

All transactions are initially screened by NZEC, using the information provided in the NZEC Application Form. **Where screening identifies any potential environmental and/or social impacts, then an applicant must complete this Environmental and Social Impacts Questionnaire.**

This questionnaire is divided into two sections. Section 1 provides the actual questions, and Section 2 provides guidance in responding to the questions in Section 1. Given the limited space available to answer the questions thoroughly, the applicant is encouraged to enclose applicable annexes and other relevant information.

Use of information in Questionnaire

Information provided by in this Questionnaire is commercial-in-confidence information. NZEC will not disclose this information to any third party, except with the consent of the applicant or otherwise in accordance with NZEC's statutory confidentiality obligations.

NZEC will review the information provided in this Questionnaire and classify the transaction, against the significance of its potential environmental and/or social impacts. This process considers:

- the potential environmental and social (including human rights) impacts associated with the transaction;
- the exporter's role in the transaction, including the ability and authority to directly manage the environmental and social impact of a project;
- New Zealand's obligations under international agreements; and

- relevant international (including the International Finance Corporation – IFC), industry and host country standards.

NZEC may indicatively classify the project as either a Category A, B or C project:

Category A: A project with potential to have significant risk of adverse environmental and/or social impacts, which are diverse, irreversible and/or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works. In principle, it includes projects in sensitive sectors or located in or near sensitive areas. An illustrative list of Category A projects is set out in Annex 1.

Category B: A project is classified as Category B if its potential environmental and/or social impacts are less adverse than those of Category A projects. Typically, these impacts are few in number, site-specific, few if any of them are irreversible, and mitigation measures are more readily available.

Category C: A project is classified as Category C if it is likely to have minimal or no adverse environmental and/or social impacts.

Additional Information and Disclosure

NZEC will require additional information, including an **Environmental and Social Impact Assessment (ESIA)**, to be provided by an applicant for all:

- projects in or near sensitive areas;
- projects and existing operations where the screening has identified that there is a high likelihood of severe project-related human rights impacts occurring;
- Category A projects where NZEC's guaranteed amount (if approved) would be above NZD 20 million.

An ESIA should address the issues set out in Annex II. Please note that, for Category A projects, NZEC will (within any constraints of business confidentiality):

- publicly disclose project information (including project name, location, description of project) and
- require that environmental and social impact information (e.g. ESIA report, or summary thereof) is made publicly available (either via NZEC or the Applicant, buyer, project sponsor),

at least 30 calendar days before a final commitment to grant official support. The above information will be made available on, or with links from, the NZEC website.

A Category B project generally requires a narrower scope of assessment, and it is the discretion of NZEC whether to seek an **ESIA** and/or project-related assessment reports, planning documents and technical reviews, environmental and social studies, or other relevant information.

If NZEC's screening or information gathering process highlights risks of **project-related human rights impacts** occurring then NZEC is to ensure that these risks are specifically identified, assessed and addressed. [The UN Guiding Principles on Business and Human Rights](#) firmly establish the corporate responsibility to respect human rights as a standard of expected conduct.

No further action is required for a category C project.

NZEC may decline an application if the necessary information on and analysis of environmental and social consequences are not received, or if the review has revealed strong negative environmental and/or social impact in the transaction which do not satisfy relevant benchmarks.

Section 1: Questionnaire

Project Outline and General Information

1. *** Describe the goods / services that you are supplying, as well as the project or existing operations that you are supplying into.**

* Detailed guidance in responding to these questions are provided in Section 2.

2.

(a) Confirm and attach any certified Environmental Management System (EMS) that you have (e.g. according to ISO 14001 or other internationally accepted EMS standard) and/or an officially stated environmental and social policy.

Copy of certificate/policy attached.

No certificate/policy in place.

(b) Attach details of any documented environmental and social policy issued by the project sponsor.

Copy of environmental and social policy attached.

No environmental and social policy developed for the project

(c) If the project sponsor is certified according to ISO 14001 or other internationally accepted EMS standard, please attach relevant copies.

Copy of certificate attached.

No certificate in place.

3. *

(a) Have the goods/services that you are supplying been designed to comply with recognised environmental standards?

Host Country World Bank

International Finance Corporation (IFC) Other Not relevant

If Other, refer to relevant standard and provide a copy.

If not relevant, please explain.

(b) Has the project that you are supplying been designed to comply with recognised environmental standards?

Host Country World Bank

International Finance Corporation (IFC) Other Not relevant

If Other, refer to relevant standard and provide a copy.

If not relevant, please explain.

4. *

(a) Has an Environmental and Social Impact Assessment (ESIA) been prepared or is one planned?

Yes No Planned

If Yes, attach a copy. If an ESIA is planned, please forward a copy of Terms of Reference and timescales for completion.

(b) If there is the risk of project-related human rights impacts occurring, please confirm the preparation of either:

A stand-alone Human Rights Impacts Assessment (HRIA)

Yes No Planned

A human rights impacts assessment integrated into an ESIA

Yes No Planned

If Yes, attach a copy. If a HRIA is planned, please forward a copy of Terms of Reference and timescales for completion.

(c) In the absence of an ESIA and/or HRIA, has any other social or environmental management or monitoring plan been developed for the project?

Yes. Copy/copies attached Not available for the project

(d) Where the goods or project impact on the local population and an ESIA and/or HRIA have not been prepared, have the local population been consulted?

Yes No

If Yes, please give details on how this has been managed, including any mitigation or compensation measures.

Environmental Impacts

5.* Will the goods/services/project have any actual or potential negative environmental impacts in any of the following areas? (Please mark relevant boxes.)

- Water pollution or extraction
- Damage to wildlife or habitats
- Local air quality
- Climate change (greenhouse effect)
- Acid deposition
- Ozone depletion
- Use of hazardous substances
- Production of damaging or toxic waste
- Noise pollution
- Degradation of land (e.g. soil contamination, erosion, salinisation)
- Other adverse environmental impacts, specify:

If there are actual or potential environmental impacts according to above, please give details (e.g. consultants' reports, argument for choice of technique, planned mitigating factors, etc.)

Is there a plan for monitoring potential negative environmental impacts?

- Yes No Planned

If Yes, attach copy of plan.

6. Will the goods/services/project have any actual or potential positive environmental impacts?

- Yes, please give details No

7.

(a) Please give the exact geographical location of the project:

(b) For what is the project site currently used?

- Urban Industrial Greenfield
 Agricultural Other - please specify

(c) Indicate if the goods/services/project will be located in or could have an environmental impact upon any of the following: (Please mark boxes.)

- Semi-arid areas or desert margins
- Properties on World Heritage List; <http://whc.unesco.org/en/list>
- Tropical or subtropical forest (especially primary forest)
- Rivers, lakes, coastline, coral reefs, areas of hydrological importance, wetlands including mangroves
- National parks, nationally designated nature reserves and all other conservation areas, and the margin of these
- Habitat providing important resources for vulnerable groups (e.g. indigenous or tribal groups)
- Habitat of endangered species of flora and fauna or areas of high concentration of biological diversity
- Areas largely untouched by humans (wildlands)
- Areas of high concentration of population where further development could create significant environmental problems
- Areas of high concentration of industrial activity where further development could create significant environmental problems
- Areas with high quality resources for forestry, tourism, fishery, mining etc.
- Other areas of local interest or sensitive locations – please provide details

(d) Have other alternative locations been considered?

- Yes No

If Yes, please attach summary of assessment and motives for choice of location.

Social impacts

8. * Will the goods or project cause any of the following social impacts?

- Resettlement of the local population
- Compulsory acquisition of land
- Displacement of, or damage to, existing industry or agriculture
- Job losses among the local population
- Damage to sites of cultural, historic, religious or scientific interest
- Impact on minority or vulnerable communities

Please provide details of any of these that apply.

- Other adverse social or human rights impacts, please specify:

9. Will the goods/services/project have any beneficial social impacts, please specify.

Date:

Company:

Authorized Person and title:

.....
Signature

Section 2: Guidance notes to Questions

Question 1

Describe the goods / services that you are supplying, as well as the project or existing operations that you are supplying into.

Guidance notes

- Outline your contractual obligations, and the business stage of your negotiations;
- Describe, in layman terms, the technical nature of your goods/services, as well as the technical nature and outputs of the project (include productive capacity, main raw materials, energy consumptions);
- Explain the extent to which you are able to influence the design, specification and delivery of your goods / services, and/or the design and implementation of the wider project.
- Where you are supporting the expansion or upgrade of an existing operation, describe the relative scope and impacts of the expansion or upgrade.

Question 3 – Benchmarking compliance

Guidance notes

NZEC's risk evaluation includes benchmarking, where relevant, the project's environmental and social performance against:

- World Bank Safeguard Policies (<https://www.worldbank.org/en/projects-operations/environmental-and-social-policies#safeguards>);
- IFC Performance Standards (https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards), in particular where justified and/or practicable due to the size and/or structure of the transaction such as, but not limited to, certain types of structured finance transactions that share characteristics with project finance, and/or where financial institutions forming a significant part of the project are applying these same standards; and
- the host country standards.

Where a Major Multilateral Financial Institution (e.g. African Development Bank, Asian Development Bank, European Investment Bank, Inter-American Development Bank, International Bank for Reconstruction and Development, International Finance Corporation, Multilateral Investment Guarantee Agency) is supporting the project, NZEC may instead benchmark the project against the relevant standards of this Institution.

If project does not meet the international standards against which it has been benchmarked, please justify.

If there are no applicable or appropriate environmental standards please provide an explanation of why this is the case.

Question 4 – Impact Assessment reports

Guidance notes

See Annex II for a summary of the content typically contained in an Environmental and Social Impact Assessment.

A **human rights impact assessment (HRIA)** is a [process for identifying, understanding, assessing and addressing](#) the adverse effects of a business project or activities on the human rights enjoyment of impacted rights-holders such as workers and community members. HRIAs can take various shapes and be led by different stakeholders, but should share the ultimate goal of protecting human rights and improving accountability of businesses for their adverse impacts on human rights. According to the UN Guiding Principles, businesses should do the following when assessing their human rights impacts:

- Draw on internal and/or independent human rights expertise;
- Undertake meaningful consultation with potentially affected rights-holders and other relevant parties;
- Be gender-sensitive and pay particular attention to any human rights impacts on individuals from groups that may be at heightened risk of vulnerability or marginalization;
- Assess impacts from the perspective of risk to people rather than risk to business; and
- Repeat its risk and impact identification and assessment at regular intervals (i.e. before entering into a new activity, prior to significant decisions about changes in activities, and periodically throughout the project-cycle). ([UNGP 18 and Commentary](#)).

Question 5

Will the goods/services/project have any actual or potential negative environmental impacts in any of the following areas?

Guidance notes

Identify all areas of impact and provide sufficient information. NZEC will assess the information provided and determine whether or not environmental impacts resulting from normal operations, including any risk scenarios linked to the operations, are significant. Please also enclose information on any mitigating measures and relevant reports.

Many projects will have impacts in several of the areas listed. Early identification of these and provision of relevant information will facilitate NZEC's analysis of your application. The following questions may assist in determining if environmental impacts occur or not. The questions also indicate the type and detail of information required.

Water pollution or extraction

Is the consumption of water or disposal of liquid effluent likely to impact on other users of this supply? How much water will be required and where will it come from? How much effluent will be generated? What are the contaminants of the effluent and their concentrations?

Damage to wildlife or habitats

Is a change of land use necessary e.g. agricultural to industrial? Does the project involve the clearance of land? What is the present use of land? Are any compensating features planned e.g. provision of greenbelt areas?

Local air quality

Do the goods or project produce dust or fumes? What are the sources and levels of emissions? What mitigation systems will be installed? How efficient is any filtration equipment?

Climate change (greenhouse effect)

How much CO₂ will be produced per energy unit? What quantities of other greenhouse gases will be produced?

Acid Deposition

What fuel is proposed to be used and what is its sulphur content? Has low sulphur or biofuel been considered? Is flue-gas desulphurisation equipment proposed? If so, provide details on process and efficiency.

Ozone depletion

Are CFCs or HCFCs used in refrigeration or air-conditioning systems? Have alternatives been considered? Are any other ozone depleters used? Details of the Montreal Protocol including a list of ozone depleters can be found on the United Nations Environment Programme (UNEP) website at:
http://www.unep.ch/ozone/mont_t.htm

Use of hazardous substances

What hazardous substances are used in the goods and project, e.g. are polychlorinated biphenyls (PCBs) present in transformers or capacitors; is mercury, cadmium or benzene used in the processes? Give details on any hazardous substances including estimated yearly consumption.

Production of damaging or toxic waste

What quantities of solid waste and secondary products are produced? What damaging or toxic substances are contained in the waste and in what quantities are they presented? What mitigation procedures have been implemented to minimise production of waste, please describe. What measures have been made for safe storage and/or disposal of waste?

Noise pollution

What noise levels are expected from the process/project? Please give figures in A-weighted decibels dB(a). Also, give information on distance to closest residential area. Have any mitigation measures been made to reduce noise, please give details?

Degradation of land (e.g. soil contamination, erosion, salinisation)

What steps will be taken to ensure that land degradation is avoided, e.g. bunding of tanks and other measures to prevent spillage? What plans are there or site restoration after the project has closed?

Other adverse environmental impacts, specify:

Provide details on any other adverse environmental impacts you are aware of.

If there are actual or potential environmental impacts according to above, please give details (e.g. consultants' reports, argument for choice of technique, planned mitigating factors, etc.).

Is there a plan for monitoring potential negative environmental impacts?

Monitoring of potential or actual environmental impacts is an important part of NZEC's project monitoring. If an environmental monitoring plan has been developed for the project, please enclose.

Question 8

Will the goods or project cause any of the following social impacts?

Guidance notes

If the project/goods will cause an impact on the areas described below, please provide sufficient information. NZEC will assess the information provided and determine whether or not impacts are significant. The questions below may assist in determining if impacts occur or not. The questions also indicate the type and detail of information required.

Resettlement of the local population

Are people being moved from or excluded from the site of the project, particularly on an involuntary basis? How many are involved? How long have they lived or worked on the site? What is the source of this data and how reliable is it?

Compulsory acquisition of land

Is land being acquired by or on behalf of the project company through compulsory purchase systems? How and by whom are the assets and resources base being valued? Are current inhabitants/users being offered alternative land or cash or both?

Displacement of, or damage to, existing industry or agriculture

Are alternative jobs including appropriate training being offered? What groups of the society have been consulted?

Job losses among the local population

Are job losses expected to arise as a result of the project? What opportunities for re-employment or re-training are being provided?

Damage to sites of cultural, historic, religious or scientific interest

Does the project affect important sites? Is the site near to a recognised World Heritage site? Is the site situated on or near to a recognised site of special scientific interest?

Impact on minority or vulnerable communities

Does the project have a disproportionate effect on national, ethnic or religious minority communities or other vulnerable groups in the country concerned?

Please provide details if any of the above apply.

Please specify other social drawbacks, losses, or disadvantages.

ANNEX I - ILLUSTRATIVE LIST OF CATEGORY A PROJECTS¹

The following is an illustrative list containing examples of the types of new projects and major expansion projects that may be classified as Category A; however, in practice, classification should be undertaken in accordance with the potential environmental and/or social impacts of each project.

1. Crude oil refineries (excluding undertakings manufacturing only lubricants from crude oil) and installations for the gasification and liquefaction of 500 tonnes or more of coal or bituminous shale per day.
2. Thermal power stations and other combustion installations (including cogeneration) with a heat output of not less than 300 megawatts (equivalent to a gross electrical output of 140 MWe for steam and single cycle gas turbines power stations) and nuclear power stations and other nuclear reactors, including the dismantling or decommissioning of such power stations or reactors (except research installations for the production and conversion of fissionable and fertile materials, whose maximum power does not exceed 1 kilowatt continuous thermal load).
3. Installations designed for the production, or enrichment of **nuclear fuels**, the reprocessing, storage or final disposal of irradiated nuclear fuels, or for the storage, disposal or processing of **radioactive waste**.
4. Integrated works for the initial **smelting of cast-iron and steel**, e.g. installations for the production of primary steel by blast furnace route or direct reduction; installations for the production of non-ferrous crude metals from ore, concentrates or secondary raw materials by metallurgical, chemical or electrolytic processes.
5. Installations for the extraction of **asbestos** and for the processing and transformation of asbestos and products containing asbestos: for asbestos-cement products, with an annual production of more than 20 000 tonnes finished product; for friction material, with an annual production of more than 50 tonnes finished product; and for other asbestos utilisation, of more than 200 tonnes per year.
6. Installations for the manufacture and/or recovery of chemicals (including but not limited to petrochemicals, fertilisers, pesticides & herbicides, health care products, detergents, paints, adhesives, agro-chemicals, pharmaceuticals, explosives) on an industrial scale using physical, chemical and/or bio-chemical processes and for large scale distribution of such chemicals via pipelines/terminals and associated facilities.
7. Construction of **airports** with a basic runway length of 2,100 metres or more.
8. Construction of **motorways** and express roads.
9. Construction of a new **road**, or realignment and/or widening of an existing road, where such new road, or realigned and/or widened section of road, would be **10 km or more** in a continuous length.
10. Construction of **railway lines** that go beyond urban areas and of long-distance railway lines.

¹ Sourced from Annex 1 of TAD/ECG(2016)3.

11. **Sea ports** and also **inland waterways** and ports for inland-waterway traffic which permit the passage of vessels of over 1,350 tonnes; trading ports, piers for loading and unloading connected to land and outside ports (excluding ferry piers) which can take vessels of over 1,350 tonnes.
12. Waste-processing and disposal installations for the incineration, chemical treatment or landfill of **hazardous, toxic or dangerous wastes**.
13. **Large² dams** and other impoundments designed for the holding back or permanent storage of water.
14. **Groundwater abstraction** activities or artificial groundwater recharge schemes in cases where the annual volume of water to be abstracted or recharged amounts to 10 million cubic metres or more.
15. Industrial plants for the production of **pulp, paper and board** from timber or similar fibrous materials.
16. Operations that involve **large scale extraction**, via underground or open-pit mining, solution mining, or marine or riverine operations to obtain precious metals, base metals, energy and industrial minerals, or construction materials. It may also include the processing of the extracted material.
17. **Greenfield cement plants** where the project includes a greenfield quarry.
18. Large scale **oil, gas, or liquefied natural gas development** that may include any or all of:
 - exploration (seismic and drilling);
 - field development and production activities;
 - transport activities, including pipelines/terminals, pump stations, pigging stations, compressor stations and associated facilities; or
 - gas liquefaction facilities.
19. Installations for **storage of petroleum, petrochemical, or chemical products** with a capacity of 200,000 tonnes or more.
20. **Large-scale logging**.
21. **Municipal wastewater treatment plants** with a capacity exceeding 150,000 population equivalent.
22. **Municipal solid waste-processing and disposal facilities**.
23. Large-scale **tourism and retail development**.
24. Construction of **overhead electrical power transmission lines** with a length of 15 km or above and a voltage of 110 kV or above.
25. Large-scale **land reclamation**.

² Per definition of International Commission on Large Dams (ICOLD): A large dam is:

- a dam with a height of 15m or more from the foundation; or
- a dam between 5 and 15 m high and with a reservoir volume of more than 3 million m³

26. Large-scale **primary agriculture/sylviculture** involving intensification or conversion of natural habitats.
27. Plants for the **tanning of hides and skins** where the treatment capacity exceeds 12 tons of finished products per day.
28. Installations for **the intensive rearing of poultry or pigs** with more than: (i) 85,000 places for broilers and 60,000 places for hens; (ii) 3,000 places for production pigs (over 30 kg); or (iii) 900 places for sows.
29. Projects which are planned to be carried out in **sensitive areas** or are likely to have a perceptible impact on such areas, even if the project category does not appear in the above list.
30. Projects that may result in significant adverse social impacts to local communities or other project affected parties, including those involved in the construction and/or operation of the project.
31. Projects involving **land acquisition and involuntary resettlement** of a significant number of affected people.

ANNEX II

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

An ESIA report is to focus on the significant issues of a project. The report's scope and level of detail should be commensurate with the project's potential impacts and risks, and should benchmark and address the relevant international standards applied to the project.

An ESIA report typically includes the following items:

- *Non-technical Executive Summary.* A concise discussion of the significant findings and recommended actions in lay language.
- *Policy, legal and administrative framework.* Discusses the policy, legal and administrative framework within which the ESIA is carried out. Identifies relevant host country regulations, international environmental and social agreements to which the country is a party, and relevant international standards applied to the project. Explains the environmental requirements of any co-financiers.
- *Project description.* Concisely describes of the proposed project and its geographic, ecological, social, health and temporal context), including any additional project components that may be required (e.g. dedicated pipelines, access roads, power plants, water supply, housing, raw material and product storage facilities) and/or other activities by third parties that are essential for the successful operation of the project. Indicates the need for any resettlement or indigenous people's development plan for the area concerned. Normally includes a map showing the project site and project's area of influence, as well as project timetable.
- *Baseline data.* Data to show the impact of the project on human health, environment, socioeconomic, human rights and labour conditions, including any changes anticipated before the project commences. The assessment should also pay regard to current and proposed development activities within the project area but not directly connected to the project. Data should be relevant to decisions about project location, design, operation or mitigation measures. This section also indicates the accuracy, reliability and sources of data.
- *Environmental and Social Impacts.* Predicts and assesses the project's likely positive and negative impacts, in quantitative terms to the greatest extent possible. Identifies mitigation measures and any residual negative impacts that cannot be mitigated, as well as measures for environmental and/or social enhancement. Identifies and estimates the extent and quality of available data, key data gaps and uncertainties associated with predictions and topics that do not require further attention. Evaluates impacts and risks from other third party activities.
- *Analysis of alternatives.* Systematically compares reasonable alternatives to the proposed project site, technology, design and operation (including the "without project" situation) in terms of their potential environmental and social impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions and their institutional, training and monitoring requirements. For each of the alternatives, the environmental impacts should be quantified and economic values attached where feasible. States the basis for

selecting the particular project design proposed and justifies recommended emission levels, including where relevant for greenhouse gases, and approaches to pollution prevention or abatement.

- *Consultation*. Describes the results of any public consultation with local communities directly affected by the project and/or their legitimate representatives and of any engagement with other parties, such as civil society organisations, that have expressed an interest in the project. It is the responsibility of the buyer / project sponsor to undertake any such public consultations and/or engagements with interested parties. For the purposes of public consultations, environmental and social impact information should be made available to affected communities in a language accessible to them.
- *Management Plan*. Describes mitigation and management measures to be taken during construction and operation to avoid, reduce, mitigate or remedy for adverse social and environmental impacts, in the order of priority, and their timelines. Describes the desired outcomes as measurable events to the extent possible, such as performance indicators, targets or acceptance criteria that can be tracked over defined time periods, and indicates the resources, including budget, and responsibilities required for implementation. Where the buyer / project sponsor identifies related measures and actions, the Management Plan will include an Action Plan, which is subject to disclosure to the affected communities and ongoing reporting and updating.
- *Annexes*:
 - a) List of ESIA report preparers – individuals and organisations
 - b) References (written materials, both published and unpublished, used in study preparation).
 - c) Record of interagency and consultation meetings, including consultations for obtaining the informed views of the affected communities and/or their legitimate representatives (local population, minority groups, regulatory agencies) and other interested parties, such as civil society organisations. The record specifies any means other than consultations (e.g. surveys) that were used to obtain the views of affected groups.
 - d) Tables presenting the relevant data referred to, or summarised in, the main text.
 - e) List of associated reports, audits and plans (e.g. resettlement plans, development plans for indigenous population).
 - f) Action Plan that:
 - i. Describes the actions necessary to implement the various sets of mitigation measures or corrective actions to be undertaken
 - ii. Prioritises these actions
 - iii. Includes the time-line for their implementation; and
 - iv. Describes the schedule for communicating with affected communities when on-going disclosure or consultation is expected.