**Environment and Social Safeguards
Policies and Procedures Manual
Version 1: July 2019**

Contents

In the pages that follow, you will learn how the first five policies support successful program design and implementation within a community, while the Child Safeguarding policy defines appropriate behavior when working with children and vulnerable adults.

Introduction

The purpose of the Safeguards Manual is to provide Rare employees with policies and procedures to minimize and/or avoid negative environmental and social impacts and to enhance positive impacts to the maximum extent possible. To accomplish this objective, environmental and social concerns must be integrated into project design, and safeguards must be made an intrinsic part of project management. With publication of this first version, Rare commits to assign responsibility for implementation to the appropriate employees and to train all Rare employees in the relevant policies for their roles.

- **Program Staff** train and implement the Safeguards within the programs and track metrics.
- **Development Staff** stay abreast of Safeguard developments and report to donors.
- **Operations Staff** oversee compliance, hold the Safeguards implementation plan, and imbed the concept into grant and talent management tasks, including general training and complaint resolution.

Rare will apply these standards fairly and consistently throughout its programs. This manual will be revised as we continue to learn, and we expect a second version in 2020.

These safeguard policies and their associated minimum standards align with the policies and standards of a number of Rare's major donors and partners. The policies in this manual assume that all Rare projects fit within Category C (as described below).

> Category C Definition: A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental and social impacts. Beyond safeguard screening, no formal Environmental and Social Impact Assessment is required. However, specific project-level safeguard plans might be required by donors to strengthen the project compliance with their environmental and social safeguard requirements.

The Policy on Environment and Social Risk Management is an umbrella policy which establishes the importance of integrated environmental and social management to identify and manage the environmental and social impacts, risks, and opportunities of Rare projects. This policy explains how Rare will use a simple Safeguard Screening Tool to evaluate its projects for potential impacts and to determine the course of action if an impact is identified.

Abbreviations
GEF	Global Environment Facility
IPLC	Indigenous People and Local Communities
GMP	Gender Mainstreaming Plan
MA+R	Managed Access + Reserve
SEP	Stakeholder Engagement Plan
SST	Safeguard Screening Tool

Acknowledgment: This manual is informed by the policy and management instruments developed by the Global Environment Facility (GEF) and adhered to by its 18 Implementing Agencies, most notably Conservation International and World Wildlife Fund, Inc.

Policy on Environment and Social Risk Management

Introduction

The Policy on Environment and Social Risk Management is a framework to guide Rare in identifying potential environmental and social risks and benefits associated with a project. This policy aligns with the Minimum Standard for Environmental and Social Impact Assessments, which aims to ensure that all projects are environmentally and socially sound and sustainable. The specific policy objectives are to:

- Ensure appropriate planning—especially in the identification and selection of alternatives to enhance environmental benefits—and avoid or, if avoidance is not possible, minimize, mitigate, and offset or compensate for adverse impacts on the environment and on affected communities;
- Ensure the effective management of environmental and social opportunities and risks at all stages of the project life cycle from conception to closure;
- Provide for the engagement of diverse stakeholders and key parties, so that interested and affected parties have timely access to information and are empowered to meaningfully engage in issues that may affect them through all stages of the project life cycle.

Assumption on Categorization

The standardized safeguards framework results in a project being designated in one of three categories:

- Category A - Full or comprehensive Environment and Social Impact Assessment is required as the project is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented;
- Category B - Partial assessment is required as the proposed project's potential adverse environmental impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects; or
- Category C - No further assessment is required as the proposed project is likely to have minimal or no adverse environmental impacts. Beyond safeguard screening, no formal Environmental and Social Impact Assessment is required. However, specific project-level safeguard plans might be required by donors to strengthen the project compliance with their environmental and social safeguard requirements.

As mentioned in the Introduction, all Rare projects are presumed to be Category C and therefore the Safeguard Screening Tool (SST) below is designed under this assumption.

Safeguards Screening Tool

The SST is the first step to screen programs for potential environmental and social impacts. The Program Staff, with input from the Donor Owner, will conduct the screening and a sub-set of the Executive Team made up of representatives from programs, development and operations will approve the results. Other steps may be determined based on the specific donor requirements for a given program or project.

Rare staff will track the baseline indicators included in the Safeguards Manual, and shown on the SST, on all Rare projects. For a number of Rare's donors and partners (e.g., Global Environment Facility, Asian Development Bank, World Bank, etc.), projects that trigger certain safeguard policies will also require simplified plans and possible tracking of additional indicators.

Safeguards Screening Tool is provided in Appendix 1.

Policy on Protection of Natural Habitats

<u>Introduction</u>
Rare's mission is to inspire change so that people and nature can thrive. Protection of natural habitats is at the core of Rare's work.

Rare's approach is to build local capacity through training and the facilitation of decision-making processes and policies to enable communities to make informed decisions regarding the sustainable management of their natural resources.

In other words, Rare is a training and facilitating organization that advises communities and guides them in decision making. It feels responsible for the communities' decisions, but unlike some other conservation organizations, Rare does not co-manage the places where it works, and it does not have authority over the management of a given area.

For these reasons, Rare's approach does not harm natural habitats.

This policy aligns with the Minimum Standard for the Protection of Natural Habitats as adhered to by a number of Rare's key development partners.

<u>Policy Requirements</u>
Rare's Safeguards Screening Tool (SST) assumes no harm to natural habitats. The Program Staff will be asked to confirm that this statement is true for the project being evaluated. If a project were to envision degradation, destruction, or harm to biological diversity or ecosystem integrity, the SST would trigger a review by the Executive Team, which would result in a modification to project plans to avoid the problem.

Policy on Stakeholder Engagement

<u>Introduction</u>
Central to Rare's work is engaging communities. Rare trains and facilitates -- and communities decide. Rare's programs will incorporate the knowledge and contributions of partners and stakeholders, such as local communities, to ensure that its work results in lasting and fundamental improvements. Accordingly, all Rare projects must:

- Involve key stakeholders in project design and preparation processes;
- Ensure that stakeholders' views and concerns are taken into account by the project and are known by key decision makers;
- Continue consultations throughout project implementation, monitoring and evaluating, as necessary, to ensure adaptive management and proper implementation of environmental and social safeguard plans.

This policy is consistent with widely accepted standards for Stakeholder Engagement.

For this initial version of the Safeguards Manual, because these three policies are so inter-related for Rare, the Minimum Standards for Restricted Access to Resources and Involuntary Resettlement and Indigenous Peoples are considered as part of the Stakeholder Engagement policy.

<u>Related Policy on Restricted Access to Resources (part of Involuntary Resettlement)</u>
Rare does not work on projects that involve involuntary resettlement. However, restricted access to resources falls under this minimum standard and therefore it is relevant.

> For example, in Fish Forever countries where managed access is legal and where communities welcome it, Rare helps local communities design the decision-making process to establish managed access. Importantly, Rare does not make decisions about who can and cannot access resources. Communities decide what plans to adopt, and local or regional governing authorities approve them, with Rare providing science-based, best practices input as the plan is developed. Most often, the approved plans limit or otherwise change parameters of use at today's legal levels and/or exclude future use in designated areas. Immediate exclusions are usually illegal actors.

> Generally, these co-developed plans are accepted. If a plan was created by a community that deviated too much from the scientifically-based options presented by Rare and its partners, Rare would cease its work in that area. Similarly, if a community was found to be noncompliant with an agreed-upon plan, then Rare would cease its work in that area.

Restricted Access is not triggered when Rare follows its regular engagement process.

Related Policy on Indigenous Peoples and Local Communities

Rare's target audience is a mix of Indigenous Peoples and Local Communities (IPLC), and in many locations where Rare works, it is hard to determine exactly which communities are indigenous. In the next version of this manual, Rare intends to build out indicators to measure how Rare follows the principle of Free Prior Informed Consent (FPIC)[1].

The terms in FPIC are as defined by the United Nations Economic and Social Council (2005):
- Free: without coercion, intimidation, or manipulation;
- Prior: before the start of any activity while also respecting indigenous consultation/ consensus processes;
- Informed: IPLC have full information about the scope and impacts of the proposed activity on their lands, resources, and well-being;
- Consent: right to say yes or no as a result of consultation and participation in good faith.

To ensure that the voices of IPLC are heard, this policy is always triggered.

Policy Requirements

Rare will endeavor to involve all stakeholders, including project-affected groups, IPLC, and local civil society organizations, as early as possible in the design/preparation process and ensure that their views and concerns are made known, considered and documented. Rare will make efforts to include stakeholder groups of historically vulnerable or marginalized people (e.g. women, youth, elders, religious/ethnic minorities). Ideally, Stakeholder Engagement should involve the public in problem-solving. The joint effort by stakeholders, in-country representatives, executing entities, and Rare ensures better results.

The SST includes a question on Stakeholder Engagement to determine whether this policy is triggered. Whether triggered or not, all Rare projects will track minimum indicators. For some donors (e.g. the GEF), Rare may be required to develop a Stakeholder Engagement Plan (SEP), which maps stakeholders and highlights how the project will engage with them.

Minimum Indicators

All Rare programs will monitor and report on the following stakeholder engagement indicators:
- Proportion of local leaders that contribute to widespread adoption of MA+R (i.e., influence community members as they adopt MA+R; influence other leaders to adopt and sustain aligned activities; and provide informed opinions and relevant experience to national authorities to influence broader policy decisions and create champions of those officials)
- Proportion of workshop attendees who were women
- Proportion of women in community that hold leadership positions in the management body
- Proportion of community members who attended reserve design participatory workshops
- Proportion of community members who feel that their interests are represented by the management body
- Proportion of management bodies with clear strategies for communicating decision

Appendix 2: Example Stakeholder Engagement Plan

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[1] Free, Prior and Informed Consent (FPIC) is a specific right that pertains to indigenous peoples and is recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It allows them to give or withhold consent to a project that may affect them or their territories.

Policy on Gender Mainstreaming

Introduction
Rare considers the respective roles of men and women in its project activities, project design and implementation, and monitoring and evaluation in order to promote and achieve gender equality and equity. This policy and its implementation mitigate potentially adverse effects on men and women and promote equality in participation and decision-making in consultative processes, access to natural resources and services, and project benefits. This policy is consistent with the Minimum Standards for Gender Mainstreaming as adhered to by a number of Rare's key development partners.

Policy Requirements
Rare staff are responsible for mainstreaming gender throughout the project as appropriate.
The SST includes a question on Gender Mainstreaming to determine whether this policy is triggered. Whether triggered or not, all Rare projects will track minimum indicators. For some donors (e.g. GEF, USAID), Rare may also be required to develop a Gender Mainstreaming Plan (GMP), which highlights how the project will address gender issues.

Minimum Indicators
All Rare programs will monitor and report on the following gender mainstreaming indicators:
- Proportion of community enterprise members who are women
- Proportion of women buyers trained to use the Our Fish app
- Proportion of workshop attendees who were women
- Proportion of community members who feel that the fisheries management body makes decisions that benefit the fishery and community
- Proportion of participants who are confident they will continue to benefit from community management of the fishery for the next 5 years.
- Proportion of community that believes they benefit equally from fishery as other households
- Proportion of government recurrent and capital spending to sectors that disproportionately benefit women, the poor and vulnerable groups

Appendix 3: Example Gender Mainstreaming Plan

Policy on Accountability and Grievance Mechanism

<u>Introduction</u>

This policy establishes a system to allow for the expression of and response to complaints related to the implementation of Rare projects. This policy is designed to:

- Address potential breaches of Rare's policies and procedures;
- Be independent, transparent, and effective;
- Be accessible to project-affected people;
- Keep complainants abreast of progress of cases brought forward; and
- Maintain records on all cases and issues brought forward for review.

Program Staff will be responsible for informing project-affected parties about the Accountability and Grievance Mechanism.

Grievances may be reported using one of the following methods:

- Confidential ethics hotline (844-280-0005 in the US or Canada, 01-800-681-5340 in Mexico, or 800-603-2869 outside of North America),
- Confidential reporting website (www.lighthouse-services.com/Rare),
- Confidential e-mail address (reports@lighthouse-services.com [must reference Rare with report]).

Appendix 4: Procedures for Accountability and Grievance Mechanism

Policy on Child Safeguarding

Introduction
Rare staff are prohibited from engaging in child abuse, exploitation, or neglect. Through careful hiring, proper training, regular communication, and transparent reporting channels, Rare systems will minimize the risk of inappropriate behavior.

Policy Requirements
Rare's Talent department engages a third-party vendor who conducts background checks for all U.S. hires to help ensure that no one is hired whose behaviors may create risks for children. Outside the U.S., a third-party vendor also conducts background checks in accordance with applicable local law.

All Rare employees are required to abide by the following Child Protection Code of Conduct:

- Always prioritize the safety and wellbeing of the child.
- Always act within professional boundaries, ensuring that contact with children is essential to the program / project / activity.
- Remember they are children first, and contributors or participants second.
- Never give out personal contact details, 'friend' or 'follow' children on social networking sites.
- Do not assume sole responsibility for a child and only take on practical caring responsibilities such as taking a child to the toilet in an emergency. If a child needs care, an employee must alert the parent or chaperone.
- Use behavior and language that is appropriate for children.
- Listen to and respect children at all times, avoiding patronization and favoritism.
- Treat children and young people fairly and without prejudice or discrimination.

Rare commits to comply with host country and local child welfare and protection legislation, international standards, and U.S. law as applicable; and to maintain an environment that prevents child abuse, exploitation, or neglect, including, but not limited to:

- Requiring all direct interactions with children be supervised by a parent, legal guardian, or other responsible adult;
- Prohibiting exposure to pornography;
- Complying with applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities of children.

If an employee becomes aware of a critical allegation that involves a violation of the laws of the country in which the incident occurs, the employee must report it to appropriate authorities. A critical allegation is an allegation whereby there may be an immediate risk to the welfare of a child should the allegation be found true.

The SST includes a question on Child Safeguarding, to determine whether a Rare project involves significant, direct interaction with children. Rare's approach includes open community events where children are present, but these events are not considered significant, direct interaction. Therefore, most often, this safeguard will not be triggered.   If the Child Safeguarding question in the SST is triggered,

then the Program Staff should consider potential risks to children that are associated with project activities. Rare's Talent department can help Program Staff design proper training for the situation.

This policy also applies to vulnerable adults, defined as persons who are 18 years of age or over, and who are or may be in need of community care services by reason of mental or other disability, age or illness and who are or may be unable to take care of themselves, or unable to protect themselves against significant harm or serious exploitation.

How to Report
Violations of the Policy on Child Safeguarding may be reported using one of these methods:

- Confidential ethics hotline (844-280-0005 in the US or Canada, 01-800-681-5340 in Mexico, or 800-603-2869 outside of North America),
- Confidential reporting website (www.lighthouse-services.com/Rare),
- Confidential email address (reports@lighthouse-services.com; reference Rare in report.)

Definitions

- Child: Person who has not attained 18 years of age.
- Child abuse, exploitation, or neglect: Constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. It includes but is not limited to: any act or failure to act that results in death, serious physical or emotional harm to a child, or an act or failure to act that presents an imminent risk of serious harm to a child.
- Physical abuse: Constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child's health or welfare, or death. Such acts may include, but are not limited to: punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.
- Sexual Abuse: Constitutes fondling a child's genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials.
- Emotional abuse or ill treatment: Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.
- Exploitation: Constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or well-being. This includes, but is not limited to, the commercial sexual exploitation of children and child labor.
- Neglect: Constitutes failure to provide for a child's basic needs within activities that are responsible for the care of a child in the absence of the child's parent or guardian.

Appendix 1: Rare Safeguard Screening Tool

The tool is shown here for explanatory purposes and is available as a separate document to be completed.

Rare follows safeguarding policies and procedures to avoid (or minimize) negative environmental and social impacts and to enhance positive impacts to the maximum extent possible. To ensure this result, environmental and social concerns must be integrated into its project design and safeguards made an intrinsic part of project management. The purpose of this tool is to provide a simple way for Rare to assess a new project and ensure that its design complies with these safeguards.

Please see the Employee Handbook for a complete understanding of Rare's policies and procedures.

Project Data
Project title: _____
Project donor: _____
Country / Countries: _____
Start date: _____ End date: _____ Length of project in months: _____

Safeguard Questions

1. **Protection of Natural Habitats**: Rare's approach is to build local capacity through training and the facilitation of decision-making processes to enable communities to make informed decisions regarding the sustainable management of their natural resources.

   Question: Is this project designed using standard Rare practices?
   a. YES: This safeguard is not triggered.
   b. NO: If there is something unusual about this project, that may cause a negative impact to the project habitat, please explain.

   _____
   _____
   _____
   _____

2. **Stakeholder Engagement**:   Because stakeholder engagement is fundamental to project success, this safeguard is always triggered. All Rare projects must track the following indicators to help understand impact over time.

   The indicators are as follows:

   a.   Proportion of local leaders that contribute to widespread adoption of MA+R (i.e., influence community members as they adopt MA+R; influence other leaders to adopt and sustain aligned activities; and provide informed opinions and relevant experience to national authorities to influence broader policy decisions and create champions of those officials)
   b.   Proportion of workshop attendees who were women
   c.   Proportion of women in community that hold leadership positions in the management body
   d.   Proportion of community members who attended reserve design participatory workshops

    e.   Proportion of community members who feel that their interests are represented by the management body

    f.   Proportion of management bodies with clear strategies for communicating decision

3. **Gender Mainstreaming**: Because gender equity is crucial to project success, this safeguard is always triggered. All Rare projects must track the following indicators to help understand impact over time. The indicators are as follows:

    a.   Proportion of community enterprise members who are women

    b.   Proportion of women buyers trained to use the Our Fish app

    c.   Proportion of workshop attendees who were women

    d.   Proportion of community members who feel that the fisheries management body makes decisions that benefit the fishery and community

    e.   Proportion of participants who are confident they will continue to benefit from community management of the fishery for the next 5 years.

    f.   Proportion of community that believes they benefit equally from fishery as other households

    g.   Proportion of government recurrent and capital spending to sectors that disproportionately benefit women, the poor and vulnerable groups

4. **Child Safeguarding:** Rare does not work directly with children. Rather, Rare holds open community events where children are present. These events are not considered significant, direct interaction.

Question: Is this project designed using standard Rare practices?

    a. YES: This safeguard is not triggered.

    b. NO: If you expect significant direct interaction with children, please explain.
           _____
           _____

Appendix 2: Stakeholder Engagement Plan

If the donor requires a Stakeholder Engagement Plan, the Program Staff, with input from the Donor Owner, must document how all stakeholders will be appropriately engaged. Stakeholders and their roles/interest will vary by project.

A list of possible stakeholders is as follows:

- Local fisher/famer and/or indigenous communities
- Cooperatives
- Aggregators and processors
- Early stage enterprises
- Last-mile distributors, retailers, hospitality community
- Business experts
- Certifiers
- Local Environmental Partners and Foundations
- Local, provincial and national public bodies
- Well-connected local individuals
- Corporate Sector
- Women's groups/cooperatives/enterprises

A completed table, with these headings, constitutes the Stakeholder Engagement Plan.

Stakeholder	Role/Interest	Project Effects on Stakeholder	Engagement during Project Implementation

Appendix 3: Gender Mainstreaming Plan

If the donor requires a Gender Mainstreaming Plan, the Program Staff, with input from the Donor Owner, must document how gender will play a role in the project and what actions will be built into the project to maximize success.

Considerations will vary by project but may include such items as:

- Will men and women have the potential to equitably enjoy benefits (real or perceived) from the project?
- Will men and women be equally engaged in relevant project activities?
- How have gender considerations been incorporated into relevant strategies and plans?

A completed table, with these headings, constitutes the Gender Mainstreaming Plan. Normally, the baseline indicators will be shown here, but its possible that other indicators may also be tracked.

Considerations	Action	Indicators

Appendix 4: Procedures for Accountability and Grievance Mechanism

Introduction

Rare's Policy on Accountability and Grievance Mechanism has established a grievance mechanism to allow for the expression of and response to complaints related to the implementation of its projects. The policy can be found at https://www.rare.org.

The grievance redress mechanism is designed to enable the receipt of complaints of affected women and men and public concerns regarding the environmental and social performance of the project. In short, the aim of the mechanism is to provide people concerned about or suffering from adverse impacts, with the opportunity to be heard and assisted. The policy is designed to address the concerns of the community(ies) with a particular project, identify the root causes of the conflicts, and find options for the resolution of grievances. Therefore, it is an essential tool to foster good cooperation with stakeholders and ensure adequate delivery of previously agreed-upon results.

Eligibility

Any community or group (defined as at least two or more people) that believes it is or may be negatively affected by a failure on the part of Rare to follow its safeguards in the design or implementation of a Rare project is considered an "Affected Party." Any Affected Party may file a complaint.

Representatives filing a complaint on behalf of an Affected Party must provide concrete evidence of authority to represent them. While anonymous complaints will not be considered, complainants can request confidentiality. Since this complaints process is oriented toward direct dialogue and engagement among all parties, there is a risk that confidentiality may limit efforts to resolve complaints, and complainants will be informed if confidentiality is impeding the process.

Complaint Filing Process

Rare has designated its Vice President, Talent as its "Project Complaints Officer" (PCO). The PCO, working closely with a Complaint Advisory Board, is responsible for ensuring that the institution executes the procedures required under this policy.

Complaints may be submitted in the Affected Party's native language. The complaint should include the following information:

- Complainant's name and contact information;
- If not filed directly by the complainant, proof that those representing the affected people have authority to do so;
- The specific project or program of concern;
- The harm that is or may be resulting from the project;
- The relevant Environmental and Social Safeguards policy or provision (if known);
- Any other relevant information or documents;
- Any actions taken so far to resolve the problem, including contacting Rare
- Proposed solutions; and
- Whether confidentiality is requested (stating reasons).

Complaint Review Process

The PCO will acknowledge receipt and—within 10 business days—assess the eligibility of the complaint and provide a response as to whether or not it is eligible, in accordance with the above criteria. The source of the complaint is treated with confidentiality, unless the complainant waives confidentiality. If the complaint is eligible, the PCO will notify the Program Staff and request a response. The Program Staff will provide a response within 10 business days with information on how it plans to look into the complaint and a time frame for this process. The PCO will communicate this information to the Affected Party. The Program Staff will then look into the matter, with technical support as needed, for example, through investigation of the issues raised and dialogue with the Affected Party (unless confidentiality is requested) and other concerned parties. Based on the results, the Program Staff will work with concerned parties to develop an action plan and time frame of steps required to resolve any issues identified. A summary of the concerns raised, actions taken, conclusions reached, follow-up plan, and time frame for completion will be documented and communicated as agreed to by the parties and provided to the PCO. (If confidentiality has been requested, the PCO will then communicate the response to the Affected Party.)

At the country level, the Program Staff is required to provide information on this policy to Affected Parties. Typically, this is provided during consultations in the design phase of the project. This requirement is established in this policy.

Non-retaliation

Rare prohibits any form of retaliation against any employee for raising or reporting a bona fide complaint under this policy or for assisting in a complaint investigation. Any employee who is found to have participated or engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination. Employees who reasonably believe that they have been victims of any such retaliation should inform the Vice President, Talent immediately.

Monitoring

Agreed-upon action plans should establish time frames for regular process monitoring toward resolution of the complaint. The PCO will coordinate the monitoring by organizing periodic checks—bringing together the concerned parties and relevant technical advisors for calls, meetings, or other communication on the status of action plans, until they are completed.

On an annual basis, the PCO will provide a report to the Program Committee of the Board.