

Governance Review

Kanjeza Gorge Hydropower Project

ASSESSMENT PREPARED BY	Meridian Environmental Partners
REGULATORY FRAMEWORK	ifc_ps_ep4
DOCUMENT SET REVIEWED	Hard mode
OBLIGATIONS IN SCOPE	15
REVIEW DATE	06 August 2026
REVIEWER	SLR Consulting (independent)

SYNTHETIC TEST DATA

Fictional geography. Demonstrates the review method; not a real assessment.

Executive summary

SLR Consulting reviewed the Kanjeza Gorge Hydropower Project assessment against ifc_ps_ep4. The review examined 15 obligations and raised **11 issues** (4 critical, 7 major), and identified **5 obligations with no supporting evidence**. On the current evidence the assessment is **not yet suitable** for disclosure; the critical issues below must be closed first.

Obligations reviewed	15	Critical issues	4
Issues raised	11	Coverage gaps	5

Issues identified

Severity	Issue and evidence	Where	Recommended action
CRITICAL	Two chapters disagree. The downstream fishery depends on 12.4 but the operating rule only commits 6.0, and nothing in the documents reconciles the two.	flow_regime.md fisheries_baselin e.md	Reconcile the two chapters on a single agreed figure and carry it into the ESMP.
CRITICAL	Someone left out of the survey. The survey frame in resettlement/household_survey.csv contains no 'downstream' records, so receptors in that category are counted nowhere.	household_surve y.csv executive_summ ary.md	Extend the survey frame to cover the omitted receptors and re-run affected counts.
CRITICAL	Mismatched measurements. Levels use 'MVD-72 (national)' while modelling uses a global geoid, combined without conversion. A 2.3 m offset between them is never applied.	flow_regime.md	Apply the datum/unit conversion and re-derive dependent quantities.
CRITICAL	A finding softened in the summary. The technical inventory establishes a critical-habitat determination, but the summary states it is not triggered.	species_inventor y.csv executive_summ ary.md	Restore the technical finding's severity in the summary.
MAJOR	A promise with no funding or owner. Commitments C-04, C-05, C-07 have no budget, indicator or owner, and no assurance elsewhere that the chain reaches the ESMP.	esmp_commitme nts.csv	Assign a budget, an indicator and an owner to every mitigation commitment.
MAJOR	Jumped to offsetting too soon. An offset or compensation measure is proposed with no record that avoidance or minimisation was considered first.	biodiversity_asse ssment.md	Document avoidance and minimisation before any offset or compensation.
MAJOR	A required source left out. A mandatory source (reservoir methane from flooded biomass) is missing from the accounting (about 41200 tCO ₂ e/yr in the ground-truth model), while the benefit side is reported.	ghg_and_climate _risk.md	Add the missing source to the accounting and restate the net position.
MAJOR	A complaint that went nowhere. Grievance GRV-004 is open and unaddressed, and the community that raised it is absent from the affected-population survey — so the concern reaches no chapter.	consultation_log. csv	Trace each open grievance to an impact chapter and a commitment.

Severity	Issue and evidence	Where	Recommended action
MAJOR	A headline number that doesn't add up. The headline figure (1840) disagrees with the underlying data (4963) by 63% and is not reconciled or footnoted.	executive_summary.md household_survey.csv	Reconcile the headline figure to the underlying data, or footnote the difference.
MAJOR	Out-of-date baseline. The baseline (February 2023) predates Cyclone Ndileka (March 2024) but is presented as current, with no caveat.	fisheries_baseline.md	Re-survey after the material event, or caveat the baseline as superseded.
MAJOR	A nearby project ignored. A reasonably foreseeable third-party scheme sharing the same receptor is absent from the cumulative-impact scope.	flow_regime.md	Bring the foreseeable third-party scheme into the cumulative assessment.

Obligation coverage

The coverage register below lists every obligation in scope. 5 obligation(s) currently have no supporting evidence — a lender's independent reviewer will ask about these first. Gaps and issues are listed at the top.

Status	Obligation	Responsible discipline	Requirement
No evidence	HYDRO-SED	hydrology and sediment	Assess sediment trapping and downstream geomorphic response over the operating life, including delta and floodplain consequences.
No evidence	EP4-P5	stakeholder engagement	Conduct Informed Consultation and Participation for Category A projects, documented and proportionate to risk.
No evidence	PS1-14	terrestrial biodiversity	Apply the mitigation hierarchy: anticipate and avoid, then minimise, then compensate or offset residual impacts.
No evidence	PS7-12	resettlement and livelihoods	Where Indigenous Peoples are affected, obtain Free, Prior and Informed Consent for relocation, critical cultural heritage or land use impacts.
No evidence	PS8-16	cultural heritage	Identify cultural heritage including graves and sacred sites, and apply chance-find procedures and consultation on removal or relocation.
ISSUE	EP4-P10	legal and regulatory	Publicly disclose the assessment documentation for a minimum of 30 days before financial close, accurately reflecting the underlying findings.
ISSUE	EP4-P2	climate and ghg	For Category A projects, assess climate change risk including a TCFD-aligned physical and transition risk assessment, an alternatives analysis for less GHG-intensive options, and reporting of scope 1
ISSUE	PS1-07	aquatic ecology and fisheries	Establish a current environmental and social baseline of sufficient detail to characterise risks and impacts, informed by recent conditions.
ISSUE	PS1-08	hydrology and sediment	Assess cumulative impacts of the project together with other existing, planned or reasonably defined developments on the same receptors.

Status	Obligation	Responsible discipline	Requirement
ISSUE	PS1-24	legal and regulatory	Establish an ESMP in which every mitigation measure has an action, a responsible party, a budget, a timeframe and a monitoring indicator.
ISSUE	PS1-35	stakeholder engagement	Operate a grievance mechanism and demonstrate that concerns raised are assessed and responded to.
ISSUE	PS4-05	dam safety and geotech	Address community health, safety and security risks, including structural safety of dams and reservoir-associated disease.
ISSUE	PS5-05	resettlement and livelihoods	Identify and compensate economic displacement, including loss of livelihood or access to resources where no physical relocation occurs, and restore livelihoods to at least pre-project levels.
ISSUE	PS6-16	terrestrial biodiversity	Determine whether critical habitat is present and, where it is, meet the no-net-loss and net-gain requirements with documented justification.
ISSUE	PS6-24	hydrology and sediment	Where the project affects a river system, sustain environmental flows adequate to maintain downstream ecosystem function and dependent uses.

Method and validation

The review applies eleven governance checks — for contradictions between chapters, survey-coverage gaps, broken commitment chains, mitigation-hierarchy skips, scope omissions, unclosed grievances, unit/datum errors, headline-figure mismatches, severity drift, out-of-date baselines and cumulative-scope omissions — each mapped to the obligation it supports.

Validation. Against a known answer key for this document set, the checks correctly identified 11 of 11 planted issues (recall 100%) with 0 false alarms (precision 100%).

SYNTHETIC TEST DATA — fictional geography. Prepared to demonstrate the governance review method. Never to be merged into, or mistaken for, a real assessment.