



ENVIRONMENTAL REVIEW DIRECTIVE

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Preamble

Section 10.1 of the *Export Development Act* requires that Export Development Canada (EDC), before entering into a transaction that is related to a project, make the determination described below.

In addition, as part of its commitment to carry out its mandate in a socially responsible manner consistent with its corporate values, EDC has an environmental policy.

General

1. For the purposes of section 10.1 of the *Export Development Act*, this Environmental Review Directive (the “directive”) sets out the process by which EDC will, before entering into a transaction that is related to a project, determine whether the project is likely to have adverse environmental effects despite the implementation of mitigation measures and, if so, whether EDC is justified in entering into the transaction.
2. The directive requires EDC to categorize relevant projects on the basis of their potential adverse environmental effects; categorization determines the nature and extent of environmental information that will be required by EDC in conducting its environmental review of the project, as well as the extent of that review.
3. Where the directive requires that EDC conduct an environmental review of a project, EDC will use international standards as benchmarks. The directive establishes grounds upon which EDC is justified in entering into a transaction related to a project where that project, despite the implementation of mitigation measures, is likely to have adverse environmental effects.
4. The directive also prescribes those projects in respect of which EDC is not required to conduct an environmental review, and sets out exceptions to the obligation to make the determination referred to above. Finally, the directive provides, in Annex 1, definitions of various terms used herein.

Scope

5. This directive applies in all instances in which EDC is considering exercising its powers under section 10 or 23 of the *Export Development Act* by entering into a transaction that has, as applicable, a repayment term or coverage period of two years or more and a value of more than SDR 10 million and that is related to a project. A transaction is related to a project if, in EDC’s opinion, it is: (i) in respect of goods or services purchased or to be purchased (or with respect to which rights of use are otherwise acquired), by a project sponsor, project company or an entity with prime responsibility for project design, development and construction, for use in a particular identified project; (ii) an equity

transaction in respect of a particular identified project or a political risk insurance transaction in respect of a particular identified project (other than a political risk insurance transaction referred to in clause (iii)); (iii) a political risk insurance transaction or financing transaction in respect of a) an equity investment or loan made by or on behalf of a project sponsor in or to a particular identified project or, b) a loan to a project company or to a project sponsor in respect of a particular identified project; or (iv) entered into by EDC solely for the purpose of promoting procurement of Canadian goods or services by a project sponsor, project company or other entity with prime responsibility for project design, development and construction, for use in a particular identified project;

provided, however, that a transaction is not related to a project if EDC enters into it for purposes one of which is (a) to support the purchase of Canadian goods or services that will not be used in a particular identified project, or (b) to support or develop Canadian capacity (1) to engage in Canada's export trade other than by means of a particular identified project, or (2) to respond to an international business opportunity other than a particular identified project, or (c) to promote procurement of Canadian goods or services that will not be used in a particular identified project.

Categorization

6. In respect of each transaction to which this directive applies, EDC will categorize the related project on the basis of the extent of the project's potential adverse environmental effects, which categorization will determine the nature and extent of environmental information that will be required by EDC in conducting its environmental review of the project, as well as the extent of that review. EDC's categorization of a project into one of the following three categories will reflect EDC's evaluation of the most appropriate category for the project in question. Where an international financial institution (IFI) has categorized a project, EDC may take into account such categorization in EDC's own categorization of such project. Where EDC determines that its categorization of any project is inappropriate, EDC will re-categorize the project.

Category A

7. EDC will categorize a project in Category A if EDC considers that the project is likely to have significant adverse environmental effects that are sensitive, diverse, or unprecedented. These effects may affect an area broader than the sites or facilities subject to the physical works, and may be irreversible. For illustrative purposes only, Annex 2 provides a list of projects and sensitive sectors and areas that will generally be considered by EDC, for the purposes of categorization, to be Category A projects.
8. The environmental impact assessment for a Category A project should address the content outlined in Annex 3, and while normally in the form of an environmental impact assessment (EIA), may be comprised of or supplemented by other environmental assessment (EA) instruments including any of those referred to in Annex 4.

9. EDC expects that for each Category A project public consultations with affected parties, if any, will be held in the host country, and that the results of these consultations will have been taken into account in the environmental assessment of the project. EDC's expectations regarding the nature, scope and extent of public consultation will take into account the political, legal, and cultural context of the host country.

Category B

10. EDC will categorize a project in Category B if EDC considers that the project's potential environmental effects are less adverse than the potential environmental effects of Category A projects. Environmental effects associated with Category B projects are usually site-specific; few if any are irreversible; and in most cases mitigation measures can be designed more readily than for Category A projects. For illustrative purposes only, Annex 5 provides a list of sectors and projects that will generally be considered by EDC, for the purposes of categorization, to be Category B projects.
11. The scope of environmental assessment for a Category B project may vary from project to project, and is more narrow than that of an EA for a Category A project.

Category C

12. EDC will categorize a project in Category C if EDC considers that the project is likely to have minimal or no adverse environmental effects. Generally, no environmental assessment is required for Category C projects. Examples of Category C projects may include: injection molding equipment; office and retail buildings; telecommunications or electrical equipment without greenfield infrastructure; transportation services and equipment.

Environmental Review Information Requirements

13. The information EDC will require in connection with its environmental review of a project will vary depending upon the category into which the project has been classified by EDC.
14. In all cases, the submission to EDC of existing documentation is encouraged to improve the efficiency of the review process and minimize duplication of effort. Where an environmental analysis of a project has been conducted by an IFI, EDC may consider such IFI's environmental analysis of the project in conducting its own review.
15. Where a project is located in any of Canada, France, Germany, Italy, Japan, the United Kingdom or the United States of America and EDC is satisfied that the project has been designed in compliance with host country environmental requirements, EDC may determine that it requires no additional environmental information in respect of the project beyond that required for categorization.

16. Where EDC determines that it is unable to obtain sufficient environmental assessment information to conduct its environmental review of a project, EDC will decline to enter into a transaction related to such project.

Category A projects

17. For Category A projects, EDC will require a copy of the EIA report (or comparable EA instrument reports) or elements thereof in order to assist EDC in identifying and assessing potential adverse environmental effects associated with the project.
18. If the environmental assessment for a Category A project has been completed by an employee(s) of the project sponsor or project company, or an employee(s) of any affiliate thereof, EDC will require, prior to the time it enters into a transaction related to the project, that independent expertise acceptable to EDC be engaged to review such environmental assessment for potentially significant problems in the analysis.

Category B projects

19. Environmental information provided to EDC for the purposes of an environmental review of a Category B project may be in the form of EA instrument reports or elements thereof and should examine the project's potential negative and positive environmental impacts including measures to prevent, minimize or compensate for adverse impacts and improve environmental performance.

Category C projects

20. No environmental assessment information is required by EDC in respect of a Category C project, except as may be required by EDC to categorize the project.

Evaluation and Decision

21. In conducting environmental reviews, EDC will benchmark projects against one or more relevant environmental standards and guidelines published by the World Bank Group, the European Bank for Reconstruction and Development, the Asian Development Bank, the African Development Bank and the Inter-American Development Bank, any applicable safeguard policies published by the World Bank Group, or any higher international recognized environmental standards such as European Community standards. EDC will require any adverse gaps EDC identifies between the standards to which the project has been designed and the international standards selected by EDC to be explained to EDC's satisfaction.
22. In addition, the environmental assessment information provided will demonstrate, to EDC's satisfaction, that the project in respect of which EDC is conducting a review has been designed to comply with host country environmental requirements, such as any

applicable provisions for local consultation, licenses, permits and other regulatory approvals.

23. On the basis of its environmental review, EDC will come to a conclusion as to whether or not a project is likely to have adverse environmental effects despite the implementation of mitigation measures. In the event that EDC has completed its environmental review and is of the view that a project is likely to have adverse environmental effects despite the implementation of mitigation measures, EDC will determine whether, despite these effects, EDC is justified in entering into a transaction in respect of such project.
24. Grounds which in EDC's view justify providing support to a project that has adverse environmental effects despite mitigation measures include:
 - the adverse environmental effects, taking into account mitigation measures, associated with the project are not in EDC's view significant;
 - EDC's satisfaction that the project is designed to meet or exceed internationally recognized good practices, guidelines or standards;
 - the project represents an opportunity to improve environmental conditions in the host country above base-line conditions; or
 - the project provides the opportunity to transfer environmentally sound technologies, services and knowledge to, or for the benefit of, the host country.
25. Where EDC determines that it is justified in entering into a transaction related to a project that is likely to have adverse environmental effects despite the implementation of mitigation measures, EDC may (but need not) enter into the transaction.
26. Where EDC determines that it is not justified in entering into a transaction related to a project that is likely to have adverse environmental effects despite the implementation of mitigation measures, EDC will decline to enter into the transaction.

Covenants and Monitoring

27. Compliance by a project with host country laws and regulations will normally be confirmed through warranties and representations.
28. Where EDC imposes conditions upon its support to a project which require monitoring, EDC will ensure procedures are in place to: (i) conduct such monitoring, and (ii) take such action as it deems appropriate in the event of non-compliance with such conditions.

Exceptions

29. Notwithstanding anything else herein, EDC shall not be required to make a determination for the purposes of section 10.1 of the *Export Development Act* in respect of:

- a) any transaction related to a project that is in support of a review or study in connection therewith, such as an environmental, or feasibility study or preliminary design work;
 - b) any transaction related to a Category C project;
 - c) any transaction related to a Category A or B project which is located in Canada, France, Germany, Italy, Japan, the United Kingdom or the United States of America, where EDC is satisfied that the project has been designed in compliance with applicable host country environmental requirements; or
 - d) any transaction related to a project in respect of which project EDC has previously made a determination under this directive where: (1) EDC is satisfied that the project scope and design have not changed in any material respect since the time of such determination and (2) EDC's procedures in place with respect to such project do not indicate non-compliance in any material respect with any environmental covenants imposed on such project by EDC.
30. Transactions related to projects described in 29 a) and d) above are entirely exempt from the application of this directive. EDC will categorize projects referred to under 29 b) and c) above in accordance with this directive, but EDC is not required to make a determination in respect of same.

Effective Date

31. This amended directive shall come into effect on November 2, 2005 and shall replace the directive which came into effect on May 1, 2002.
32. A categorization or determination made under the provisions of the directive which came into effect on May 1, 2002, as those provisions read immediately before the coming into effect of this amended directive, are deemed to be a categorization or determination (as applicable) under this amended directive.

Annex 1 – Definitions

Definitions

The following terms shall have the meanings ascribed thereto below when used in this directive:

“adverse environmental effect” means any harmful environmental effect;

“affected parties” means those parties living at or near the site of the project, indigenous groups with an interest in project land, project sponsors and local non-governmental or public sector organizations participating in the local public consultation process;

“considering”, in relation to a transaction and for the purposes only of the Scope of this directive, means that EDC is prepared, but for the application of the directive, to enter into the transaction;

“coverage period” means the time period starting from the day that insurance coverage provided under a policy issued by EDC in a political risk insurance transaction commences to apply through to and including the date upon which such coverage would normally be expected to terminate in accordance with the terms of such policy;

“enter”, in relation to a transaction related to a project, means, in respect of financings or equity, the point of time at which EDC first becomes unconditionally legally obligated to provide funds to its transaction counterparty, or, in respect of guarantees, at which all conditions to effectiveness have been met or, in respect of political risk insurance, at which EDC’s coverage commences to apply or the amount of such coverage is increased;

“environment” means land, water, air, living organisms and interacting natural systems;

“environmental assessment” or **“EA”** means the process of assessing the environmental effects and project-related social impacts of a project in order to evaluate their significance, and may include identifying measures to prevent, minimize, mitigate or compensate for adverse environmental effects. Environmental assessment is the responsibility of the project sponsor;

“environmental assessment instruments” or **“EA instruments”** are tools used to assess the environmental effects and project-related social impacts of a project in order to evaluate their significance, which may also identify measures to prevent, minimize, mitigate or compensate for adverse environmental effects; EA instruments include EIAs and other instruments described in Annex 4;

“environmental effect” means any change to the environment, including any project-related social impact, as a result of the normal construction or operation of the project, or in the event of a reasonably foreseeable accident or malfunction in relation to the project;

“environmental impact assessment” or **“EIA”** means an EA instrument to identify and assess the potential environmental effects of a project, evaluate alternatives, and design mitigation, management and monitoring measures;

“environmental impact assessment report” or **“EIA report”** means the document or documents which describe the processes, findings and conclusions of the EIA;

“environmental review” means the review by or for EDC of the environmental assessment of a project;

“equity transaction” means the acquisition by EDC, other than by way of the taking or realization of security or recovery, of an interest in an entity in the exercise of its powers under subsection 10(1.1) of the *Export Development Act*;

“Export Development Act” means the Export Development Act (R.S.C. 1985, c. E-20), as amended from time to time;

“financing transaction” means a loan, any facility whereby EDC purchases receivables whether or not such receivables are evidenced by debt instruments, lease or financing guarantee entered into by EDC pursuant to EDC’s financing program;

“greenfield” means, in relation to a project, developed on a previously undeveloped site or location;

“host country” means the nation in which a project is located;

“IFI” means a recognized international financial institution whose environmental procedures are acceptable to EDC;

“international standards” means the internationally recognized good practices, standards and guidelines with respect to project design and performance that EDC will rely upon as benchmarks in undertaking its environmental review of a project;

“major extension” means, in relation to a project, additions or modifications intended to result in a substantial change in output or functionality;

“mitigation measures” means methods to reduce, eliminate or compensate for adverse environmental effects;

“particular identified project” means a project or projects which are occurring or planned at the time EDC enters into the transaction and which EDC intends specifically to support;

“political risk insurance transaction” means political risk insurance coverage provided by EDC to protect against political risks such as foreign exchange transfer difficulties, expropriation by a host government, or war, revolution, and insurrection;

“project” means a physical development that is or will be greenfield, or a major extension or transformation-conversion thereof, and which in each case is planned or occurring and is industrial-, commercial- or infrastructure-related in nature;

“project-related social impact” means any instance of involuntary resettlement or any other adverse change that the project imposes on indigenous or vulnerable groups or on cultural heritage;

“project company” means an entity owned in whole or in part by a project sponsor and established for the purpose of the design, development, construction or operation of a particular identified project;

“project sponsor” means an entity owning, either directly or through an ownership interest in a project company, the assets of a project;

“repayment term” shall have the meaning given that term in section 8 of the Arrangement on Guidelines for Officially Supported Export Credits;

“SDR” means Special Drawing Rights, an artificial currency unit defined as a basket of national currencies established by the International Monetary Fund;

“transformation/conversion” means, in relation to a project, reuse on a previously developed site or a modernization intended to result in a substantial change in output or functionality;

“transaction” means EDC’s support of a project in the form of a financing transaction, political risk insurance transaction or equity transaction, or any combination thereof which support is provided by EDC directly (or indirectly through a financial intermediary) to a project sponsor, project company or other entity with prime responsibility for project design, development and construction;

“World Bank Group” means the group of associated institutions that includes the International Bank for Reconstruction and Development, International Finance Corporation, Multilateral Investment Guarantee Agency, International Development Association and International Centre for Settlement of Investment Disputes.

Annex 2 – Illustrative List of Category A Projects and Sensitive Sectors and Areas

The following list¹ is indicative and the types of projects it contains are examples only.

"A" level projects

This list applies to "greenfield" or major extension projects in the categories listed below.

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 with a heat output of 300 megawatts or more 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; installations for the production of non-ferrous metals 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 utilization of more than 200 tonnes per year.
6. Integrated chemical installations, i.e. those installations for the manufacture on an industrial scale of substances using chemical conversion processes, in which several units are juxtaposed and are functionally linked to one another and which are for the production of: basic organic chemicals; basic inorganic chemicals; phosphorous-, nitrogen- or potassium-based fertilizers (simple or compound fertilizers); basic plant health products and of biocides; basic pharmaceutical products using a chemical or biological process; explosives.
7. Construction of motorways, express roads and lines for long-distance railway traffic and of airports with a basic runway length of 2,100 metres or more; construction of a new road of

¹ The source is the revised Environmental Policy of the European Bank for Reconstruction and Development applicable as of April 29, 2003 (<http://www.ebrd.org/enviro/index.htm>).

four or more lanes, or realignment and/or widening of an existing road so as to provide four or more lanes, where such new road, or realigned and/or widened section of road would be 10 km or more in a continuous length.

8. Pipelines, terminals, and associated facilities for the large-scale transport of gas, oil, and chemicals.
9. 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.
10. Waste-processing and disposal installations for the incineration, chemical treatment or landfill of hazardous, toxic or dangerous wastes.
11. Large² dams and other impoundments designed for the holding back or permanent storage of water.
12. 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.
13. Industrial plants for the (a) production of pulp from timber or similar fibrous materials; (b) production of paper and board with a production capacity exceeding 200 air-dried metric tonnes per day.
14. Peat extraction, quarries and open-cast mining, and processing of metal ores or coal.
15. Extraction of petroleum and natural gas for commercial purposes.
16. Installations for storage of petroleum, petrochemical, or chemical products with a capacity of 200,000 tonnes or more.
17. Large-scale logging.
18. Municipal waste-water treatment plants with a capacity exceeding 150,000 population equivalent.
19. Municipal solid waste-processing and disposal facilities.
20. Large-scale tourism and retail development.

² As per the definition of the International Commission on Large Dams (ICOLD). ICOLD defines a large dam as a dam with a height of 15 m or more from the foundation. Dams that are between 5m and 15m high and have a reservoir volume of more than 3 million m³ are also classified as large dams.

21. Construction of overhead electrical power lines.
22. Large-scale land reclamation.
23. Large-scale primary agriculture/silviculture involving intensification or conversion of natural habitats.
24. Plants for the tanning of hides and skins where the treatment capacity exceeds 12 tons of finished products per day.
25. Installations for the intensive rearing of poultry or pigs with more than: 40,000 places for poultry; 2,000 places for production pigs (over 30 kg); or 750 places for sows.
26. Projects which are planned to be carried out in sensitive locations or are likely to have a perceptible impact on such locations, even if the project category does not appear in the above list. Such sensitive locations include National Parks and other protected areas identified by national or international law, and other sensitive locations of international, national or regional importance, such as wetlands, forests with high biodiversity value, areas of archaeological or cultural significance, and areas of importance for indigenous peoples or other vulnerable groups.

The preceding list is clearly non-exhaustive and the types of projects it contains are examples only.

Annex 3 – Illustrative Environmental Impact Assessment Report

An EIA's scope and level of detail should be commensurate with the project's potential impacts. The EIA report should include the following items (not necessarily in the order shown):

- Executive Summary: concisely discusses significant findings and recommended actions.
- Policy, legal and administrative framework: discusses the policy, legal, and administrative framework within which the EIA is carried out.
- Project description: describes the proposed project and its geographic, ecological, social, and temporal context, including any offsite investments that may be required (e.g.: dedicated pipelines, access roads, power plants, water supply, housing, and raw material and product storage facilities). Indicates the need for any resettlement or social development plan. Normally includes a map showing the project site and the project's area of influence.
- Baseline data: assesses the dimensions of the study area and describes relevant physical, biological, and socio-economic conditions, including any changes anticipated before the project commences. Also takes into account 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 mitigatory measures. The section indicates accuracy, reliability and sources of the data.
- Environmental Impacts: predicts and assesses the project's likely positive and negative impacts, in quantitative terms to the extent possible. Identifies mitigation measures and any residual negative impacts that cannot be mitigated. Explores opportunities for environmental enhancement. Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions, and specifies topics that do not require further attention.
- Analysis of alternatives: systematically compares feasible alternatives to the proposed project site, technology, design and operation including the "without project" situation in terms of their potential environmental impacts; the feasibility of mitigating these impacts; their capital and recurrent costs, their suitability under the local conditions; and their institutional, training and monitoring requirements. For each of the alternatives, quantifies the environmental impacts to the extent possible, and attaches economic values where feasible. States the basis for selecting the particular project design proposed and justifies recommended emission levels and approaches to pollution prevention and abatement.
- Environmental Management Plan: describes mitigation, monitoring and institutional measures to be taken during construction and operation to eliminate adverse impacts, offset them, or reduce them to acceptable levels.
- Consultation: Record of consultation meetings, including consultations for obtaining the informed views of the affected people, local non-governmental organizations and regulatory agencies.

Annex 4 – Other Environmental Assessment Instruments

Other Environmental Assessment Instruments

“environmental audit” means an instrument to determine the nature and extent of all environmental areas of concern at an existing facility. The audit identifies and justifies appropriate measures to mitigate the areas of concern, estimates the cost of the measures, and recommends a schedule for implementing them. For certain projects, the EA report may consist of an environmental audit alone; in other cases, the audit is part of the EA documentation;

“environmental management plan” (EMP) means an instrument that details (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental effects, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures. The EMP is an integral part of Category A EAs (irrespective of other instruments used). EAs for Category B projects may also result in an EMP;

“hazard assessment” means an instrument for identifying, analyzing, and controlling hazards associated with the presence of dangerous materials and conditions at a project site;

“environmental risk assessment” means an instrument for estimating the probability of harm occurring from the presence of dangerous conditions or materials at a project site;

“corrective action plan” (CAP) means an instrument which, in the case of existing operations, plant modernizations, privatizations and corporate investment programs, may be required to address remediation or corrective action to bring facilities into compliance with international standards. The CAP should also provide details of an implementation schedule and costs;

“resettlement action plan” (RAP) is an instrument specifying the procedures to be followed and actions to be taken by a project sponsor or other responsible entity to mitigate adverse effects, compensate losses, and provide development benefits to persons and communities affected by a project;

“permit” means an instrument consisting of a permit, license or authorization issued in connection with a project by authorities the standards of which are satisfactory to EDC, provided that the permit is only used as an EA instrument in association with an existing EIA report for a project.

Annex 5 – Illustrative List of Category B Projects

Examples of projects categorized by EDC as Category B projects may include:

- Agri-industry and aquaculture
- Housing and real estate
- Irrigation, rural water supply, and sanitation projects
- General manufacturing
- Manufacture of structural iron and steel products
- Textiles
- Electrical transmission and distribution
- Tourism (including hotels)
- Automotive plant conversion
- Thermal power stations with capacities less than 300 MWt (~140 MWe)

(provided the above are not in or near sensitive areas)