



## Gap Resolution Report

**Project Name:** Cahora Bassa South Bank HPP

**Installed Capacity:** 2 075 MW

**Country:** Mozambique



**Project Sponsor:** Hidroeléctrica de Cahora Bassa

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Assessment overview	<p>The Cahora Bassa South Bank HPP underwent an assessment in 05-2025 using the Hydropower Sustainability Standard (HSS). The assessment identified a total of 2 significant gaps against the Minimum Requirements of HSS.</p> <p>Hidroeléctrica de Cahora Bassa has worked to address these gaps since the draft assessment report was delivered on 17 July 2025, using the designated timeframe available to address gaps under the <a href="#">HS Assurance System</a>.</p> <p>This report presents the Accredited Lead Assessor’s assessment of whether the gaps have been closed, conducted immediately following the designated timeframe in January-February 2026. Findings are presented below according to the actions and indicators of achievement set out in the July 2025 assessment report.</p> <p><b>This shows that all minimum-level and some advanced-level gaps have been closed. The final assessment report has been revised, with a recommendation of silver certification.</b></p>
Purpose of Gap Resolution Report	<p>In accordance with the HS Assurance System, the Gap Resolution Report documents the resolution of gaps identified during the on-site assessment. Project Proponents have eight months to implement the Minimum Requirements Action Plan and close all gaps. If unresolved, a new assessment is required. If resolved, the Accredited Assessor verifies the corrective actions and submits the revised Preliminary Assessment Report and Gap Resolution Report to the HS Secretariat within ten months of the on-site assessment.</p> <p>The HS Secretariat processes the reports and supporting evidence, initiating the public comment period within 12 months of the on-site assessment. The Gap Resolution Report is published online alongside the Initial Assessment Report, after which Project Proponents may apply for HS certification.</p> <p>This report represents compliance with Section 3.4 of the <a href="#">HS Assurance System</a>.</p>
Revised assessment report	<p>The revised assessment report can be found on the HSA website <a href="http://www.hs-alliance.org">www.hs-alliance.org</a>. This gap resolution report will be published online alongside the revised assessment report.</p>
Layout of Gap Resolution Report	<p>The Gap Resolution Report provides a comprehensive summary of the significant gaps identified during the May 2025 assessment, the corrective actions undertaken by the Project Proponent, and the Accredited Lead Assessor’s evaluation of whether these gaps have been effectively resolved.</p>

# Gap Resolution Findings

## Minimum Requirements

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
4	There is no External Emergency Response Plan and emergency drills/simulations are not implemented regularly and lack a planned schedule for their implementation.	Develop the External Emergency Response Plan in collaboration with INGD, including a provision for regular emergency drills/simulations based on international good practice. Create and approve internally a routine for emergency drills/simulations to be added to the Internal Emergency Response Plan based on international good practice.	HCB	The contracting of a consultant to implement the EERP and an Inception Report from this assignment will be necessary before this gap can be removed. The draft content must include provisions for regular emergency simulations/drills (for both internal and external plans).	HCB developed a Request For proposal including the Terms of Reference for the procurement of the consulting company that will implement the EERP, the correspondent Board Approval, and the contract is signed by both parties. The scope of the work specifies maintenance plans for warning and alert systems, including simulation exercises. The work is expected to be completed in 10 months. The gap is on track to be resolved.	✓
10	The existing G-Res Tool Assessment is not publicly disclosed	Disclose the existing G-Res Tool report.	HCB	Disclosure of the existing G-Res Tool report (prominently on HCB's website).	G-Res Tool report was made available on HCB's website under the "News" tab, and as such it may lose visibility over time. One would expect a greater visibility for such an important document, it should absolutely be posted permanently under the "Sustainability" tab. This downplaying of the evidence is considered a non-significant gap, but one which HCB is strongly encouraged to address.	✓

## Advanced Requirements

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
1	Risk and information management is reactive and report-driven, with no live risk register, delayed reporting, and limited use of data in operational decision-making.	Establish a live risk register, including corrective actions. Strengthen data integration so it can be used for operational decision-making. Use the system to ensure timely reporting, issue escalation, and feedback into strategic planning. The tool should be integrated into day-to-day operations.	HCB	Live risk register in place and actively used by the environmental and social departments, with regular updates, shared access, and integration into operational decision-making (evidence from e.g. planning meetings, action logs, or dashboard reviews).	No attempt to close gap.	×
1	Similar to gaps under Section 6 - the Biodiversity Action Plan (BAP) is still in a stage of very early implementation after many years.	Implement BAP, particularly the actions for which HCB is responsible, and integrate those actions in the ESMS management system.	HCB	BAP implementation on track.	No attempt to close gap.	×

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
1	Delays on long-standing E&S commitments and multiple audit-identified improvements, highlighting the need to strengthen ESMS implementation and follow-up.	Integrate existing ESMS processes (e.g. follow-up on commitments, audit findings, and environmental monitoring) into day-to-day operational management. This should be supported by a centralised IMS platform that ensures shared access, version control, and systematic tracking of E&S information, risks, and actions.	HCB	E&S commitments and audit findings are tracked and delivered using the centralised platform. Actions are reviewed regularly as part of management routines, with evidence of progress, updates, and issue resolution.  % of open E&S commitments with documented progress updates	No attempt to close gap.	×
2, 9	Remediation trackers show pending actions from 2024, with inconsistencies in document control. Records often lack key metadata (e.g. dates, signatories, responsible units). Compliance processes remain manual and fragmented, with no centralised system in place and the assessment team was unable to meet with any contractors to verify their processes.	Establish a centralised compliance and remediation tracking system and ensure timely follow-up of outstanding actions, with clear responsibilities, deadlines, and progress monitoring.  Standardise document management procedures to ensure all records include key metadata (e.g. dates, signatories,	HCB	All remediation actions from 2024 onwards tracked in centralised system, with progress status and assigned responsibility.  Audit or management review confirms system-wide adoption of new compliance and document control processes.  Certification against ISO 37301.	No attempt to close gap.	×

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
		responsible units) and implement a digital document control system to replace fragmented processes.  Finalise certification against ISO 37301.				
3	The lack of regular monitoring of sediment inflow to, and sedimentation in, the reservoir.	The regular re-assessments of reservoir sedimentation recommended in the 2017 bathymetric report should be implemented, possibly with longer intervals than suggested though.	HCB	Periodic re-assessment of reservoir sedimentation (at a minimum every 10 years, next one latest by 2027).	No attempt to close gap.	×

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
3	The project does not contribute to addressing water-quality issues beyond those impacts caused by the operating hydropower facility.	The only realistic option open to the project for resolving this is to address the point-source pollution from the commercial aquaculture operations on the reservoir. This is, however, likely not an efficient use of resources, which are better spent in other areas.	N/A	N/A	No attempt to close gap.	×
3	There are no processes in place to anticipate and respond to emerging public-health risks and opportunities.	A comprehensive assessment of options for the anticipation and response to public-health risks.	HCB, via expert consultants.	A report by public-health experts outlining options to be considered by HCB.	No attempt to close gap.	×

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
4	There are no processes in place to anticipate and respond to emerging public-health risks and opportunities.	A comprehensive assessment of options for the anticipation and response to public-health risks.	HCB, via expert consultants.	A report by public-health experts outlining options to be considered by HCB.	No attempt to close gap.	×
4	Safety risks have not been avoided, minimised and mitigated without identified gaps.	Develop the External Emergency Response Plan and revise the Internal Emergency Response Plan including regular emergency simulations/drills.	HCN	Formal approval of the External Emergency Response Plan and revised Internal Emergency Response Plan including regular emergency simulations/drills.	No attempt to close gap.	×

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
4	Safety issues have not been addressed beyond those risks caused by the operating facility itself.	See above.	See above.	See above.	No attempt to close gap.	×
6	There is unsatisfactory evidence of ongoing monitoring and follow-up on the BAP at the time of the assessment, this also contributes to the project not being able to demonstrate contributions to biodiversity over and above its own impacts.	Adopt an overarching vision of what HCB wants to achieve with its Biodiversity Action Plan.	HCB	Periodic re-assessment of the biodiversity-related targets and goals including monitoring of the BAP with clear progress indicators.	The first of the two requirements constituting one “not-met” assessment in the original Preliminary Assessment Report is closed by the combination of HCB’s Environmental Policy and the biodiversity assessment and associated BAP from 2022. In combination these demonstrate ambitions and processes to respond to emerging risks and opportunities. Progress and updates to this work is reported on in the bi-annual Environmental Performance Reports.	✓

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
	There is unsatisfactory evidence of ongoing monitoring and follow-up on the BAP at the time of the assessment, this also contributes to the project not being able to demonstrate contributions to biodiversity over and above its own impacts.	Implement the actions of the BAP and monitor the outcomes.	HCB	Periodic re-assessment of the biodiversity-related targets and goals including monitoring of the BAP with clear progress indicators.	There was no attempt to close the second half of the original lack of requirement fulfilment. Hence this one remains.	×
6	Several ecosystems affected by the hydropower facility that are not in a healthy state.	The issue of the Marromeu Delta is not practical to resolve since the present flow regime is based on a balanced priority set by the government.  The Mágoè National Park issue will be covered by actions recommended for the assessment / monitoring gaps above.	HCB	Not solvable.  See box above.	No attempt to close gap.	×

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
6	Commitment that no illegal logging and poaching takes place in a 250-metre buffer zone from the reservoir FSL.	Not practical to resolve since it is a commitment that remains from the colonial era with almost no possibility to enforce.	N/A	N/A	No attempt to close gap.	×
9	Risk updates across departments are not regular nor systematic, and integration into a central risk system is incomplete. The approved Risk and Audit Committee is not yet active, limiting independent oversight and institutional consolidation.	Complete the implementation of the central risk management system and require regular, cross-departmental risk updates aligned with governance cycles.  Operationalise the Risk and Audit Committee to strengthen independent oversight.	HCB	Central risk system and live risk register operational and regularly updated by all departments  % of departments submitting quarterly risk updates to the central system  Risk and Audit Committee fully operational and providing documented oversight of corporate risk processes.	No attempt to close gap.	×

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
9	Sustainability and anti-corruption criteria are not systematically applied during supplier pre-qualification.	<p>Bidders to required to sign acceptance of HCB’s existing Supplier Code of Ethics and Conduct at the pre-qualification stage.</p> <p>Update the Supplier Code of Ethics and Conduct to explicitly reinforce environmental and social dimensions, aligning with HCB’s sustainability goals and international best practices.</p> <p>Expand the existing supplier evaluation checklist to include sustainability objectives and ESG performance, not only technical compliance with contract specifications.</p>	HCB	<p>% of tender processes requiring signed acceptance of HCB’s Code of Ethics and Conduct at proposal stage.</p> <p>Supplier evaluation checklist includes ESG indicators and is used during both contracting and post-award monitoring.</p>	<p>Progress is confirmed. HCB has strengthened its procurement framework by amending the procurement processes to include anti-corruption measures and to specify sustainability and anti-corruption criteria at the supplier pre-qualification stage. This is reflected in the Procurement Manual, which incorporates integrity, compliance, and eligibility requirements for supplier screening, and is supported by the Anti-Corruption Policy establishing preventive controls applicable prior to contract award. These recent updates address the design of the procurement management framework in line with the requirement. The requirement is therefore considered on track to be met.</p>	✓

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
9	The existing corporate obligations matrix ( <i>Mapa de Avaliação de Conformidade Legal</i> ) lacks compliance status, verification, and supporting evidence.	Implement the Legal Compliance Assessment Procedure (PRO-GAR-013), including the development of a centralised and verifiable compliance register.	HCB	Legal Compliance Procedure approved and operational, with a central register and management system populated with compliance status, responsibilities, and evidence.	The compliance framework design has improved. The new evidence confirms that HCB has adopted a formal Compliance Policy and related procedures assigning responsibilities, defining compliance obligations, and establishing internal controls and reporting lines. However, organisation-wide compliance assurance at advanced level was not demonstrated, as no evidence was provided of a centralised and verifiable corporate compliance register covering all applicable legal and regulatory obligations, including compliance status, responsible owners, and verification records. As a result, this requirement is not met.	×
9	Key governance measures remain unresolved, including the activation of the Risk and Audit Committee, and the centralised compliance system foreseen in the 2018–2022 Strategic Plan. Some historical audit findings, such as cost appropriation adjustments, also remain unresolved.	Ensure timely implementation of governance actions already highlighted above and in progress.  Review and close outstanding audit findings, including those considered non-material, to demonstrate follow-through on past recommendations and reinforce institutional credibility.	HCB	The Risk and Audit Committee fully operational and providing documented oversight of corporate risk processes.  Legal Compliance Procedure approved and operational, with a central register and management system populated with compliance status, responsibilities, and evidence.  All pending audit findings reviewed and formally closed, with documented evidence.	No attempt to close gap.	×

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
10	The stakeholder map lacks detail in some areas.	Address all blanks and complete the stakeholder map with all contact information	HCB	A complete stakeholder map, to be updated as indicated in the procedures.	No attempt to close gap.	×
10	The HCB public web site is only in the Portuguese language, in spite of significant stakeholders not being Portuguese-speaking, and the web site is difficult to navigate.	Improve the web site to make it easier to navigate and include, at a minimum, key communication in the English language, including significant documents of interest to stakeholders.	HCB	An improved web site, addressing the actions as described to the left.	No attempt to close gap.	×
10	The Climate-Resilience Assessment (CRA) implemented for the project is not publicly disclosed.	Disclose the Climate-Resilience Assessment (CRA) implemented for the project.	HCB	Disclosure of the Climate-Resilience Assessment (CRA) implemented for the project (e.g. on HCB's website).	The CRA report was made available on HCB's website under the "News" tab, and as such it may lose visibility over time. One would expect a greater visibility for such an important document, it should absolutely be posted permanently under the "Sustainability" tab. We consider the requirement as met by the publication, but HCB is strongly encouraged to move the report to the Sustainability tab on its web site.	✓

Environmental and Social Action Plan, July 2025					Gap Resolution Assessment, February 2026	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
11	Identification of risks and opportunities relating to downstream-flow regimes is not well covered.	A comprehensive assessment of options for improved downstream flows, analysing the environmental, social and economic priorities to arrive at a scientifically proven regime.	HCB, via expert consultants.	A report by downstream-flow experts outlining flow-regime options to be considered by HCB with specific attention to trade-offs between environmental, social and economic priorities.	No attempt to close gap.	×
11	There are no commitments to downstream flows and no measures to monitor such flows.	See above.	See above.	See above.	No attempt to close gap.	×
12	There is no site-specific assessment of reservoir emissions demonstrating clear compliance with the < 100 gCO <sub>2</sub> e/kWh requirement.	Bluemethane completes the site-specific assessment, resulting in < 100 gCO <sub>2</sub> e/kWh and/or HCB commissions an updated G-Res Tool study for the project with the inclusion of the North Bank extension.	HCB	Clear, publicly available, documents demonstrating specific emissions < 100 gCO <sub>2</sub> e/kWh.	No attempt to close gap.	×
12	The project is not demonstrated to be resilient under a broad range of scenarios	Implement the North Bank extension and/or other actions such as a large solar-PV installation, which would enhance the resilience of HCB to a climate-changed future.	HCB	The start of CBN project implementation or other effective measure.	No attempt to close gap.	×