

A black and white photograph of a large garment factory. In the foreground, a woman with dark hair in a ponytail is seen from behind, working at a sewing machine. The factory floor is filled with rows of sewing machines and workers in the background. The lighting is bright, coming from overhead fixtures. The overall scene depicts a busy industrial environment.

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PHASE 4: IMPACT MITIGATION AND MANAGEMENT

HUMAN RIGHTS
IMPACT
ASSESSMENT
GUIDANCE AND
TOOLBOX

Phase 4: Impact Mitigation and Management Human Rights Impact Assessment

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PHASE 4: IMPACT MITIGATION AND MANAGEMENT

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You can find the full version of the Human Rights Impact Assessment Guidance and Toolbox here: <https://www.humanrights.dk/hria-toolbox/>



What Happens in Phase 4?

In the impact mitigation and management phase, the business, HRIA team and stakeholders come together to create a plan for preventing and addressing human rights impacts. All human rights impacts need to be addressed, with the most severe impacts taking priority. Rights-holders should be meaningfully involved in planning, enacting and monitoring impact management efforts.

Planning for effective impact management should be an integral part of the HRIA process. Allocating time and resources for developing a detailed impact management plan at the outset of the HRIA can be very helpful for facilitating this.

In determining what actions should be taken to address identified impacts, mitigation plans should focus primarily on avoiding and reducing negative human rights impacts. Businesses should also exercise leverage to address impacts that involve third parties such as government actors, other operators in the area and contractors in the supply chain. As human rights impacts relate to a variety of business functions, it is also useful to consider how different business units might be involved in human rights impact management.

Once the adverse human rights impacts have been identified and an impact management plan has been created, it is important to follow up on whether the actions to address the identified impacts are implemented and that they effectively address the impacts.

Access to remedy is a key component of impact mitigation and management. The role of operational-level grievance mechanisms in impact management, both as a resource to identify impacts as well as a means to address any grievances associated with the HRIA process itself, should be considered.



Key Questions Addressed in This Section

- What can contribute to effective planning and resourcing for human rights impact management?

- What types of actions are businesses expected to take in response to the different impacts identified?
- What is the role of leverage in impact management?
- What is participatory monitoring and how can it be applied in impact management?
- What is the role of operational-level grievance mechanisms in human rights impact management?

4.1 PLANNING AND RESOURCING FOR HUMAN RIGHTS IMPACT MANAGEMENT

Impact mitigation and management involves designing and implementing measures to address impacts through prevention, mitigation and remediation. To ensure that the HRIA contributes to effectively addressing the human rights impacts that are identified, it is essential that adequate resources are assigned by the business for impact mitigation, as well as for monitoring effectiveness, addressing unanticipated impacts, and resolving grievances. These considerations should be clearly outlined in an impact management plan (see Box 4.1, below).

Box 4.1: Impact management plans

An impact management plan, sometimes referred to as a mitigation or action plan, serves as a tool through which the company specifies how it will address the identified impacts. The plan notes specific actions that will be implemented across the company's operations and assigns responsibility for each task. Therefore, the plan serves not only as a way to guide management internally, but also to clarify the roles and responsibilities of various actors involved in impact mitigation, management and monitoring. Essentially, impact management plans are a strategy for ongoing management; they summarise impact findings from the assessment and detail the measures to address them. Additionally, an impact management plan establishes monitoring and reporting procedures and provides estimates of the timing, frequency, duration and cost of management procedures.

Sources: Daniel M. Franks (2011), 'Management of the social impacts of mining', in P. Darling (Ed), *SME Mining Engineering Handbook* (3rd edn), Littleton: Society for Mining, Metallurgy and Exploration, pp.1817-1825; Daniel M. Franks and Frank Vanclay (2013), 'Social impact management plans: Innovation in corporate and public policy', *Environmental Impact Assessment Review*, 43, p.57.

It is important to involve rights-holders and duty-bearers in the development of the impact management plan and its implementation, as relevant and appropriate. This may require capacity building. Section 1.1 of the [Impact Mitigation and Management Practitioner Supplement](#) provides more information on stakeholder engagement and capacity building for effective impact management.



In the HRIA process, resources and approaches for impact management should be considered and accounted for from the outset, including through steps such as:

- Ensuring that **the development of an impact management plan is an integral part of the HRIA process** by providing for the development of an impact management plan in the TOR for the assessment.
- Developing a detailed impact management plan that **assigns specific persons to the implementation of the mitigation measures** and ensuring that the people assigned have the relevant skills, time, management support and other resources necessary to effectively implement the mitigation measures.
- **Developing the impact management plan collaboratively**, involving: workers; women and men from the affected communities; state actors; and other relevant parties. For example, a community workshop and bilateral engagement with state actors can help gain stakeholder buy-in for the proposed mitigation measures.
- Ensuring that the impact mitigation measures **are based on and build on the human rights indicators** that have been established in the baseline and scoping phases.
- **Integrating different mitigation measures** into the relevant management plans and systems of the business.
- Ensuring that the business commits to dedicating **adequate and appropriate resources for the implementation of impact mitigation measures and ongoing impact management**, including through assigning adequate budget, time and human resources to impact management, as well as developing specific key performance indicators for staff with responsibilities for impact management.
- Taking a **multidisciplinary and cross-functional approach to impact management**. Often, departments within the business which oversee community relations, social responsibility or sustainability will be assigned the responsibility for implementing impact mitigation measures; however, as human rights impacts relate to many different areas of the business, it is necessary and appropriate to involve all relevant business units in impact management.¹

- Investigating and adopting **collaborative impact monitoring processes**, as and where appropriate.
- **Involving relevant state actors in impact management**, as appropriate. For example, involving local land councils when addressing impacts associated with land tenure and housing, or aligning impact mitigation strategies with local development plans where possible and appropriate.
- **Involving relevant organisations and experts in impact management**, as appropriate. For example, if impacts on women and girls have been identified, a local NGO or CSO on women's rights might be involved in impact mitigation planning and implementation.
- **Developing, implementing and/or reviewing operational-level grievance mechanisms** that can assist with identifying any adverse human rights impacts throughout and beyond the HRIA process.



For examples of HRIA findings and mitigation measures, see section 1.3 of the [Impact Mitigation and Management Practitioner Supplement](#).

4.2 DEVELOPING ACTIONS TO ADDRESS IMPACTS AND EXERCISING LEVERAGE

In developing actions to address the human rights impacts that have been identified, several points should be considered:

- All human rights impacts need to be addressed, and the most severe impacts should be addressed as a matter of priority, as explained in [Phase 3: Analysing Impacts](#)
- The identification of actions to address the identified impacts should involve the rights-holders who are impacted, as well as pertinent duty-bearers and other relevant parties
- The mitigation hierarchy applied should be compatible with international human rights standards and principles
- Whether the business has caused or contributed to the adverse impact or whether the impact is directly linked to the business operations, products or services by a business relationship will imply different types of mitigation measures; and
- For impacts that the business contributes to or is directly linked to, the extent of leverage that the business can exercise in addressing the impacts will need to be examined.

Box 4.2, below, outlines some points to consider for developing a human rights-compatible mitigation hierarchy.

Box 4.2: The mitigation hierarchy

The majority of mitigation hierarchies in EIA, SIA and ESHIA take the following approach:

- Avoid: making changes to the project or plan to avoid the impact.
- Reduce: implementing actions to minimise the impacts.
- Restore: taking actions to restore or rehabilitate to the conditions that existed prior to the impact.
- Compensate: compensating in kind or by other means, where other mitigation approaches are neither possible nor effective.

In broad terms, a similar approach can be adopted in HRIA, i.e., an approach that always prioritises avoiding impacts, and if this is not possible, considers ways to reduce and mitigate impacts. However, from a human rights perspective, there are three things which warrant attention when adapting the above approach for HRIA:

- Any measures taken must be compatible with international human rights standards, as well as a human rights-based approach
- Remediation should be explicitly included. This includes understanding and explaining that compensation and remediation are not synonymous, and that compensation should not be the default remedy; and
- Human rights impacts cannot be subject to 'offsetting' in the same way that, for example, environmental impacts can be. For example, a carbon offset is a reduction in emissions of carbon dioxide made in order to compensate for or to offset an emission made elsewhere. With human rights impacts, on the other hand, due to the fact that human rights are indivisible and interrelated, it is not appropriate to offset one human rights impact with a 'positive contribution' elsewhere. For example, if business activities have caused an adverse impact on the right to health of workers due to inadequate personal protective equipment and health and safety procedures, these impacts cannot be offset by the business offering more jobs to local workers. Or if a business has caused an adverse impact on the adequate standard of living of communities through the pollution of groundwater, which in turn reduces the ability of people to grow their food, such impacts cannot be offset by the business providing a community development project that provides educational and schooling material.

In determining what type of action to take to address a particular impact, there will be differences depending on whether the business has **caused**, **contributed to** or is **directly linked to** the impact.

In short, for impacts that the business causes, it will be expected to develop and implement actions to cease and address these impacts. For impacts that the business contributes to or that are directly linked through business relationships, the business should take the necessary steps to cease its contribution to the impacts, including through exercising leverage (see further immediately below). In determining appropriate actions to address identified impacts that are linked through business relationships, the UN Guiding Principles suggest that the following factors should be considered:

- The business's leverage over the entity/entities concerned
- How crucial the relationship is to the business
- The severity of the situation; and
- Whether terminating the relationship with the entity itself would have adverse human rights consequences.

Table 4.A, below, provides an overview for determining appropriate business responses for each of the different types of impacts.

Table 4.A: Determining appropriate actions to address the impacts identified			
Type of impact	Impacts caused by the business	Impacts to which the business contributes	Impacts directly linked to a business's operations, products or services through its business relationships (contractual and non-contractual)
Required actions	<ul style="list-style-type: none"> • Take necessary steps to cease and prevent the impact; and • Provide for, or collaborate in, remediation for actual impacts caused. 	<ul style="list-style-type: none"> • Take necessary steps to cease or prevent contribution to the impact, including through exercising leverage and taking steps to increase leverage if this is needed; and 	<ul style="list-style-type: none"> • Exercise existing leverage to prevent or mitigate the impact • Increase and exercise leverage if existing leverage is inadequate; and • The business is not required to provide for remediation, although it may take a role in doing so.

Table 4.A: Determining appropriate actions to address the impacts identified			
		<ul style="list-style-type: none"> • Provide for, or cooperate in, the remediation of adverse impacts. 	
Source: UN Guiding Principles.			

4.2.1 LEVERAGE

‘Leverage’ is considered to exist where a business has the ability to effect change in the practices of another entity that causes harm. ‘In other words, leverage is a company’s ability to influence the behaviour of others.’² If the business has leverage, it is expected to exercise it. If the business lacks leverage, it is expected to seek ways to increase it: for example, by offering capacity building or other incentives to the third party to address the impact, or by engaging in collaboration with other actors and stakeholders to influence the behaviour of the party causing or contributing to the impact. Table 4.B, below, gives an overview of some examples of different types of leverage and how leverage might be exercised.

It is important to remember that **severity** is relevant for determining the **order of priority** in which the identified impacts should be addressed, whereas **leverage** becomes relevant for determining **how to address impacts** that the business contributes to or is directly linked to through its business relationships. Where a business has contributed to or is directly linked to an impact through its business relationships, it has a responsibility to act to address the impact; leverage, on the other hand, is a relevant consideration in determining what types of actions to take to address the identified impacts. In sum, the absence of leverage does not absolve a business from responsibility to address the impacts that have been identified.

Table 4.B: Examples of exercising and increasing leverage to address human rights impacts	
Examples of types of leverage	Examples of exercising leverage
Traditional commercial leverage: leverage that sits within the activities the company routinely undertakes	<ul style="list-style-type: none"> • Include human rights standards in contracts

Table 4.B: Examples of exercising and increasing leverage to address human rights impacts	
Examples of types of leverage	Examples of exercising leverage
in commercial relationships, such as through contracting.	<ul style="list-style-type: none"> • Audit for compliance with the human rights standards included in the contract • Include human rights in pre-qualification criteria in bidding processes; and/or • Provide commercial incentives for suppliers that are based on human rights considerations (e.g., targets for local content).
Broader business leverage: leverage that a company can exercise on its own through activities that are not routine or typical in commercial relationships, such as capacity building.	<ul style="list-style-type: none"> • Build the capacity of suppliers to meet the responsibility to respect human rights • Ensure that procurement and purchasing staff send the same messages on human rights in their conversations with suppliers and decision-making about contracts; and/or • Use relevant international and industry standards to drive expectations by requiring supplier compliance with such standards.
Leverage together with business partners: leverage created through collective action with other companies in or beyond the same industry.	<ul style="list-style-type: none"> • Work with business peers to establish common requirements for suppliers; and/or • Engage bilaterally with peer companies which may be facing similar supply chain issues to share lessons learned and identify possible solutions.
Leverage through bilateral engagement: leverage generated through engaging bilaterally and separately with one or more other actors, such as government actors, business	<ul style="list-style-type: none"> • Engage CSOs and relevant international organisations that can provide relevant information on local actors or circumstances in supplier countries; and/or • Engage with a range of actors bilaterally to identify and implement solutions to

Table 4.B: Examples of exercising and increasing leverage to address human rights impacts	
Examples of types of leverage	Examples of exercising leverage
peers, international organisations and/or CSOs.	specific human rights supply chain issues that have been identified.
Leverage through multi-stakeholder collaboration: leverage generated through collective, collaborative action with business peers, governments, international organisations and/or NGOs or CSOs.	<ul style="list-style-type: none"> • Develop shared standards for suppliers through multi-stakeholder initiatives, thereby enhancing the credibility of the standards; and/or • Use the business's brand and reputation to convene relevant stakeholders to address any systemic issues that have been identified.
Source: Adapted from: Shift (2013), <i>Using Leverage in Business Relationships to Reduce Human Rights Risks</i> , New York: Shift, pp.14-24.	

4.3 MONITORING

Once adverse human rights impacts have been identified and an impact management plan has been determined, it will be important to follow up on whether the actions to address the identified impacts are implemented and whether they effectively address the impacts. Planning for the monitoring of impact mitigation measures should therefore be an integral component of the HRIA and be included in the impact management plan. It is important that planning for monitoring considers precisely what is to be monitored, when, how often and by whom. In addition to providing information on whether the impact mitigation measures are effective, and making any necessary adjustments if they are not, ongoing monitoring provides an opportunity to identify any unforeseen impacts. Section 1.2 of the [Impact Mitigation and Management Practitioner Supplement](#) features key questions that practitioners may reflect on when developing a monitoring plan.



Involving rights-holders, duty-bearers and other relevant parties in impact monitoring, as appropriate in the given context, can provide valuable opportunities for strengthening accountability and building trust between



different parties. It can also provide a way to involve the necessary expertise or contribute to building the capacity of the stakeholders involved in impact management.



Section 1.1 of the [Impact Mitigation and Management Practitioner Supplement](#) goes into greater detail on stakeholder engagement and capacity building for Phase 4.

One strategy for facilitating the participation of different stakeholders is participatory monitoring. When involving stakeholders in monitoring, assessors should keep in mind the considerations for engaging with rights-holders outlined in section B.2 of [Stakeholder Engagement](#). Box 4.3, below, provides an overview of participatory monitoring.

Box 4.3: What is participatory monitoring?

Participatory monitoring can be defined as ‘a collaborative process of collecting and analysing data, and communicating the results, in an attempt to identify and solve problems together. It includes a variety of people in all stages of the monitoring process, and incorporates methods and indicators meaningful to the stakeholders concerned. Traditionally, companies and agencies initiate and undertake monitoring. Participatory monitoring requires changing the dynamic so that a wider range of stakeholders assume responsibility for these tasks, and learn and benefit from the results. Participatory monitoring is not only scientific, but also social, political, and cultural. It requires openness, a willingness to listen to different points of view, a recognition of the knowledge and role of different participants, and the ability to give credit where credit is due.’

Source: International Finance Corporation (2010), *International Lessons of Experience and Best Practice in Participatory Monitoring in Extractive Industry Projects*, Washington: IFC.

Participatory monitoring can be a way to build understanding and trust between the different stakeholders involved in HRIA. In particular, it can provide an avenue for dialogue between affected rights-holders and the business that stretches beyond the HRIA process. HRIA can play a role in identifying the different rights-holders and duty-bearers who might be involved in community monitoring of the impact mitigation measures. HRIA can also identify whether the individuals, communities and groups who are anticipated to participate in monitoring need additional capacity building.³ Box 4.4, below, provides some example good practices of participatory monitoring initiatives from the extractive industries sector.

Box 4.4: Example good practices of participatory monitoring initiatives from the extractive industries

According to the International Finance Corporation, a common practice in the extractive industries sector is the creation of a Participatory Environmental Monitoring and Oversight Committee. These committees have the purpose of taking water samples at pre-established collection points. They usually consist of community-appointed representatives who either take the water samples themselves or who witness a third party (technical team, university professor, consultant, etc.) take the samples, which are sent to laboratories chosen by the parties. Sample collection could be done monthly, bimonthly, every three months or quarterly, and the committees should meet regularly and document their findings. Funding is often made available by the extractive industries company. Government environmental agencies are increasingly taking part in these committees, sometimes providing financial resources and, more often, technical assistance to the process.

Source: International Finance Corporation (2010), *International Lessons of Experience and Best Practice in Participatory Monitoring in Extractive Industry Projects*, Washington: IFC.

According to the International Finance Corporation's review of participatory monitoring programmes, there is no 'one size fits all' solution, as the success of such schemes is very dependent upon each specific local context.⁴ This emphasises the importance of good context analysis and stakeholder engagement throughout the HRIA process, which can then inform the design of any participatory monitoring to be implemented.

Participatory monitoring is likely to be most effective when designed and implemented at the outset of a project and, moreover, used throughout all stages of the project cycle and not only when impacts cause community contention. If implementing a participatory monitoring scheme in a reactive way, community groups may view it suspiciously as a tool designed to silence and co-opt dissenting voices; therefore, the monitoring effort may suffer credibility issues and further contribute to community conflict and tensions. Furthermore, in some scenarios, communities may need time to develop the capacity and technical skills to participate in the monitoring. Participatory monitoring programmes should therefore include a focus on rights-holders' access and ability to participate in the process. Having access to a participatory monitoring programme without having the ability to meaningfully participate will be out of sync with a human rights-based approach. The same applies for the reverse where capacities exist, but the participatory monitoring programme is not accessible.

4.4 ACCESS TO REMEDY AND OPERATIONAL-LEVEL GRIEVANCE MECHANISMS

Operational-level grievance mechanisms can have an important role to play in HRIA. Workers and community members may have grievances to raise with regard to the HRIA process and/or the specific impacts that have been identified. Access to remedy, of which operational-level grievance mechanisms are one component, is a core pillar of the UN Guiding Principles, which also outline eight effectiveness criteria for non-judicial grievance mechanisms (see Box 4.5, below).

Much has been written about operational-level grievance mechanisms in theory and practice, including how they might be designed in collaboration with local communities to ensure responsiveness to the specific context. Case studies have analysed the effectiveness of operational-level grievance mechanisms in different contexts.

However, current guidance on operational-level grievance mechanisms has focused less on how such mechanisms might interact with impact assessment processes, including HRIA. In short, operational-level grievance mechanisms can relate to HRIA in a number of ways, including:

- For established operations where a grievance mechanism is already in place:
 - Information from the grievance mechanism can inform the HRIA about any patterns or trends identified from the grievances that have been submitted. They are likely to provide useful information about the concerns of community members and workers; and
 - The HRIA can provide insights about if and how the existing grievance mechanism might need to be revised to ensure effectiveness.
- For planned or new operations, or where a grievance mechanism is not already in place:
 - The information gained through the HRIA can provide insights about how an operational-level grievance mechanism could be designed and implemented to ensure responsiveness to the local context, including, for example, by identifying any existing methods, approaches or community preferences for grievance resolution; and
 - A preliminary channel for grievance resolution throughout the HRIA process should be established as part of embarking on a HRIA.

Overall, operational-level grievance mechanisms can be important for the early identification of impacts, as well as for the ongoing monitoring of the effectiveness of impact mitigation. The development, review and/or implementation of operational-level grievance mechanisms should therefore be an integral component of the HRIA process.

Box 4.5: Effectiveness criteria for non-judicial grievance mechanisms

UN Guiding Principle 31 outlines eight effectiveness criteria for non-judicial grievance mechanisms:

- (a) Legitimate: enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes
- (b) Accessible: being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access
- (c) Predictable: providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation
- (d) Equitable: seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms
- (e) Transparent: keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake
- (f) Rights-compatible: ensuring that outcomes and remedies accord with internationally recognized human rights; and
- (g) A source of continuous learning: drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms.

Operational-level mechanisms should also be:

- (h) Based on engagement and dialogue: consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances.

Source: UN Guiding Principles.

ENDNOTES

¹ See, e.g., Rebecca DeWinter-Schmitt and Kendyl Salcito (2019), 'The need for a multidisciplinary HRIA team: Learning and collaboration across fields of impact assessment' in Nora Götzmann (Ed), *Handbook on Human Rights Impact Assessment*, Cheltenham: Edward Elgar.

² Shift (2013), *Using Leverage in Business Relationships to Reduce Human Rights Risks*, New York: Shift, p.3.

³ See, e.g., Alejandro Gonzalez Cavazos (2019), 'Mining in Mexico: Lessons from an ex ante community-based HRIA on the right to water, the right to health and the right to a healthy environment' in Nora Götzmann (Ed), *Handbook on Human Rights Impact Assessment*, Cheltenham: Edward Elgar.

⁴ International Finance Corporation (2010), *International Lessons of Experience and Best Practice in Participatory Monitoring in Extractive Industry Projects*, Washington: IFC.

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