

57<sup>th</sup> GEF Council Meeting  
December 17 - 19, 2019  
Washington, D.C.

Agenda Item 06

**REPORT ON THE ASSESSMENT OF AGENCIES' COMPLIANCE WITH MINIMUM  
STANDARDS IN THE GEF POLICIES ON:  
ENVIRONMENTAL AND SOCIAL SAFEGUARDS;  
GENDER EQUALITY; AND  
STAKEHOLDER ENGAGEMENT**

### **Recommended Council Decision**

The Council, having reviewed document, GEF/C.57/05, Report on the Assessment of GEF Agencies' Compliance with Minimum Standards in the Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement, welcomes the assessment (in annex 1) and takes note of the findings and the plans of action submitted by Agencies to address the findings of non-compliance. The Council requests that:

- a. Each Agency determined not to be in full compliance with the minimum standards provide updates to the Secretariat, ahead of every Council meeting, on the progress in implementing their plans of action according to the timelines set out in those plans, until they have completed implementation of the plans of action to come into full compliance with each minimum standard in the three Policies (mentioned above)
- b. The Secretariat report to the Council on the progress on Agencies' implementation of the plans of action at subsequent Council meetings, based on the updates provided by the Agencies and, as needed, further expert assessment and consultation with the Agencies; and to provide a summary of overall progress in the annual reports on the implementation of the Policy on Environmental and Social Safeguards.
- c. The Secretariat notify Council when Agencies have met their commitments set out in their respective plans of action to achieve compliance.

The Council approves the plans of action submitted by Agencies to achieve full compliance as summarized in paragraphs 18-54 of this document and further detailed in the letters provided by Agencies in Annex 2 and decides that these Agencies may continue to seek GEF financing while they implement the time-bound plans of action.

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## INTRODUCTION

1. The GEF Policies on Environmental and Social Safeguards<sup>1</sup>, Gender Equality<sup>2</sup>, and Stakeholder Engagement<sup>3</sup> set forth a number of minimum standards<sup>4</sup>, and require GEF Partner Agencies (hereafter referred to as “GEF Agencies”) to demonstrate that they have in place the necessary policies, procedures, systems, and capabilities to meet these standards. The three Policies also call for the Secretariat to facilitate an assessment of GEF Agencies’ compliance with these minimum standards, to be presented for Council review and decision.
2. Pursuant to these Policies, this document presents for Council consideration the findings of the required assessment of GEF Agencies’ compliance with the applicable minimum standards. As described in more detail below, the assessment was facilitated by the Secretariat and carried out by expert reviewers in line with Policies and the Assessment Guidelines for GEF Agencies’ Compliance with Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement<sup>5</sup>.
3. The findings outlined in this document have been established and validated through an iterative process including bilateral consultations and discussions between GEF Agencies, expert reviewers and the Secretariat.
4. This document includes a summary of the findings of the assessment for each GEF Agency. The summaries identify those minimum standards for which the Agency is determined to be compliant, as well as any areas of gaps in compliance. In all cases where an Agency was found not to have met a standard, including its sub-components, the summary includes a time-bound plan of action for the Agency to come into compliance. The details of these plans of action build on information contained in the formal letters submitted by Agencies (enclosed in annex 2) outlining their commitment, concrete actions and timelines to achieve full compliance.
5. As part of these plans of action, the Agencies have committed to provide updates to the Secretariat, prior to every Council meeting, on progress implementing the actions contained in the plans until Agencies have come into full compliance. The Secretariat, in turn, will report to the Council on the progress on Agencies’ implementation of the plans of action at subsequent

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<sup>1</sup> GEF/C.55/07/Rev.01 ([http://www.thegef.org/sites/default/files/council-meeting-documents/EN\\_GEF.C.55.07.Rev\\_01\\_ES\\_Safeguards.pdf](http://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.55.07.Rev_01_ES_Safeguards.pdf))

<sup>2</sup> SD/PL/02 ([http://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Policy.pdf](http://www.thegef.org/sites/default/files/documents/Gender_Equality_Policy.pdf))

<sup>3</sup> SD/PL/01 ([http://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Policy.pdf](http://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Policy.pdf))

<sup>4</sup> The respective minimum standards for the three Policies are contained in Annex I.A of the Policy on Environmental and Social Safeguards, Paragraph 19 (a)–(e) of the Policy on Gender Equality and Paragraph 16 (a)–(f) of the Policy on Stakeholder Engagement.

<sup>5</sup> [SD/GN/03](http://www.thegef.org/sites/default/files/documents/20190301_agency_policy_compliance_assessment_guidelines.pdf)

[https://www.thegef.org/sites/default/files/documents/20190301\\_agency\\_policy\\_compliance\\_assessment\\_guidelines.pdf](https://www.thegef.org/sites/default/files/documents/20190301_agency_policy_compliance_assessment_guidelines.pdf))

Council meetings, based on the updates provided by the Agencies and, as needed, further expert assessment and consultations with the Agencies.

6. Under the provisions of the Policy on Environmental and Social Safeguards, it is recommended that Council decide that Agencies may continue to seek GEF financing while they implement their time-bound plans of action.<sup>6</sup> Under the provisions in the Policies on Gender Equality and Stakeholder Engagement, it is also recommended that Agencies may continue to seek financing while they implement their time-bound plans of action.<sup>7</sup> If a plan of action for an Agency is not implemented according to the timeline as set out in this Report further review of this decision may be warranted.

#### **ASSESSMENT PROCESS AND METHODOLOGY**

7. In accordance with the Guidelines (referenced above in para 2), the Secretariat facilitated the following process with regards to the assessment of Agencies' compliance:

- 1) **Agencies' self-assessment:** Based on a checklist prepared by the Secretariat, Agencies compiled evidence of their compliance with the applicable minimum standards and submitted this evidence to the Secretariat.
- 2) **Secretariat's screening:** The Secretariat screened the evidence provided by the Agencies for clarity, completeness, and relevance.
- 3) **Expert assessment:** Consistent with the indicative competency requirements contained in Annex II of the Guidelines (mentioned above)<sup>8</sup>, the Secretariat hired two experts to assess, based on the information submitted by Agencies and compiled and screened by the Secretariat, whether Agencies were compliant with the applicable minimum standards in the three Policies<sup>9</sup>.
- 4) **Consultation on preliminary findings:** The Secretariat, in collaboration with the expert reviewers, facilitated bilateral consultations with all Agencies on the preliminary findings of the assessments provided by the reviewers. These consultations offered opportunities for Agencies to provide additional clarifications

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<sup>6</sup> See e.g., Policy on Environmental and Social Safeguard Standards, paragraph 8 (stating that "The Council decides whether the Agency may continue to seek GEF financing while it implements the time-bound action plan.")

<sup>7</sup> The Policy on Gender Equality (paragraph 21) and Stakeholder Engagement (paragraph 18) provide that "Unless the Council decides otherwise, the Agency may continue to seek GEF financing while it implements the time-bound action plan."

<sup>8</sup> SD/GN/03

[https://www.thegef.org/sites/default/files/documents/20190301\\_agency\\_policy\\_compliance\\_assessment\\_guidelines.pdf](https://www.thegef.org/sites/default/files/documents/20190301_agency_policy_compliance_assessment_guidelines.pdf)

<sup>9</sup> Some limitation of the assessment should be noted, including that, as per the Guidelines, the experts' assessment was based on the information provided by the Agency's self-assessments and as such did not extend to any additional verifications of Agencies' policy compliance in project implementation, but rather was limited to a determination of "reasonable assurance of effectiveness" based on a sample of implementation experience. The findings of the assessment should be understood in this context.

and information as well as to verify findings and discuss any needed plans of action to meet full compliance.

- 5) **Preparation of plans of action to achieve full compliance:** In cases where the expert assessment found that an Agency did not meet one or more of the minimum standards, the Agency, in consultation with the Secretariat, prepared a plan of action outlining the commitment, process and actions that the Agency agreed was reasonable to achieve compliance, taking into account the experts' recommendations.

8. The methodology to determine the findings of the compliance assessment considered the guiding principles set out in the Guidelines (referenced above in para 2), including:

- (i) **Impartiality** (assessment to be carried out in balanced, unbiased manner by impartial experts);
- (ii) **Transparency** (a transparent process will be utilized, with clear communications, timely responses and respect for information shared in confidence);
- (iii) **Reasonable assurance of effectiveness** (review of evidence based on a sample of implementation experience rather than a comprehensive review of Agencies' operations); and
- (iv) **Comparability** (assessment aims to determine whether Agencies' policies, procedures, and systems are comparable and equivalent to the GEF's minimum standards in their effect, notwithstanding differences in structure and terminology, including relevant exclusion rules).

#### **PROCESS FOR AGENCIES TO ACHIEVE FULL COMPLIANCE**

9. Considering the institutional diversity of the GEF Partnership and the evolving nature of safeguards at the international level, the process to develop or adjust policies, procedures and or guidelines to be in full compliance with the updated minimum standards understandably may require additional actions by some GEF Agencies. The three Policies and related Assessment Guidelines for Agency Compliance anticipate this situation and set out a process for assessing any areas of non-compliance and developing time-bound action plans to come into full compliance.

10. The below elaborates on the process and concrete steps and actions that will be followed until all those Agencies have met all minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality and Stakeholder Engagement:

- (i) The Agency provides updates on the progress on their plans of action (included in this report), to the GEF Secretariat until they reach full compliance with each minimum standard in the three Policies;

- (ii) The Secretariat compiles, tracks and reviews these updates and reports to the Council on progress on Agencies' implementation of the plans of action at subsequent Council meetings, including in the annual reports on the implementation of the Policy on Environmental and Social Safeguards.
- (iii) As part of its review of these updates, the Secretariat re-engages the expert reviewers as needed, to assess additional information and evidence submitted by Agencies to determine whether they have achieved compliance in accordance with their agreed plan of action.
- (iv) The Secretariat notify Council when Agencies have met their commitments set out in their respective plans of action to achieve compliance.
- (v) For all Agencies, including those which have developed and completed a plan of action to meet all minimum standards, the Agency and the Secretariat will subsequently carry out periodic reporting and monitoring of compliance using the modalities set out in the Policy on Monitoring and Agencies' Compliance<sup>10</sup>.

#### **OVERVIEW FINDINGS OF THE AGENCIES' COMPLIANCE ASSESSMENT AND PLANS OF ACTIONS**

11. The below presents an overview of findings, across all 18 Agencies, contained in the expert reviewers' assessments of the Agencies compliance with the Minimum Standards (see annex 1). It also includes an overview of the Agencies' efforts to develop plans of action.

12. The expert reviewers' complete assessment report for each Agency is provided in Annex 1. These reports describe each Agency's relevant policies, and provide the expert reviewer's summary findings, recommendations as well as the details and justifications of the findings for each minimum standard in the three Policies<sup>11</sup>. Through a consultative process (described in para 6) the respective Agencies have confirmed the accuracy of the content and acknowledged the findings of these reports.

#### *Summary Findings - Overview*

13. Most Agencies have put in place comprehensive policies, processes and mechanisms for addressing environmental and social risks and impacts in project design, implementation and operations. Several Agencies have recently updated their frameworks, policies, guidelines or procedures in line with international good practices. Other Agencies are currently in the process of updating or revising their policies, preparing detailed guidance notes and or developing new screening procedures.

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<sup>10</sup> SD/GN/03

[https://www.thegef.org/sites/default/files/documents/20190301\\_agency\\_policy\\_compliance\\_assessment\\_guidelines.pdf](https://www.thegef.org/sites/default/files/documents/20190301_agency_policy_compliance_assessment_guidelines.pdf)

<sup>11</sup> The respective minimum standards for the three Policies are contained in Annex I.A of the Policy on Environmental and Social Safeguards; Paragraph 19 (a)–(e) of the Policy on Gender Equality; and Paragraph 16 (a)–(f) of the Policy on Stakeholder Engagement.

14. Commonly across those Agencies that were found not to have met a GEF standard or subcomponent is that they have partial gaps related to some of the new requirements in the GEF Policy on Environmental and Social Safeguards (i.e. climate and disaster risks; disability inclusion; disadvantaged or vulnerable individuals or group, adverse gender-related impacts, including gender-based violence and sexual exploitation and abuse; Free Prior Informed Consent for indigenous peoples). Some Agencies also currently do not have policies that address the full range of issues related to the two new GEF minimum standards: MS8 (Labor and Working Conditions) and MS9 (Community Health, Safety and Security).

15. Most Agencies have longstanding and robust policies and procedures to address gender equality and stakeholder engagement. Almost all Agencies were found to be fully compliant with the minimum standards set out in the GEF Policies on Gender Equality and Stakeholder Engagement. A few Agencies are currently updating and improving their policies and procedures related to stakeholder engagement.

*Plans of Action - Overview*

16. In all cases where an Agency has been assessed to have some gap areas, Agencies have established concrete timebound actions to address the identified gaps (taking into account the recommendations provided by the expert that carried out their respective compliance assessment). All these Agencies have, at this stage, further committed themselves to provide updates on the progress on their plans of action (as described in para 10 (i)) to the GEF Secretariat until they have met full compliance with each minimum standard in the three Policies. Table 1, below, provides an overview of the plans of actions for the fourteen Agencies that were assessed to have some gap areas and the expected date of completion. Further details are summarized in paragraphs 18-54 of this document and further detailed in the letters provided by Agencies in Annex 2.

**Table 1. Overview of Agencies Plans of Action and Expected Date of Completion**

	<b>Plans of action to achieve full Compliance</b>	<b>Expected completion date</b>
<b>AfDB</b>	<ul style="list-style-type: none"> <li>Review and update the Integrated Safeguards System</li> </ul>	<ul style="list-style-type: none"> <li>Updated Policy to be approved in <b>2022</b></li> </ul>
<b>ADB</b>	<ul style="list-style-type: none"> <li>Review and update the Safeguard Policy, and issuance of an internal guideline for GEF-financed projects</li> </ul>	<ul style="list-style-type: none"> <li>Policy update process to be completed by <b>Dec 2021</b></li> <li>Guideline for GEF-financed projects to be completed by <b>June 2020</b></li> </ul>
<b>FUNBIO</b>	<ul style="list-style-type: none"> <li>Adjust the Environmental and Social Safeguards (ESS) Policy, and approve a new Policy on Stakeholder Engagement</li> </ul>	<ul style="list-style-type: none"> <li>Adjustments to ESS Policy to be completed by <b>Feb 2020</b></li> <li>New Policy on Stakeholder Engagement to be approved by <b>Nov 2019</b></li> </ul>
<b>CI</b>	<ul style="list-style-type: none"> <li>Update Policies on Gender, Stakeholder Engagement and Environmental and Social Safeguards, including guidance notes/templates</li> </ul>	<ul style="list-style-type: none"> <li>Updated Policies and procedures to be completed by <b>June 2020</b></li> </ul>

	<b>Plans of action to achieve full Compliance</b>	<b>Expected completion date</b>
<b>CAF</b>	<ul style="list-style-type: none"> <li>Update Environmental and Social Safeguard Policy, including operational guidance notes and screening tools</li> </ul>	<ul style="list-style-type: none"> <li>Policy, guidance notes and screening tools to be finalized and approved no later than <b>Dec 2020</b></li> </ul>
<b>DBSA</b>	<ul style="list-style-type: none"> <li>Update the Environmental and Social Safeguards Standards, and revise the Independent Grievance Redress Mechanisms (IGRM)</li> </ul>	<ul style="list-style-type: none"> <li>Updated ESS standards to be approved by <b>Nov 2019</b></li> <li>Revised IGRM to be implemented by <b>Oct 2020</b></li> </ul>
<b>FAO</b>	<ul style="list-style-type: none"> <li>Revise the Environmental and Social Safeguards Standards and integrate new guidance notes and screening procedures in the project cycle</li> </ul>	<ul style="list-style-type: none"> <li>Adoption of new standards by <b>Dec 2020</b></li> <li>Guidance notes, tools and capacity building activities to be completed in 2020-2021</li> </ul>
<b>IDB</b>	<ul style="list-style-type: none"> <li>Draft a new Environmental and Social Policy Framework (ESPF), incorporating Environmental and Social Performance Standards and develop an implementation plan</li> </ul>	<ul style="list-style-type: none"> <li>Full implementation of the new ESPF is expected in the second half of <b>2021</b></li> </ul>
<b>IFAD</b>	<ul style="list-style-type: none"> <li>Update social, environmental and climate assessment procedures (SECAP)</li> <li>Issue a new framework for governance, transparency and accountability</li> </ul>	<ul style="list-style-type: none"> <li>Revised SECAP to be approved by <b>April 2020</b></li> <li>New framework on to be approved by <b>Dec 2019</b></li> </ul>
<b>IUCN</b>	<ul style="list-style-type: none"> <li>Adjust ESS Standards, amend Management System, develop new guidance notes, and revise Grievance Mechanisms Note</li> </ul>	<ul style="list-style-type: none"> <li>Adjustments to standards and systems to be approved by <b>Dec 2019</b></li> <li>Revised Grievance Mechanisms Guidance note to be approved by <b>Jan 2020</b></li> </ul>
<b>UNEP</b>	<ul style="list-style-type: none"> <li>Update Policy on Environmental, Social, and Economic sustainability, and guidelines and screening tools</li> </ul>	<ul style="list-style-type: none"> <li>Policy to be approved by <b>end of 2019</b></li> <li>Guidelines and screening tools to be completed by <b>mid-2020</b></li> </ul>
<b>UNIDO</b>	<ul style="list-style-type: none"> <li>Revise Environmental and Social Safeguards Policies and Procedures, and improve operational guidance and tools</li> </ul>	<ul style="list-style-type: none"> <li>Actions to be completed by <b>Dec 2020</b></li> </ul>
<b>BOAD</b>	<ul style="list-style-type: none"> <li>Review and revise Policies and Procedures for Environmental and Social Management.</li> </ul>	<ul style="list-style-type: none"> <li>Revised Policies and procedures to be approved by the <b>end of 2020</b></li> </ul>
<b>WWF-US</b>	<ul style="list-style-type: none"> <li>Update Environmental and Social Safeguards Integrated Policies and Procedures (SIPP) and guidance notes</li> </ul>	<ul style="list-style-type: none"> <li>Updated SIPP to be completed by <b>March 2020</b></li> </ul>

## **SUMMARY FINDINGS OF THE ASSESSMENT FOR EACH GEF AGENCY AND, WHERE APPLICABLE, THEIR PLANS OF ACTION**

17. The below describes the summary findings contained in the expert reviewers' assessments of the Agencies compliance with the Minimum Standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement (details and justifications are contained in Annex 1); and, where applicable, a summary description of Agencies' plans of action outlining their concrete timebound actions to address the identified gaps. Additional details are contained in the formal letters provided by Agencies (in Annex 2) outlining their commitment, concrete actions and timelines and to achieve full compliance.

### **African Development Bank (AfDB)**

#### *Summary Findings*

18. The expert reviewer assessed the alignment between the AfDB Integrated Safeguards System (ISS) and other relevant AfDB policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - AfDB was assessed to meet all requirements (no gaps) with MS7 (Resource Efficiency and Pollution Prevention), and MS8 (Labor and Working Conditions).
  - AfDB was assessed to have some gaps in MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS4 (Resettlement), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), and MS9 (Community Health, Safety and Security).
- (ii) *Policy on Gender Equality:*
  - AfDB was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - AfDB was assessed to have one partial gap related to the minimum standards in contained in the Policy.

#### *Plans of Action*

19. AfDB wishes to acknowledge the findings and gaps identified in the GEF's assessment in terms of its compliance with the GEF's Policy on Environmental and Social Safeguards, Gender Equality and Stakeholder Engagement. In July 2019, the Bank has concluded an Independent evaluation of its Integrated Safeguards System (ISS). The evaluation report along with the Management's responses were discussed and approved by the responsible Board Committee on 7 October 2019. The recommendations of the evaluation have been articulated in a

comprehensive Action Plan which has been agreed and will constitute the primary basis for the review and update of the ISS. This process aims to be completed by end 2021 with a target submission to the Bank's Board of Directors for consideration and approval in 2022. The Bank confirms that the issues raised will be addressed to the extent possible as part of the planned internal review and updating process of the Bank's ISS in 2021."

## **Asian Development Bank (ADB)**

### *Summary Findings*

20. The expert reviewer assessed the alignment between the ADB Safeguard Policy Statement (SPS) and other relevant ADB policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - ADB was assessed to meet all requirements (no gaps) with MS2 (Accountability), MS4 (Resettlement), and MS8 (Labor);
  - ADB was assessed to have some partial gaps in MS1 (Assessment), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource Efficiency/Pollution Prevention) and MS 9 (Community Health and Safety).
- (ii) *Policy on Gender Equality:*
  - ADB was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - ADB was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

### *Plans of Action*

21. ADB acknowledge the findings of the expert assessment comparing ADB's policies against the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. With respect to the GEF Policy on Environmental and Social Safeguards, ADB notes that it was assessed to meet all requirements with MS2, MS4, and MS8 and that there were some partial policy gaps with respect to MS1, MS3, MS5, MS6, MS7 and MS 9. Currently, ADB's Independent Evaluation Department is undertaking a comprehensive review of ADB's Safeguard Policy Statement, 2009. This includes review of implementation experiences and the potential need for any policy revisions based on emerging safeguard policy issues and policy changes by other multilateral financial institutions. The evaluation is expected to be completed by June 2020. Linked to this, ADB expects to launch a safeguard policy update process in 2020 with an indicative timetable for completion by December 2021. As part of this,

ADB will fully consider the GEF's Policy on Environmental and Social Safeguards, including the above referenced gaps. In the meantime, ADB's can commit to ensuring that any material gaps are filled with respect to any GEF co- financed projects administered by ADB. This will be addressed through the issuance of an internal guideline with respect to environmental and social safeguards for the GEF financed projects by 30 June 2020.

### **Brazilian Biodiversity Fund (FUNBIO)**

#### *Summary Findings*

22. The expert reviewer assessed the alignment between the Funbio's Environmental and Social Safeguards Policy (ESSP) and other relevant Funbio policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

(i) *Policy on Environmental and Social Safeguards:*

- Funbio was assessed to meet all requirements (no gaps) with MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS4 (Resettlement), MS5 (Indigenous Peoples), MS8 (Labor), and MS9 (Community Health, Safety and Security).
- Funbio was assessed to have some partial gaps in MS6 (Cultural Heritage) and MS7 (Resource Efficient and Pollution Prevention).

(ii) *Policy on Gender Equality:*

- Funbio was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

(iii) *Policy on Stakeholder Engagement:*

- Funbio was assessed to have some partial gaps related to minimum standards contained in the Policy.

#### *Plans of Action*

23. Funbio welcomes and acknowledges the assessment and agrees with its findings. Funbio's plan of action includes concrete and time bound actions to address the gaps identified. To address the gaps related to the Policy on Environmental and Social Safeguards, Funbio will make adjustments in its Environmental and Social Safeguards (ESS) Policy to address: (1) the gap in MS6 on the need to withhold information on cultural heritage when necessary in order to safeguard its safety and integrity; and (2) the gap in MS7 to fully address the expanded range of prohibited pesticides (the criteria regarding carcinogenicity, mutagenicity, or reproductive toxicity) by February 2020. To address the partial gaps related to stakeholder engagement Funbio will complete the ongoing process updating Funbio's Policy on Stakeholder Engagement that is expected to be approved at the Funbio Council meeting on November 28th, 2019.

## **Conservation International (CI)**

### *Summary Findings*

24. The expert reviewer assessed the alignment between the CI's Environmental and Social Management Framework (ESMF) and other relevant CI policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - CI was assessed to have some partial gaps across minimum standards 1-9.
- (ii) *Policy on Gender Equality:*
  - CI was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - CI was assessed to have one partial gap with the minimum standards contained in the Policy.

### *Plans of Action*

25. CI acknowledges the findings of the expert assessment and is committed to addressing the identified gaps to ensure full compliance. CI recognized the gaps identified by the expert reviewer already during its self-assessment process. CI's plan of actions includes concrete actions to complete its consultative process to update its policies on gender, stakeholder engagement, and environmental and social safeguards as well as updating guidance notes and safeguard plan templates by June 30, 2020. It is expected that these actions will address all the identified gaps under MS 1 through 9, including the development of new standards for MS8 (Labour and Working Conditions) and MS9 (Community Health, Safety and Security).

## **Development Bank of Latin America (CAF)**

### *Summary Findings*

26. The expert reviewer assessed the alignment between CAF's Environmental and Social Safeguards (ESS) and other relevant CAF policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - CAF was assessed to have some partial gaps across minimum standards 1-9.
- (ii) *Policy on Gender Equality:*

- CAF was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
- CAF was assessed to have some partial gaps related to minimum standards in the Policy.

### *Plans of Action*

27. CAF acknowledges the findings of the assessment, accepts the detailed recommendations and is committed to addressing all identified gaps in order to achieve full compliance before the end of 2020. CAF's concrete actions include a scheduled update of the CAF-GEF Environmental and Social Safeguards (ESS) Policies and Procedures to address all the identified gaps, including in MS1-9 and Stakeholder Engagement. As part of this process, CAF is currently analyzing the CAF-GEF ESS and CAF ESS (version 2016) to inform the design and validation of the upgraded CAF-GEF's Environment and Social Safeguards, Gender Equality and Stakeholder Engagement standards (version 2020). The updated CAF ESS policy as well as operational guidance notes and screening tools are expected to be finalized and approved by the CAF management no later than December 2020. In addition, CAF has developed and shared with the GEF Secretariat a detailed action plan outlining more detailed actions and timelines to address each of the identified gaps

### **Development Bank of Southern Africa (DBSA)**

#### *Summary Findings*

28. The expert reviewer assessed the alignment between DBSA's Environmental and Social Safeguards Standards (ESSS) and other relevant DBSA policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
- DBSA was assessed to meet all requirements (no gaps) with MS4 (Resettlement), MS6 (Cultural Heritage) and MS7 (Resource Efficiency/Pollution Prevention).
  - DBSA was assessed to have some partial gaps in MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS8 (Labor), and MS9 (Community Health, Safety and Security).
- (i) *Policy on Gender Equality:*
- DBSA was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (ii) *Policy on Stakeholder Engagement:*

- DBSA was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

#### *Plans of Action*

29. DBSA acknowledges the findings of the expert assessment and is committed to addressing the identified partial gaps to ensure full compliance. It recognized the gaps identified by the expert reviewer already during its self-assessment process. DBSA's plan of actions include concrete and timebound actions to: (1) complete their process updating DBSA ESSS to address all gaps identified in MS1-3, MS5 and MS8-9 expected to be presented to the DBSA Board Committee for ratification in November 2019; and (2) complete the process of overhauling DBSA's entire Independent Grievance Redress Mechanism (IGRM), expected to be implemented by October 2020.

#### **European Bank for Reconstruction and Development (EBRD)**

##### *Summary Findings*

30. The expert reviewer assessed the alignment between the EBRD's Environment and Social Policy (ESP) and other relevant EBRD policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - EBRD was assessed to meet all requirements (no gaps) and is compliant with the minimum standards contained in the policy.
- (ii) *Policy on Gender Equality:*
  - EBRD was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - EBRD was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

##### *Plans of Actions*

31. As EBRD was assessed to be fully compliant with all minimum standards in the three Policies no further action is needed.

#### **Food and Agriculture Organization of the United Nations (FAO)**

##### *Summary Findings*

32. The expert reviewer assessed the alignment between the FAO's Environmental and Social Management Guidelines (ESMG) and other relevant FAO policies, procedures, guidelines,

and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - FAO was assessed to meet all requirements (no gaps) with MS3 (Biodiversity) and MS4 (Resettlement);
  - FAO was assessed to have some partial gap areas in MS1 (Assessment), MS2 (Accountability), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource Efficiency, Pollution), MS8 (Labor) and MS 9 (Community Health and Safety).
- (ii) *Policy on Gender Equality:*
  - FAO was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - FAO was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

#### *Plans of Action*

33. FAO acknowledges the findings of the expert assessment and is committed to addressing the partial gaps identified by the expert reviewer. Efforts to address gaps related to MS1, MS5-9 are already integrated in FAO's ongoing processes revising FAO's Environmental and Social Management Guidelines (2015) which is expected to be completed with the adaption of a revised FAO Environmental and Social Safeguards Standards policy by December 2020. Identified gaps related to MS2 will be considered as part of the on-going internal assessment of FAO's grievance, redress and conflict resolution mechanisms at the country level which is expected, subject to internal governance review timelines, to be revised by December 2020. FAO's plans of action include concrete and time bound actions to complete these processes by December 2020, including the adoption of the revised FAO Environmental and Social Safeguards Standards. Moreover, FAO plans to integrate operational guidance notes/updated screening procedures in the FAO project cycle, technical reference documents and other relevant tools and capacity building activities to complement the revised policy continuously in 2020-2021 to complement the revised Policy.

#### **Foreign Economic Cooperation Office, Ministry of Environmental Protection of China (FECO)**

#### *Summary Findings*

34. The expert reviewer assessed the alignment between the FECO's Environmental and Social Safeguard Framework (ESSF) and other relevant FECO policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and

Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - FECO was assessed to meet all requirements (no gaps) with MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS6 (Cultural Heritage), MS7 (Resource Efficiency and Pollution Prevention), MS8 (Labor), and MS9 (Community Health)
  - FECO currently has a Memorandum of Understanding with the GEF on the following standards: MS4 (Resettlement); and MS5 (Indigenous Peoples)<sup>12</sup>.
- (ii) *Policy on Gender Equality:*
  - FECO was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - FECO was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

#### *Plans of Action*

35. As FECO was assessed to be fully compliant with all minimum standards in the three Policies no further action is needed.

#### **Inter-American Development Bank (IDB)**

##### *Summary Findings*

36. The expert reviewer assessed the alignment between the IDB Environment and Safeguards Compliance Policy (ESCP) and other relevant IDB policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - IDB was assessed to meet all requirements (no gaps) with MS7 (Resource Efficiency and Pollution Prevention).

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<sup>12</sup>The Memorandum of Understanding between FECO and the GEF (<https://www.thegef.org/sites/default/files/documents/GEF%20MOU%20with%20FECO.pdf>) states that FECO will not propose any projects nor receive GEF Financing or support to implement projects that require the application of the minimum standards on Involuntary Resettlement and Indigenous Peoples.

- IDB was assessed to have some partial gap areas in MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS4 (Resettlement), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS8 (Labor), and MS9 (Community Health).
- (ii) *Policy on Gender Equality:*
- IDB was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
- IDB was assessed to have one one partial gap with the minimum standards contained in the Policy.

### *Plans of Action*

37. IDB acknowledges the receipt of the report containing the assessment. The Environmental and Social Policy Framework (ESPF) and its guidance notes are being developed within the framework of the IDB's policies and procedures, which would address gaps identified in the assessments. The IDB is committed to modernize its Environmental and Social (E&S) policies, consolidate them into an integrated and coherent policy framework to more effectively respond to the challenges faced by countries in the Latin American and Caribbean region. To fulfill its commitment, the IDB is drafting a new Environmental and Social Policy Framework (ESPF), that will incorporate a comprehensive set of Environmental and Social Performance Standards (ESPS), which describe the requirements that the Borrower/client/recipient must meet in the development and implementation of operations that are financed by the IDB. It is expected a full implementation of the new ESPF in the second half of 2021. The ESPF would adapt the eight IFC performance standards (PS) to the IDB context and will include two additional ESPSs on Gender Equality, and Stakeholder Engagement and Information Disclosure. The new ESPF will supersede the five existing environmental and social policies at the IDB. The proposed ESPS are as follows: ESPS 1: Assessment and Management of Environmental and Social Risks and Impacts; ESPS 2: Labor and Working Conditions; ESPS 3: Resource Efficiency and Pollution Prevention; ESPS 4: Community Health, Safety and Security; ESPS 5: Land Acquisition and Involuntary Resettlement; ESPS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; ESPS 7: Indigenous Peoples; ESPS 8: Cultural Heritage; ESPS 9: Gender Equality; and ESPS 10: Stakeholder Engagement and Information Disclosure. The new IDB's ESPF sets out a systematic approach to environmental and social risk management that protects people and the environment and is harmonized with international best practices. The IDB will only support projects that meet the ESPF's standards in a manner and timeframe acceptable to the Bank. Management is also preparing an Implementation Plan of the ESPF describing the milestones required to reach implementation (e.g., update to the Bank systems; development of the Operational Guidelines; and training activities on the new ESPF for Bank staff and the executing agencies). The ESPF will become effective upon completion of the Implementation Plan's milestones.

### **International Fund for Agricultural Development (IFAD)**

#### *Summary Findings*

38. The expert reviewer assessed the alignment between the IFAD's Social, Environmental and Climate Change Procedures (SECAP) and other relevant IFAD policies, procedures,

guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - IFAD was assessed to meet all requirements (no gaps) with MS1 (Assessment), MS2 (Accountability), MS4 (Resettlement), MS6 (Cultural Heritage), MS7 (Resource Efficiency and Pollution Prevention), and MS9 (Community Health).
  - IFAD was assessed to have no standard that meets the requirements of MS8 (Labor and Working Conditions).
  - IFAD was assessed to have some partial gaps in MS3 (Biodiversity) and MS5 (Indigenous Peoples).
- (ii) *Policy on Gender Equality:*
  - IFAD was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - IFAD was assessed to meet to have one partial gap with the minimum standards contained in the Policy.

#### *Plans of Action*

39. IFAD acknowledges the findings of the expert assessment and is committed to addressing the identified gaps. Actions to make IFAD fully compliant with MS 3, 5 and 8 of the GEF Policy on Environmental and Social Safeguards are currently being incorporated in IFAD's ongoing process of updating its Social, Environmental and Climate Assessment Procedures (SECAP) and the planned updates of its "How-to-do Note" on FPIC. A draft revised SECAP is expected to be completed by the end of December 2019 and approved by April 2020. Efforts to make IFAD fully compliant with the GEF Policy on Stakeholder Engagement are already being considered as part of IFAD's new Framework for Operational Feedback from Stakeholders, Enhancing Transparency, Governance and Accountability, that is expected to be presented to the IFAD Executive Board for approval in December 2019.

#### **International Union for Conservation of Nature (IUCN)**

##### *Summary Findings*

40. The expert reviewer assessed the alignment between the IUCN Environmental and Social Management System (ESMS) Manual and other relevant IUCN policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - IUCN was assessed to meet all requirements (no gaps) with MS3 (Biodiversity) and MS4 (Resettlement).
  - IUCN was assessed to have some partial gaps in MS1 (Assessment), MS2 (Accountability), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource Efficiency and Pollution Prevention), MS8 (Labor), and MS9 (Community Health).
- (ii) *Policy on Gender Equality:*
  - IUCN was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - IUCN was assessed to have one partial gap with the minimum standards contained in the Policy.

#### *Plans of Action*

41. IUCN acknowledges the findings of the expert assessment and confirm its commitment to implement the recommendations to address the identified gaps. IUCN's plan of action includes concrete timebound actions to address the identified gaps in MS1, MS2, MS5, MS6, MS7, MS8 and MS9 , including actions to; adjust IUCN's Standard on Indigenous Peoples and the standard on cultural heritage (expected to be approved by IUCN Senior Management by 31 December 2019); amend IUCN's ESMS Questionnaire; develop of new Guidance Note on Environmental and Social Assessment, Management and Monitoring (expected to be approved by IUCN Senior Management by 31 December 2019); and revise IUCN's Grievance Mechanism Guidance Note (expected to be approved by IUCN Senior Management by 31 January 2020). IUCN commits to inform the Secretariat of the progress of these actions.

#### **United Nations Development Programme (UNDP)**

##### *Summary Findings*

42. The expert reviewer assessed the alignment between UNDP's Social and Environmental Standards (SES) and other relevant UNDP policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - UNDP was assessed to meet all requirements and is compliant with the minimum standards contained in the policy.
- (ii) *Policy on Gender Equality:*

- UNDP was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

(iii) *Policy on Stakeholder Engagement:*

- UNDP was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

*Plans of Action*

43. As UNDP was assessed to be fully compliant with all minimum standards in the three Policies no further action is needed.

**United Nations Environment Programme (UNEP)**

*Summary Findings*

44. The expert reviewer assessed the alignment between UNEP's Environmental, Social, and Economic Sustainability Framework (ESESF) and other relevant UNEP policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

(i) *Policy on Environmental and Social Safeguards:*

- UNEP was assessed to meet all requirements (no gaps) in MS4 (Resettlement) and MS7 (Resource Efficiency and Pollution Prevention).
- UNEP was assessed to have no standard that meets the requirements of MS9 (Community Health, Safety and Security).
- UNEP was assessed to have some partial gaps in MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS8 (Labor and Working Conditions).

(ii) *Policy on Gender Equality:*

- UNEP was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

(iii) *Policy on Stakeholder Engagement:*

- UNEP was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

*Plans of Action*

45. UNEP acknowledges the findings of the expert assessment and is committed to addressing the gaps identified by the expert reviewer. UNEP recognized the gaps identified by the expert reviewer already during its self-assessment process. Efforts to address these gaps are already integrated in UNEP's ongoing consultative process to revise its 2015 Environment

and Social Sustainability Framework (ongoing since February 2019). UNEP's plan of action includes concrete and timebound actions to complete the process to update the new policy and developing guidelines and tools to support its effective implementation. The updated policy is expected to include a specific standard on MS9 and specific provisions to address the identified partial gaps in MS1-3, MS5, MS6, and MS8. It is envisaged that the updated policy will be approved by UNEP's Executive Director by the end of 2019. In addition, UNEP is planning to develop specific guidelines for each of the minimum standards and adapt its Environmental and Social Safeguards Review Notes and screening tools by mid-2020.

## **United Nations Industrial Development Organization (UNIDO)**

### *Summary Findings*

46. The expert reviewer assessed the alignment between UNIDO's Environmental and Social Safeguards Policies and Procedures (ESSPP), and other relevant UNIDO policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - UNIDO was assessed to meet all requirements (no gaps) in MS4 (Resettlement) and MS9 (Community Health).
  - UNIDO was assessed to have some partial gaps in MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource Efficiency and Pollution Prevention), MS8 (Labor)
- (ii) *Policy on Gender Equality:*
  - UNIDO was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy
- (iii) *Policy on Stakeholder Engagement:*
  - UNIDO was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy

### *Plans of Action*

47. UNIDO acknowledges the findings of the expert assessment and is committed to addressing the partial gaps identified by the expert reviewer. UNIDO plan of action includes concrete and timebound actions, including revision of UNIDO's Environmental and Social Safeguards Policies and Procedures (ESSPP) and improvements to UNIDO's operational guidance and tools. Specifically, partial gaps identified with regards to MS1, MS3, MS5, MS6 and MS7 will be addressed through the process of revising and updating the ESSPP. Partial gaps identified in relation to MS2 will be covered in close interaction with UNIDO's Internal Oversight. A similar approach will be taken for partial gaps identified with regards to MS8,

where Procurement and Human Resources will also be consulted. In addition, enhanced operational guidance and tools will be prepared to assure that all requirements of MS1 as well as the planned policy revisions are fully accounted for. UNIDO expects to complete these actions December 2020.

### **West African Development Bank (BOAD)**

#### *Summary Findings*

48. The expert reviewer assessed the alignment between BOAD's Operational Policies and Procedures for Environmental and Social Management in Financing Projects (POP) and other relevant BOAD policies, procedures, guidelines, and systems and the minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - BOAD was assessed to meet all requirements (no gaps) in MS2 (Accountability)
  - BOAD was assessed to have gaps in MS1 (Assessment) and MS3 (Biodiversity), MS4 (Resettlement), (MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource Efficiency and Pollution Prevention), MS8 (Labor), and MS9 (Community Health)
- (ii) *Policy on Gender Equality:*
  - BOAD was assessed to have some partial gaps relating to the Policy on Gender Equality.
- (iii) *Policy on Stakeholder Engagement:*
  - BOAD was assessed to have some partial gaps relating to the Policy on Stakeholder Engagement.

#### *Plans of Actions*

49. BOAD acknowledges the findings of the expert assessment and is committed to addressing the identified gaps to ensure full compliance. BOAD updated its operational Policies and Procedures for Environmental and Social Management in Financing Projects (POP) in 2018 and a recent version was approved by the Bank's Board of Directors in June 2019. The gaps identified in this assessment in terms of BOAD's compliance with GEF Policies on Environmental and Social Safeguards, Gender Equality and Stakeholder Engagement have been noted by BOAD and will be addressed as part of a planned review of its Policies and Procedures and the forthcoming revision of the Policy which is expected to be submitted to BOAD's Board of Directors for consideration and approval by the end of 2020.

## **World Bank (WB)**

### *Summary Findings*

50. The expert reviewer assessed the alignment between the WB's Environmental and Social Framework (ESF) and other relevant WB policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards:*
  - The WB was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (ii) *Policy on Gender Equality:*
  - The WB was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.
- (iii) *Policy on Stakeholder Engagement:*
  - The WB was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

### *Plans of Action*

51. As the WB was assessed to be fully compliant with all minimum standards in the three Policies no further action is needed.

## **World Wildlife Fund (WWF-US)**

### *Summary Findings*

52. The expert reviewer assessed the alignment between the WWF-US's Environment and Social Safeguards Integrated policies and procedures (SIPP) and other relevant WWF-US policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. The expert assessment found:

- (i) *Policy on Environmental and Social Safeguards: was assessed as follows:*
  - WWF-US was assessed to meet all requirements (no gaps) in MS9 (Community Health, Safety and Security).
  - WWF-US was assessed to have some partial gaps across minimum standards 1-8.
- (ii) *Policy on Gender Equality:*
  - WWF-US was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

(iii) *Policy on Stakeholder Engagement:*

- WWF-US was assessed to meet all requirements and is compliant with the minimum standards contained in the Policy.

*Plans of Action*

54. WWF-US acknowledges the assessment and its findings as prepared by the expert reviewer and is committed to achieving full compliance with the updated GEF Policy on Environmental and Social Safeguards. WWF-US recognized the gaps identified by the expert reviewer already during its self-assessment process. As such, WWF-US plans of action include concrete timebound actions, including completing its process to update WWF-US Environment and Social Safeguards Integrated Policies and Procedures (SIPP) to address the range of partial gap areas identified across the minimum standards 1-8. WWF-US expects that these changes and update of SIPP will be completed by March 2020.

## REFERENCES AND RELATED DOCUMENTS

### *Policies*

- *Minimum Fiduciary Standards for GEF Partner Agencies (GA/PL/02)*
- *Monitoring Agencies' Compliance (SD/PL/04)*
- *Monitoring and Evaluation Policy*
- *Project and Program Cycle (OP/PL/01)*
- *Policy on Gender Equality (SD/PL/02)*
- *Policy on Stakeholder Engagement (SD/PL/01)*

### *Guidelines*

- *Guidelines on the Project and Program Cycle Policy (GEF/C.52/Inf.06)*
- *Guidelines for GEF Agencies' Compliance with Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement ([SD/GN/03](#))*
- *Guidelines on Gender Equality in GEF Projects and Programs (SD/GN/02)*
- *Guidelines on Stakeholder Engagement*

**ANNEX I: REPORT ON THE ASSESSMENTS OF AGENCIES' COMPLIANCE WITH THE GEF POLICIES ON ENVIRONMENTAL AND SOCIAL SAFEGUARDS, GENDER EQUALITY, AND STAKEHOLDER ENGAGEMENT, PREPARED BY EXPERT REVIEWERS**

**(PLEASE SEE THE FOLLOWING DOCUMENT)**

**Assessment of Agencies' Compliance with the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement**

**November 14, 2019**

**Prepared by expert reviewers:**

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## AFRICAN DEVELOPMENT BANK (AFDB)

### Background on relevant Agency Policies

1. The AfDB Group is a multilateral development bank whose shareholders include 54 African countries (regional member countries or RMCs) and 24 non-African countries from the Americas, Asia, and Europe (non-regional member countries or non-RMCs). AfDB's mission is to promote sustainable economic growth in order to reduce poverty in Africa. The Bank prioritizes national and multinational projects and programs that promote regional economic cooperation and integration.
2. As a multilateral development bank, AfDB has joined the other international financing institutions in adopting environmental and social policies, guidelines, and procedures to ensure that its operations avoid adverse impacts on people and the environment. During the ADF12 Commitments and the General Capital Increase, and at the request of shareholders, the Bank committed itself in 2010 to revising and upgrading its Environmental and Social Safeguards (ESS) system and procedures by preparing and adopting an Integrated Safeguards System (ISS) and by promoting the mainstreaming of climate-change considerations in Bank Group-funded operations.
3. The ISS consists of four parts: (i) an overall Policy Statement; (ii) five Operational Safeguards (OSs); (iii) technical guidance in the form of [Environmental and Social Assessment Procedures](#) (ESAP); and (iv) a set of Integrated E&S Impact Assessment (IESIA) guidance notes. The five Operational Safeguards (OS) mainstream E&S considerations, including those related to climate change vulnerability, into Bank operations. The themes of the OSs are OS 1: Environmental and social assessment; OS 2: Involuntary resettlement: land acquisition, population displacement and compensation; OS 3: Biodiversity, renewable resources and ecosystem services; OS 4: Pollution prevention and control, hazardous materials and resource efficiency; and OS 5: Labor conditions, health and safety.

### Findings and Recommendations on Compliance with GEF Policies

4. The review assessed the alignment between the AfDB ISS and other relevant AfDB policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards:* AfDB was assessed as follows:
    - (i) Fully compliant (no gaps) with MS7 (Resource Efficiency and Pollution Prevention), and MS8 (Labor and Working Conditions).
    - (ii) Some gaps were found with MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS4 (Resettlement), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), and MS9 (Community Health, Safety and Security).

- (b) *Policy on Gender Equality:* AfDB was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement:* AfDB was assessed to have one partial gap with the Policy on Stakeholder Engagement.
5. *Recommendations:* AfDB should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
- (a) *Safeguards:*
    - (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) address issues relating to seasonal variation in baseline data collection, (b) require the establishment of independent advisory panels for high risk projects, (c) provide fuller treatment of disability inclusion, and (d) identify and address risks of GBV and SEA, including establishing GBV reporting and response protocols;
    - (ii) MS2 Accountability, Grievance and Conflict Resolution: address risks of retaliation to complainants;
    - (iii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: address the issue of forest restoration and maintenance of biodiversity;
    - (iv) MS4 Restrictions on Land Use and Involuntary Resettlement: explicitly address the prohibition on forced evictions;
    - (v) MS5 Indigenous Peoples: (a) address risks and circumstances of indigenous peoples living in voluntary isolation, and (b) address issues concerning the rights of indigenous peoples in planning and management of areas where access may be restricted;
    - (vi) MS6 Cultural Heritage: (a) address issues with restrictions to stakeholder access, and (b) address issues of stakeholder rights with regards to the commercial use of cultural heritage items;
    - (vii) MS9 Community Health, Safety and Security: fully address the MS9 requirements, such as through development of a new Community Health, Safety, and Security Operational Safeguard standard.
  - (b) *Stakeholder Engagement:* AfDB should incorporate explicit policy requirements for stakeholder consultations to be gender responsive.
6. Descriptions of the findings for each policy are provided below.

## Policy on Environmental and Social Safeguards

### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring)*

7. The AfDB Integrated Safeguards System contains comprehensive policy requirements and procedures to promote environmental and social sustainability and to help ensure prevention and mitigation of undue harm to people and the environment.
8. The following gap areas were identified:
  - (a) Partial gap: 4d: Text relating to seasonal variation in baseline data collection is missing from Annex 7 of the ESAP, and in the relevant IESIA Guidance notes.
  - (b) Partial gap: 4f: The Bank's Environmental and Social Assessment Procedures require the engagement of independent environmental and social specialists to carry out SESA/ESIA and ESMP. However, they do not specify a requirement to establish Independent Advisory Panels for high risk projects.
  - (c) Partial gap: 4l: The Bank's screening, assessment and planning processes do not systematically address disability.
  - (d) Partial gap: 4m,4o: The Bank's OS 1 emphasizes the need to assess gender issues in the context of vulnerability. However, the Bank does not have as of yet any policies and guidelines in place specifically for gender-based violence.

### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

9. The Bank's Independent Review Mechanism provides a robust independent compliance review function. Only one area of gap was identified:
  - (a) Partial gap: 5f: This policy component requires the Bank to take appropriate and timely measures to minimize the risk of retaliation to complainants. The ISS does not specifically mention procedures that minimize risk of retaliation.

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

10. The Bank's OS3 is focused on the conservation of biodiversity, and the protection of natural, modified, and critical habitats. The Operational Safeguard meets all of the required MS 3 criteria but does not deal with the issue of forest restoration maintenance or enhancing biodiversity and ecosystem functionality. The following partial gap should therefore be addressed:
  - (a) Partial gap: 8e: OS 3 does not deal with the issue of forest restoration and maintenance of biodiversity.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

11. The Bank's Operational Safeguard 2 deals with involuntary resettlement: land acquisition, population displacement and compensation. It is almost entirely compliant with the GEF's MS 3. Only one area of gap, was identified:
  - (a) Partial gap: 9i: OS2 does not specify that forced eviction without the provision of and access to appropriate forms of legal and other protection is prohibited.

#### *Minimum Standard 5: Indigenous People*

12. The Bank considers indigenous people to be a special case of "vulnerable groups". Indigenous people's issues are dealt with in OS 2. This safeguard standard is almost entirely compliant with MS 5. Only two areas of gap exist:
  - (a) Partial gap: 11i: OS 2 does not mention rights of indigenous people in planning and management of protected areas where access may be restricted.
  - (b) Partial gap: 11j: OS 2 does not cover the issue of indigenous people in voluntary isolation.

#### *Minimum Standard 6: Cultural Heritage*

13. The Bank does not have an explicit OS for cultural heritage. However, OS 1 as part of 'special screening considerations' (OS1, p.27), stipulates that the borrower or client is responsible for ensuring that project sites and designs avoid significant damage to cultural heritage. Two areas of gap exist:
  - (a) Partial gap: 12f: The issue of restrictions to stakeholder access
  - (b) Partial gap: 12g: The issue of commercial use and stakeholder rights

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

14. The Bank's Operational Safeguards address Resource Efficiency and Pollution Prevention under OS 4. This Operational Safeguard is entirely compliant with MS 7.

#### *Minimum Standard 8: Labor and Working Conditions*

15. The Bank's OS 5 (Labour and Working Conditions) outlines the main requirements for borrowers or clients to protect the rights of workers and provide for their basic needs. This OS is entirely compliant with MS 8.

#### *Minimum Standard 9: Community Health, Safety and Security*

16. Some aspects of MS 9 are contained within the Bank's OS1 and OS8. However, the Bank does not have a specific Operational Safeguard that covers community health, safety, and

security. The recent independent evaluation of the ISS has recommended that this is a significant gap. As a consequence, it is recommended that the Bank develop a new Community Health, Safety, and Security Operational Safeguard.

### **Policy on Gender Equality**

17. The Bank does not have a specific Operational Safeguard that covers Gender Equality. Rather, gender is seen as a cross-cutting aspect throughout its ISS. The Bank has several policy documents/instruments that seek to inform gender responsive project design, implementation and monitoring. These include; AfDB Gender Policy (2001), AfDB Gender Strategy 2014-2018 (which has been extended to 2020) and more significantly for this requirement from GEF, AfDB Gender Marker System that categorises the banks projects based on their contribution to gender equality and women’s empowerment. These instruments act in combination to ensure compliance with the GEF’s Policy on Gender Equality.

### **Policy on Stakeholder Engagement**

18. The Bank does not have a specific Operational Safeguard dealing with stakeholder engagement. However, the issue is sufficiently covered by the Bank’s ISS Guidance Materials Volume 2: “Consultation, Vulnerable Groups and Grievance and Redress Mechanisms”. This guidance material also provides support to OS 1’s requirements on consultations.
19. There is only one area of partial gap:
  - (a) Partial gap: SE16b: The Policy on Stakeholder Engagement requires that consultations are gender responsive; free of manipulation, interference, coercion, discrimination and intimidation; and responsive to the needs and interests of disadvantaged and vulnerable groups. This aspect is missing from the Bank’s Volume 2 Guidance Materials.

## ASIAN DEVELOPMENT BANK (ADB)

### Background on relevant Agency policies

1. The Asian Development Bank (ADB) is an international development finance institution committed to achieving a prosperous, inclusive, resilient, and sustainable Asia and the Pacific, while sustaining its efforts to eradicate extreme poverty. It assists its members and partners by providing loans, technical assistance, grants, and equity investments to promote social and economic development.
2. ADB has comprehensive policy requirements and procedures to promote environmental and social sustainability and to help ensure the prevention and mitigation of undue harm to people and the environment. ADB's integrated Safeguard Policy Statement (SPS, 2009), supported by mandatory procedures (Operational Manual), contain three main safeguards: (1) environmental safeguards, (2) involuntary resettlement safeguards, and (3) indigenous peoples safeguards. The environmental safeguards encompass a range of requirements, including environmental assessment, management, planning, monitoring, and reporting; consultation, information disclosure, and grievance redress mechanisms; biodiversity conservation and sustainable natural resource management; pollution prevention and abatement; health and safety; and physical cultural resources.
3. ADB's Access to Information Policy (2018) governs organizational access to information and disclosure. The ADB Accountability Mechanism Policy (2012) stipulates both a compliance review function (Compliance Review Panel) and a problem-solving function (Special Projects Facilitator). ADB's Policy on Gender and Development (2001) adopts gender mainstreaming as the key strategy to promote gender equity. A range of other strategies and guidelines support implementation of ADB's environmental and social policies and safeguard requirements.

### Findings and Recommendations on Compliance with GEF Policies

4. The review assessed the alignment between the ADB SPS and other relevant ADB policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards:* ADB was assessed as follows:
    - (i) fully compliant (no gaps) with MS2 (Accountability), MS4 (Resettlement), and MS8 (Labor);
    - (ii) some partial gaps were identified for MS1 (Assessment), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource Efficiency/Pollution Prevention) and MS 9 (Community Health and Safety).

- (b) *Policy on Gender Equality*: ADB was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: ADB was assessed as fully compliant with the Policy on Stakeholder Engagement.
5. *Recommendations*: ADB should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements, as follows:
- (a) *Safeguards*:
    - (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) strengthen the focus on ensuring nondiscrimination and equal opportunity for persons with disabilities; and (b) establish modalities for GBV reporting and response protocols;
    - (ii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) ensure procurement of natural resource commodities does not contribute to significant conversion or degradation of natural habitats, where feasible; and (b) ensure that all projects (not just those affecting indigenous peoples) conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources;
    - (iii) MS5 Indigenous Peoples: (a) broaden the circumstances for which free prior informed consent (FPIC) of indigenous peoples is required (i.e. all projects that may “impact” indigenous lands and territories and/or may “significantly impact” indigenous peoples cultural heritage); and (b) address the special circumstances of indigenous peoples living in voluntary isolation;
    - (iv) MS6 Cultural Heritage: (a) ensure that the scope of the relevant ADB safeguard provisions encompass “intangible cultural heritage;” (b) provide for continued access to cultural heritage in the event a project imposes access restrictions (not limited to projects that may invoke the ADB’s Involuntary Resettlement and/or Indigenous Peoples safeguards; and (c) fair and equitable benefit sharing from commercial use of cultural heritage (not limited to the cultural heritage of indigenous peoples);
    - (v) MS7 Resource Efficiency and Pollution Prevention: broaden the categories of prohibited pesticides that meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies; and
    - (vi) MS9 Community Health, Safety and Security: address risks associated with use of security personnel.

6. Descriptions of the findings for each policy are provided below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

7. ADB's Safeguard Policy Statement (SPS) and Operational Manual (OM procedures) contain policy requirements and procedures to promote environmental and social sustainability and to help ensure prevention and mitigation of undue harm to people and the environment.
8. ADB's policies and procedures address most GEF criteria of MS 1. However, the following partial gaps were identified:
  - (a) Partial Gap: Para. 4.l states that differentiated risks to persons with disabilities be systematically addressed in screening, assessment, and planning in a manner that ensures non-discrimination and equality, and provision of opportunities and benefits to persons with disabilities on an equal basis with others. ADB's SPS requires screening and assessment of risks to vulnerable groups, including to persons with disabilities. ADB project documentation demonstrate attention to the risks and circumstances of persons with disabilities. However, the SPS does not fully address the GEF emphasis on ensuring nondiscrimination and equality of opportunity for persons with disabilities. ADB's Strategy 2030 Operational Priority 1 plan emphasizes that ADB will strengthen attention to disability inclusion in programming.
  - (b) Partial Gap: Para. 4.o: Para. 4.o requires adoption of reporting and response protocols for addressing incidences of GBV/SEA. The SPS and IPSA require identification of gender-differentiated risks and seek to address GBV risks through the focus on vulnerability. ADB Strategy 2030 Operational Priority 2 on gender states that ADB will expand operations addressing GBV and will assess project risks of sexual harassment, SEA, human trafficking. Recently approved templates seek to ensure that such risks are identified at project approval. ADB has a workplan to develop operational guidelines on GBV risks. However, at this time it does not appear that the issue of establishing GBV response and reporting protocols is fully addressed.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

9. ADB's Accountability Mechanism (see ADB Accountability Mechanism Policy, 2012) encompasses both compliance review (undertaken by the Compliance Review Panel, CRP) and problem-solving functions (Special Projects Facilitator). Numerous cases posted on the AM website provide implementation evidence. The ADB was assessed as fully compliant with MS2.

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

10. The SPS includes policy requirements for the protection and conservation of biodiversity and sustainable management of renewable natural resources. ADB's policies and procedures address most GEF criteria of MS3. However, the following partial gaps were identified:
  - (a) Partial Gap: Para. 8.c states that procurement of natural resource commodities may not contribute to significant conversion or degradation of natural habitats, where feasible, and that the choice of suppliers should be limited to those who can demonstrate compliance with this requirement. ADB's SPS requirements regarding sustainable management of natural resources requires, in the context of projects, application of sustainable management principles, including where appropriate independent certification. ADB's guidance note on procurement provides for adoption of sustainable procurement requirements, however this is not considered mandatory. The ADB requirements do not fully address the scope of GEF procurement criteria (which extends beyond the project context).
  - (b) Partial Gap: Para. 8.f requires that projects conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources. This issue is partially addressed in the ADB Indigenous Peoples safeguard (covering use and commercial development of indigenous peoples' knowledge, culture and natural resources). ADB requires that projects meet all national obligations, including where a country has ratified the CBD Nagoya Protocol on ABS. While this would address many country situations, a gap may still exist where a country has not ratified the protocol. GEF's requirement in this regard is broader in scope.

### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

11. The ADB's Safeguard Policy Statement includes requirements to avoid or at least minimize involuntary resettlement, to enhance or at least restore the livelihoods of all displaced persons, and to improve the standards of living of the displaced poor and other vulnerable groups. ADB's Involuntary Resettlement safeguard addresses all of the criteria of MS4 (fully compliant).

### *Minimum Standard 5: Indigenous Peoples*

12. The SPS establishes a framework for avoidance and/or minimization of impacts on indigenous communities, provision of culturally appropriate benefits, and recognition of indigenous people's rights to participate in project decision-making. ADB's Indigenous Peoples safeguard addresses most of the GEF MS5 requirements; however, some partial gaps were identified:

- (a) Partial Gap: Para. 10a: FPIC: The first FPIC circumstance of MS5 requires obtaining FPIC for projects with “impacts” on indigenous lands and territories, including locating projects on such lands or commercial development of resources on such lands. The relevant SPS consent requirement is limited to commercial development. In addition, the scope of potential impacts that may trigger consent requirements do not fully align (GEF: impacts on “lands and resources;” SPS: impacts on “livelihoods” and “cultural/ceremonial/spiritual uses”). ADB has noted that its broad meaningful consultations requirement would likely address the issues targeted by the GEF FPIC circumstances, however the SPS policy language remains narrower in scope.
- (b) Partial Gap: Para. 10.c: FPIC: The third FPIC circumstance of MS5 requires obtaining FPIC for projects with “significant impacts” on indigenous people’s cultural heritage or the “use of such cultural heritage for commercial purposes.” The relevant SPS consent requirement applies more narrowly to “commercial development of the cultural resources and knowledge of Indigenous Peoples.”
- (c) Gap: Para. 11.j requires that appropriate measures be taken to address the special circumstances of indigenous peoples living in voluntary isolation. The SPS does not address this requirement.

#### *Minimum Standard 6: Cultural Heritage*

13. The SPS includes policy and procedural requirements to avoid or minimize impacts on physical cultural resources (PCR). Some partial gaps were identified in comparison to the requirements of MS6:
  - (a) Partial Gap: Para. 12 (most provisions in section, including 12.a, 12.b, 12.e): Definition of Cultural Heritage: The SPS environmental safeguards include requirements regarding the conservation of “physical cultural resources” (PCR). The term PCR is defined as “moveable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance.” The term PCR does not encompass the full range of Cultural Heritage as defined in the GEF MS, namely in that it does not specifically address “intangible cultural heritage,” that is, the “practices, representations, expressions, knowledge, or skills” that communities, groups, individuals recognize as part of their heritage (see full GEF definition in glossary). ADB has noted that if national law covers intangible cultural heritage it would address this aspect; however, a gap would remain where national law does not address it.
  - (b) Partial Gap: Para. 12.f requires measures to ensure continued access to cultural heritage in the event a project imposes access restrictions. While the SPS safeguards on Involuntary Resettlement and Indigenous Peoples address this circumstance (in full or in part), the GEF requirements apply more broadly, including to projects for which the Involuntary Resettlement safeguard may not be

invoked. ADB's general requirements to identify and mitigate project-related adverse impacts may address this provision (or may not depending on the scope of the risk assessment). The SPS's special considerations for impacts on (physical) cultural heritage do not specifically address the issue of continued access.

- (c) Partial Gap: Para. 12.g requires fair and equitable sharing of benefits from any commercial use of cultural heritage. The SPS addresses this issue in the context of commercial development of indigenous peoples' "cultural resources and knowledge." However, the GEF requirement applies to all relevant projects (not solely those affecting indigenous peoples). ADB would address this issue where it is enacted into national law, but a gap would remain where it is not.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

- 14. The SPS environmental safeguards include requirements that projects avoid and minimize the generation of pollution, wastes, hazardous materials and promote the safe use of pesticides as well as resource efficiency measures. ADB's policies, procedures and guidelines fully address all but one of the GEF MS7 requirements:
  - (a) Partial Gap: Para. 14.d, among other requirements, prohibits use of pesticides that meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies. The SPS requires the use of less hazardous substitutes for all chemicals and materials. It also bans the use of pesticides that fall into WHO classifications 1a and 1b, and limits use of WHO Class II pesticides. The SPS also calls for pesticide management in accordance with international good practice. These requirements address some but not all of the updated GEF criteria, particularly those on prohibited classes of pesticides due to carcinogenicity, mutagenicity, or reproductive toxicity (GHS Categories 1A and 1B; see the criteria for Highly Hazardous Pesticides in the 2016 [FAO/WHO Guidelines on Highly Hazardous Pesticides](#); note that WHO Class 1a and 1b pesticides are addressed by criterion 1 of the eight HHP criteria).

#### *Minimum Standard 8: Labor and Working Conditions*

- 15. The ADB/ILO Core Labour Standards Handbook (2006) states that ADB adopted a commitment to the CLS in its 2001 Social Protection Strategy and since then "ensures that the CLS are duly considered in the design and implementation of its investment projects." Labour issues, including adherence to the CLS, are to be identified in the Initial Poverty and Social Analysis (IPSA). The SPS includes requirements regarding occupational health and safety. ADB's policies, procedures and guidelines fully address the criteria of MS8.

#### *Minimum Standard 9: Community Health, Safety and Security*

- 16. The SPS contains a range of provisions regarding community health and safety. It requires identification and assessment of risks and impacts to the safety of affected communities throughout the project cycle. It emphasizes prevention or avoidance of such risks over

minimization. ADB's policies, procedures and guidelines address all but one of the GEF MS9 requirements:

- (a) Partial Gap: Para. 17.f requires consideration of potential risks associated with the use of security personnel (i.e. security arrangements are proportional and consistent with applicable national laws and good international industry practice). ADB's SPS requires analysis of potential risks and impacts in the project's area of influence, including facilities controlled by contractors. This may partially address the GEF requirement, but it is general in nature and does not specifically address risks associated with security arrangements.

### **Policy on Gender Equality**

- 17. ADB has a comprehensive set of strategies, policies, guidance and systems to address gender equality and gender mainstreaming in supported projects. ADB was assessed as fully compliant with the requirements of the GEF Policy on Gender Equality.

### **Policy on Stakeholder Engagement**

- 18. ADB requires stakeholder identification, meaningful consultation, and timely disclosure of relevant project information with stakeholders throughout the project cycle. Its requirements were assessed as fully compliant with the GEF Policy on Stakeholder Engagement.

## BRAZILIAN BIODIVERSITY FUND (FUNBIO)

### Background on relevant Agency policies

1. The Brazilian Biodiversity Fund (Funbio) is a not-for-profit civil association providing strategic financial and material resources to support the conservation and sustainable use of biological diversity. Established in 1996, Funbio's main objective is to complement governmental initiatives for the conservation of biodiversity, in line with the Convention on Biological Diversity (CBD) and Brazil's National Programme on Biological Diversity (PRONABIO).
2. Funbio updated its Environmental and Social Safeguards Policy (ESSP) in 2018. It has aligned its Policy with the IFC Performance Standards (2012). The Policy includes the following standards: PS1 - Evaluation and Management of Socioenvironmental Risks and Impacts; PS2 - Employment and Labor Conditions; PS3 - Resource Efficiency and Pollution Prevention; PS4 - Community Health and Safety; PS5 - Land Acquisition and Involuntary Resettlement; PS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources; PS7 - Indigenous Peoples; PS8 - Cultural Heritage. Funbio's ESSP provides general descriptions of each Performance Standard. It indicates that it will follow the full set of applicable requirements as articulated in the IFC's PSs as well as the IFC PS guidance notes, when relevant. Funbio updated its project screening tool in 2019.
3. Funbio updated its Grievance Policy and Gender Mainstreaming Policy in 2018.

### Findings and Recommendations on Compliance with GEF Policies

4. The review assessed the alignment between the Funbio's policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. A summary of key findings follows:
  - (a) *Policy on Environmental and Social Safeguards:* Funbio was assessed as follows:
    - (i) fully compliant (no gaps) with MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS4 (Resettlement), MS5 (Indigenous Peoples), MS8 (Labor), and MS9 (Community Health, Safety and Security).
    - (ii) some partial gaps were identified for MS6 (Cultural Heritage) and MS7 (Resource Efficient and Pollution Prevention).
  - (b) *Policy on Gender Equality:* Funbio was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement:* some partial gaps were identified regarding compliance with the Policy on Stakeholder Engagement.

5. Recommendations: Funbio should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
  - (a) *Safeguards:*
    - (i) MS6 Cultural Heritage: address the need to withhold information on cultural heritage when necessary in order to safeguard its safety and integrity;
    - (ii) MS7 Resource Efficiency and Pollution Prevention: address the expanded range of prohibited pesticides.
  - (b) *Stakeholder Engagement:* ensure the forthcoming Funbio Policy on Stakeholder Engagement addresses all of the relevant GEF requirements.
6. A description of the assessment for each GEF Policy is below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

7. Funbio's PS1 on Socio-Environmental Risk and Impact Assessment addresses many of the GEF criteria of MS1. Funbio's screening tool includes a broad range of risk identification measures that go beyond the PS1 policy requirements, including risks of discrimination to persons with disabilities and gender-based violence (including response measures). Together, Funbio's policies and tools were assessed as meeting the MS1 criteria.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

8. Funbio's ESSP contains a section of Complaint, Control and Accountability System. Funbio also adopted an updated Grievance Policy in 2018 and provided documents that explain and diagram the functioning of its complaints system. Funbio was assessed as being fully compliant with the MS2 requirements.

#### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

9. Funbio's PS6 on Biodiversity and Sustainable Management of Living Natural Resources covers nearly all of the GEF criteria of MS3. In addition, Funbio's screening tool addresses additional requirements (including access and benefit sharing in the utilization of genetic resources). Together, Funbio's policies and tools address all of the MS3 requirements.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

10. The ESSP's PS5 on Land Acquisition and Involuntary Resettlement addresses all of the GEF criteria of MS4 and was assessed as being fully compliant.

### *Minimum Standard 5: Indigenous Peoples*

11. Funbio's PS7 on Indigenous Peoples addresses nearly all of the GEF MS5 criteria. Funbio's screening tool addresses additional MS5 requirements (including risks regarding indigenous peoples in voluntary isolation) and, together, Funbio's policies and tools were assessed as fully compliant with MS5.

### *Minimum Standard 6: Cultural Heritage*

12. Funbio's PS8 on Cultural Heritage was assessed as meeting nearly all of the MS6 requirements. One gap area was identified:
  - (a) Para. 12.d: Gap: It does not address the need for withholding information on cultural heritage when necessary in order to safeguard its safety and integrity.

### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

13. Funbio's safeguards, in particular PS3 on Resource Efficiency and Pollution Prevention, and screening tool were assessed as addressing all but one of the criteria of GEF MS7:
  - (a) Para. 14.d: Partial Gap: Funbio's policy and updated screening tool (which addresses a range of issues regarding pesticide risks) do not fully address the expanded range of prohibited pesticides in MS7 (i.e. the criteria regarding carcinogenicity, mutagenicity, or reproductive toxicity).

### *Minimum Standard 8: Labor and Working Conditions*

14. Funbio's PS2 on Work and Labor Conditions was assessed as fully compliant with the GEF requirements of MS8.

### *Minimum Standard 9: Community Health, Safety and Security*

15. Funbio's PS4 on Community Health and Safety was assessed as fully compliant with the GEF requirements of MS9.

### **Policy on Gender Equality**

16. Funbio updated its Gender Mainstreaming Policy in 2018. It established a Gender Working Group in 2019 to mainstream gender in projects, and the project risk screening tool addresses a wide range of gender issues. Funbio was assessed as being fully compliant with GEF's Policy on Gender Equality.

### **Policy on Stakeholder Engagement**

17. Funbio's ESSP and screening tool address some of the requirements of the GEF Policy on Stakeholder Engagement provisions (i.e. consultations during the assessment process and

for projects that involve displacement or affect indigenous peoples). However, the assessment found a range of gap areas, including the need for consultations throughout the project cycle, criteria for meaningful consultations (beyond those required for indigenous peoples), public record of consultations, and broader access to information requirements. Funbio indicates that it is currently developing a Policy on Stakeholder Engagement.

## CONSERVATION INTERNATIONAL (CI)

### Background on relevant Agency policies

1. Conservation International works to spotlight and secure the critical benefits that nature provides to humanity. Since its founding in 1987, Conservation International has worked with partners to protect more than 1.5 billion acres of the most critical landscapes and seascapes around the world. Building upon a strong foundation of science, partnership and field demonstration, Conservation International seeks to empower societies to responsibly and sustainably care for nature, our global biodiversity, for the well-being of humanity.
2. CI's Environmental and Social Management Framework (ESMF) (updated version Feb 2017) is composed of nine policies: 1: Environmental and Social Impact Assessment (ESIA); 2: Protection of Natural Habitats; 3: Involuntary Resettlement; 4: Indigenous Peoples; 5: Pest Management; 6: Physical Cultural Resources; 7: Accountability and Grievance Mechanisms; 8: Gender Mainstreaming; and 9: Stakeholder Engagement.

### Findings and Recommendations on Compliance with GEF Policies

3. The review assessed the alignment between the CI's ESMF and other relevant policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards:* CI was assessed as follows:
    - (i) Some partial gaps were identified across all of the Minimum Standards.
  - (b) *Policy on Gender Equality:* CI was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement:* CI was assessed to have a partial gap with the Policy on Stakeholder Engagement.
4. *Recommendations:* CI should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
  - (a) *Safeguards:*
    - (i) MS1 Environmental and Social Assessment, Management and Monitoring:
      - (a) ensure use of independent expertise in assessments and third-party monitoring;
      - (b) address climate change impacts and disaster risks in screening and assessment,
      - (c) strengthen focus on risks to disadvantaged and vulnerable groups,
      - (d) identify potential risks of GBV and SEA and establish GBV response and reporting protocols;

- (ii) MS2 Accountability, Grievance and Conflict Resolution: ensure that appropriate measures are taken to minimize the risk of retaliation to complainants;
  - (iii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: address (a) strengthen mitigation strategies for impacts on natural habitats to preferably seek a net gain of biodiversity values, (b) criteria for use of biodiversity offsets, (c) risks of procurement of natural resource commodities to natural habitats, and (d) access and benefit sharing arrangements in the utilization of genetic resources;
  - (iv) MS4 Restrictions on Land Use and Involuntary Resettlement: define displacement eligibility categories and compensation and assistance standards per the GEF criteria;
  - (v) MS5 Indigenous Peoples: address (a) requirements regarding commercial development of indigenous peoples' lands and resources, and (b) risks to and circumstances of indigenous peoples living in voluntary isolation;
  - (vi) MS6 Cultural Heritage: (a) broaden scope of policy to encompass intangible cultural heritage, and address requirements regarding (b) confidentiality, (c) continued access, and (d) commercial use of cultural heritage;
  - (vii) MS7 Resource Efficiency and Pollution Prevention: (a) broaden coverage of risks associated with wastes, hazardous materials, and climate pollutants; (b) expand categories of prohibited pesticides; and (c) address the resource efficiency provisions of the GEF MS7;
  - (viii) MS8 Labor and Working Conditions: address the labor and working condition provisions of the GEF Policy; and
  - (ix) MS9 Community Health, Safety and Security: address broader range of risks to community health and safety such as from infrastructure, conflict situations, climate change and disaster risks, disease exposure, and security arrangements.
- (b) *Stakeholder Engagement*: consider defining criteria for meaningful consultations per the GEF criteria (i.e. gender responsive; free of manipulation, interference, coercion, discrimination and intimidation; and responsive to the needs and interests of disadvantaged and vulnerable groups).

5. Descriptions of the findings for each policy are provided below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

6. The ESMF's Policy 1 on Environmental and Social Impact Assessment (ESIA) sets out CI's requirements regarding screening, assessment, and management of potential

environmental and social risks and impacts of supported projects. A number of gap areas were identified:

- (a) Gap: Para. 4.f: The ESMF does not appear to require that independent expertise be used to conduct assessments, where appropriate. In addition, it does not require use of independent advisory panels for certain projects of high magnitude/impacts.
  - (i) Partial Gap: Para. 4.g: Third party monitoring and/or independent audits are not specifically addressed in the ESMF.
  - (ii) Gap: Para. 4.i: CI's screening form and ESIA requirements do not systematically address risks of climate change impacts and disaster risks.
  - (iii) Gap: Paras. 4.j and 4.k: CI's screening and assessment requirements do not require that differentiated impacts to disadvantaged and vulnerable groups and individuals be identified, and that relevant differentiated mitigation measures be implemented. The assessment requirements do not address potential risks of discrimination and prejudice.
  - (iv) Partial Gap: Paras. 4.m and 4.n: The ESMF screening form does not address gender-related risks. GBV and SEA risks are not flagged. Policy 8 notes that required Gender Mainstreaming Plans are to ensure that gender-related adverse impacts are avoided or mitigated. Policy 8 also promotes gender equality and equity; however specific requirements regarding the avoidance of gender-related adverse impacts and prevention of gender-based discrimination are not reflected in screening and assessment provisions.
  - (v) Gap: Para. 4.o: CI's ESMF does not address the need to establish reporting and response protocols for incidences of GBV.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

7. CI's ESMF contains Policy 7 on Accountability and Grievance Mechanisms. The Policy outlines both agency-level compliance review and problem-solving functions to address potential stakeholder complaints and includes requirements for project-level grievance mechanisms. CI's policy and procedures address nearly all of the requirements of MS2 except for the following:

- (a) Gap: Paras. 5.f and 6.g: CI's policy does not address the need to take appropriate measures to minimize the risk of retaliation to complainants.

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

8. CI's ESMF contains Policy 2 on the Protection of Natural Habitats. The Policy includes provisions regarding biodiversity conservation and sustainable management of natural resources. While the Policy addresses many of the criteria of GEF's MS3, the following gap areas were identified:
- (a) Partial Gap: Para. 8.b: Regarding potential adverse impacts on natural habitats, the ESMF does not specify that mitigation strategies are to preferably seek a net gain of biodiversity values (not just 'no net loss'). Also, the ESMF does not address the GEF MS3 criteria for the use of offsets and compensation.
  - (b) Gap: Para. 8.c: The ESMF does not address the GEF criteria regarding potential risks that procurement of natural resource commodities may contribute to significant conversion or degradation of natural habitats.
  - (c) Gap: Para. 8.f: The ESMF does not address the GEF criteria that supported activities conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources.

### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

9. CI's ESMF exclusion list and Policy 3 on Involuntary Resettlement prohibit support for projects that may involve *involuntary* physical displacement, land acquisition and/or taking of shelter and other assets. The Policy sets out requirements for voluntary resettlement as well as projects that may impact livelihoods through access restrictions to natural resources (voluntary or involuntary). The review found the following partial gaps:
- (a) Partial Gap: Para. 9.d: While CI's voluntary resettlement Action Plans V-RAPs are to be cognizant of all forms of asset ownership or use rights, the requirements are not specific regarding potential eligibility categories per the GEF criteria (i.e. people with formal legal rights to land or assets; people without formal legal rights but with a claim to land or assets that is recognized or recognizable under national law; and people who have no recognizable legal right or claim to the land or assets they occupy or use, but who are occupying or using the land prior to a project-specific cut-off date).
  - (b) Partial Gap: Para. 9.f: CI's requirements regarding physical displacement (noting that this is only undertaken with consent of affected persons) do not address all of the criteria of GEF MS4, namely they do not stipulate provision of feasible resettlement options, land-for-land compensation (of equal potential and secure tenure), and do not stipulate that "adequate replacement housing" and services be provided.

- (c) Partial Gap: Para. 9.g: Regarding compensation standards for economic displacement impacts, CI's Policy 3 does not specify compensation of equal or greater value for loss assets or cash compensation at replacement cost.
- (d) Partial Gap: Para. 9.h: Policy 3 does not specifically address the assistance standards for persons without formal legal rights to land or claims to such land that could be recognized under national laws.
- (e) Partial Gap: Para. 9.j: Policy 3 does not stipulate that in cases of physical displacement (CI's Voluntary-RAP requirements) that compensation, assistance, and benefits be provided before displacement activities begin.

#### *Minimum Standard 5: Indigenous Peoples*

10. The ESMF's Policy 4 on Indigenous Peoples outlines requirements to ensure projects are undertaken in partnership with indigenous peoples and that adverse impacts are avoided, minimized and mitigated. It requires obtaining free, prior and informed consent (FPIC) for all projects that affect indigenous peoples. CI's Policy addresses nearly all of the GEF MS5 criteria except for the following two gap areas:
- (a) Gap: Para. 11.g: CI's ESMF does not address the GEF criteria regarding instances where projects may seek commercial development of lands and natural resources central to indigenous peoples' identity and livelihood, or commercial use of cultural heritage of indigenous peoples (i.e. the need to inform affected groups of their rights, nature of impacts, and enable equitable benefit sharing).
  - (b) Gap: Para. 11.j: CI's Policy does not address measures to respect indigenous peoples living in voluntary isolation, per the GEF criteria.

#### *Minimum Standard 6: Cultural Heritage*

11. ESMF Policy 6 sets out requirements regarding physical cultural resources (PCR). The scope of the Policy is not as broad as GEF's MS6 which encompasses both tangible (e.g. PCR) and intangible cultural heritage. In addition, the following gap areas were identified:
- (a) Gap: Para. 12.d: CI's Policy does not address potential need for confidentiality regarding cultural heritage.
  - (b) Gap: Para. 12.f: The issue of ensuring continued access to cultural heritage in the event of restricted access is not addressed.
  - (c) Gap: Para. 12.g: CI's Policy does not address the GEF criteria regarding potential commercial use of cultural heritage.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

12. CI's Policy 1 on ESIA addresses potential pollution risks generally. Policy 5 on Pest Management addresses risks associated with pesticides. However, the ESMF

requirements regarding pollution prevention and resource efficiency are not as encompassing (or as specific) as the criteria of GEF MS7. The following gap areas were identified:

- (a) Partial Gap: Para. 14.a: ESMF Policies 1 and 5 address screening and assessment of pollution and pesticides risks. The ESMF however is not specific regarding risks of wastes, hazardous materials, and climate pollutants.
- (b) Partial Gap: Para. 14.d: Policy 5 bans the use of pesticides that fall into WHO classifications 1a and 1b (and limits use of WHO Class II pesticides). It does not specifically address the GEF criteria regarding carcinogenicity, mutagenicity, or reproductive toxicity (GHS Categories 1A and 1B; see the criteria for Highly Hazardous Pesticides in [FAO/WHO Guidelines on Highly Hazardous Pesticides](#); note that WHO Class 1a and 1b pesticides are addressed by criterion 1 of the eight HHP criteria). The Policy 5 requirements appear to only partially address the GEF criteria.
- (c) Gap: Para. 14.e: CI's ESMF does not specifically address resource efficiency issues, including issues regarding significant water consumption.

#### *Minimum Standard 8: Labor and Working Conditions*

13. CI notes that it currently does not have requirements regarding labor and working conditions for project workers other than direct employees. CI notes that projects adhere to relevant national laws and regulations. It states that it will address the criteria of MS8 when it updates its ESMF.

#### *Minimum Standard 9: Community Health, Safety and Security*

14. CI's Policy 1 on ESIA requires identification of risks to human health and safety. However, not all GEF criteria of MS9 are addressed. Identified gap areas include the following:
- (a) Partial Gap: Para. 17.a: CI's screening and assessment requirements do not specifically address general infrastructure risks (structural elements) to communities; special needs and risk exposure of vulnerable and disadvantaged groups and individuals; conflict and post-conflict situations; and risks of climate change impacts and natural hazards.
  - (b) Gap: Para. 17.c: The ESMF does not specify that external experts (separate from design and construction teams) be engaged to review structural components of projects that are situated in high-risk locations.
  - (c) Gap Para. 17.d: The ESMF does not address the potential need for emergency preparedness plans.
  - (d) Gap: 17.e: ESMF does not specifically address risks of community exposure to disease and the need for analysis of differentiated exposure of disadvantaged and vulnerable groups and individuals.

- (e) Gap: Para. 17.f: The ESMF does not address potential risks posed by project security arrangements.

### **Policy on Gender Equality**

- 15. CI's ESMF contains Policy 8 on Gender Mainstreaming and Appendix 8 provides guidance on the development of Gender Mainstreaming Plans (GMP), which are required for all GEF-funded projects. The requirements and procedures of CUI's Policy and GMPs address all of the criteria of GEF's Policy on Gender Equality.

### **Policy on Stakeholder Engagement**

- 16. CI's ESMF includes Policy 9 on Stakeholder Engagement and App. 9 provides guidance on the development of Stakeholder Engagement Plans (SEP), which are required for all GEF projects. The Policy and Appendix address nearly all criteria of GEF's Policy on Stakeholder Engagement, except for one gap area:
  - (a) Partial Gap: Para. SE16.c: Policy 9 notes that SEPs are to include differentiated measures to allow effective participation of vulnerable and disadvantaged. However, the Policy and Appendix do not define criteria for meaningful consultations per the GEF criteria (i.e. gender responsive; free of manipulation, interference, coercion, discrimination and intimidation; and responsive to the needs and interests of disadvantaged and vulnerable groups).

## DEVELOPMENT BANK OF LATIN AMERICA (CAF)

### Background on Relevant Agency Policies

1. The Development Bank of Latin America (CAF) is a regional development bank that has a mission of stimulating sustainable development and regional integration in Latin America by financing projects in the public and private sectors and providing technical cooperation and other specialized services. Founded in 1970 and currently owned by 19 countries from Latin America, the Caribbean and Spain and Portugal along with 14 private banks, CAF is one of the main sources of multilateral financing for the region.
2. In 2016 CAF updated its institution-wide safeguards to more closely align with the IFC Performance Standards. The “Salvaguadas Ambientales y Sociales de CAF” (CAF Environmental and Social Safeguards, ESS) contain the following standards: S01 Evaluation and Management of Environmental and Social Impacts, S02 Sustainable Use of Renewable Natural Resources, S03 Conservation of Biological Diversity, S04 Pollution Prevention and Management, S05 Cultural Heritage, S06 Ethnic Groups and Cultural Diversity, S07 Population Resettlement, S08 Working and Training Conditions, and S09 Gender Equity. In addition, CAF applies its Guidelines and Procedures on Environmental and Social Safeguards for CAF/GEF Projects Manual (2015). The Manual includes additional requirements that are applied in GEF-supported projects.

### Findings and Recommendations on Compliance with GEF Policies

3. The review assessed the alignment between CAF’s safeguards and other relevant policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards:* CAF was assessed as follows:
    - (i) Some gap areas were identified across all of the Minimum Standards.
  - (b) *Policy on Gender Equality:* CAF was assessed as fully compliant with the GEF Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement:* CAF was assessed as addressing nearly all of the GEF stakeholder engagement requirements except for two gap areas.
4. *Recommendations:* CAF should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
  - (a) *Safeguards:*
    - (i) MS1 Environmental and Social Assessment, Management and Monitoring:
      - (a) require the use of independent experts for assessments, where appropriate;
      - (b) ensure systematic treatment of risks regarding persons

with disabilities; and (c) strengthen measures to prevent discrimination of women and adoption of GBV reporting and response protocols;

- (ii) MS2 Accountability, Grievance and Conflict Resolution: address risks of retaliation against project complainants;
- (iii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) address the preference for mitigation measures to achieve net biodiversity gains; (b) address risks of procurement of natural resource commodities; and (c) address access and benefit sharing in the utilization of genetic resources;
- (iv) MS4 Restrictions on Land Use and Involuntary Resettlement: (a) strengthen consideration of all viable alternatives to avoid displacement, (b) ensure efforts to secure negotiated settlements, (c) make clear that restricted access to land and resources is considered a potential policy trigger, (d) stipulate eligibility criteria and the need to provide sufficient resources so that displaced persons may benefit from the project, (e) address the more specific GEF criteria regarding compensation and assistance standards for physical and economic displacement, (f) address the prohibition on forced evictions, and (g) ensure entitlements and benefit are provided before commencement of displacement activities;
- (v) MS5 Indigenous Peoples: (a) ensure FPIC applies to access restrictions to indigenous peoples' natural resources, locating a project on indigenous lands, or commercial development of natural resources; (b) support legal recognition of customary rights and usage if activities involve acquisition of customary indigenous lands (or where otherwise necessary); (c) address the GEF criteria on commercial development/use of indigenous peoples' lands, natural resources or cultural heritage; (d) address the circumstances of restricted access of indigenous peoples to parks and protected areas; and (e) further elaborate the risks and circumstances of indigenous peoples living in voluntary isolation;
- (vi) MS6 Cultural Heritage: (a) address continued access to cultural heritage in the event the project imposes access restrictions, and (b) address the GEF criteria regarding commercial use cultural heritage;
- (vii) MS7 Resource Efficiency and Pollution Prevention: ensure the GEF criteria regarding resource efficiency are applied to all project inputs (i.e. energy, materials);
- (viii) MS8 Labor and Working Conditions: address (a) workers' rights to freedom of association and collective bargaining, and (b) the more specific GEF criteria regarding workplace grievance mechanisms;
- (ix) MS9 Community Health, Safety and Security: (a) address risks posed by structural elements (general infrastructure) as well as particular risks

present in conflict and post-conflict contexts; (b) ensure external qualified experts review all projects with structural elements that may threaten community health and safety (not just dams); (c) address the general requirements for emergency preparedness plans (not just for workplaces or dams); (d) address measures to avoid community exposure to disease and other relevant health risks; and (e) address the requirements regarding security arrangements to safeguard personnel or property.

- (b) *Stakeholder Engagement*: (a) ensure a public record of consultations is available, and (b) clearly identify projects that receive GEF support.

5. Descriptions of the findings for each policy are provided below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

- 6. CAF's ESS contains SO1 on Evaluation and Management of Environmental and Social Impacts that outlines requirements for the identification, assessment, and management of environmental and social risks and impacts arising from supported projects. SO1 includes an annex of screening/activation questions that help to determine whether additional safeguards of the ESS are applicable.
- 7. The assessment found the following gap areas with MS1:
  - (a) Para. 4.f: Partial Gap: The CAF ESS SO1 does not specifically require the use of independent expertise in conducting assessments, where appropriate, and does not require the use of independent advisory panels for projects with high risk levels. CAF's policies do note that independent experts may be hired.
  - (b) Para. 4.l: Gap: the ESS does not address the GEF criteria to systematically address differentiated risks and potential impacts on persons with disabilities to ensure non-discrimination and opportunities to participate in and benefit from projects on an equal basis with others.
  - (c) Paras. 4.n, 4.o: Partial Gap: SO1 requires that human rights be respected, which includes nondiscrimination and the activation criteria for SO9 notes the risk of gender discrimination. However, SO1 or SO9 does not explicitly address the need for measures to prevent discrimination against women. In addition, while SO9 requires that risks of gender violence be identified in impact evaluations, the need for GBV response and reporting protocols is not addressed.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

- 8. CAF's Guidelines and Procedures on Environmental and Social Safeguards for CAF/GEF Projects Manual (2015) includes a Grievances and Complaints System that outlines a structure and procedures for receiving and processing stakeholder complaints. CAF's

complaints system includes both conflict resolution and compliance review functions. The CAF system addresses nearly all of the GEF MS requirements except for the following:

- (a) Paras. 5.f and 6.g: Gap: CAF's Grievances and Complaints System does not address the GEF requirement to take appropriate measures to minimize the risk of retaliation to complainants.

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

9. CAF's ESS includes SO2 on Sustainable Use of Renewable Natural Resources and SO3 Conservation of Biological Diversity that seek to avoid and limit adverse impacts to biodiversity and habitats. CAF's requirements address nearly all of the MS3 requirements except for the following gap areas:

- (a) Para. 8.b: Partial Gap: ESS SO3 V.3 notes that biodiversity offsets/compensation are required if there are net losses of biodiversity values of natural habitats. The preference for mitigation measures to achieve net biodiversity gains is not specified.
- (b) Para. 8.c: Partial Gap: CAF's ESS SO3 V.8 includes sustainable sourcing provisions that require verification of legal origin and compliance with sustainable practices. The requirement is not as specific as the GEF requirement of no procurement of natural resource commodities that contribute to significant conversion or degradation of natural habitats.
- (c) Para. 8.f: Gap: The ESS does not address the GEF requirement to ensure that supported activities conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources.

### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

10. CAF's ESS contains SO7 on Population Resettlement which outlines requirements that seek to minimize adverse impacts caused by land acquisition and involuntary resettlement. CAF's policies partially address the requirements of MS4. However, a range of gap areas were identified:

- (a) Para. 9.a: Partial Gap: While the ESS SO7 requires the identification of alternatives to avoid and minimize displacement, the safeguard could more emphatically emphasize the need to explore all viable alternatives to avoid potential displacement as per the GEF criteria. In addition, SO7 does not specifically identify restricted access to land and resources as a potential trigger for the policy.
- (b) Para. 9.c: Gap: While SO7 includes requirements regarding consultation and outreach, it does not specify that good faith efforts will be undertaken to secure negotiated settlements.

- (c) Para. 9.d: Partial Gap: MS4 para. 9.d includes a range of requirements. The CAF ESS SO7 addresses some but not all of these. *Eligibility*: SO7 requires specification of eligibility requirements for displaced persons. However, it does not address the GEF eligibility categories (people with formal land/asset rights, people with recognizable claims, people without such rights or claims). *Sufficient investment resources*: It does not address the requirement to design resettlement activities as a sustainable development programme with sufficient investment resources so that displaced persons directly benefit from the project, as warranted.
- (d) Para. 9.f: Partial Gap: SO7 does not address all of the GEF criteria regarding circumstances of physical displacement. It does not (i) specify a preference for land-for-land compensation (equal in productive potential, location, and security of tenure, ownership and use rights); (ii) specify that replacement housing include adequate access to services and resources to maintain social organization and social cohesion; and (iii) provide relocation assistance and (iv) assistance to improve or at least restore livelihoods and living standards (the latter is an overarching objective of SO7, but the specific provision of assistance (and compensation standards) to achieve this objective is not specified).
- (e) Para. 9.g: Gap: SO7 does not specify the compensation standards for economic displacement per the GEF criteria (including the need to compensate at replacement cost).
- (f) Para. 9.h: Gap: SO7 does not address the assistance standards for displaced persons without formal land rights or claims per the GEF criteria (i.e. provide assistance to help improve or at least restore their livelihoods in another location and in cases of physical resettlement, arrangements to allow them to obtain adequate housing with security of tenure, and compensation for assets other than land (such as dwellings)).
- (g) Para. 9.i: Gap: SO7 does not include a prohibition against forced evictions.
- (h) Para. 9.J: Gap: SO7 is not specific that compensation, assistance and benefits need to be provided before displacement activities commence.

#### *Minimum Standard 5: Indigenous Peoples*

11. The ESS contains SO6 Ethnic Groups and Cultural Diversity that outlines requirements and procedures for ensuring that the rights of indigenous peoples and ethnic groups are respected, and adverse impacts are avoided and/or mitigated. While CAF's policy addresses a number of the MS5 requirements, the following gap areas were identified:
  - (a) Para. 10.a: Partial Gap: Regarding the first FPIC circumstance of MS5, CAF's ESS SO6 requires FPIC for projects that impact indigenous territories and resources. However, it less specific and does not fully address the GEF requirement to seek FPIC for access restrictions to resources, locating a project on indigenous lands, or

commercial development of resources (there is some overlap between the GEF and CAF requirements, but the GEF criteria are more specific).

- (b) Para. 11.f: Gap: SO6 (nor SO7 on resettlement) address the GEF requirement that if activities involve acquisition of customary indigenous lands (or where otherwise necessary) that support be provided for legal recognition of customary rights and usage.
- (c) Para. 11.g: Gap: SO6 does not specifically address the GEF requirements for commercial development of indigenous peoples lands and resources: inform indigenous groups of their rights and the potential impacts and ensure equitable sharing of benefits from commercial use (while CAF's FPIC requirements may overlap with some of these elements, the GEF criteria are more specific).
- (d) Para. 11.i: Partial gap: While SO6 includes comprehensive requirements regarding meaningful consultations with indigenous peoples, it does not specifically address the circumstances of restricted access of indigenous peoples to parks and protected areas.
- (e) Para. 11.j: Partial Gap: SO6 "scope" section notes that circumstances of uncontacted indigenous peoples are to be respected. CAF noted in self-assessment that this provision however needs further elaboration in the safeguard.

#### *Minimum Standard 6: Cultural Heritage*

- 12. SO5 Cultural Heritage and the GEF Manual outline a set of requirements to avoid and minimize impacts on cultural heritage. Cultural heritage is defined broadly (encompassing both tangible and intangible cultural heritage), consistent with the GEF definition, and most of the MS6 criteria are addressed except for the following two areas:
  - (a) Para. 12.f: Gap: SO5 does not address the need to provide continued access to cultural heritage in the event the project imposes access restrictions to the relevant area.
  - (b) Para. 12.g: Gap: SO5 does not address the GEF criteria regarding commercial use cultural heritage (i.e. inform affected parties of rights and potential impacts and provide for equitable benefit sharing from such use).

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

- 13. CAF's ESS contains SO2 Sustainable Use of Renewable Natural Resources and SO4 Pollution Prevention and Management that require sustainable use of resources and avoidance/minimization of the generation of pollution, wastes, hazardous materials and promote the safe use of pesticides. The GEF Manual also includes a chapter on Pest Management. The assessment found that the CAF addresses nearly all of the GEF MS7 requirements save for one area:

- (a) Para. 14e: SO2 on Sustainable Natural Resource Use requires sustainable use of water resources and avoidance of significant impacts on other users. However, it does not address the GEF requirement to apply efficiency requirements to all project inputs (e.g. energy, other resources).

#### *Minimum Standard 8: Labor and Working Conditions*

- 14. SO8 on Working and Training Conditions requires the promotion of safe and healthy working conditions for workers hired to perform project activities. CAF's SO8 addresses nearly all of the MS8 requirements except for the following gap areas:
  - (a) Paras. 15.a and 15.g: SO8 address nearly all of the GEF criteria on identifying risks to workers and adherence to the ILO core labour standards; however, it does not address workers' rights to freedom of association and collective bargaining (para. 15.g specifically addresses these rights).
  - (b) Para. 15.k: Partial Gap: SO8 requires the establishment of workplace grievance mechanisms. However, it does not address the more specific GEF criteria regarding such mechanisms (i.e. non-retribution, do not impede access to other judicial or administrative remedies available under the law or through existing arbitration procedures, or substitute for grievance systems provided through collective agreements).

#### *Minimum Standard 9: Community Health, Safety and Security*

- 15. CAF's ESs does not have a stand-alone standard on Community Health, Safety and Security. Some aspects of MS9 are addressed in various ESSs (e.g. SO1 Evaluation and Management of Environmental and Social Impacts, SO2 Sustainable Use of Renewable Natural Resources, SO4 Pollution Prevention and Management, SO8 Working and Training Conditions, as well as the GEF Manual chapter on Safety of Dams). However, a range of gap areas were identified, as follows:
  - (a) Para. 17.a: Partial Gap: Various ESSs cover some risk areas of the GEF criteria (i.e. risks to vulnerable groups, impacts on ecosystem services, risks of climate change. However, community health and safety risks posed by structural elements (general infrastructure) are not specifically addressed nor are the particular risks present in conflict and post-conflict contexts.
  - (b) Para. 17.c: Partial Gap: CAF's ESS does not address the GEF requirement to engage external qualified experts (separate from the project design and construction team) to review projects with structural elements that may threaten community health and safety. The Safety of Dams chapter in the CAF GEF Manual does address these requirements, but only in the context of dams.
  - (c) Para. 17.d: Partial Gap: The ESS does not include general requirements to develop emergency preparedness plans (on participatory basis). (SO8 on Working

Conditions does require workplace emergency plans, and the GEF Manual chapter on Safety of Dams includes emergency planning.)

- (d) Para. 17.e: Gap: The ESS does not require measures to avoid community exposure to disease and other relevant health risks (accounting for differentiated exposure of vulnerable groups).
- (e) Para. 17.f: Partial Gap: ESS does not include a general requirement to ensure that any security arrangements to safeguard personnel or property are proportional and consistent with applicable national laws and good international industry practice. SO8 on Working Conditions does address the use of workplace security personnel.

### Policy on Gender Equality

- 16. CAF's ESS includes SO9 Gender Equity. The CAF GEF Manual includes a chapter on Gender Mainstreaming. The objectives of the safeguard are to (i) ensure that women and men benefit equally from projects financed by CAF; (ii) ensure the equal participation of women and men, both in the design and in the execution of projects financed by CAF; and (iii) prevent the design and execution of CAF-funded projects from deepening pre-existing gender gaps or produce adverse impacts that affect any of the genders. Gender analysis, sex disaggregated data, and specific gender indicators are required for all projects that receive GEF support. The GAF policies were assessed as fully compliant with the GEF Policy on Gender Equality.

### Policy on Stakeholder Engagement

- 17. CAF's ESS SO1 includes sections V.7 through V.13 that address participation and consultation, information disclosure, and conflict resolution. The ESS requirements address most of the requirements of the GEF Policy on Stakeholder Engagement regarding stakeholder identification and undertaking meaningful consultations. CAF's self-assessment noted challenges regarding tracking implementation of the requirements among clients and plans to address this going forward. Two gap areas were identified:
  - (a) Para. 16.d: Partial Gap: SO1 V.11 notes that consultation conclusions "should" be documented and all actors should have access to these records. The lack of a mandatory requirement on documentation and disclosure of consultations falls short of the GEF criteria to ensure a public record of consultations is available;
  - (b) Para. 16.f: Gap: It appears that CAF does not clearly identify whether a project has received GEF financing. A scan of CAF's website did not identify a list of GEF supported projects.

## DEVELOPMENT BANK OF SOUTHERN AFRICA (DBSA)

### Background on relevant Agency policies

1. The Development Bank of South Africa (DBSA), established in 1983, is a development finance institution owned by the Government of South Africa that seeks to play a pivotal role in delivering developmental infrastructure in South Africa and the rest of the African continent. It's mission it to advance the development impact in the region by expanding access to development finance and effectively integrating and implementing sustainable development solutions to improve the quality of life of people through the development of social infrastructure, support economic growth through the investment in economic infrastructure, support regional integration, and promote sustainable use of scarce resource.
2. The DBSA Environmental and Social Safeguard Standards (ESSS, version March 2018) address the following areas: Standard 1: Project Screening: Environmental and Social Risks, Impacts and Opportunities; Standard 2: Stakeholder Engagement and Information Disclosure; Standard 3: Gender Mainstreaming; Standard 4: Indigenous Peoples; Standard 5: Development Induced Displacement and Resettlement; Standard 6: Labour; Standard 7: Community Health and Safety; Standard 8: Cultural Heritage; Standard 9: Biodiversity Conservation and Sustainable Management of Living Natural Resources and Resilience; Standard 10: Resource Efficiency and Pollution Prevention and Management; and Standard 11: Dam Safety.
3. DBSA has adopted a bank-level Project Grievance Procedure (March 2018). It provides complainants an opportunity to register complaints directly with DBSA.
4. As a national development bank, DBSA adheres to South African legislation for projects within the country regarding environmental management, social impacts, labour relations, as well as access to information and public participation. DBSA's ESSS are aligned with this legislation. For projects outside of South Africa, DBSA requires adherence to national regulations and DBSA ESSS requirements (whichever more stringent).

### Findings and Recommendations on Compliance with GEF Policies

5. The review assessed the alignment between DBSA's ESSS and other relevant policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards:*
    - (i) fully compliant (no gaps) with MS4 (Resettlement), MS6 (Cultural Heritage) and MS7 (Resource Efficiency/Pollution Prevention).

- (ii) some partial gaps were identified for MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS8 (Labor), and MS9 (Community Health, Safety and Security).
  - (b) *Policy on Gender Equality*: DBSA was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: DBSA was assessed as fully compliant with the Policy on Stakeholder Engagement.
6. Recommendations: DBSA should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements. DBSA has indicated that it is updating its ESSS to address the findings:
- (a) *Safeguards*:
    - (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) use independent advisory panels for high risk projects, and (b) ensure GBV response and reporting protocols are established;
    - (ii) MS2 Accountability, Grievance and Conflict Resolution: demonstrate clearer procedures regarding independent compliance review, proactive problem solving, accessibility and visibility of the Agency complaints mechanism, and address criteria on record keeping and anti-retaliation measures;
    - (iii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) apply criteria in the design of biodiversity offsets, and (b) address access and benefit sharing in the utilization of genetic resources;
    - (iv) MS5 Indigenous Peoples: (a) ensure that FPIC is sought for projects with potential impacts on indigenous peoples' lands and natural resources, (b) support legal recognition of indigenous peoples' ownership and customary use for projects that involve acquisition of such lands and territories, where appropriate or necessary, (c) address the need for participatory planning in cases of restricted access to parks and protected areas, and (d) address circumstances of indigenous peoples living in voluntary isolation;
    - (v) MS8 Labor and Working Conditions: address the more specific GEF occupational health and safety requirements;
    - (vi) MS9 Community Health, Safety and Security: address community health and safety risks in conflict and post conflict contexts.

7. Descriptions of the findings for each policy are provided below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

8. DBSA's ESSS includes Standard 1 on Project Screening: Environmental and Social Risks, Impacts and Opportunities that includes requirements regarding screening and assessment of project risks and impacts. Annexes address the content of scoping reports, ESIA's, ESMP's, audits. DBSA's policies and procedures address nearly all GEF criteria of MS1. Two partial gaps were identified:
  - (a) Para. 4.f: Partial gap: While ESSS1 requires the use of independent expertise in conducting ESIA's, it does not address the use of independent advisory panels for projects with high magnitude/impact.
  - (b) Para. 4.o: Partial Gap: DBSA's ESSS addresses potential risks of gender-based violence (GBV), but it does not specifically address the GEF criteria of establishing GBV reporting and response protocols.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

9. DBSA has adopted a bank-level Project Grievance Procedure (March 2018). It provides complainants an opportunity to register complaints directly with DBSA. In addition, the ESSS requires that project-level grievance mechanisms be established. The assessment identified the following partial gaps:
  - (a) Para. 5 (most sub-criteria): Partial Gap: DBSA's agency-level Grievance Procedure does not fully outline an independent compliance review process. While complaints regarding potential breaches of Agency policies are eligible, and a time-bound process is specified for investigating and informing complainants, the articulated process is entirely management-led and is largely deferred to the relevant operational unit to be addressed (noting that escalation to the Chief Risk Officer is a possibility). The GEF criteria require compliance review to be independent (e.g. from project operational units). In addition, the degree to which the Procedure is accessible and broadly advertised to stakeholders is uncertain. Issues of record keeping, and anti-retaliation measures were not addressed.
  - (b) Partial Gap: Para 6 (most sub-criteria): As noted above, the Procedure includes a time-bound process for acknowledging and investigating complainants, and for keeping complainants informed. However, the Procedure does not address many of the GEF criteria for conflict resolution, such as the need for proactive problem-solving, accessibility and visibility, independence from project teams, record keeping, and anti-retaliation.

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

10. Standard 9 of DBSA’s ESSS includes comprehensive requirements on biodiversity conservation and sustainable management of living natural resources. ESSS9 addresses most of the MS3 requirements. Two gap areas were identified:
  - (a) Para. 8.b: Partial Gap: The criteria for the design of biodiversity offsets are not addressed.
  - (b) Para. 8.f: Gap: ESSS9 does not address the requirement that projects are to conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources.

### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

11. ESSS5 on Development Induced Displacement and Resettlement addresses adverse impacts associated with physical and economic displacement resulting from project land acquisition or restricted access. The DBSA requirements address all of the GEF MS4 requirements.

### *Minimum Standard 5: Indigenous Peoples*

12. DBSA’s Standard 4 on Indigenous Peoples includes comprehensive requirements to respect the rights of project-affected indigenous peoples and to avoid and mitigate adverse impacts. The assessment identified the following gap areas:
  - (a) Para. 10a: Partial Gap: The GEF criteria require obtaining FPIC for projects that impact indigenous peoples’ lands and natural resources. ESSS4 states in its objectives that FPIC will be undertaken for projects that impact livelihoods, lands, and natural resources of indigenous peoples. However, in the ESSS4 section on “impacts on lands and natural resources,” the FPIC requirements are not specified. This stands in contrast to the following sections on relocation and cultural heritage where the FPIC provisions are specified.
  - (b) Para. 11.f: Gap: ESSS4 does not address the requirement to undertake measures to support legal recognition of indigenous peoples’ ownership and customary use in projects that involve acquisition of such lands and territories, where appropriate or necessary.
  - (c) Para. 11.i: Partial Gap: ESSS4 does not specifically address the need for participatory planning with indigenous peoples for projects that may restrict access to parks and protected areas.
  - (d) Para. 11.j: Gap: ESSS4 does not include requirements regarding the circumstances of indigenous peoples living in voluntary isolation.

#### *Minimum Standard 6: Cultural Heritage*

13. DBSA's requirements regarding protecting and preserving cultural heritage (ESSS8 Cultural Heritage) was assessed as fully compliant with MS6.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

14. DBSA's ESSS contains Standard 10 on Resource Efficiency, Pollution Prevention and Management. Together with the general requirements on ESIA's, ESSS10 was assessed as fully compliant with the MS7.

#### *Minimum Standard 8: Labor and Working Conditions*

15. DBSA's ESSS contains Standard 6 on Labour and Working Conditions. The Standard was assessed as addressing all but one criterion of MS8:
  - (a) Para. 15.j: Partial Gap: ESSS10 requires that workers be provided with a safe and healthy working environment, taking into account specific risks (physical, chemical, biological, hazards). It requires measures to prevent injury and disease. These general provisions partially address the GEF OSH criteria, however the GEF criteria include more targeted requirements (e.g. need for modification, substitution, elimination of hazardous conditions; training; documentation; emergency response and remedies) that are not fully addressed in ESSS10.

#### *Minimum Standard 9: Community Health, Safety and Security*

16. DBSA's ESSS includes Standard 7 on Community Health and Safety that address all but one of the GEF MS9 criteria:
  - (a) Para. 17.a: Partial Gap: Neither ESSS7 nor ESSS1 specifically require identification of community health and safety risks associated with conflict and post conflict contexts.

#### **Policy on Gender Equality**

17. ESSS3 Gender Mainstreaming and its Annex include requirements and tools to promote gender mainstreaming. It was assessed as fully compliant with the criteria of the GEF Policy on Gender Equality.

#### **Policy on Stakeholder Engagement**

18. DBSA's ESSS contains Standard 2 on Stakeholder Engagement and Information Disclosure. It was assessed as fully compliant with the criteria of the GEF Policy on Stakeholder Engagement.

## EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT (EBRD)

### Background on relevant Agency policies

1. The European Bank for Reconstruction and Development is an international financial institution founded in 1991. As a multilateral developmental investment bank, the EBRD uses investment as a tool to build market economies. The EBRD is active in 38 economies across three continents, from the Southern and Eastern Mediterranean, to Central and Eastern Europe, to Central Asia.
2. EBRD's environmental and social policies and procedures provide a comprehensive framework for the identification, avoidance, and mitigation of adverse impacts to people and the environment. EBRD's policies apply to all projects and investments. Sustainability is one of the Bank's core values and underlies all of EBRD's activities. The Environmental and Social Policy is one of the Bank's three good governance policies and a key document that guides the EBRD's commitment to promoting "environmentally sound and sustainable development" in the full range of its investment and technical cooperation activities.
3. In 2014, EBRD conducted a review of its Environmental and Social Policy (ESP). Following this review an updated ESP was announced which will come into effect in January 2020. The Policy and Performance Requirements were reviewed over an 18-month period through extensive internal and external consultations.
4. The updated ESP includes 10 key EBRD Performance Requirements that clients must meet for EBRD projects: PR1 Assessment and Management of Environmental and Social Risks and Impacts; PR2 Labour and Working conditions; PR3 Resource efficiency and Pollution Prevention and control; PR4 Health, Safety and Security; PR5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources; PR7 Indigenous Peoples; PR8 Cultural Heritage; PR9 Financial Intermediaries; and, PR10 Information Disclosure and Stakeholder Engagement. PRs 1 to 8 and 10 include the requirements for direct investment projects. PR 2, PR9 and the occupational safety and health requirements of PR4 include the requirements for financial intermediaries (FI) projects. Each PR includes specific requirements for EBRD clients in respect of projects financed by EBRD regardless of whether it is carried out directly by the client or through third parties.
5. EBRD's safeguard framework is supported by its Access to Information Policy as well as by its Project Complaint Mechanism (accountability and grievance redress systems).

### Findings and Recommendations on Compliance with GEF Policies

6. The review assessed the alignment between the EBRD ESP and other relevant EBRD policies, procedures, guidelines, and systems and the various requirements of the GEF

Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:

- (a) *Policy on Environmental and Social Safeguards*: EBRD was assessed as fully compliant with the Policy on Environmental and Social Safeguards.
  - (b) *Policy on Gender Equality*: EBRD was assessed as fully compliant with the Policy on Gender Equality
  - (c) *Policy on Stakeholder Engagement*: EBRD was assessed as fully compliant with the Policy on Stakeholder Engagement.
7. *Recommendations*: No further actions recommended. The ESP will not come into effect until January 2020.
8. Descriptions of the findings for each policy are provided below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

9. The EBRD ESP contains comprehensive policy requirements and procedures to promote sound and sustainable environmental and social performance, and can lead to improved financial, environmental, and social outcomes. EBRD's updated ESP (2019) has a Performance Requirement 1: Environmental and Social Assessment that covers the screening and assessment of all the elements that are established in GEF's Minimum Standards 3-9.
10. EBRD's PR1 addresses all GEF criteria of MS1. EBRD is therefore fully compliant with MS1.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

11. EBRD has provided evidence of the implementation of its Project Complaints Mechanism (PCM) and the corresponding Rules of Procedure. The PCM sufficiently identifies potential breaches of the Agency's policies and procedures related to the identification, management, and monitoring of Environmental and Social risks and impacts. Annual "PCM" reports are published for transparency and illustrate the effectiveness of this mechanism. In addition, EBRD has published a new "Project Accountability Policy" that addresses elements of retaliation against persons involved in the PCM processes. This Policy will not come into effect until 2020. EBRD is therefore compliant with MS2.

#### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

12. EBRD's PR6: Biodiversity Conservation and Sustainable Management of Living Resources recognizes that the conservation of biodiversity and the sustainable management of living resources are fundamental to environmental and social sustainability.

13. The ESP requirements of PR6 address all the GEF “policy” criteria of MS 3. EBRD is therefore fully compliant with MS3.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

14. ESP PR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement contains requirements that seek to avoid or minimize adverse impacts caused by land acquisition and involuntary resettlement. The application of this PR is consistent with the universal respect for, and observance with human rights and freedoms. The ESP requirements address all the GEF criteria of MS 4.

#### *Minimum Standard 5: Indigenous Peoples*

15. ESP PR7: Indigenous Peoples establishes a framework that ensures that projects fully respect the dignity, rights, aspirations, cultures, customary laws and livelihoods of indigenous peoples. This PR also lays out client obligations to collaborate with affected indigenous peoples in the planning and implementation of measures to avoid, minimise, mitigate and compensate for adverse effects and share project benefits. The ESP requirements of PR7 address all the GEF criteria of MS 5. EBRD is therefore fully compliant with MS5.

#### *Minimum Standard 6: Cultural Heritage*

16. PR8: Cultural Heritage outlines a set of requirements to avoid and minimize impacts on cultural heritage. This PR requires that EBRD’s “clients” are to be precautionary in their approach to the management and sustainable use of cultural heritage. In PR8, Cultural heritage is defined broadly (encompassing both tangible and intangible cultural heritage), consistent with the GEF definition. The ESP requirements, as established in PR8, address all the GEF criteria of MS 6. EBRD is therefore fully compliant with MS6.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

17. PR3: Resource Efficiency and Pollution Prevention and Control outlines a project-level approach to climate impacts, GHG emissions, resource management and pollution prevention and control. Underlying this PR is adherence to the mitigation hierarchy. This PR also recognizes the importance of using best available techniques and international best practice in order to optimize resource efficiency and prevent and control pollution. The ESP requirements address all the GEF “policy” criteria of MS 7. EBRD is therefore fully compliant with MS7.

#### *Minimum Standard 8: Labor and Working Conditions*

18. PR2: Labor and Working Conditions requires the promotion of safe and healthy working conditions for project workers. EBRD PR2 is underpinned by the ILO Fundamental Rights at Work Policy. EBRD is fully compliant with MS8.

### *Minimum Standard 9: Community Health, Safety and Security*

19. PR4: Health, Safety, and Security addresses the health, safety and security risks and impacts that may be caused by supported projects. This PR states that the “client” of EBRD has the primary responsibility to provide safe and healthy conditions for their workers, along with informing, instructing, training and consulting workers on their health and safety. The ESP requirements address all the GEF criteria of MS 9. EBRD is therefore fully compliant with MS9.

### **Policy on Gender Equality**

20. Gender is seen as a cross cutting issue by EBRD, with gender considerations being integrated into each respective PR of its new ESP. Gender analysis and considerations during the assessment of projects is outlined in paragraph 12 of EBRD’s Performance Requirement 1: Assessment and Management of Environmental and Social Risks and Impacts. In 2015, EBRD produced its first ever "Strategy for the Promotion of Gender Equality (2016-2020), setting out how gender can be best mainstreamed into EBRD operations by 2020. There is a core team of 6 gender experts providing advice and guidance on gender mainstreaming across the Bank's operations, engaging both in project delivery and policy dialogue promoting women's access to economic opportunities.
21. The requirements of EBRD’s ESP and its Strategy for the Promotion of Gender Equality (2016-2020) address all the criteria of the GEF Policy on Gender Equality. EBRD is therefore fully compliant with the Policy on Gender Equality.

### **Policy on Stakeholder Engagement**

22. Performance Requirement 10: Information Disclosure and Stakeholder Engagement outlines the requirements for Stakeholder Engagement including the early identification of Stakeholders (PR 10, paragraphs 10 and 11). As per PR10 of the ESP, EBRD identifies stakeholder engagement as being “central to building constructive and responsive relationships which are essential for the successful management of a project’s environmental and social risks and impacts” (PR10, Para.2). Stakeholder engagement is also addressed in various other standards.
23. EBRD stresses that "meaningful consultation" is a two-way street where stakeholders are able to express their view on many aspects of the project from design to risk and impacts. EBRD also instils requirements for the consultations to be gender responsive and free of manipulation (para 13, PR10), which is also a requirement of GEFs Stakeholder Engagement Policy.
24. The ESP requirements address all of the criteria of the GEF Policy on Stakeholder Engagement. EBRD is therefore fully compliant with the Policy on Stakeholder Engagement.

## FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS (FAO)

### Background on relevant Agency policies

1. The Food and Agriculture Organization (FAO) is a specialized agency of the United Nations that leads international efforts to defeat hunger. FAO's goal is to achieve food security for all and make sure that people have regular access to enough high-quality food to lead active, healthy lives. It assists member countries in reducing food insecurity and rural poverty; ensuring an enabling policy and regulatory framework for food and agriculture, fisheries and forestry; securing sustainable increases in the supply and availability of food; conserving and enhancing the natural resource base; and generating knowledge for food and agriculture, fisheries, and forestry.
2. FAO adopted its Environmental and Social Management Guidelines (ESMG) in 2015. The ESGM apply to all projects and programmes. The guidelines outline requirements for managing environmental and social risks of projects and programs, with sections on screening and categorization; environmental and social assessment; stakeholder engagement, disclosure, and grievance mechanisms; capacity development; monitoring and reporting. The ESGM also include nine Environmental and Social Standards (ESS) that establish requirements across a range of thematic areas: ESS1 Natural Resources Management; ESS2 Biodiversity, Ecosystems and Natural Habitats; ESS3 Plant Genetic Resources for Food and Agriculture; ESS4 Animal – Livestock and Aquatic – Genetic Resources for Food and Agriculture; ESS5 Pest and Pesticides Management; ESS6 Involuntary Resettlement and Displacement; ESS7 Decent Work; ESS8 Gender Equality; and ESS9 Indigenous Peoples and Cultural Heritage.
3. FAO's Policy on Gender Equality establishes organizational goals and requirements regarding promotion of gender equality and women's empowerment. FAO's Policy on Indigenous and Tribal Peoples sets out objectives and requirements in working with indigenous peoples. FAO has an environmental and social compliance review mechanism within its Office of the Inspector General. A wide range of guidance materials support FAO's environmental and social policies and procedures.

### Findings and Recommendations on Compliance with GEF Policies

4. The review assessed the alignment between the FAO's policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards*: FAO was assessed as follows:
    - (i) fully compliant (no gaps) with MS3 (Biodiversity) and MS4 (Resettlement);
    - (ii) some gap areas were identified for MS1 (Assessment), MS2 (Accountability), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7

(Resource Efficiency, Pollution), MS8 (Labor) and MS9 (Community Health and Safety).

- (b) *Policy on Gender Equality*: FAO was assessed as fully compliant with the Policy on Gender Equality.
- (c) *Policy on Stakeholder Engagement*: FAO was assessed as fully compliant with the Policy on Stakeholder Engagement.

5. *Recommendations*: FAO should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements, as follows:

(a) *Safeguards*:

- (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) address criteria for undertaking alternatives analyses, including the no-project scenario; and (b) strengthen requirements for GBV reporting and response protocols;
- (ii) MS2 Accountability, Grievance and Conflict Resolution: (a) review visibility and effectiveness of compliance review mechanism, (b) ensure anti-retaliation measures apply to all potential complainants, (c) enhance provision of Agency-level conflict resolution services (including those independent from project teams) and (d) broaden eligibility criteria for complaints;
- (iii) MS5 Indigenous Peoples: (a) consider adopting more specific provisions that address equitable benefit sharing from any commercial development of indigenous peoples' lands or natural resource, and (b) the specific circumstances of indigenous peoples living in voluntary isolation;
- (iv) MS6 Cultural Heritage: address criteria on cultural heritage regarding (a) confidentiality, (b) continued access, and (c) commercial development;
- (v) MS7 Resource Efficiency and Pollution Prevention: consider broader pollution prevention requirements encompassing all wastes and non-pesticide hazardous materials;
- (vi) MS8 Labor and Working Conditions: address (a) specific GEF criteria regarding occupational health and safety) and (b) workplace grievance mechanisms;
- (vii) MS9 Community Health, Safety and Security: (a) address risks presented by infrastructure beyond water infrastructure, (b) emergency preparedness for potentially affected communities, (c) broader risks of community exposure to disease, and (d) risks posed by security arrangements.

6. Descriptions of the findings for each policy are provided below.

## Policy on Environmental and Social Safeguards

### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

7. The ESMG requires the screening of project for environmental and social risks and impacts, appropriately-scaled risk assessments and the development of management measures. The ESMG addresses many of the GEF MS1 criteria, however two partial gaps were identified:
  - (a) Partial Gap: Para. 4.d: The ESMG procedures for assessing alternatives in order to avoid and/or minimize potential environmental and social impacts do not stipulate that the “no-project” scenario be considered.
  - (b) Partial Gap: Paras. 4.o: The ESMG (and a wide range of other policies and procedures) requires that measures be identified to avoid, minimize, and/or mitigate adverse gender-related impacts. While FAO has guidance material on addressing incidences of GBV/SEA in programming, the guidance does not appear to require that response protocols and procedures be in place for all incidences of GBV/SEA in programming (FAO policies provide for such procedures involving FAO staff).

### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

8. FAO has created an environmental and social compliance review mechanism within its Office of the Inspector General to address grievances related to potential violations of FAO environmental and social policies and procedures. FAO also requires that project and country office grievance mechanisms be established. However, several gaps were identified:
  - (a) Partial Gap: Para. 5.b (and 5.a-5.f regarding implementation): As noted above, an independent compliance review mechanism was established in OIG. However, the effectiveness of the mechanism cannot be ascertained as to date no cases have been filed with OIG. FAO should consider reviewing visibility of the mechanism.
  - (b) Partial Gap: Paras. 5.f and 6.g: The GEF criterion of minimizing the risk of retaliation against complainants in compliance review (and in other grievance redress processes) is partially addressed in that FAO’s whistleblower policy which prohibits retaliation to any FAO staff member of persons engaged by FAO. However, the scope of the GEF criteria is broader (anyone affected by an FAO project who files a complaint or engages in a grievance process).
  - (c) Partial Gap; Paras. 6.a, 6.c, 6.e, 6.i: FAO does not have an agency-level conflict resolution mechanism. Instead, it requires that complaint mechanisms be established at the project and country office level. The eligibility requirements (“allegations or potential violations of FAO’s social and environmental commitments”) appear narrower than the GEF criterion (“complaints related to implementation of projects.” Also, the procedures and criteria for the operation

of project and country office complaints mechanisms are not described in the ESMG or in guidelines, limiting assessment against various GEF criteria on the functioning of complaint mechanisms (6.a, 6.c, 6.e, 6.i).

- (d) Gap: Para. 6.d: The option for conflict resolution processes independent from project teams is not addressed (except for the OIG Compliance Review Process, which is not conflict resolution per se).

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

- 9. Several standards of FAO's ESMG address the GEF criteria of MS 3. These include ESS1 Natural Resources Management; ESS2 Biodiversity, Ecosystems and Natural Habitats; ESS3 Plant Genetic Resources for Food and Agriculture; and ESS4 Animal – Livestock and Aquatic – Genetic Resources for Food and Agriculture. FAO's requirements address the criteria of GEF's MS3.

### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

- 10. ESS6 on Involuntary Resettlement and Displacement establishes requirements to avoid, and where avoidance is not possible, to minimize and mitigate adverse impacts caused by physical or economic displacement. The ESMG requires that any displacement be voluntary in nature (involuntary resettlement is not supported). FAO also implements the Voluntary Guidelines on Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security and has developed a range of technical guides for implementation. FAO's policies and guidelines address the criteria of GEF's MS4.

### *Minimum Standard 5: Indigenous Peoples*

- 11. FAO's Policy on Indigenous and Tribal Peoples sets out objectives and requirements in working with indigenous peoples. The requirements of ESS9 Indigenous Peoples and Cultural Heritage address nearly all of the GEF criteria of MS5. It should be noted that FAO's requirements for obtaining FPIC for projects that affect indigenous peoples – specifically projects that affect their rights, lands, natural resources, territories, livelihoods, knowledge, social fabric, traditions, governance systems, and culture or heritage – are significantly broader than the circumstances of the GEF criteria. However, FAO's policies and procedures could be more specific in the following two areas:
  - (a) Partial Gap: Para. 11.g: ESS9 does not stipulate requirements regarding commercial development of indigenous peoples' lands or resources. While such a circumstance would trigger FAO's FPIC requirements, ESS9 does not specify that the benefits of such development must be shared equitably per the GEF criteria (ESS9 and the FAO policy seek to ensure all indigenous peoples' rights are respected; however, the specific circumstance of commercial development is not addressed).

- (b) Gap: Para. 11.j: ESS9 does not address the specific circumstances of projects that may affect indigenous peoples living in voluntary isolation.

#### *Minimum Standard 6: Cultural Heritage*

- 12. ESS9 Indigenous Peoples and Cultural Heritage includes requirements regarding the protection and preservation of cultural heritage (both tangible and intangible). The provisions do not apply only to the cultural heritage of indigenous peoples (despite the combined title). Several gap areas were identified:
  - (a) Gap: Para. 12.d: ESS9 does not address the issue to maintaining the confidentiality of cultural heritage in certain circumstances in order to ensure its safety and integrity.
  - (b) Gap: Para. 12.f: ESS9 does not address the need to ensure continued access to cultural heritage where general access restrictions may be applied to the project area.
  - (c) Partial gap: Para. 12.g: ESS9 does not stipulate that any commercial development of cultural heritage must ensure fair and equitable benefit sharing with project-affected persons. (There is partial coverage in the indigenous peoples requirements; however these too are not specific regarding commercial development of such resources). It should be noted that project examples did demonstrate in practice steps to ensure fair and equitable benefit sharing from commercial use of agricultural cultural heritage systems.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

- 13. ESS1 Natural Resources Management addresses resource efficiency and some waste management issues. ESS5 Pest and Pesticides Management addresses the safe use and handling of pesticides. Two partial gaps were identified (combined below):
  - (a) Partial Gap: Paras. 14.a and 14.b: The ESMG includes specific requirements regarding pollution risks to water resources, soils, risks of pesticide use, and GHG emissions. However, the EMSG does not include requirements regarding general pollution risks beyond pesticide and fertilizer use, non-pesticide hazardous materials, and wastes other than wastewater discharges and pesticides, as elaborated in the GEF criteria.

#### *Minimum Standard 8: Labor and Working Conditions*

- 14. ESS7 Decent Work stipulates a range of requirements to promote decent work and safe working conditions. It includes promotion of the ILO core labour standards and a range of ILO conventions. FAO also has developed a range of guidelines and tools that address working conditions in rural sectors. Two partial gaps were identified:

- (a) Partial Gap: 15.i: While ESS7 includes a section on occupational health and safety (OSH) risks, it does not address the specific criteria stipulated in the GEF MS (15.i (i) through (vi)).
- (b) Partial Gap: Paras. 15.j and 15.k: While the ESMG requires that project and country office grievance mechanisms be established, it does not address the GEF criterion for workplace level mechanisms.

*Minimum Standard 9: Community Health, Safety and Security*

15. The ESMG addresses risks and impacts to community health and safety in several ESSs, however, the following partial gap was identified:
- (a) Partial Gap: Para, 17.a: The ESMG addresses community health and safety risks through its general risk assessment provisions and provisions on use of modern biotechnologies, pesticides, and water infrastructure. However, it does not include more specific requirements regarding risk exposure of communities from structural elements other than water infrastructure.

## FOREIGN ECONOMIC COOPERATION OFFICE, MINISTRY OF ENVIRONMENTAL PROTECTION OF CHINA (FECO)

### Background on relevant Agency policies

1. The Foreign Economic Cooperation Office (FECO) of the Ministry of Environmental Protection of China, is a national entity with a mandate of improving economic cooperation in the area of environmental protection through management of financial assistance from international financial organizations.
2. In April 2015, FECO first adopted a set of ESS standards and related policies, which were in line with the relevant policies of GEF at the time. These policies and standards were reviewed and approved by the GEF before FECO was accredited as one of its project agencies. In December 2015, FECO further adopted the Environmental and Social Safeguard Framework (ESSF), which applies to all GEF and GCF projects implemented by FECO. Since the adoption of the ESSF in December 2015, a further update to the ESSF (2019) has been produced, which further aligns with the updated GEF's ESS Policy.
3. The ESSF is comprised of three parts: 1. overarching principles; 2. environmental and social safeguard standards (ESSS); 3. procedures for implementing the environmental and social safeguard standards. The environmental and social safeguards standards (ESSS) consist of 11 specific safeguards as follows: ESSS1: Environmental and Social Impact Assessment; ESSS2: Natural Habitats, Biodiversity Conservation and Sustainable Management of Living Natural Resources; ESSS3: Resource Efficiency and Pollution Prevention; ESSS4: Pest Management; ESSS5: Community Health, Safety and Security; ESSS6: Safety of Dams; ESSS7: Cultural Heritage; ESSS8: Involuntary Resettlement; ESSS9: Indigenous Peoples; ESSS10: Labor and Working Conditions; ESSS11: Accountability and Grievance Mechanism. The ESSF is to be used together with other policy documents, including the Gender Mainstreaming Standard and the Accountability and Grievance Mechanism.
4. According to the agency's self-assessment checklist, it currently has an MoU with GEF that states that GEF's MS4 (Restrictions on land use and involuntary resettlement) and MS5 (Indigenous Peoples) are not applicable. Despite this MoU, FECO's updated ESSF includes specific standards on both involuntary resettlement (ESSS8) and Indigenous Peoples (ESSS9).

### Findings and Recommendations on Compliance with GEF Policies

5. The review assessed the alignment between the FECO ESSF and other relevant FECO policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:

(a) *Policy on Environmental and Social Safeguards:* FECO was assessed as follows:

- (i) Fully compliant (no gaps) with MS1 (Assessment); MS2 (Accountability); MS3 (Biodiversity), MS6 (Cultural Heritage); MS7 (Resource Efficiency and Pollution Prevention); MS8 (Labor); and MS9 (Community Health).
  - (ii) FECO currently has an MoU with GEF on the following: MS4 (Resettlement); MS5 (Indigenous Peoples). The agency does not finance projects that involve resettlement or indigenous people, and projects that would involve these safeguard issues are screened out by screening procedure.
- (b) *Policy on Gender Equality:* FECO was assessed as fully compliant with the Policy on Gender Equality
  - (c) *Policy on Stakeholder Engagement:* FECO was assessed as fully compliant with the Policy on Stakeholder Engagement.
6. *Recommendations:* No further actions recommended.
7. Descriptions of the findings for each policy are provided below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

- 8. The ESSF contains policy requirements and procedures to promote environmental and social sustainability and to help avoid, reduce or mitigate adverse impacts on people and the environment.
- 9. The requirements of FECO as established in the ESSF, and in particular in ESS1: Environmental and Social Impact Assessment, address all of the GEF criteria of MS1. FECO is therefore fully compliant with MS1.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

- 10. FECO's requirements and approach to its Accountability and Grievance Mechanism are established in ESSS 11 of the ESSF, and in the separate Accountability and Grievance Mechanism document. The objective of the accountability and grievance mechanism is to identify breaches of FECO's environmental and social safeguards policy, along with other agency related policies during the project cycle. This is outlined under paragraph 1 of the FECO Standard 11 on page 15. FECO addresses all of the GEF criteria of MS2, and so is fully compliant with this Minimum Standard.

#### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

- 11. ESSS2: Natural Habitats, Biodiversity Conservation and Sustainable Management of Living Natural Resources includes requirements that seek to avoid and limit adverse impacts to biodiversity and habitats, while also stating that preferential support shall be given to

projects that help protect natural habitats and improve service functions of the ecosystem. The ESSF requirements address all the GEF criteria of MS 3. FECO is therefore fully compliant with the MS 3 criteria.

*Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

12. According to FECO's self-assessment, their MoU clears them of a need to meet this MS.

*Minimum Standard 5: Indigenous Peoples*

13. According to FECO's self-assessment, their MoU clears them of a need to meet this MS.

*Minimum Standard 6: Cultural Heritage*

14. ESSS7: Cultural Heritage outlines a set of requirements to avoid and minimize impacts on cultural heritage, including tangible and intangible heritage. The broad definition of Cultural Heritage is consistent with the GEF definition. The ESSF requirements meet the GEF policy criteria of MS 6, and so FECO is fully compliant with this Standard.

*Minimum Standard 7: Resource Efficiency and Pollution Prevention*

15. ESSS3: Resource Efficiency and Pollution Prevention requires that projects should explore technically and financially feasible measures for the efficient use of energy, water and other resources. It also states that projects should implement options to reduce project related GHG emissions. The guidance and promotion of the safe use of pesticides (required by the GEF policy criteria of MS 7 paragraph 14) is sufficiently covered by ESSS4: Pest Management. The ESSF requirements address all of the GEF criteria of MS 7, and so FECO is fully compliant with this Standard.

*Minimum Standard 8: Labor and Working Conditions*

16. ESSS10: Labor and Working Conditions requires the promotion of fair treatment of workers, equal opportunity of workers, compliance with "national employment and labor laws ", as well as safe and healthy working conditions for project workers. The ESSF requirements address all of the GEF criteria of MS 8, and so FECO is fully compliant with this Standard

*Minimum Standard 9: Community Health, Safety and Security*

17. ESSS5: Community Health, Safety and Security addresses the health, safety and security risks and impacts that may be caused by supported projects. Through the requirements established in the ESSF (particularly in ESSS5), FECO is fully compliant with all the GEF criteria of MS9.

## Policy on Gender Equality

18. FECO's main relevant policy instrument is its "Gender Mainstreaming Policy". Under Section 2 of the Policy, improvements to institutional configurations are proposed by FECO. One such example included in this section is the establishment of a gender equality mechanism for all FECO operations/activities.
19. Section 3 of the Gender Mainstreaming policy presents steps that FECO is promoting in order to "close the gender gap" within its area of operations.
20. The collection of sex-disaggregated data is outlined in section 7 on "Gender program design and implementation for all projects". This presents the approach FECO has towards collecting sex-disaggregated data throughout the project lifecycle. This section also speaks to FECO's inclusion of women's participation in project design, implementation and monitoring and evaluation.
21. The requirements FECO's "Gender Mainstreaming Strategy" along with the considerations for project related risks and adverse impacts on gender that are included in the ESSF address all the criteria of the GEF Policy on Gender Equality.

## Policy on Stakeholder Engagement

22. FECO does not have a free-standing policy on stakeholder engagement. Stakeholder engagement is also not included as a separate ESSS in the ESSF, rather crucial elements and requirements with regards to stakeholder engagement and consultation are cross-cutting throughout the ESSF.
23. In paragraph 11 of the ESSS1, the identification and involvement of stakeholders early in the project cycle is established as a key objective of any FECO initiative that requires the implementation of the ESSF. This paragraph also requires that such consultations should be gender responsive; free of manipulation, interference, coercion, discrimination and intimidation; and responsive to the needs and interests of disadvantaged and vulnerable groups.
24. This section of the ESSF (para. 11 of ESSS1) also includes the provision that stakeholders, including those project-impacted communities or related vulnerable groups and local NGOs, shall be invited to participate in the project assessment as early as possible, so as to ensure that their reasonable demands, as decision-making basis, can be effectively conveyed to the decision makers.
25. The ESSF requirements address all of the criteria of the GEF Policy on Stakeholder Engagement.

## INTER-AMERICAN DEVELOPMENT BANK (IDB)

### Background on relevant Agency policies

1. The Inter-American Development Bank is the largest source of development financing for Latin America and the Caribbean. Established in 1959, the IDB supports Latin American and Caribbean economic development, social development and regional integration through the loans, grants, technical assistance and extensive research. The IDB's current focus areas include three development challenges – social inclusion and equality, productivity and innovation, and economic integration – and three cross-cutting issues – gender equality and diversity, climate change and environmental sustainability; and institutional capacity and the rule of law.
2. The Environment and Safeguards Compliance Policy (ESCP) was approved by the IDB's Board of Executive Directors on January 19, 2006. It supersedes the Bank's previous environment policy, which dated back to 1979. The Policy has three specific objectives: (i) to enhance long-term development benefits by integrating environmental sustainability outcomes in all Bank operations and activities and strengthening environmental management capacities in its borrowing member countries; (ii) to ensure that all Bank operations and activities are environmentally sustainable; and (iii) to foster corporate environmental responsibility within the Bank
3. The ESCP consists of two distinct directives. One of these directives is "Environmental Mainstreaming" which seeks to mainstream environmental issues throughout IDB's project and program-level activities. The second of these directives is "Safeguarding Directives" (B.1 through to B.16).
4. The "Safeguarding Directives" as outlined in the ESCP are as follows: B1 Bank Policies; B2 Country Laws and Regulations; B3 Screening and Classification; B4 Other risk factors; B5 Environmental Assessment Requirements; B6 Consultations; B7 Supervision and Compliance; B8 Transboundary Impacts; B9 Natural Habitats and Cultural Sites; B10 Hazardous Materials; B11 Pollution Prevention and Abatement; B12 Project under Construction; B13 Noninvestment Lending and Flexible Lending Instruments; B14 Multiple Phase and Repeat Loans; B15 Co-financing Operations, B17 Procurement.
5. Alongside the ESCP, IDB has developed "Implementation Guidelines for the Environment and Safeguards Compliance Policy". Its objective is to support project teams and staff in the interpretation and implementation of each of the Policy Directives. Therefore, these Guidelines aim to strengthen the Bank's commitment to environmental sustainability in the region.
6. IDB's requirements for environmental and social safeguarding are further supported by other free-standing policies and directives such as the IDB Access to Information Policy (Operational Policy -102), Operational Policy on Gender in Development (OP-761),

Independent Consultation and Investigation Mechanism Policy, Involuntary Resettlement Operational Policy (OP-710), and IDB's Indigenous Peoples Policy (OP-765).

### Findings and Recommendations on Compliance with GEF Policies

7. The review assessed the alignment between the IDB ESCP and other relevant IDB policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards*: IDB was assessed as follows:
    - (i) Fully compliant (no gaps) with MS7 (Resource Efficiency and Pollution Prevention).
    - (ii) Some gap areas were identified for MS1 (Assessment); MS2 (Accountability); MS3 (Biodiversity); MS4 (Resettlement); MS5 (Indigenous Peoples); MS6 (Cultural Heritage); MS8 (Labor); and, MS9 (Community Health).
  - (b) *Policy on Gender Equality*: IDB was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: IDB was assessed to have one partial gap with the Policy on Stakeholder Engagement.
8. *Recommendations*: IDB should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
  - (a) *Safeguards*:
    - (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) address seasonal variability in baseline studies, (b) third-party monitoring, (c) consideration of the needs of disadvantaged and vulnerable groups/individuals, (d) disability inclusion, and (e) risks of gender-based violence;
    - (ii) MS2 Accountability, Grievance and Conflict Resolution: (a) address risks of retaliation to complainants, and (b) the provision of a grievance mechanism as a locally available option;
    - (iii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) ensure that requirements for the harvesting of living natural resources is carried out consistent with good sustainable management practices, and (b) address the requirements for access and benefit sharing in the utilization of genetic resources;

- (iv) MS4 Restrictions on Land Use and Involuntary Resettlement: address the prohibition of forced eviction without the provision of and access to appropriate forms of legal and other protection;
  - (v) MS5 Indigenous Peoples: (a) include explicit requirements for the triggering of FPIC in situations that could lead to “loss of access”, (b) require that grievance and conflict resolution systems are established, which are culturally appropriate, available in local languages, accessible to affected Indigenous Peoples;
  - (vi) MS6 Cultural Heritage: (a) ensure that continued access to cultural heritage sites is arranged in consultation with stakeholders, and (b) address issues of stakeholder rights with regards to the commercial use of cultural heritage items;
  - (vii) MS8 Labor and Working Conditions: There is no specific IDB policy that addresses labor and working conditions. IDB should seek to address this gap in its safeguard standards and systems;
  - (viii) MS9 Community Health, Safety and Security: There is no specific IDB policy which addresses the elements of GEF MS 9: Community Health, Safety and Security. IDB should seek to address this gap in its safeguard standards and systems.
- (b) *Stakeholder Engagement*: IDB should provide timely access to information about projects/activities to those who may not have access to the internet or the ability to travel to a representation of IDB.

9. Descriptions of the findings for each policy are provided below.

## **Policy on Environmental and Social Safeguards**

### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

10. As per Policy Directive B.3 “Screening and Classification” in IDB’s Environmental Safeguards and Compliance Policy (2006), all projects and programs receive a screening assessment for potential environmental and social impacts that is scaled to the level of risk. The screening process will consider potential negative environmental impacts whether direct, indirect, regional or cumulative in nature, including environmentally related social and cultural impacts. However, throughout B.3 and the ESCP in general there is a lack of inclusion of certain key social safeguarding themes (i.e. Labor and Working conditions, and Community Health, Safety, and Security).
11. The IDB ESCP requirements address several of the GEF criteria of MS1. However, a number of areas of partial gap were identified. In what follows, the partial gaps are defined as relating to the criteria paragraphs as outlined in the GEF Policy on Environmental and Social Safeguards.

- (a) Partial Gap: Para. 4a: requires that projects and programs are screened as early as possible to identify Environmental and Social Risks. As per Policy Directive B.3 in IDB's Environmental Safeguards and Compliance Policy (2006), all projects and programs receive a screening assessment for potential environmental and social impacts that is scaled to the level of risk. However, there is a lack of consideration for key GEF minimum standards: MS 8 Labor and Working conditions and MS 9: Community Health, which are not explicitly covered in the IDB standards.
- (b) Partial Gap: Para. 4d: which requires that agencies recognize that periodicity (e.g., seasonal variation) or other variability over time may require more robust baseline data than relatively constant conditions. The ESCP lays out the requirements, in directive B.5, for assessments to be conducted on both a project and programmatic level. This includes varying levels of assessments and corresponding management plans depending on the level of risk identified. However, there is no focus on recognition for periodicity in the ESCP.
- (c) Partial gap: Para. 4g: which requires third party monitoring to monitor project implementation and/or assess if Environmental and Social Risk and Impact mitigation objectives are being or have been achieved. IDB does not have any specific requirement for third party monitoring to be used for monitoring project implementation.
- (d) Partial gap: Para 4j: requires the consideration of disadvantaged and vulnerable groups (4j) as well as people with disabilities (4l) in the screening process. IDB does not have a separate policy requirement outlining procedures for assessing risks to people with disabilities, and further to this, there is no specific mention of inclusion of disadvantaged or vulnerable groups in the project screening requirements outside of "consultation".
- (e) Partial gap. Para. 4o: this GEF criterion of MS1 requires the provision of reporting and response protocol specifically for cases of Gender-Based Violence and/or Sexual Exploitation and Abuse.

### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

12. The Independent Consultation and Investigation Mechanism (MICI) is the independent accountability body of the IDB Group, created by a mandate of the Board of Governors of IDB in order to improve the Bank's transparency, accountability, and effectiveness. The MICI embodies an agency-level grievance system and provides a range of problem-solving approaches to address stakeholder complaints. The MICI is grounded in the "MICI Policy" that acts as a policy framework for IDB's response and procedures concerning grievances and redress.
13. IDB, and more specifically MICI, addresses nearly all GEF criteria of MS2. Two areas of partial gap were identified:

- (a) Partial Gap: Para. 5f: this GEF criterion require that a given agency takes appropriate and timely measures to minimize the risk of retaliation to complainants. As per the requirements of the MICI Policy, IDB does allow for confidentiality of complainants, however, there is no requirement/policy for protection against retaliation.
- (b) Partial Gap: Para. 6i: which requires the Inclusion of a locally available option at the project or program level that is established early, proportionate to the potential risks and impacts of the project or program. A locally available option at the project or program level is not required by any IDB policy. However, IDB "recommends" that a mechanism for receiving and handling grievances is provided at the project level.

*Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

- 14. Directive B.9: Natural Habitats and Cultural Sites requires the Bank to not finance projects that significantly convert or degrade critical habitats. This includes requirements that seek to avoid and limit adverse impacts to biodiversity and habitats.
- 15. The ESCP requirements address nearly all the GEF criteria of MS3. The following partial gaps were identified:
  - (a) Partial Gap: Para. 8d: requires that any project- or program-supported production or harvesting of living natural resources is carried out consistent with good sustainable management practices. This issue is not explicitly addressed by IDB in the ESCP.
  - (b) Partial Gap: Para. 8.f requires that supported activities conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources. This issue is not addressed in the ESCP.

*Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

- 16. IDBs Involuntary Resettlement Operational Policy (OP-710) stipulates that "every effort shall be made to avoid the need for involuntary resettlement". It also puts forth the requirement that a thorough analysis of project alternatives must be carried out if project/program activities could lead to involuntary resettlement. As part of its Involuntary Resettlement Operational Policy, IDB requires that when displacement is unavoidable, a resettlement plan must be prepared to ensure that the affected people receive fair and adequate compensation and rehabilitation.
- 17. The OP- P710 requirements address nearly all the GEF criteria of MS4. The following gaps were identified:

- (a) Partial gap: Para. 9i: stipulates that forced eviction without the provision of and access to appropriate forms of legal and other protection is prohibited. There is no IDB policy provided or referenced that relates to the prohibition of forced eviction without the provision of and access to appropriate forms of legal and other protection

#### *Minimum Standard 5: Indigenous Peoples*

- 18. Operational Policy- 765 and its corresponding “Operational Strategy for indigenous Peoples” seek to enhance the Bank’s contribution to the development of indigenous peoples. The policy contains two sets of directives. The first requires the Bank to use its best efforts to promote the development with identity of indigenous peoples. The second creates safeguards designed to prevent or minimize exclusion and adverse impacts that Bank operations might generate with respect to indigenous peoples and their rights.
- 19. OP-765 requirements address nearly all the GEF criteria of MS5. The following two gaps have been identified:
  - (a) Partial gap: Para. 10a: which includes loss of access as a requirement for the triggering of Free Prior Informed Consent. In Op-765 there is a general lack of detail on whether land use or the loss of access does in fact trigger the requirement for FPIC.
  - (b) Partial gap: Para. 11e: requires that Grievance and conflict resolution systems are established, which are culturally appropriate, available in local languages, accessible to affected Indigenous Peoples. There is no specific IADB policy that requires the establishment of a grievance and conflict resolution system, but only recommendation when appropriate.

#### *Minimum Standard 6: Cultural Heritage*

- 20. Policy directive B.9 of IDB’s ESCP covers Natural Habitats and Cultural Sites. This directive prohibits the bank from undertaking any operations that will significantly damage critical cultural sites.
- 21. The ESCP requirements address nearly all the GEF criteria of MS 6. The following two partial gaps were identified:
  - (a) Partial gap: Para. 12f: requires, where feasible, that continued access to cultural heritage sites is arranged in consultation with stakeholders. IDB has not provided any evidence or information for this element and it is not covered in the Bank’s ESCP.
  - (b) Partial gap: Para. 12g: requires that where a project or program involves the commercial use of Cultural Heritage, project- or program-affected parties are informed of their rights under national law. There is no evidence provided by IDB

to demonstrate that the Bank is compliant with this section of the GEF's specific criterion of MS 6.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

22. Both Directives B.10 "Hazardous materials" and B11 "Pollution Prevention and Abatement" of IDB's ESCP and their respective supporting guidelines call for avoidance of adverse impacts to the environment and human health and safety from production, procurement, use, and disposal of hazardous material, including organic and inorganic toxic substances, pesticides and Persistent Organic Pollutants (POPs). Policy provisions require minimization, management plans, and bans financing of certain pesticides and to reduce or eliminate pollution that is produced through their activities
23. The ESCP requirements address all the GEF criteria of MS7.

#### *Minimum Standard 8: Labor and Working Conditions*

24. There is no specific IDB policy that addresses labor and working conditions. It has provided a note that it will soon be undergoing a "modernization" of its safeguard system. Labor and Working Conditions should be a key focus for this update as currently it is not compliant with any aspect of GEF MS 8.

#### *Minimum Standard 9: Community Health, Safety and Security*

25. There is no specific IDB policy which addresses the elements of GEF MS 9: Community Health, Safety and Security. It has provided note that it will soon be undergoing a "modernization" of its safeguard system. Community Health, Safety, and Security should be a key focus for this update as currently it is not compliant with any aspect of GEF MS 9.

#### **Policy on Gender Equality**

26. IDB has several policy requirements/mechanisms for the inclusion and mainstreaming of gender into project design, implementation, and monitoring and evaluation. These are outlined in IDB's Operational Policy on Gender Equality in Development (2010). This puts forth two lines of action. (para 4.1). One of these is preventative action, that seeks to safeguard, prevent or mitigate against any adverse impacts "on women or men due to gender resulting from the Bank's actions through its financial operations. The other "line of action" is proactive action, which is responsible for providing equal opportunities for women and men to benefit.
27. Section V of the Banks Operational Policy on Gender Equality in Development, "Implementation and Compliance" has a directive outlined in para 5.1 which requires any Bank funded project to meet certain criteria for its gender indicators including sex-disaggregated data. IDB also has a strong focus on Gender Based reporting (GBR), this approach includes the tracking of certain indicators that have been embedded in the

project results matrices to measure the "narrowing of a gender gap". As a consequence, IDB is fully compliant with the Policy on Gender Equality.

### Policy on Stakeholder Engagement

28. IDB does not have an independent/separate Stakeholder Engagement policy, rather the elements that are considered "best practices" have been embedded throughout other IDB policies and guidelines, such as the IDB Operational Policy on preparation, analysis and approval of projects (OP- 302). However, this document is confidential and has not been provided to GEF. Identification and inclusion of stakeholders are referenced in both IDB's Environmental Safeguards and Compliance Policy as well as its Indigenous Peoples Policy.
29. The IDB requirements address all of the criteria of the GEF Policy on Stakeholder Engagement. However, the following has been identified as a partial gap:
  - (a) Partial gap: Para. 16e (Stakeholder Engagement Policy): requires that the agency ensures that stakeholders have access to timely, relevant and understandable information about activities implemented by the Agency, and clear procedures to request information. IDB has stated that "All Stakeholders with access to either the internet or to a Representation of the IDB (present in the capitals of all 26 borrowing member countries, as well as in Madrid, Sao Paolo, Tokyo and Washington DC, and reachable by phone, e-mail or in person) have free access to an ample range of information about IDB Group Activities, including clear procedures to request information." However, there is a need for IDB to provide timely access to information about projects/activities to those who may not have access to the internet or the ability to travel to a representation of IDB.

## INTERNATIONAL FUND FOR AGRICULTURAL DEVELOPMENT (IFAD)

### Background on relevant Agency policies

1. As a UN agency operating as an international financial institution, IFAD has adopted a number of environmental and social policies and procedures to ensure that its operations avoid adverse impacts on people and the environment.
2. IFAD has recently updated its Social, Environmental and Climate Change Procedures (SECAP, 2017) to better mainstream environmental, social and climate change considerations into the project cycle and demonstrate IFAD's commitment to go beyond "doing no harm". Key changes in the updated SECAP include: roles and responsibilities at each stage of the SECAP process clarified; further detailing of tools and methods to assess and document environmental, social and climate risks; greater emphasis on community health, safety and labour issues; greater emphasis on community and stakeholder engagement; revised guidance statements; greater clarity on physical and economic resettlement (GS 13); revised guidance statements on: rangeland-based livestock production (GS 6), water (GS 7), dams and their safety (GS 8), rural roads (GS 10), value chains (GS 11), rural finance (GS 12), and a new GS 14 on community health.
3. SECAP includes 14 guidance statements on key environmental and social themes. These are as follows: GS1 Biodiversity; GS2 Agrochemicals; GS3 Energy; GS4 Fisheries and aquaculture; GS5 Forest resources; GS6 Rangeland-based livestock production; GS7 Water (agriculture and domestic use); GS8 Dams, their safety and SECAP; GS9 Physical cultural resources; GS10 rural road; GS11 Development of value chains; GS12 Rural finance; GS13 Physical and economic resettlement; GS14 Community Health.
4. SECAP is underpinned by the IFAD Policy on Disclosure of Documents and IFAD Complaints Procedures (to respond to alleged complaints of non-compliance with IFAD's environmental and social policies and mandatory elements of SECAP).

### Findings and Recommendations on Compliance with GEF Policies

5. The review assessed the alignment between the IFAD SECAP and other relevant IFAD policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards:* IFAD was assessed as follows:
    - (i) Fully compliant (no gaps) with MS1 (Assessment); MS2 (Accountability); MS4 (Resettlement); MS6 (Cultural Heritage); MS7 (Resource Efficiency and Pollution Prevention); and, MS9 (Community Health).
    - (ii) No standard that meets the requirements of MS8 (Labor and Working Conditions).

- (iii) Some gaps evident with MS3 (Biodiversity) and MS5 (Indigenous Peoples).
  - (b) *Policy on Gender Equality*: IFAD was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: IFAD was assessed to have one partial gap with the Policy on Stakeholder Engagement.
6. *Recommendations*: IFAD should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
- (a) *Safeguards*:
    - (i) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) address issues concerning the prohibition of the introduction of invasive alien species, and (b) address the need for a reference on procurement policies with regards to avoiding those which will have a potentially negative impact on natural habitats;
    - (ii) MS5 Indigenous Peoples: (a) include the triggering of FPIC for any activity that could result in a significant impact on Indigenous Peoples Cultural Heritage, and (b) address risks and circumstances of indigenous peoples living in voluntary isolation;
    - (iii) MS8 Labor and Working Conditions: address the requirements of MS8, through a separate Guidance Statement on Labor and Working Conditions;
  - (b) *Stakeholder Engagement*: IFAD should broaden its requirements with regards to public disclosure of stakeholder consultations and engagement (currently only requires a public disclosure for projects with a “significant risk”).
7. Descriptions of the findings for each policy are provided below.

## **Policy on Environmental and Social Safeguards**

### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

- 8. The SECAP contains comprehensive policy requirements and procedures to promote environmental and social sustainability and to help ensure prevention and mitigation of undue harm to people and the environment. The SECAP is also underpinned by IFAD’s commitment to going beyond “do no harm”.
- 9. All IFAD projects are screened at the project concept stage to identify the main social, environmental and climate issues. These are reviewed by the Environment, Climate, Gender and Social Inclusion Division (ECG) before being submitted to the Operational Strategy and Policy Guidance Committee (OSC). The results of the screening are captured in a project compliance review that assigns a project a preliminary environmental and social category (A, B and C) and climate risk classification (high, moderate or low).

Depending on the classification, project design teams carry out further assessments in order to identify measures to mitigate undesired social and environmental impacts

10. The SECAP requirements address all GEF criteria of MS 1. IFAD is therefore fully compliant with MS1.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

11. Section 1.3.7 of the SECAP outlines the requirements with regard to GRMs. IFAD has an agency level GRM that can be contacted either through email or on its website. This section of the SECAP also outlines the requirement that borrowers are to have a project-level GRM in place that is accessible to affected communities. The SECAP requires the borrower to provide a grievance mechanism proportionate to risks and impact. IFAD is fully compliant with MS2.

#### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

12. Guidance Statement 1 of SECAP (page 112) is fully devoted to outlining IFAD's approach and requirements for biodiversity promotion and conservation. As outlined in para 19 of SECAP GS1 - Biodiversity, the agency prohibits the implementation of any projects in areas of critical habitats or those that will result in degradation of such habitats.
13. The SECAP GS1 requirements address nearly all the GEF policy criteria of MS 3. However, the following gaps were identified:
  - (a) Gap: Para. 7c: which requires that agencies do not introduce or use potentially invasive, non-indigenous species in projects or activities. Although the potential adverse impacts of alien species is referenced in IFAD's SECAP, it is not exclusively prohibited anywhere in the SECAP.
  - (b) Gap: Para. 8c: where the procurement of natural resource commodities that may contribute to significant conversion or degradation of Natural Habitats is required to be avoided. This is currently not explicitly prohibited/mentioned in the updated SECAP. IFAD has drawn attention to the fact that any private partnership is subject to rigorous review of a company's safeguards and track record etc. However, there is no reference provided on procurement policies with regards to avoiding those which will have a potentially negative impact on natural habitats.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

14. "Avoiding involuntary resettlement wherever possible" is one of the guiding principles for IFAD's SECAP. The main policy document that is referenced for this element in the SECAP is IFAD's Land Policy (2008). Physical and Economic Resettlement issues are also covered in Guidance Statement 13 of the SECAP. However, it should be noted that this GS is currently under revision.

15. IFAD has outlined the instances in which resettlement has occurred throughout its portfolio since 2014, which is a fairly low occurrence rate due to "IFAD projects typically not involving major infrastructure elements".
16. The SECAP and IFAD Land Policy requirements address all GEF criteria of MS 4. IFAD is therefore fully compliant with MS4.

#### *Minimum Standard 5: Indigenous Peoples*

17. IFADs main safeguard instrument that addresses the criteria and requirements as set out in GEFs MS 5: Indigenous Peoples is the IFAD Policy on Engagement with Indigenous People which was published in 2009. IFAD's policy on improving access to land and tenure security is closely interlinked with the requirements of GEF MS 5. In its Policy on Engagement with Indigenous Peoples, IFAD outlines (page 25) situations where FPIC is triggered by IFAD activities/operations.
18. The SECAP and IFAD Policy on Engagement with Indigenous Peoples requirements address nearly all GEF criteria of MS5. However, the following partial gaps were identified:
  - (a) Partial gap: Para. 10c: which requires the triggering of FPIC when a project or activity could potentially result in any significant impacts on an Indigenous People's Cultural Heritage. One of the nine pillars of the IFAD Policy on Engagement with Indigenous Peoples is to recognize cultural heritage and identity as assets. This is most clearly presented on page 13 of IFAD's Policy on Engagement with Indigenous Peoples. However, there is no direct/explicit mention of this specific element requiring the triggering of FPIC.
  - (b) Partial gap: 11j: which addresses potential issues that may arise when a project or program may affect Indigenous Peoples in voluntary isolation. When undertaking the SECAP, IFAD applies its new Targeting Policy, which guides the agency's engagement with indigenous people, the assessment of beneficiaries, and other potentially affected parties. This process assists in the determination of the location of interventions. While there are no cases to date known to IFAD of its projects working in areas where indigenous peoples are living in voluntary isolation, this dimension of its IP safeguards will be reflected in the form an explicit statement within the revised IP safeguard standard which is expected to be available in draft form by the end of 2019 and reflected in the updated How-to-do note on FPIC.

#### *Minimum Standard 6: Cultural Heritage*

19. IFAD SECAP GS 9 - Physical and Cultural Resources, lays out the use of environmental and social assessment procedures, avoidance and mitigation measures for impacts and potential risks to cultural heritage. In addition, Principle no.4 in IFAD's Policy on Engagement with Indigenous Peoples highlights cultural heritage (p.13). IFAD is fully compliant with MS6.

### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

20. IFAD complies with the Stockholm Convention and other international bans and restrictions on pesticide use. This is outlined in further detail under SECAP Guidance Statement 2- Agrochemicals. Issues surrounding sustainable water consumption in IFAD projects are outlined in the Guidance Statement 7- Water of SECAP.
21. The SECAP requirements, as outlined in GS2 and GS7, address all the GEF criteria of MS7. IFAD is therefore fully compliant with MS7.

### *Minimum Standard 8: Labor and Working Conditions*

22. IFAD does not have any specific guidance on labor and working conditions in the SECAP. Rather, some elements of this MS requirement are referenced in sections such as Guidance Statement 12 of SECAP- Rural Finance, which includes the assessment of whether a specific project will create "decent jobs" and have prohibitions on the employment of children. However, several of the other main elements of this section of the GEF MS are missing such as freedom of association; recognition of the right to collective bargaining; and, elimination of discrimination in respect of employment and occupation.
23. Para 15h of GEF MS 8, on forced labor and child labor, is one of the elements of this GEF MS that IFAD does sufficiently meet. IFAD is a founding partner of the International Partnership for Cooperation on Child Labor in Agriculture and has requirements and policies in place to prevent forced employment and child labor.
24. IFAD's comment is that "as a UN agency we embrace ILOs Decent Work toolkit for mainstreaming decent work which provides for sound labor management procedures by contractors". However, there is no reference/explicit mention of this in any policy document including SECAP. IFAD does not have a separate Guidance Statement on Labor and Working Conditions, in line with GEF MS 8.

### *Minimum Standard 9: Community Health, Safety and Security*

25. Guidance statement 14 on community health (in SECAP) provides specific requirements for assessing health impact and safety issues that may arise from project activities and construction. Adverse impacts on community health and safety are assessed, monitored and mitigated (where necessary) by the requirements specified in Guidance Statement 14 "Community Health" of SECAP, as well as in GS 2- Agrochemicals, and GS 8- Dams and their safety.
26. The SECAP requirements as outlined in GS14, GS2 and GS8 address all the GEF requirements of MS 9. IFAD is therefore fully compliant with MS9.

## Policy on Gender Equality

27. IFADs approach to gender is guided by its 2012 policy on Gender Equality and Women's Empowerment. Under IFADs current (11th) replenishment, it is committed to a specific set gender target, with 25% being gender transformative, and 90% of IFAD projects should be gender mainstreamed at completion. IFAD has also set out to have gender parity at all levels of its staffing which further demonstrates its commitments to gender equality. IFAD strives to go beyond Just seeking gender mainstreaming, with ambitious goals such as transforming unequal gender relations and the promotion of shared control of resources and decision making. Project performance is reviewed and reported with regard to the outcomes of targeting and gender activities.
28. IFAD's guide for project M&E (2002) provides practical tips and examples for setting up an M&E system that tracks sex-disaggregated differences and assesses how well the project is doing in terms of gender-balanced impact.
29. The requirements of the IFAD policy on Gender Equality and Women's Empowerment addresses all the criteria of the GEF Policy on Gender Equality.

## Policy on Stakeholder Engagement

30. Section 1.3.5 outlines the IFAD requirements and approach to "Consultation in the SECAP Process". This includes attaining meaningful consultation with communities, especially "targeted groups". This consultation with key stakeholders will continue to be sought throughout the project and program life cycle. IFAD's policies on Targeting, Gender Equality and empowerment, and section 1.3.5 of SECAP contain clear guidelines and approaches that should be adopted for appropriate consultation as is specified by the GEF requirements for its Stakeholder engagement policy.
31. The requirements of IFAD's SECAP Section 1.3.5 address nearly all of the criteria of the GEF Policy on Stakeholder Engagement. However, the following was identified as a partial gap:
  - (a) Partial gap: Para. 16d (stakeholder engagement policy): which requires that a public record of Stakeholder Engagement throughout the project cycle is maintained and disclosed. Disclosure of consultations and stakeholder engagement is outlined in both Section 1.3.5 and 1.3.6 of SECAP. IFAD only requires that projects with significant risks and impacts involving economic and physical resettlement, indigenous peoples or physical cultural resources will be subject to disclosure and consultation requirements set out in section 1.3.6 of SECAP.

## INTERNATIONAL UNION FOR CONSERVATION OF NATURE (IUCN)

### Background on relevant Agency policies

1. The International Union for Conservation of Nature is an international organization working in the field of nature conservation and sustainable use of natural resources. IUCN is a membership union composed of both government and civil society organisations, with more than 1,300 member organisations and input of more than 15,000 experts. This diversity and vast expertise make IUCN a global authority on the status of the natural world and the measures needed to safeguard it.
2. IUCN has an ESMS Manual that provides a systematic procedure to check IUCN projects for potential adverse environmental and social impacts to assure that negative impacts are avoided or minimized to the extent possible, while positive impacts are stimulated. This ESMS received its most current update in 2016 (now version 2.0).
3. The ESMS principles and standards are rooted in IUCN environmental and social policies and IUCN World Conservation Congress (WCC) resolutions. They also draw on IUCN values, good practice tools developed by IUCN Secretariat programmes and IUCN Commissions and on lessons learned during IUCN's long tradition of working at the interface of conservation and social issues and human rights.
4. The ESMS Policy Framework is outlined in the ESMS Manual. The ESMS Policy Framework includes the ESMS principles: Taking a rights-based approach; protecting the needs of vulnerable groups; gender equality and women empowerment; stakeholder engagement; free prior informed consent; accountability; precautionary approach and precedence of the most stringent standards; and, ESMS standards: (the Standard on Involuntary Resettlement and Access Restrictions; the Standard on Indigenous Peoples; the Standard on Biodiversity Conservation and Sustainable Use of Natural Resources; and the Standard on Cultural Heritage).

### Findings and Recommendations on Compliance with GEF Policies

5. The review assessed the alignment between the IUCN ESMS Manual and other relevant IUCN policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards*: IUCN was assessed as follows:
    - (i) Fully compliant (no gaps) with MS3 (Biodiversity) and MS4 (Resettlement).
    - (ii) Some gaps with MS1 (Assessment), MS2 (Accountability), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource Efficiency and Pollution Prevention), MS8 (Labor), and MS9 (Community Health).

- (b) *Policy on Gender Equality*: IUCN was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: IUCN was assessed to have one partial gap with the Policy on Stakeholder Engagement.
6. *Recommendations*: IUCN should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
- (a) *Safeguards*:
    - (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) broaden screening requirements to address all GEF MSs, (b) include third-party monitoring, (c) address GBV risk screening and response and reporting protocols, and (d) ensure that its Guidance Note on Environmental and Social Assessment, Management and Monitoring is an enforceable policy requirement);
    - (ii) MS2 Accountability, Grievance and Conflict Resolution: address the risks of retaliation to complainants;
    - (iii) MS5 Indigenous Peoples: (a) address the requirement for a GRM that is available for IPs and provided in a culturally and appropriate form, and (b) address risks and circumstances of indigenous peoples living in voluntary isolation;
    - (iv) MS6 Cultural Heritage: address the inclusion of qualified experts or local people in the consultation and assessment of project/activity level aspects that relate to cultural heritage;
    - (v) MS7 Resource Efficiency and Pollution Prevention: need to develop a separate E&S standard, or at a minimum, codify its requirements and approach for further assessments and mitigation measures;
    - (vi) MS8 Labor and Working Conditions: need to develop a separate E&S standard, or at a minimum, codify its requirements and approach for further assessments and mitigation measures;
    - (vii) MS9 Community Health, Safety and Security: (a) address the need for requirements/guidance on the provision of emergency preparedness plans, and (b) include considerations for the risk of exposure of communities to both natural and accidental hazards.
  - (b) *Stakeholder Engagement*: IUCN should provide stakeholder with more detailed instructions/guidance on the procedures to request further information.
7. Descriptions of the findings for each policy are provided below.

## Policy on Environmental and Social Safeguards

### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

8. The IUCN ESMS Manual and corresponding ESMS Policy Framework contain comprehensive policy requirements and procedures to promote environmental and social sustainability and to help ensure prevention and mitigation of undue harm to people and the environment.
9. The IUCN ESMS Policy Framework and manual address nearly all GEF criteria of MS 1. In the ESMS Manual there is a section which provides the IUCN ESMS Screening Questionnaire. This Screening Questionnaire is designed to identify potential environmental and social risks. The ESMS screening questionnaire consists of four sections. The first section addresses stakeholder engagement (a), the second addresses potential impacts related to IUCN ESMS standards (b), the third section handles issues relating to other E&S risks that may fall outside of the ESMS standards for IUCN (c), and the fourth and final section assess risks relating to climate change (d).
10. Two partial gaps were identified:
  - (a) Partial Gap: Para. 4.a: (screening of E&S risks and adverse impacts): Due to the fact that IUCN does not have a specific standard devoted to either Labor and Working conditions or Community Health, Safety, and Security there are potential issues that these key themes/requirements are not being featured predominantly in the screening process.
  - (b) Partial Gap: Para. 4.m: (Adverse Gender-Related Impacts, Including Gender-Based Violence and Sexual Exploitation and Abuse): The IUCN Guidance Note on Social Baseline requires the analysis of risks that may aggravate or perpetuate discrimination. However, this Guidance Note (provided by IUCN as evidence of a relevant policy) doesn't have any enforceable policy requirement mechanism. There is also a general lack of inclusion of considerations on GBV and Sexual exploitation and abuse included in the screening questionnaire.

### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

11. IUCN has a brief description of its Grievance Mechanism online, at its website. A more detailed description has been provided by IUCN through its Guidance Note on IUCN Project Grievance Mechanism. This Guidance Note requires that each high or moderate risk project adapts the institution-wide grievance mechanism to fit the specific context of the project site. In addition, the ESMP Guidance Note requires that the ESMP be monitored on an annual basis and should describe the implementation of the grievance mechanism.
12. One partial gap was identified:

- (a) Partial Gap: Para.5f: which requires the partner agency to have in place policies and procedures that ensure appropriate and timely measures to minimize the risk of retaliation to Complainants. This is somewhat covered in Chapter 3 of the Guidance Note for IUCN ESMS Grievance Mechanism. However, this is only covered in light detail. Potentially more could be done by IUCN to strengthen the measures around minimizing the risks of retaliation.

#### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

- 13. Biodiversity Conservation and Sustainable use of Natural Resources is one of the four IUCN ESMS Standards. This standard includes requirements that seek to avoid and limit adverse impacts to biodiversity and habitats. Procurement and supply chain risks to critical habitats are outlined in paragraph 45 of the ESMS Standard on Biodiversity Conservation and Sustainable Use of Natural Resources. IUCN has adopted a more "comprehensive" definition of critical habitats. The protection of natural habitats and especially critical habitats is a key focus area for IUCN's operations. The ESMS requirements on Biodiversity Conservation and Sustainable use of Natural Resources address all the GEF criteria of MS 3.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

- 14. As mentioned, one of IUCN's four ESMS is "involuntary resettlement and access restrictions", which assures that projects will not lead to adverse impacts on the rights and livelihoods of peoples and communities. This ESMS applies to all projects that will involve: the resettlement of communities; restricting access to land or natural resources; or, cause economic or livelihood loss. The ESMS on Involuntary Resettlement and Access Restrictions addresses all the GEF criteria of MS 4.

#### *Minimum Standard 5: Indigenous Peoples*

- 15. Indigenous Peoples is another free-standing IUCN ESMS. This standard applies to whenever indigenous people are present in a proposed project area or could be negatively affected by the project. The IUCN ESMS on Indigenous Peoples Uses a broad definition of 'indigenous' and assures that indigenous peoples' social and cultural identity, customs and institutions are fully respected.
- 16. Two partial gaps were identified:
  - (a) Partial gap: Para 11e requires establishment of a GRM that is available for IPs and provided in a culturally and appropriate format. This is not explicitly outlined in the IUCN Standard on Indigenous Peoples.
  - (b) Partial gap: Para 11j addresses the risks and circumstances associated with indigenous people living in voluntary isolation. In the ESMS Questionnaire, under Section B, there is a question that seeks to assess/establish the impact that a given

project will have on IPs who are living in voluntary isolation. However, there is little guidance on how to manage such risks if they were to arise and no reference to voluntary isolation in the Standard on Indigenous Peoples.

#### *Minimum Standard 6: Cultural Heritage*

17. The Cultural Heritage ESMSS outlines a set of requirements to avoid and minimize impacts on cultural heritage. This standard applies to projects that could adversely affect cultural heritage defined as tangible, movable or immovable cultural resources or natural features of historical, cultural, spiritual or symbolic value.
18. One area of partial gap was identified:
  - (a) Partial gap: Para 12c & 12d: IUCN, and its ESMSS on Cultural Heritage, do not address the inclusion of and consultation with qualified experts, local people and other stakeholders with regards to whether disclosure is appropriate in the context of cultural heritage.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

19. Resource efficiency and pollution prevention are not codified in the ESMS Policy Framework as a distinct safeguard standard. In its self-assessment, IUCN has stated that it "would not support any project that entails the application or use of any substance that has been listed under the Stockholm convention on POPs". This is a valid statement given the nature of IUCN's portfolio and projects, however there is no policy requirement/enforcement mechanism that explicitly prohibits the use of such substances.

#### *Minimum Standard 8: Labor and Working Conditions*

20. IUCN does not have a specific standard on Labor and Working Conditions. IUCN justifies this by stating that the nature of their projects, i.e. not consisting of large infrastructure work, does not require it to hire large work forces. The lack of a Labor and Working Conditions standard is a clear compliance gap with the GEF MS 8.
21. The two aspects of the GEF "criteria" in MS8 that are sufficiently met by IUCN are forced child labor (which is covered in section C of the ESMS questionnaire), and sexual harassment, intimidation and exploitation of workers (which is sufficiently covered by IUCN Policy on the Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment, March 2019). This policy is very comprehensive and demonstrates IUCN's adoption of best practice in this area.

#### *Minimum Standard 9: Community Health, Safety and Security*

22. Elements of this GEF MS are included in the ESMS Questionnaire Section C. There is also no IUCN-specific ESMS standard for Community Health and Safety. Certain aspects of this GEF MS are evident throughout the ESMS Manual and associated Policy Framework.

23. However, the following gaps have been identified:
- (a) Partial gap: Para. 17a: (which addresses the screening and assessment of risks or potential impacts to the health, safety and security of project- or program-affected communities): considerations for the risk of exposure of communities to both natural and accidental hazards (17, a, i) is not sufficiently outlined in the ESMS questionnaire.
  - (b) Partial gap: Para. 17d (development of emergency preparedness plans): This requirement for the development of emergency preparedness plans is not addressed by any policy or guidance note.

### Policy on Gender Equality

24. At the 95th meeting of its Board, in October 2018, IUCN had its "Gender Equality and Women's Empowerment Policy" approved. This policy document further strengthens IUCN's approach to the embedding of gender-responsive approaches throughout its program and project portfolio. The IUCN Policy on Gender Equality and Women's Empowerment outlines in paragraph 15 c i, that gender analyses shall be undertaken on IUCN projects in order to inform "gender-responsive project design, budgeting, staffing, implementation, monitoring and evaluation". This policy document reinforces strong references to budgeting requirements for gender related activities at the project level.
25. IUCN has provided strong evidence of how this element is effectively implemented in practice, with several project "gender strategies" provided which include the establishment of equal opportunities as a strategic objective of such strategies. This demonstrates IUCN's track record in implementing gender responsive and transformative projects/programs. The policy impetus for establishing equal opportunities is outlined in paragraph 15 c iv, of the IUCN Gender Equality and Women's empowerment policy.
26. The requirements of the IUCN "Gender Equality and Women's empowerment Policy" as well as the ESMS Policy Framework address all the criteria of the GEF Policy on Gender Equality.

### Policy on Stakeholder Engagement

27. IUCN does not have a specific standard or separate policy document that deals with stakeholder engagement requirements and procedures. It is included as a principle in the ESMS Manual and a separate guidance note was produced in March 2019. The purpose of the Stakeholder Engagement Guidance Note is to compliment the requirements as established in the ESMS Manual. The imperative for stakeholder identification and engagement "as early as possible" is outlined in the ESMS Manual, Section 2.1.4 "Principle on Stakeholder Engagement".
28. As per the IUCN ESMS principle on Stakeholder Engagement, meaningful, effective and informed participation of stakeholders in the development and implementation of

projects is an essential principle of IUCN's project management practice. Engaging stakeholders as early as possible is important to understand their views and interests, establish a constructive relationship with relevant parties and enable stakeholders to take ownership of the project.

29. Only one partial gap has been identified:

- (a) Partial gap: Para. 16e (Stakeholder engagement policy) requires access to timely, relevant and understandable information about activities implemented by the Agency, and clear procedures to request information. Project and ESMS documentation is available on the IUCN website. However, there is not much information provided by IUCN on the procedures to request further information.

## UNITED NATIONS DEVELOPMENT PROGRAMME (UNDP)

### Background on relevant Agency policies

1. UNDP is the UN's global development network, an organization which partners with people at all levels of society to help build nations that can withstand crisis and drive and sustain the kind of growth that improves the quality of life for everyone. On the ground in 177 countries and territories, UNDP offers global perspective and local insight to help empower lives and build resilient nations, encouraging in all its activities, the protection of human rights, capacity development and the empowerment of women.
2. UNDP's Strategic Plan (2018 – 2021) and policy framework articulate the organization's strategic commitment to promoting its 2030 Agenda. The Social and Environmental Standards (SES) underpin this commitment by ensuring social and environmental sustainability is mainstreamed across all programming. The SES are UNDP policy and require that all UNDP programming maximizes social and environmental opportunities and benefits as well as ensures that adverse social and environmental risks and impacts are avoided, minimized, mitigated and managed. The SES do not define the substantive development outcomes and results orientation of UNDP's programming, as this is elaborated in UNDP's Strategic Plan and Programme Documents.
3. The SES objectives are to: (i) strengthen the quality of programming by ensuring a principled approach; (ii) avoid adverse impacts to people and the environment; (iii) minimize, mitigate, and manage adverse impacts where avoidance is not possible; (iv) strengthen UNDP and partner capacities for managing social and environmental risks; and (v) ensure full and effective stakeholder engagement, including through a mechanism to respond to complaints from project-affected people.
4. The comparative advantage of UNDP lies in the implementation of projects relating to capacity building and technical assistance. As such, UNDP does not implement "investment" projects as defined by the GEF. UNDP assists countries in promoting, designing and implementing activities consistent with both the GEF mandate and national sustainable development plans. UNDP also has extensive inter-country programming experience.
5. At the Project level, UNDP Standards 1-8 further support implementation of UNDP's commitments to promoting that no one is left behind; human rights, gender equality and women's empowerment; sustainability and resilience; and accountability (the SES Programming Principles). The Standards set out specific requirements relating to different social and environmental issues.
6. UNDP's Project-level Standards relate to the following areas: Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management; Standard 2: Climate Change and Disaster Risks; Standard 3: Community Health, Safety and Security; Standard 4: Cultural Heritage; Standard 5: Displacement and Resettlement; Standard 6: Indigenous

Peoples; Standard 7: Labour and Working Conditions; Standard 8: Pollution Prevention and Resource Efficiency.

### Findings and Recommendations on Compliance with GEF Policies

7. UNDP's Social and Environmental Standards and accompanying Social and Environmental Screening Procedure were first introduced in 2015. In 2019 the SES has been updated, in part to specifically address the new GEF Environmental and Social Policy.
8. The review assessed the alignment between the UNDP SES and other relevant UNDP policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards*: UNDP was assessed as being fully compliant with all of the Minimum Standards.
  - (b) *Policy on Gender Equality*: UNDP was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: UNDP was assessed as fully compliant with the Policy on Stakeholder Engagement.
9. *Recommendations*: No further actions recommended.
10. Descriptions of the findings are provided below.

### Policy on Environmental and Social Safeguards

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

11. In the updated UNDP SES, there has been a change in the approach to alignment of Programme risk screening with the UNDP Quality Assurance Framework. The screening and classification of E&S risk for potential projects and programs includes consideration for all elements as outlined in GEF MS 1. UNDP's approach to classification is outlined in Paragraph 16 of the "Social and Environmental Management System Requirements" which constitutes part of its updated SES. UNDP is fully compliant with MS1.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

12. Accountability, grievance and conflict resolution are primarily deal with by UNDP within the Social and Environmental Management System requirements (SEMS). The SEMS includes the Stakeholder Response Mechanism. UNDP is fully compliant with MS2.

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

13. UNDP's Project-level Standard 1 in its updated SES is devoted to Biodiversity Conservation and Sustainable Natural Resource Management and is fully compliant with MS 3.

### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

14. UNDP is fully compliant with MS 4, due to the extensive provisions to be found in Standard 5: Resettlement and Displacement.

### *Minimum Standard 5: Indigenous Peoples*

15. UNDP is fully compliant with MS 5, due to the provisions to be found in Standard 6: Indigenous People.

### *Minimum Standard 6: Cultural Heritage*

16. MS 6 requires that agencies demonstrate that they have in place the necessary policies, procedures, systems and capabilities to ensure that cultural heritage issues are properly dealt with. UNDP is fully compliant with the requirements of MS 6, due to the provisions contained within its Standard 4 (Cultural Heritage).

### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

17. UNDP is fully compliant with MS 7, due to the provisions contained within its Standard 8 (Pollution Prevention and Energy Efficiency). This section of UNDP's updated SES has been especially strengthened.

### *Minimum Standard 8: Labor and Working Conditions*

18. UNDP is fully compliant with MS 8, due to the development of an entirely new Standard 7 (Labor and Working Conditions). This Standard was originally drafted by ILO, as part of the UN Model Approach.

### *Minimum Standard 9: Community Health, Safety and Security*

19. UNDP is fully compliant with the requirements of MS 9, due to the provisions contained within its Standard 3 (Community Health, Safety and Security).

### **Policy on Gender Equality**

20. UNDP is fully compliant with GEF's Policy on Gender Equality. It has produced a "Guide to Gender mainstreaming in UNDP supported GEF Financed Projects". This includes approaches on gender that should be taken at various phases of the project cycle including sections on project development, implementation and reporting, monitoring

and evaluation. In addition, Programming Principle 2 (Human Rights and Gender Equality and Women's Empowerment) of the UNDPs updated SES, addresses the need for activities to not exacerbate existing gender-related inequalities.

### **Policy on Stakeholder Engagement**

21. UNDP is fully compliant with the GEF's Policy on Stakeholder Engagement. In the Social and Environmental Management Requirements that are included in UNDP's updated SES there is a specific section on Stakeholder Engagement and Response Mechanisms.

## UN ENVIRONMENT (UNEP)

### Background on Relevant Agency Policies

1. UNEP is the leading environmental authority in the United Nations system. UNEP uses its expertise to strengthen environmental standards and practices while helping implement environmental obligations at the country, regional and global levels. UNEP's mission is to provide leadership and encourage partnership in caring for the environment by inspiring, informing, and enabling nations and peoples to improve their quality of life without compromising that of future generations.
2. UNEP's approach to safeguards is presented in its Environmental, Social, and Economic Sustainability Framework (ESESF). This Framework is one of UNEP's concrete ways of supporting the achievement of the SDGs. It is compliant with the requirements of "A Framework for Advancing Environmental and Social Sustainability in the United Nations System (2012)," prepared by the Environmental Management Group (EMG).
3. The purpose of the Environmental, Social and Economic Sustainability Framework is to improve business practices of the UNEP by integrating standardized and structured sustainability measures across its work. This Framework sets minimum sustainability standards for UNEP and its implementing/executing partners, and enables UNEP to anticipate and manage emerging environmental, social and economic issues. UNEP states that the Framework is a working document which will be modified and improved as the agency gathers more experience and increases its capacity to incorporate ESES into its work. The Safeguard Standards came into force in 2015 and cover nine specific areas. The agency is currently updating its policy and will soon begin developing new screening rules and guidelines.

### Findings and Recommendations on Compliance with GEF Policies

4. The review assessed the alignment between UNEP's ESESF and other relevant UNEP policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings.
  - (a) *Policy on Environmental and Social Safeguards:* UNEP was assessed as follows:
    - (i) fully compliant (no gaps) with MS4 (Resettlement) and MS7 (Resource Efficiency and Pollution Prevention);
    - (ii) no standard exists that covers Community Health, Safety and Security;
    - (iii) some areas of partial gap were identified for MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), and MS8 (Labor and Working Conditions).

- (b) *Policy on Gender Equality*: UNEP was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: UNEP was assessed as fully compliant with the Policy on Stakeholder Engagement.
5. *Recommendations*: UNEP should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements.
- (i) MS1: Environmental and Social Assessment, Management and Monitoring: (a) address the need for screening of community health, safety and security issues, (b) offsetting of residual impacts, (c) seasonal variability in baseline studies, (d) use of independent advisory panels for high risk projects and third-party monitoring; (e) screening for climate change and natural hazard risks, (f) consideration of the needs of disadvantaged and vulnerable groups/individuals, people with disabilities, and gender-based violence);
  - (ii) MS2 Accountability, Grievance and Conflict Resolution: address risks of retaliation to complainant);
  - (iii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) recognize/consider the potential adverse impacts to critical habitats that could occur through the procurement of natural resource commodities, (b) ensure that requirements for the harvesting of living natural resources is carried out consistent with good sustainable management practices, (c) address impacts that could be associated with forest restoration, and (d) address requirements for access and benefit sharing in the utilization of genetic resources;
  - (iv) MS5 Indigenous Peoples: (a) include explicit requirements for the triggering of FPIC in situations that could lead to impacts on cultural heritage and “loss of access”, (b) require compensation to be considered as proportionate to the nature and scale of impacts, (c) require that meaningful consultation be undertaken during the development of mitigation and compensation plans, and these to be gender and inter-generationally inclusive, (d) ensure that GRM is culturally appropriate and available in local languages specifically for affected Indigenous Peoples, (e) require that projects inform Indigenous Peoples of their rights under national law with respect to commercial development and provide for opportunities of negotiation on benefit sharing, and, (f) require that the rights of Indigenous People living in voluntary isolation be taken into account;
  - (v) MS6 Cultural Heritage: (a) ensure that “intangible” cultural heritage is addressed, (b) require that where a project or program involves the commercial use of Cultural Heritage that affected groups are informed of their rights under national law, and (c) require that meaningful consultation with stakeholders take place when chance finds occur;

- (vi) MS8 Labor and Working Conditions: (a) ensure that projects explicitly allow for freedom of association and the recognition of the right to collective bargaining, (b) require that workers are provided regular and timely payment of wages; adequate periods of rest, holiday, sick, maternity, paternity, and family leave; and written notice of termination and severance payments, (c) require that workers who participate, or seek to participate, in workers' organizations and collective bargaining do so without interference, and (d) allow for the establishment of workplace GRMs;
- (vii) MS9 Community Health, Safety and Security: there is no specific UN Environment standard which addresses the elements of GEF MS 9: Community Health, Safety and Security.

## Policy on Environmental and Social Safeguards

### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

6. UN Environment environmental, social and economic risks are screened using an Environmental, Social and Economic Review Note. All UN Environment projects, whether donors approve the concepts or not, should go through safeguard screening by the Office for Operation (OfO) during the full project preparation. The UN Environment ESESF requirements address several of the GEF criteria of MS1. However, the following areas of gap were identified:
  - (a) Partial Gap: Para. 4a: requires that projects and programs are screened as early as possible to identify Environmental and Social Risks. As per the ESESF's Section 3.3.1 (Environmental, Social, and Economic Screening), all projects and programs receive a screening assessment for potential environmental and social impacts that is scaled to the level of risk. However, there is a lack of consideration for key GEF minimum standard MS 9: Community Health, which is not explicitly covered in the UN Environment standards.
  - (b) Partial Gap: Para. 4c: which requires that agencies offset residual impacts where avoidance or prevention, minimization, mitigation, and management are not feasible. "Offsetting harm" is not part of the UN Environment risk management hierarchy.
  - (c) Partial Gap: Para. 4d: which requires that agencies recognize that periodicity (e.g., seasonal variation) or other variability over time may require more robust baseline data than relatively constant conditions. There is a lack of recognition for periodicity and other variability that may require more robust baseline data in the ESESF.
  - (d) Partial Gap: Para. 4f: which requires that Independent expertise is used in the assessment of Environmental and Social Risks and Impacts, where appropriate, including where specialized knowledge may be needed. The requirement of obtaining independent expert help is mentioned in SS1 (biodiversity and natural

resources), SS5 (indigenous people) and SS 7 (cultural heritage). However, there is a lack of explicit mention of the requirement for independent advisory panels. UN Environment has indicated that all of its projects with GEF thus far have been of a “low” or “moderate” risk category, and therefore the use of independent advisory panels has not been required. UN Environment should include explicit requirements for the use of independent advisory panels for projects where the level and magnitude of risks and potential impacts is deemed high.

- (e) Partial gap: Para. 4g: which requires third party monitoring to monitor project implementation and/or assess if Environmental and Social Risk and Impact mitigation objectives are being or have been achieved. However, there is no mention of the potential use of third-party monitoring in the ESESF.
- (f) Partial gap: Para 4i: requires that short- and long-term risks posed by climate change and other natural hazards are considered systematically in the screening, assessment and planning processes. Climate change and disaster risks are currently not explicitly included in the current ESESF.
- (g) Partial gap: Para 4l: requires the consideration of people with disabilities in the screening process. UN Environment does not have a separate policy requirement outlining procedures for assessing risks to people with disabilities, and further to this, there is no specific mention of inclusion of disability in the project screening requirements.
- (h) Partial gap: Paras. 4m,n,o: these GEF criterion of MS1 require the provision of specific screening for gender-based violence and sexual exploitation and abuse. These issues are not addressed in the ESESF or any other related safeguarding policy. UN Environment has indicated that this will be addressed in its updates to ESESF. Minimum Standard 2: Accountability, Grievance and Conflict Resolution.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

- 7. Accountability and oversight of the management of environmental and social risks and impacts is outlined in section 3.3.4 “Mitigation, management and monitoring of impacts during project implementation” of the ESESF. An Independent Office for the Review of Stakeholder Responses, including compliance concerns and grievances, has responsibility for managing the Stakeholder Response Mechanism. Only one partial gap was identified:
  - (a) Partial gap: Para 5f: requires that the project proponent takes appropriate and timely measures to minimize the risk of retaliation to complainants. The ESESF does not deal with minimizing the risk of retaliation to complainants.

#### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

- 8. Safeguard Standard 1 (SS1) of UNEP’s ESESF explicitly outlines requirements for Biodiversity conservation, Natural Habitats, and Sustainable Management of Living

Resources. This includes specific protections against any adverse impacts on critical habitats. The following partial gaps were identified:

- (a) Partial Gap: Para. 8c: requires that the procurement of natural resource commodities that may contribute to significant conversion or degradation of Natural Habitats is avoided, where feasible. In SS1 of the ESESF, there is a lack of explicit recognition/consideration for the potential adverse impacts to critical habitats that could occur through the procurement of natural resource commodities
- (b) Partial Gap: Para. 8d: requires that any project- or program-supported production or harvesting of living natural resources is carried out consistent with good sustainable management practices. UN Environment has provided project specific examples which demonstrate evidence of effective implementation, however this element of the GEF MS is not covered by any safeguard requirement or standard in the ESESF.
- (c) Partial Gap: Para. 8e: states that projects and programs involving forest restoration maintain or enhance biodiversity and ecosystem functionality, and are environmentally appropriate, socially beneficial and economically viable. No explicit/distinct reference is made in SS1 to the potential impacts that could be associated with forest restoration.
- (d) Partial Gap: Para. 8.f requires that supported activities conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources. Access and benefit sharing is not covered by any UN Environment policy and is not addressed in the ESESF.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

- 9. SS4: Involuntary Resettlement, of the ESESF addresses UN Environment's approach and requirements with regard to Involuntary resettlement as it pertains to its supported projects and programmes. This includes assessing all other viable alternatives in order to avoid physical or economic displacement. UN Environment is entirely compliant with MS4.

#### *Minimum Standard 5: Indigenous Peoples*

- 10. UN Environment's Safeguard Standard 5 ensures that UN Environment projects respect the rights of Indigenous Peoples and take into account Indigenous Peoples' views, needs and rights, to avoid any harm and promote opportunities to improve their livelihoods.
- 11. The following gaps have been identified:
  - (a) Partial gap: Para. 10c: which requires that FPIC be obtained when there are significant impacts on an Indigenous People's Cultural Heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected

Indigenous People's lives, or the use of such Cultural Heritage for commercial purposes. Impacts on cultural heritage are not explicitly included in SS5 as a cause for the triggering of FPIC.

- (b) Partial gap: Para. 11b: requires that where alternatives have been explored and adverse impacts are unavoidable, such impacts are minimized, mitigated, managed or compensated in a culturally appropriate manner, proportionate to the nature and scale of the impacts and the form and degree of vulnerability of the affected Indigenous Peoples. There is no explicit requirement in SS5 for compensation to be considered as proportionate to the nature and scale of the impacts.
- (c) Partial gap: Para 11c: which states that mitigation and compensation plans are developed through Meaningful Consultations with the affected Indigenous Peoples that are gender and inter-generationally inclusive. In SS5 there is a lack of explicit inclusion of requirements for “meaningful consultation to be gender and inter-generationally inclusive”.
- (d) Partial gap: Para. 11e: requires that Grievance and conflict resolution systems are established, which are culturally appropriate, available in local languages, accessible to affected Indigenous Peoples. There is no explicit mention of the requirement for a GRM to be culturally appropriate and available in local languages specifically for affected IPs.
- (e) Partial gap: Para. 11g: states that when project or program activities include the commercial development of lands and natural resources central to Indigenous Peoples’ identity and livelihood, or commercial use of Indigenous Peoples’ Cultural Heritage, the project or program informs the affected people of their rights under national law and of the scope, nature and impacts of the potential use, enabling the Indigenous Peoples to share equitably in the benefits from such commercial development or use. There is no mention in SS5 of the requirement of projects to inform IPs of their rights under national law with respect to commercial development.
- (f) Partial gap: Para 11h: states that when entitled to benefits, Indigenous Peoples are engaged through Meaningful Consultations and/ or provided opportunities for negotiation concerning the sharing of benefits, recognizing that benefits can take many forms, including participation in a project, and may not be financial. While Safeguard Requirement 5.3 states that ...”Full consideration should be given to options preferred by the potentially affected Indigenous Peoples and to options designed to enable Indigenous Peoples to benefit from the project in a culturally appropriate and feasible manner” ... it does not specifically provide for opportunities of negotiation on benefit sharing.
- (g) Partial gap: Para 11j: requires that where a project or program may affect Indigenous Peoples in voluntary isolation, appropriate measures are taken to recognize, respect, and protect their lands and territories, environment, health,

and culture, as well as to avoid all undesired contact; and aspects of the project or program that would result in such undesired contact are not processed further. This is not covered by any of UNEPs Safeguard standards or policy documents.

#### *Minimum Standard 6: Cultural Heritage*

12. MS 6 requires that agencies demonstrate that they have in place the necessary policies, procedures, systems and capabilities to ensure that cultural heritage issues are properly dealt with. Cultural heritage issues are dealt with by UN Environment in SS7. The following gaps were identified:
  - (a) Partial gap: Para. 12a: requires that any Cultural Heritage identified as part of the screening or assessment processes described under Minimum Standard 1 is appropriately preserved throughout the project or program cycle. Tangible cultural heritage is identified and addressed during screening and is codified in SS7 of UNEPs ESESF. However, UNEPs current definition of cultural heritage does not address “intangible” cultural heritage.
  - (b) Partial gap: Para. 12g: requires that where a project or program involves the commercial use of Cultural Heritage, project- or program-affected parties are informed of their rights under national law. There is no evidence provided by UN Environment to demonstrate that the agency is compliant with this section of the GEF’s specific criterion of MS 6.
  - (c) Partial gap: Para 12h: requires that Chance Finds are reported to relevant authorities, protected from further disturbance, and managed through Meaningful Consultation with Stakeholders, based on a pre-defined approach UNEP’s approach to chance finds is outlined in requirement 7.3, however there is a partial gap due to the lack of a requirement for meaningful consultation with stakeholders to take place when chance finds occur.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

13. UN Environment is fully compliant with MS 7. This is sufficiently met by SS2 Resource Efficiency, Pollution Prevention and Management of Chemicals and Wastes.

#### *Minimum Standard 8: Labor and Working Conditions*

14. UN Environment deals with labor and working conditions through its SS6. The following partial gaps were recognized:
  - (a) Partial gap: Para 15a: requires that where the screening or assessment processes described under Minimum Standard 1 identify risks or potential adverse impacts to Workers, further assessments are undertaken, and plans are developed, implemented and monitored to manage the risks and potential adverse impacts in such a way that is consistent with this Minimum Standard and respects and

protects the fundamental rights of workers, consistent with the International Labour Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work. UN Environment does not have explicit safeguard requirements concerning freedom of association and the recognition of the right to collective bargaining.

- (b) Partial gap: Para. 15d: Requires that workers are provided regular and timely payment of wages; adequate periods of rest, holiday, sick, maternity, paternity, and family leave; and written notice of termination and severance payments. This issue is not covered by the UNEP SS6 of the ESESF.
- (c) Partial gap: Para 15g: requires that workers who participate, or seek to participate, in Workers' organizations and collective bargaining, do so without interference, are not discriminated or retaliated against, and are provided with information needed for meaningful negotiation in a timely manner. UNEP does not have explicit safeguard requirements concerning freedom of association and the recognition of the right to collective bargaining.
- (d) Partial gap: Para. 15j: requires that workers are informed of applicable grievance and conflict resolution systems provided at the workplace level, which conform to the requirements of Minimum Standard 2. Workplace GRMs are not covered by the UN Environment's SS6.

#### *Minimum Standard 9: Community Health, Safety and Security*

- 15. There is currently no specific UN Environment safeguard standard that meets the requirements of GEF's MS 9.

#### **Policy on Gender Equality**

- 16. UN Environment is fully compliant with GEF's Policy on Gender Equality. The UN Environment Policy and Strategy for Gender Equality and the Environment provides a framework for integration of gender perspectives into UN Environment's operational and programmatic areas of work. UNEP's Programme Manual includes a Gender and Environment Support Kit and a Guidance Note on Gender Analysis at the Project Level, which project proponents are expected to follow.

#### **Policy on Stakeholder Engagement**

- 17. UN Environment is fully compliant with GEF's Policy on Stakeholder Engagement. UNEP's Programme Manual includes guidelines on Stakeholder Analysis and Engagement and additionally UNEP has produced a 'Handbook for Stakeholder Engagement' for activities and processes across the organization.

## UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION (UNIDO)

### Background on relevant Agency policies

1. UNIDO is committed to promoting inclusive and sustainable industrial development (ISID) to harness the full potential of industry's contribution to the achievement of sustainable development, and lasting prosperity for all. In order to meet this goal, UNIDO has adopted a set of Environmental and Social Safeguard Policies and Procedures (ESSPP). These strengthen UNIDO's accountability to the countries and communities it aims to support; stakeholders in the development processes; and the broader development cooperation and donor community.
2. UNIDO's Environmental and Social Safeguards Policies and Procedures (ESSPP), updated on July 18, 2017, require projects and programs to be screened at the earliest possible stage to identify Environmental and Social Risks and their potential impacts. The UNIDO ESSPP draws on the safeguard requirements and policies of the GEF and GCF, as well as on the guidance provided by the United Nations (UN) Environment Management Group, of which UNIDO is an active member.
3. The ESSPP consists of four components: Integrated Safeguards Policy Statement; Operational Safeguards (OS); Environmental and Social Safeguard Steps along the Project cycle; and, the Environmental and Social Safeguard Tools.
4. UNIDO's Operational Safeguards, as outlined in the ESSPP are as follows: OS1 Environmental and Social Assessment; OS2 Protection of Natural Habitats and Biodiversity; OS3 Involuntary Resettlement and Land Acquisition; OS4 Indigenous Peoples; OS5: Pest Management; OS6 Cultural heritage; OS7 Safety of Dams; OS8 Labor and Working Conditions; OS9 Resource Efficiency and Pollution Prevention; OS10 Community Health, Safety and Security. There are then a further two "framework operational safeguards": OS11 Information Disclosure and Stakeholder Consultations and OS12 Accountability and Grievance Systems.
5. As well as empowering women through targeted technical cooperation activities, UNIDO mainstreams gender in all programmes, projects and organizational practices. UNIDO's "Policy on gender equality and the empowerment of women", issued in 2009 and updated in 2015, outlines the Organization's gender equality commitments. The ESSPP also addresses gender issues in various standards.

### Findings and recommendations on compliance with GEF Policies

6. The review assessed the alignment between the UNIDO ESSPP and other relevant UNIDO policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:

- (a) *Policy on Environmental and Social Safeguards*: UNIDO was assessed as follows:
    - (i) Fully compliant (no gaps) with: MS4 (Resettlement), and MS9 (Community Health)
    - (ii) Some gaps were found with: MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource efficiency and Pollution Prevention), and MS8 (Labor).
  - (b) *Policy on Gender Equality*: UNIDO was assessed as fully compliant with the Policy on Gender Equality
  - (c) *Policy on Stakeholder Engagement*: UNIDO was assessed as fully compliant with the Policy on Stakeholder Engagement.
7. *Recommendations*: UNIDO should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
- (a) Safeguards:
    - (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) address the need for guidance/references to the use of periodicity studies for baseline data collection, (b) address the requirement for the inclusion of third-party monitoring where appropriate, and (c) address the need for identifying risks of GBV and SEA and establishing GBV reporting and response protocols;
    - (ii) MS2 Accountability, Grievance and Conflict Resolution: (a) address the criteria for broad advertisement of accountability and grievance mechanisms to stakeholders, including contact information on project websites; (b) stronger measures against retaliation; and (c) handling complaints in a culturally appropriate manner;
    - (iii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) prohibit the introduction of invasive alien species, (b) address risks of procurement of natural resources commodities, (c) provide clear guidance on its approach to forest restoration projects and programs; and (c) include requirements on access and benefit sharing in the utilization of genetic resources);
    - (iv) MS5 Indigenous Peoples: address risks and circumstances of indigenous peoples living in voluntary isolation;
    - (v) MS6 Cultural Heritage: (a) address the requirement for continued access where projects may impose access restrictions, and (b) address the inclusion of qualified experts or local people in the consultation and assessment of project/activity level aspects that relate to cultural heritage;
    - (vi) MS7 Resource Efficiency and Pollution Prevention: inclusion of guidance for the implementation of Integrated Pest Management;

- (vii) MS8 Labor and Working Conditions: (a) address terms and conditions for workers, including timely payment of wages, rest, leave; (b) termination and (c) workplace grievance mechanisms.

Descriptions of the findings for each policy are provided below.

## **Policy on Environmental and Social Safeguards**

### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

8. Environmental and social sustainability is fundamental to the achievement of development outcomes and is systematically mainstreamed into UNIDO's project cycle through consistent application of an environmental and social screening and assessment procedure.
9. All UNIDO projects and programs are screened early in the process to identify their E&S risk and impacts. All GEF MS are accounted for in the GEF screening requirements as outlined by UNIDO OS 1 "Environmental and Social Assessment".
10. The UNIDO ESSPP requirements address nearly all GEF criteria of MS 1. As noted above, implementation evidence will be provided at a later date.
11. The following gap areas were identified:
  - (a) Partial Gap: Para. 4d: This specific paragraph of GEF MS 1 requires the considerations of periodicity and other variability in the baseline collection and screening process. The requirements for impact assessments and consideration of the "no-project" alternative are sufficiently covered in UNIDO's ESSPP, but the issue of periodicity or other variability in the screening/assessment phase is not.
  - (b) Partial Gap: Para. 4g: which requires the use, where appropriate, of third-party monitoring to monitor project implementation and/or assess if Environmental and Social Risk and Impact mitigation objectives are being or have been achieved. UNIDO does not explicitly mention Third-Party monitoring in its OS1.
  - (c) Partial Gap: Para. 4.m: This paragraph requires the explicit screening of potential risks and Adverse Gender-Related Impacts, Including Gender-Based Violence and Sexual Exploitation and Abuse. The ESSPP does not include any specific/explicit requirements under its OS 1 for the screening and assessment of adverse gender-related impacts including GBV and Sexual Exploitation and Abuse.

### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

12. Framework Operational Safeguards, OS 11 (Information Disclosure and Stakeholder Engagement) and OS12 (Accountability and Grievance Systems), provide overarching frameworks on UNIDO's information disclosure and consultation requirements and the accountability and grievance systems.

13. OS12 requires UNIDO to ensure that it provides clear, constructive, and timely responses to individuals, groups, and communities potentially affected by projects, corrects non-compliance where it has occurred, and shares the results of its review and any actions taken.
14. UNIDO's ESSPP addresses nearly all GEF criteria of MS 2. However, the following areas of gap were identified:
  - (a) Partial Gap: Para. 5c: GEF criteria requires that the Grievance Redress Mechanism is accessible and broadly advertised to stakeholders. UNIDO's Accountability and Grievance mechanism is published and available on its website. However, there is a lack of explicit guidance/requirements in the OS 12 itself for the broad advertisement of the mechanism to stakeholders.
  - (b) Partial Gap: Para. 5f: GEF criteria requires that agencies take appropriate and timely measures to minimize the risk of retaliation against complainants. This is somewhat covered in OS 12. The Internal Oversight and Ethics Office (IOE) maintains records on all cases and issues brought forward, with due regard for confidentiality of information and to protect the reputation and rights of parties involved.
  - (c) Partial gap: Para. 6.a and 6b: GEF criteria requires that agencies receive, and address complaints related to the implementation of projects and programs in a timely and culturally appropriate manner (6.a) and that information on accessing the mechanism be provided not just on the Agency website but also on project-specific websites, in a local language. (6.b). OS 12 sufficiently covers the requirements for timely handling of complaints; however, OS 12 does not include specific mention of employing a "culturally appropriate" approach to the handling of complaints nor a requirement for a local language option.

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

15. OS2: Protection of Natural Habitats and Biodiversity recognizes that protecting and conserving biodiversity, maintaining ecosystem services, and sustainably managing living natural resources are fundamental to sustainable development. UNIDO uses a precautionary and ecosystem approach to natural resource conservation and management to ensure opportunities for environmentally sustainable development.
16. The ESSPP requirements address nearly all the GEF "policy" criteria of MS 3. The following partial gaps have been identified:
  - (a) Partial Gap: Para. 7.c: which prohibits GEF supported activities from the introduction or use potentially invasive, non-indigenous species. In section C2 "siting" of OS 2 it is stated that "UNIDO shall strive to ensure that projects do not lead to a significant reduction or loss of biological diversity in natural or modified

habitats, and do not lead to the introduction of known invasive species ". However, the introduction of invasive alien species is not explicitly prohibited under OS 2.

- (b) Partial Gap. Para. 8c: That requires the avoidance of the procurement of natural resource commodities that may contribute to significant conversion or degradation of Natural Habitats. Issues arising with the procurement of natural resource commodities that may contribute to significant degradation of conversion of natural habitats are not outlined in OS 2 of UNIDO's ESSPP.
- (c) Partial Gap. Para. 8e & 8f: That require projects and programs involving forest restoration maintain or enhance biodiversity and ecosystem functionality, and are environmentally appropriate, socially beneficial and economically viable (8e) and that supported activities conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources (8f). UNIDO does not have any specific guidance in OS 2 on projects and programs that include forest restoration aspects. Nor does it have any specific guidance or requirements for benefit sharing and access to genetic resources.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

- 17. Restrictions on Land use and involuntary resettlement are outlined under OS 3 of UNIDO's ESSPP. The objective of OS 3 is to avoid physical and economic displacement that results from UNIDO project related land use. This safeguard ensures that projects potentially involving land acquisition resulting in physical and/or economic displacement are either re-designed to include viable alternatives or are not approved for further development by UNIDO. The ESSPP requirements address all the GEF criteria of MS 4.

#### *Minimum Standard 5: Indigenous Peoples*

- 18. UNIDO's requirements and approach to handling issues involving Indigenous Peoples is covered by OS 4 of its ESSPP. This includes the instances which require Free Prior Informed Consent (FPIC), which is further elaborated in Annex A of the ESSPP "Practical Guide for OS 4 - Indigenous People".
- 19. The ESSPP requirements address nearly all the GEF criteria of MS 5. Only one partial gap has been identified:
  - (a) Partial Gap: Para. 11j: which outlines requirements for Indigenous peoples living in voluntary isolation. This GEF criterion also requires that appropriate measures are taken to recognize, respect, and protect their lands and territories, environment, health, and culture, as well as to avoid all undesired contact; and aspects of the project or program that would result in such undesired contact are not processed further. UNIDO does not have any explicit guidance or requirements in OS 4 for issues arising with Indigenous People living in Voluntary Isolation.

### *Minimum Standard 6: Cultural Heritage*

20. UNIDO's requirements and approach to handling issues involving Cultural Heritage are covered by OS 6 of its ESSPP. If adverse impacts to cultural heritage are identified in the screening process, a decision will be made, in consultation with national counterparts, by UNIDO management to either relocate the project to a different site or to stop any further project development.
21. The ESSPP requirements address nearly all the GEF "policy" criteria of MS6. The following partial gaps have been identified:
  - (a) Partial Gap: Para. 12b: which established the requirements for the use of qualified experts or other stakeholders in assessing the nature and extent of potential impacts a given project will have on cultural heritage. OS6 does not include any such specific requirements.
  - (b) Partial Gap: Para. 12: which addresses the requirement for continued access (to cultural heritage sites) to be arranged in consultation with stakeholders, where feasible. The continued access to cultural heritage sites is not explicitly covered in OS6.

### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

22. OS5: Pest management, alongside OS9: Resource Efficiency and Pollution Prevention, requires that projects avoid and minimize the generation of pollution, wastes, hazardous materials and promote the safe use of pesticides as well as resource efficiency measures.
23. The ESSPP requirements address nearly all the GEF criteria of MS 7. Only one gap was identified:
  - (a) Partial Gap: Para.14c: which requires that Integrated Pest Management or Integrated Management of Vectors and Intermediate Hosts are applied, where feasible, for projects and programs that involve pest management measures. There is currently no explicit mention of integrated pest management/vector management in OS5

### *Minimum Standard 8: Labor and Working Conditions*

24. OS8: Labor and Working Conditions requires the promotion of safe and healthy working conditions for project workers. This OS also ensure that UNIDO supported projects comply with national labor laws and with the objectives of the International Labour Organization (ILO) Standards.
25. The ESSPP requirements address nearly all the GEF "policy" criteria of MS 8. The following gap areas have been identified:

- (a) Partial Gap: Para.15d: which requires that workers are provided regular and timely payment of wages; adequate periods of rest, holiday, sick, maternity, paternity, and family leave; and written notice of termination and severance payments, as required under national laws and the labor management procedures. UNIDO's OS 8 does not explicitly mention the requirement for workers to be provided with "timely payment of wages; adequate periods of rest, holiday, sick, maternity, paternity, and family leave; and written notice of termination and severance payments
- (b) Partial gap: Para. 15j &15k. which stipulates that workers are informed of applicable grievance and conflict resolution systems provided at the workplace level (15j) and they are able to use such a mechanism without fear of retribution/retaliation. In OS 8, UNIDO does not include any requirements for access to grievance and conflict resolution systems provided at the workplace level. There is therefore also a lack of protection against retaliation for workers who would use such a system in OS 8.

#### *Minimum Standard 9: Community Health, Safety and Security*

- 26. The objective of OS10 "Community Health, Safety and Security" is to anticipate and avoid adverse impacts on the health and safety of the project-affected communities and beneficiaries during the project lifetime from both routine and non-routine circumstances.
- 27. The ESSPP requirements, especially those presented in OS10 and OS7 (Safety of Dams) address all the GEF criteria of MS 9.

#### **Policy on Gender Equality**

- 28. As well as empowering women through targeted technical cooperation activities, UNIDO mainstreams gender in all programmes, projects and organizational practices. UNIDO's "Policy on gender equality and the empowerment of women", issued in 2009 and updated in 2015, outlines the organizations' gender equality commitments. UNIDO's project approval function requires all projects and programs to undergo gender analyses prior to their approval. The ESSPP also addresses gender issues in various standards.
- 29. The "Gender Compliance and Marker form" also requires that projects and programs do not exacerbate existing gender related inequalities.
- 30. The requirements of the UNIDO's "Policy on gender equality and the empowerment of women" and the ESSPP address all the criteria of the GEF Policy on Gender Equality.

#### **Policy on Stakeholder Engagement**

- 31. OS11 Information Disclosure and Stakeholder Consultations is one of two "Framework Operational Safeguards" in the ESSPP. OS11 ensures that Stakeholders are identified and

involved at the earliest possible stage in the identification and the development of the project activities. Also, stakeholder engagement is sustained throughout the project's lifecycle.

32. Also included in the ESSPP is a “Practical guideline for OS11 - Information Disclosure and Stakeholder Engagement”. This serves to assist and provide guidance on how the requirements from OS11 can be integrated into program and project design.
33. The ESSPP requirements, especially those that are outlined in OS11 and the corresponding “Practical guideline for OS11”, address all of the criteria of the GEF Policy on Stakeholder Engagement.

## WEST AFRICAN DEVELOPMENT BANK (BOAD)

### Background on relevant Agency policies

1. The West African Development Bank (BOAD) is the common development finance institution of the member countries of the West African Monetary Union (WAMU). It was established by an Agreement signed on 14 November 1973 and became operational in 1976. Member countries include Benin, Burkina, Côte d'Ivoire, Guinea Bissau, Mali, Niger, Senegal, and Togo. Its purpose is to promote the balanced development of its member countries and foster economic integration within West Africa.
2. In 2018 BOAD updated its Operational Policies and Procedures for Environmental and Social Management in Financing Projects (hereafter POP). The POP includes a broad range of policies and procedures, including Operational Policies on the following areas: Environmental and Social Impact Assessment; Natural Habitats; Forest Management; Dam Safety; International Waterways; Projects in Disputed Areas; Involuntary Resettlement; Indigenous Peoples; Cultural Heritage; Pest Management; Labor and Conditions of Employment; Community Health, Safety and Security; Consideration of Cumulative Effects in ESIA; Policy on Resolution of Global and Transboundary Problems in ESIA; and Public Participation in ESIA (note BOAD's policies were translated from French utilizing Google Translate). In addition to procedures for each Operational Policy, the POP is supported by 44 environmental and social directives.
3. BOAD adopted a Gender Policy in 2012 that seeks to promote gender equity and gender mainstreaming in all BOAD programming. BOAD's Policy Manual on Disclosure and Access to Information (2013) sets out requirements for disclosing and requesting information. In 2019 BOAD adopted a Grievance Policy and an Environmental and Social Compliance Policy.

### Findings and Recommendations on Compliance with GEF Policies

4. The review assessed the alignment between the BOAD's policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards*: BOAD was assessed as follows:
    - (i) fully compliant (no gaps) with MS2 (Accountability).
    - (ii) gap areas were identified across the other GEF Minimum Standards.
  - (b) *Policy on Gender Equality*: Two gap areas were identified with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: Three gap areas were identified with the Policy on Stakeholder Engagement.

5. *Recommendations:* BOAD should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements, as follows:
- (a) *Safeguards:*
- (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) require differentiated measures so that risks and impacts do not fall disproportionately on disadvantaged or vulnerable individuals or groups, (b) address disability inclusion, and (c) require identification of GBV and SEA risks and the establishment of GBV response and reporting protocols;
  - (ii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) assess a fuller range of risks to biodiversity, (b) ensure mitigation for impacts on natural habitats seeks to achieve no net loss and preferably a net gain, (c) specify criteria for the design of biodiversity offsets, (d) address procurement risks to natural habitats, (e) broaden the sustainable management requirements for all living natural resources, and (f) ensure access and benefit sharing in the utilization of genetic resources;
  - (iii) MS4 Restrictions on Land Use and Involuntary Resettlement: (a) seek negotiated settlements in cases of displacement, (b) ensure persons without legal land rights/claims are provided access to adequate housing with security of tenure, and (c) prohibit forced evictions;
  - (iv) MS5 Indigenous Peoples: (a) broaden the current 'free prior informed consultation' standard to Free, Prior and Informed Consent (FPIC) and address the GEF FPIC circumstances, (b) ensure grievance systems are established for projects that affect indigenous peoples, and (c) ensure that risks and circumstances associated with indigenous peoples living in voluntary isolation are addressed;
  - (v) MS6 Cultural Heritage: (a) broaden the scope of the cultural heritage policy to encompass intangible cultural heritage, (c) ensure continued access to cultural heritage where project-related access restrictions are imposed, and (c) address the GEF requirements regarding commercial use of cultural heritage;
  - (vi) MS7 Resource Efficiency and Pollution Prevention: (a) address GEF's more specific requirements regarding pollution control, wastes, hazardous materials; and (b) broaden the scope of prohibited hazardous pesticides;
  - (vii) MS8 Labor and Working Conditions: (a) ensure the timely payment of wages, provision of adequate rest and leave, and (b) strengthen measures to prevent harassment, intimidation, and exploitation of workers;

- (viii) MS9 Community Health, Safety and Security: (a) address special needs and risk exposure of disadvantaged or vulnerable groups, and (b) address risks related to conflict and post conflict contexts).
  - (b) *Gender*: (a) strengthen provisions to ensure equal opportunities to benefit from project activities (not just equitable benefits), and (b) re-emphasize prevention of gender discrimination in the Policy's mandatory guidelines section (not just the analysis section).
  - (c) *Stakeholder Engagement*: (a) strengthen criteria for meaningful consultations, (b) ensure a public record of stakeholder consultations are disclosed throughout the project cycle, and (c) clearly identify projects that receive GEF support.
6. A description of the assessment for each GEF Policy is below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

7. BOAD's POP includes OP1 on ESIA, supported by a bank procedure and a range of sectoral directives. The POP also includes OP23 on cumulative impacts in ESIA and OP24 on global and transboundary issues in ESIA. While BOAD's policies address many of the requirements of the MS1, a number of gaps areas were identified:
- (a) **Partial Gap**: Paras. 4.j, 4.k: BOAD's POP requires that risks/impacts to disadvantaged and vulnerable groups be identified. However, OP1 on ESIA does not address the need for differentiated measures so that risks and impacts do not fall disproportionately on disadvantaged or vulnerable individuals or groups per the GEF requirements. The policy also does not specifically address discrimination risks.
  - (b) **Gap**: Para. 4.l: BOAD's POP does not include specific provisions on identifying differentiated risks to persons with disabilities and ensuring that such risks and equal opportunities are systematically addressed.
  - (c) **Partial Gap**: Paras. 4.m, 4.n: BOAD's assessment requirements require identification of risks to men, women, boys and girls; however, risks of GBV and SEA are not noted (4.m). While BOAD's gender policy states that it aims to eliminate gender-based discrimination (4.n), this commitment is not included in the policy's mandatory guidelines but only in the analysis section. The gender policy could be strengthened in this regard.
  - (d) **Gap**: Para. 4.o: BOAD's policies do not address the need to establish GBV response and reporting protocols.

### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

8. In 2019 BOAD adopted a Grievance Policy that establishes procedures for dispute resolution and an Environmental and Social Compliance Policy which creates an independent mechanism to examine claims of harm due to potential breaches of its environmental and social policies. BOAD's recently adopted grievance and compliance policies are fully compliant with the requirements of MS2.

### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

9. BOAD's POP includes operational policies and procedures regarding natural habitats and forest management. BOAD complements its natural habitats and sustainable management requirements with a range of sector specific guidelines. Although BOAD's policies address many of the GEF MS3 requirements, a number of gaps were identified:
  - (a) Partial Gap: Para. 8.a: The full range of risks to biodiversity, per GEF MS3, are not addressed (i.e. habitat loss, degradation and fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, Pollution and incidental take).
  - (b) Partial Gap: Para. 8.b: BOAD's policies include a range of requirements for mitigation of potential impacts on habitats. However, they do not meet the GEF criteria of requiring that mitigation measures for impacts on natural habitats seek to achieve no net loss and preferably a net gain of associated biodiversity values. BOAD's policy sets conditions for projects that involve significant conversion or degradation of natural habitats (i.e. no alternatives, benefits outweigh costs, appropriate mitigation measures adopted); however, these requirements only partially address the GEF criteria. In addition, BOAD's policy does not stipulate criteria for designing biodiversity offsets and compensation.
  - (c) Gap: Para. 8.c: BOAD's policy does not address the potential risks that procurement of natural resource commodities may lead to significant conversion or degradation of natural habitats.
  - (d) Partial gap: Para. 8.d: While BOAD's policy addresses sustainable management of forest harvesting, it does not more broadly address sustainable production and harvesting of other living natural resources (e.g. animal husbandry, agriculture, fisheries). While sector directives may address some of these issues, the overarching policy demonstrates a gap.
  - (e) Gap: Para. 8.f: It does not address the requirement that supported activities conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

10. BOAD's OP13 on Involuntary Resettlement addresses many of the GEF MS4 requirements. However, a few gaps were identified:
- (a) Gap: Para. 9.c: It does not address the need to pursue good faith efforts to secure negotiated settlements.
  - (b) Partial Gap: Para. 9.h: While it establishes compensation standards for displaced persons without formal land rights or recognizable claims (i.e. compensation for loss of non-land assets, resettlement assistance, and "other assistance" to achieve objectives of the policy), it does not specify a key requirement that in cases of physical displacement such persons be provided arrangements to obtain adequate housing with security of tenure.
  - (c) Gap: Para. 9.i: BOAD's policy does not address the prohibition on forced evictions.

#### *Minimum Standard 5: Indigenous Peoples*

11. BOAD's OP15 on Indigenous Peoples addresses many of the requirements of GEF MS5, however several gaps were identified:
- (a) Partial Gap: Paras. 10.a, 10.b, 10.c: FPIC: BOAD's policy applies a standard of 'free prior informed consultation leading to broad community support' rather than Free, Prior and Informed Consent (FPIC). While the BOAD standard addresses some aspects of the GEF FPIC requirements, its fall short and this should be revised.
  - (b) Gap: Para. 11.e: BOAD's policy does not ensure that culturally appropriate grievance and conflict resolution systems be established for projects that affect indigenous peoples.
  - (c) Gap: Para. 11.j: BOAD's policy does not ensure that risks and circumstances associated with indigenous peoples living in voluntary isolation are addressed.

#### *Minimum Standard 6: Cultural Heritage*

12. BOAD's OP17 on Cultural Heritage addresses physical cultural property or resources. Several gaps were identified:
- (a) Gap: Paras. 12.a-12. g: The scope of BOAD's policy does not address intangible cultural heritage and should be broadened.
  - (b) Gap: Para. 12.f: The policy does not address the requirement to ensure continued access to cultural heritage where project-related access restrictions are imposed.
  - (c) Gap: Para. 12.g: BOAD's policy does not address the GEF requirement regarding commercial use of cultural heritage (e.g. informing affected parties on rights, scope and impacts, and equitable benefit sharing).

### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

13. BOAD's POP does not include a stand-alone operational policy on resource efficiency and pollution prevention. OP1 on ESIA and OP19 on Pest Control address many aspects of the GEF requirements. In addition, BOAD has operational directives on land and water resources management and hazardous waste. Two partial gaps were identified:
- (a) Partial Gap: Paras. 14.a, 14.b: While BOAD's policy addresses general pollution risks, it is not as specific as the GEF requirements regarding (i) control of pollution intensity and flows from routine, and non-routine releases, (ii) performance levels, (iii) minimizing GHGs and black carbon, (iv) waste avoidance, minimization, reuse, and safe recovery, treatment, disposal; (v) hazardous wastes; and (vi) hazardous materials.
  - (b) Partial Gap: Para. 14.d: BOAD's policy and procedures prohibit financing of certain hazardous chemicals, however its requirements are not as comprehensive as the GEF criteria. The BOAD requirements do not fully address the pesticides criteria regarding carcinogenicity, mutagenicity, or reproductive toxicity (e.g. GHS Categories 1A and 1B; see the criteria for Highly Hazardous Pesticides in FAO/WHO Guidelines on Highly Hazardous Pesticides). In addition, the referenced guidance regarding the handling of hazardous chemicals appears out of date (it refers to 1985 FAO/WHO documentation).

### *Minimum Standard 8: Labor and Working Conditions*

14. BOAD's OP21 on Labor and Working Conditions addresses nearly all of the GEF MS8 requirements. Two gaps were identified:
- (a) Partial Gap: Para. 15.d: While OP21 addresses the GEF requirements regarding provision of information on terms and conditions of employment, it does not include the more affirmative requirement of ensuring timely payment of wages, adequate rest, holiday, sick, maternity, paternity, and family leave.
  - (b) Gap: Para. 15.f: It does not require that appropriate measures be put in place to prevent worker harassment, intimidation, and exploitation, and to protect vulnerable workers.

### *Minimum Standard 9: Community Health, Safety and Security*

15. BOAD's OP22 on Community Health, Safety and Security addresses nearly all of the GEF MS9 requirements. A partial gap was identified:
- (a) Partial Gap: Para. 17.a: It does not address (a) the special needs and risk exposure of disadvantaged or vulnerable groups or individuals, including in particular women and children, and (b) the particular risks of conflict and post conflict contexts.

## Policy on Gender Equality

16. BOAD adopted a Gender Policy in 2012 that seeks to promote gender equity and gender mainstreaming in all BOAD programming which addresses most of the requirements of GEF's Policy on Gender Equality. As noted in 6.c above, BOAD's Gender Policy could be strengthened by re-emphasizing prevention of gender discrimination in the Policy's mandatory guidelines section (not just the analysis section). Also, one partial gap area was identified:
- (a) Partial Gap: Para. GE19.c: BOAD's Gender Policy seeks to ensure that men and women benefit "equitably" from supported activities; however, this does not fully address the GEF requirement regarding "equal" opportunities to benefit from project activities.

## Policy on Stakeholder Engagement

17. BOAD's OP1 on ESIA includes requirements regarding stakeholder engagement. These are further elaborated by OP25 on Public Participation. These policies address some of the GEF requirements however several gaps were identified:
- (a) Partial Gap: Para. SE16.c: BOAD's policy does not fully specify the criteria for meaningful consultations (missing criteria include that they be free of manipulation, interference, coercion, discrimination and intimidation).
  - (b) Partial Gap: Para. SE16.d: BOAD's OP1 notes that consultations will be documented. However, it is not specified that a record of consultations will be disclosed. Further, it does not address the potential need to respect confidentiality of stakeholders.
  - (c) Gap: Para. SE16.f: BOAD does not appear to clearly identify projects that receive GEF support (such as on the BOAD website).

## WORLD BANK (WB)

### Background on relevant Agency policies

1. The World Bank Group is one of the world's largest sources of funding and knowledge for developing countries. It consists of five institutions with a common commitment to reducing poverty, increasing shared prosperity, and promoting sustainable growth and development. Together, IBRD and IDA form the World Bank (WB), which provides financing, policy advice, and technical assistance to governments of developing countries. IDA focuses on the world's poorest countries, while IBRD assists middle-income and creditworthy poorer countries. In addition, the WB hosts a series of Trust Funds, including the GEF, for which it is the Trustee as well as a GEF Implementing Agency.
2. The WB has comprehensive policy requirements and procedures to promote environmental and social sustainability and to help ensure the prevention and mitigation of undue harm to people and the environment. In 2016 it adopted an updated set of environmental and social safeguards policies – The World Bank Environmental and Social Framework (ESF). The ESF is applicable to all WB GEF financed Projects.
3. The ESF contains an overarching policy statement and ten environmental and social standards (ESS): ESS1: Assessment and Management of Environmental and Social Risks and Impacts; ESS2: Labor and Working Conditions; ESS3: Resource Efficiency and Pollution Prevention and Management; ESS4: Community Health and Safety; ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities; ESS8: Cultural Heritage; ESS9: Financial Intermediaries; and ESS10: Stakeholder Engagement and Information Disclosure. The ESF is supported by a range of guidance notes. The WB has also issued an Environmental and Social Directive for Investment Project Financing and a Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals and Groups.
4. Effective since October 2018, the ESF applies to Investment Project Financing (IPF). The ESF does not apply to other types of WB lending, namely Development Policy Lending and Program-For-Results financing.
5. In 2015 the WB adopted its Gender Strategy (FY16-23): Gender Equality, Poverty Reduction, and Inclusive Growth.
6. The WB Inspection Panel, established in 1993, receives complaints from project-affected persons and assesses whether the WB has complied with its internal policies and procedures designed to safeguard people and the environment. In 2015 the WB created a Grievance Redress Service as a management-led problem-solving mechanism. The WB Access to Information Policy (2010; updated 2015) governs disclosure of WB-held information.

## Findings and Recommendations on Compliance with GEF Policies

7. The review assessed the alignment between the WB's ESF and other relevant policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *GEF Policy on Environmental and Social Safeguards:* The WB was assessed as fully compliant with all minimum standards contained in the Policy.
  - (b) *GEF Policy on Gender Equality:* The WB was assessed as fully compliant with all minimum standards contained in the Policy.
  - (c) *GEF Policy on Stakeholder Engagement:* The WB was assessed as fully compliant with all minimum standards contained in the Policy.
8. *Recommendations:* No further actions recommended.
9. Descriptions and justifications of the findings for each policy are provided below.

### Policy on Environmental and Social Safeguards

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

10. The WB ESF contains comprehensive policy requirements and procedures to promote environmental and social sustainability and to help ensure prevention and mitigation of undue harm to people and the environment. The WB ESF was assessed as fully compliant with the requirements of MS1.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

11. The WB Inspection Panel provides a robust independent compliance review function. The management-led Grievance Redress Service provides a range of problem-solving approaches to address stakeholder complaints. Both mechanisms demonstrate implementation effectiveness through extensive case files and logs. The WB policies and mechanisms were assessed as fully compliant with all GEF criteria of MS2.

#### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

12. ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources includes requirements that seek to avoid and limit adverse impacts to biodiversity and habitats. The ESF requirements were assessed as meeting all of the GEF policy criteria of MS3.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

13. ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement contains requirements that seek to avoid or minimize adverse impacts caused by land acquisition and involuntary resettlement. The ESF requirements were assessed as fully compliant with MS4.

#### *Minimum Standard 5: Indigenous Peoples*

14. ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities establishes a framework for avoidance and/or minimization of adverse impacts on indigenous communities, provision of culturally appropriate benefits, and recognition of indigenous peoples rights to meaningfully participate in project decision-making. The ESF requirements were assessed as fully compliant with MS5.

#### *Minimum Standard 6: Cultural Heritage*

15. ESS8: Cultural Heritage outlines a set of requirements to avoid and minimize impacts on cultural heritage. Cultural heritage is defined broadly (encompassing both tangible and intangible cultural heritage), consistent with the GEF definition. The ESF requirements were assessed as fully compliant with MS6.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

16. ESS3: Resource Efficiency and Pollution Prevention and Management requires that projects avoid and minimize the generation of pollution, wastes, hazardous materials and promote the safe use of pesticides as well as resource efficiency measures. The ESF requirements were assessed as fully compliant with MS7.

#### *Minimum Standard 8: Labor and Working Conditions*

17. ESS2: Labor and Working Conditions requires the promotion of safe and healthy working conditions for project workers. The ESF requirements were assessed as fully compliant with MS8.

#### *Minimum Standard 9: Community Health, Safety and Security*

18. ESS4: Community Health and Safety addresses the health, safety and security risks and impacts that may be caused by supported projects. The ESF requirements were assessed as fully compliant with MS9.

#### **Policy on Gender Equality**

19. The WBG Gender Strategy (FY16-23): Gender Equality, Poverty Reduction, and Inclusive Growth (adopted in 2015) is focused on improving outcomes across four pillars: (i) improving human endowments; (ii) removing constraints for more and better jobs; (iii)

removing barriers to women's ownership and control of assets; and (iv) enhancing women's voice and agency and engaging men and boys. The strategy requires all Country Partnership Frameworks (CPF, the primary WBG planning document for country engagement) to include a country gender assessment.

20. At the project level, a "Gender Tag" identifies projects that seek to close gender gaps by explicitly addressing one of the four pillars of the gender strategy. This is not applied to all projects (data on percentage of projects so 'tagged' was not provided). Regarding project risks and impacts, the ESF mandates that project environmental and social assessments identify a range of social risks/impacts, including those that may impact disadvantaged and vulnerable groups (incl. where relevant women and girls) and to ensure that differentiated measures are adopted to ensure that adverse impacts do not fall disproportionately on them. Various ESF standards include specific attention to gender issues and inclusion of women.
21. The requirements of the WB Gender Strategy and the ESF address all the criteria of the GEF Policy on Gender Equality. Projects examples were provided that demonstrate an implementation track record.

#### **Policy on Stakeholder Engagement**

22. ESS10: Stakeholder Engagement and Information Disclosure includes requirements regarding meaningful consultation with stakeholders, information disclosure of project information (including on environmental and social risks and impacts), and the need for project-level grievance mechanisms. Stakeholder engagement is also addressed in various other standards.
23. The ESF requirements address all of the criteria of the GEF Policy on Stakeholder Engagement. Project examples from 'pre-ESF' projects demonstrate a track record of addressing the GEF criteria.

## WORLD WILDLIFE FUND (WWF-US)

### Background on relevant Agency policies

1. WWF-US is the US office of one of the world's leading conservation organizations (WWF) whose mission is to conserve nature and reduce the most pressing threats to the diversity of life on Earth. WWF works in 100 countries and is supported by more than one million members in the United States and close to five million globally. WWF combines global reach with a foundation in science, involves action at every level from local to global in order to safeguard the natural world and help people live more sustainably.
2. WWF-US's Environment and Social Safeguards Integrated policies and procedures (SIPP) contains the following policies, standards and guidance: Policy on Environment and Social Risk Management; Policy on Protection of Natural Habitats, Policy on Involuntary Resettlement, Policy on Indigenous Peoples, Policy on Accountability and Grievance Mechanism, Standard on Pest Management, Standard on Physical Cultural Resources, Standard on Community Health, Safety and Security, Standard on Stakeholder Engagement, Standard on Public Consultation and Disclosure, Guidance on Projects Relating to Dams, and Implementation Arrangements. The SIPP includes an extensive set of annexes of procedures and guidelines that support SIPP implementation.
3. WWF-US's 2011 Gender Policy addresses gender mainstreaming in its programmes and projects.

### Findings and Recommendations on Compliance with GEF Policies

4. The review assessed the alignment between WWF-US's SIPP and other relevant policies, procedures, guidelines, and systems and the various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. Below is a summary of key findings:
  - (a) *Policy on Environmental and Social Safeguards*: WWF-US was assessed as follows:
    - (i) Fully compliant (no gaps) with MS9 (Community Health, Safety and Security).
    - (ii) Some gaps were identified across the other Minimum Standards.
  - (b) *Policy on Gender Equality*: WWF-US was assessed as fully compliant with the Policy on Gender Equality.
  - (c) *Policy on Stakeholder Engagement*: WWF-US was assessed as fully compliant with the Policy on Stakeholder Engagement.
5. *Recommendations*: WWF-US should consider undertaking adjustments to its policies, procedures, and/or guidelines in order to be fully compliant with the GEF requirements:
  - (a) *Safeguards*:

- (i) MS1 Environmental and Social Assessment, Management and Monitoring: (a) address more fully differentiated impacts on disadvantaged and vulnerable groups, (b) ensure systematic treatment of risks regarding persons with disabilities, and (c) ensure adoption of GBV reporting and response protocols;
- (ii) MS2 Accountability, Grievance and Conflict Resolution: address risks of retaliation against project complainants;
- (iii) MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources: (a) address risks of procurement of natural resource commodities, (b) define requirements regarding sustainable management of living natural resources, and (c) address access and benefit sharing in the utilization of genetic resources;
- (iv) MS4 Restrictions on Land Use and Involuntary Resettlement: address the prohibition on forced evictions;
- (v) MS5 Indigenous Peoples: address (a) the GEF criteria on commercial development/use of indigenous peoples' lands, natural resources or cultural heritage, and (b) the risks and circumstances of indigenous peoples living in voluntary isolation;
- (vi) MS6 Cultural Heritage: (a) broaden the policy scope to encompass intangible cultural heritage, and address (b) confidentiality, (c) continued access, and (d) commercial use of cultural heritage;
- (vii) MS7 Resource Efficiency and pollution Prevention: (a) consider more specific provisions regarding pollution control, wastes, and hazardous materials; (b) broaden the categories of prohibited pesticides, and (c) address the GEF criteria regarding resource efficiency;
- (viii) MS8 Labor and Working Conditions: ensure that guidance on labor and working conditions that is being developed address the GEF MS8 requirements;

6. Descriptions of the findings for each policy are provided below.

### **Policy on Environmental and Social Safeguards**

#### *Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring*

7. The SIPP includes a Policy on Environment and Social Risk Management which is supported by a set of annexes that elaborate further requirements and procedures to identify and address potential environmental and social risks and impacts of supported projects. A recently updated safeguards screening tool is applied to projects. While the SIPP addresses many of the GEF MS1 requirements, several partial gaps were identified:

- (a) Paras. 4.j and 4.k: Partial Gap: SIPP requirements for socioeconomic assessments include analysis of vulnerability. Projects involving resettlement and indigenous peoples require specific measures to address vulnerability. However, SIPP does not address more broadly the need for differentiated measures to ensure that risks and impacts do not fall disproportionately on disadvantaged/vulnerable and their special needs and circumstances are addressed.
- (b) Para. 4.l: Partial Gap: WWF-US indicates that its provisions regarding risks and impacts to vulnerable groups includes persons with disabilities (PwD). However, the GEF criteria are more specific, requiring that risks/impacts to PwD be systematically addressed to ensure nondiscrimination and equal opportunity.
- (c) Para. 4.o: Partial Gap: The SIPP, screening tool, and WWF-US's specific guidance for GEF projects includes need to identify differentiated risks to women and men and risks of GBV/SEA. However, the need for GBV response and reporting protocols for incidences of GBV is not specifically covered.

#### *Minimum Standard 2: Accountability, Grievance and Conflict Resolution*

- 8. The SIPP includes a Policy on on Accountability and Grievance Mechanisms and a supporting annex that outlines requirements and procedures for receiving and handling complaints from project-affected persons and conducting compliance reviews. Many of the GEF MS 2 requirements are addressed, save for the following one area:
  - (a) Para. 5.f: Partial Gap: The SIPP addresses non-retaliation risks for grievances, however the requirements appear to be limited to “employees” rather than applying to complainants.

#### *Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources*

- 9. The SIPP includes the Policy on Natural Habitats and is supported by Annex 6 that includes further requirements and procedures. The Policy and annex address many of the GEF MS3 requirements, however several gaps were identified:
  - (a) Para. 8.c: Gap: The risks of procurement of natural resource commodities to natural habitats are not covered.
  - (b) Para. 8.d: Partial Gap: While the SIPP Policy and Annex 5 applies to projects that involve extraction of natural resources, including forestry, harvesting, agriculture, livestock, fisheries. The requirements primarily address habitat impacts and do not include more specific requirements regarding sustainable management practices, including but not limited to application of existing industry specific standards.
  - (c) Para. 8.f: Gap: The requirement to address access and benefit sharing in the utilization of genetic resources is not covered.

#### *Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement*

10. WWF-US's SIPP includes a Policy on Involuntary Resettlement and Annex 6 that stipulate requirements and guidelines for involuntary resettlement and restrictions of access to natural resources. WWF-US seeks voluntary agreements in cases of project resettlement and restricted access to natural resources. The assessment found WWF-US's policies and procedures address all of the requirements of MS4 save for one:
  - (a) Para. 9.i: Gap: The prohibition on forced evictions is not covered.

#### *Minimum Standard 5: Indigenous Peoples*

11. The SIPP includes a Policy on Indigenous Peoples and Annex 7 that outlines requirements and procedures for ensuring that the rights of indigenous peoples are respected and adverse impacts are avoided and/or mitigated. WWF-US requires obtaining FPIC for all projects that affect indigenous peoples. The SIPP addresses nearly all of the requirements of GEF MS5 except for two gaps:
  - (a) Para. 11.g: Partial Gap: Although general requirements for FPIC and equitable benefit sharing would apply, the SIPP does not specifically address the GEF criteria on commercial development/use of indigenous peoples' lands, natural resources or cultural heritage.
  - (b) Para. 11.j: Gap: The SIPP does not address the risks and circumstances of indigenous peoples living in voluntary isolation.

#### *Minimum Standard 6: Cultural Heritage*

12. WWF-US's SIPP includes a Standard on Physical Cultural Resources (PCR). The scope of the standard is narrower than that of GEF MS6 in that it only addresses tangible cultural heritage (not intangible cultural heritage). Several additional gaps were identified:
  - (a) Para. 12.d: Gap: WWF-US's Standard on PCR does not address the potential need to withhold disclosure of information regarding cultural heritage in order to safeguard its safety and integrity.
  - (b) Para. 12.f: Gap: It does not explicitly address the issue of ensuring continued access to cultural heritage when a project may impose access restrictions.
  - (c) Para. 12.g: Gap: It does not explicitly address the issue of commercial use of cultural heritage and equitable sharing of benefits thereof.

#### *Minimum Standard 7: Resource Efficiency and Pollution Prevention*

13. The SIPP environmental assessment requirements address, in general, risks regarding pollution, wastes, hazardous materials, and climate pollutants. The screening tool includes a range of questions regarding pollution, wastes, and hazardous materials. However,

there is a lack of specificity at the policy level when compared to many of the GEF MS7 requirements. Identified partial gaps include the following:

- (a) Para. 14.b: Partial Gap: While the screening tool identifies pollution risks, the SIPP does not contain specific provisions regarding the GEF criteria on pollution control measures, waste and hazardous waste management, and hazardous materials.
- (b) Para. 14.d: Partial Gap: The SIPP prohibits a narrower range of pesticides than the updated GEF criteria which bans use of pesticides that meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies (not just WHO classifications 1a and 1b, and limits on WHO Class II pesticides). The SIPP requirements do not specifically address criteria regarding carcinogenicity, mutagenicity, or reproductive toxicity (e.g., GHS Categories 1A and 1B; see the criteria for Highly Hazardous Pesticides in [FAO/WHO Guidelines on Highly Hazardous Pesticides](#); note that WHO Class 1a and 1b pesticides are addressed by criterion 1 of the eight HHP criteria).
- (c) Para. 14e: Partial Gap: The SIPP does not have specific provisions regarding resource efficiency. It also does not have specific provisions regarding risks associated with significant water consumption.

#### *Minimum Standard 8: Labor and Working Conditions*

- 14. WWF-US has a child safeguarding policy and screens for risks of child labor and forced labor. WWF-US has noted that the SIPP does not include requirements regarding the labour and working conditions of project workers creating a range of gap areas. WWF-US has indicated that it will develop relevant guidance to address the GEF standard.

#### *Minimum Standard 9: Community Health, Safety and Security*

- 15. WWF-US updated the SIPP in 2019 to include a Standard on Community Health, Safety and Security. WWF-US's screening tool also identifies community health and safety risks. WWF-US was assessed as being fully compliant with MS9.

#### **Policy on Gender Equality**

- 16. WWF-US adopted its Gender Policy Statement in 2011 that promotes gender equity in its programming. It has also developed GEF-specific guidance to address gender dimensions within its supported projects. The WWF-US Policy and guidance were assessed as fully compliant the criteria of the GEF Policy on Gender Equality.

#### **Policy on Stakeholder Engagement**

- 17. WWF-US's SIPP includes both a Standard on Stakeholder Engagement and a Standard on Public Consultation and Disclosure. In addition, Annex 10 outlines range of supporting procedures. The Standards and guidance were assessed as fully compliant with the criteria of the GEF Policy on Stakeholder Engagement

**ANNEX II: AGENCY LETTERS OF COMMITMENT AND PLANS OF ACTION TO ACHIEVE COMPLIANCE.**

**(PLEASE SEE THE FOLLOWING DOCUMENT)**

*African Development Bank (AfDB)*

# AFRICAN DEVELOPMENT BANK GROUP



GRUPE DE LA BANQUE AFRICAINE  
DE DEVELOPPEMENT  
AFRICAN DEVELOPMENT BANK GROUP

**Ref: PECG1/LT/PG/2019/011/0025**

**Date: 19<sup>th</sup> November 2019**

**Dr Naoko ISHII**  
**Chief Executive Officer and Chairperson**  
**Global Environment Facility**  
**1818 H St. NW, MSN G6-602**  
**Washington DC 20433, USA**

**Subject: On the African Development Bank Group's Compliance with the GEF's New Minimum Standards on E&S Safeguards, Gender, and Stakeholder Engagement**

**Dear Dr Naoko ISHII, GEF CEO and Chairperson**

Reference is made to the email communication from the Global Environment Facility (GEF) dated Friday, October 25, 2019 requesting a statement from the African Development Bank Group (Bank) outlining our commitment, process, planned actions and timeline to address the gaps identified following the GEF's expert assessment and to achieve compliance with the GEF's New Minimum Standards on E&S Safeguards, Gender, and Stakeholder Engagement.

In July 2019, the Bank has concluded an Independent evaluation of its Integrated Safeguards System (ISS). The evaluation report along with the Management's responses were discussed and approved by the responsible Board Committee on 7 October 2019. The recommendations of the evaluation have been articulated in a comprehensive Action Plan which has been agreed and will constitute the primary basis for the review and update of the ISS. This process aims to be completed by end 2021 with a target submission to the Bank's Board of Directors for consideration and approval in 2022.

The Bank wishes to acknowledge the findings and gaps identified in the GEF's assessment in terms of its compliance with the GEF's Policy on Environmental and Social Safeguards, Gender Equality and Stakeholder Engagement. The Bank confirms that the issues raised will be addressed to the extent possible as part of the planned internal review and updating process of the Bank's ISS in 2021.

Yours sincerely,

**Gareth PHILLIPS**

**Manager**

**Environment and Climate Finance Division (PECG1)**



*Asian Development Bank (ADB)*



18 November 2019

**Ms. Naoko Ishii**

Chief Executive Officer and Chairperson  
Global Environment Facility  
1899 Pennsylvania Ave NW, Washington, DC 20006 USA

Dear Ms Ishii,

The Asian Development Bank (ADB) would like to acknowledge and thank the Global Environment Facility (GEF) for the findings of the expert assessment comparing ADB's policies against the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement.

We note that the ADB was assessed to meet all requirements and is compliant with the minimum standards contained in the GEF Policy on Gender Equality and the GEF Policy on Stakeholder Engagement.

With respect to the GEF Policy on Environmental and Social Safeguards, we note that ADB was assessed to meet all requirements with MS2 (Accountability), MS4 (Resettlement), and MS8 (Labor), while there were some partial policy gaps with respect to MS1 (Assessment), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS7 (Resource Efficiency/Pollution Prevention) and MS 9 (Community Health and Safety).

Currently, ADB's Independent Evaluation Department is undertaking a comprehensive review of ADB's Safeguard Policy Statement, 2009. This includes review of implementation experiences and the potential need for any policy revisions based on emerging safeguard policy issues and policy changes by other multilateral financial institutions. The evaluation is expected to be completed by June 2020. Linked to this, ADB expects to launch a safeguard policy update process in 2020 with an indicative timetable for completion by December 2021. As part of this, ADB will fully consider the GEF's Policy on Environmental and Social Safeguards, including the above referenced gaps. In the meantime, ADB's can commit to ensuring that any material gaps are filled with respect to any GEF cofinanced projects administered by ADB. This will be addressed through the issuance of an internal guideline with respect to environmental and social safeguards for the GEF financed projects by 30 June 2020.

Sincerely,

A handwritten signature in black ink, appearing to read 'BK Dunn'.

**Bruce K. Dunn**

Director, Safeguards Division  
concurrently OIC, Environment Thematic Group  
Sustainable Development and Climate Change Department

*Brazilian Biodiversity Fund (FUNBIO)*



Letter nº 648/2019

Rio de Janeiro, November 1st, 2019.

To: The Global Environment Facility Secretariat

Dear GEF Secretariat,

Funbio welcomes and acknowledges the ESS assessment and agrees with its findings regarding Funbio Safeguard policies, procedures and tools.

Referring to the three identified gaps of Funbio in relation with the GEF new ESS Policy, we would like to state our commitment to achieve full compliance soon and will take these steps to ensure it:

- Adjustments in our ESS Policy to address the gap on the need to withholding information on cultural heritage when necessary in order to safeguard its safety and integrity by February 2020.
- Adjustments in our ESS Policy to address the partial gap and fully address the expanded range of prohibited pesticides (the criteria regarding carcinogenicity, mutagenicity, or reproductive toxicity) by February 2020.
- Approval by Funbio Council of a Policy on Stakeholder Engagement which was already under development. This policy will be taken into consideration in the next Funbio Council meeting on November 28th, 2019 and its adoption following just afterwards. This policy will address the gaps on the issue and be fully compliant with GEF standards.

Funbio will share these adjustments and the new policy with the GEF Secretariat to update our ESS assessment as soon as they are ready.

Sincerely,

Rosa Lemos de Sá

FUNBIO CEO

*Conservation International (CI)*



November 5, 2019

Naoko Ishii  
Chief Executive Officer  
Global Environment Facility  
1899 Pennsylvania Ave NW,  
Washington, DC 20006,  
United States.

Dear Ms. Ishii,

**Agency Compliance with Minimum Standards in GEF Policy on Environmental and Social Safeguards, Stakeholder Engagement and Gender Equality**

Conservation International acknowledges the preliminary findings of the expert assessment of the CI-GEF's Policies on Environmental and Social Safeguards, Stakeholder Engagement and Gender Equality. We recognized these gaps during the self-assessment, which were conducted and submitted to the GEF in April 2019. The CI-GEF Agency is committed to addressing the identified gaps to ensure full compliance and has started an internal process of updating its policies.

The internal process, approved by CI Leadership, entails drafting the updated policies to meet or exceed the GEF's Minimum Standards that will be reviewed by an external independent consultant, conducting internal consultations with key experts (CI's General Council Office, Rights-Based Approach team, Human Resources, Finance, Science Division, among others) and country programs to improve and validate draft policies, and submitting the updated policies to CI's Leadership for final approval.

A summary of the process, concrete actions and timeline is presented below:

October 15, 2019 (Completed): *Draft updated policies on gender, stakeholder engagement, and environmental and social safeguards. This included the gaps identified under Minimum Standards 1 through 7 and the addition of Minimum Standards 8 and 9 (Labour and Working Conditions, and Community Health, Safety and Security) to the CI-GEF policies, as well as the gaps identified in the stakeholder engagement policy. Notably, there were no gaps identified in the gender policy.*

October 15, 2019 (Completed): *Update CI-GEF's Safeguard Screening Form to reflect the proposed changes*

November – December 2019: *Review of drafted policies by an independent external consultant*

January – February 2020: *Hold internal consultations on the updated policies*

March 2020: *Finalize updated policies based on feedback from reviews and consultations*

April – May 2020: *Obtain approval from CI's leadership for the updated policies*

June 2020: *Update guidance notes and safeguard plan templates*

July 01, 2020: *Implement updated policies*

We believe this consultative and iterative process are important in ensuring that the updated policies not only meet the minimum requirements of the GEF but that of CI's policies and international best practices. The CI-GEF Agency is committed to ensuring full compliance no later than June 30, 2020.

Please do not hesitate to contact us if you need any clarifications or have questions.



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Miguel Morales, PhD  
GEF Coordinator,  
CI-GEF Project Agency.

*Development Bank of Latin America (CAF)*

Lima, November 11th, 2019

DSICC-054/2019

**Ms. Françoise Clottes**

Director, Policy and Operations  
Global Environment Facility

**REF: "CAF Findings on GEF Policies - Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement Report"**

Dear Françoise:

CAF acknowledges the document received from the GEF Team and Bruce Jenkins this last October 28<sup>th</sup>: "CAF Findings on GEF Policies - Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement Report" attached to this mail. CAF also accepts GEF's recommendations and expresses its commitment on addressing identified findings in order to achieve compliance as required.

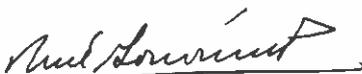
CAF as GEF Partner Agency is working on an Action Plan to be implemented in a period no longer than twelve months. We expect to complete this process before the end of 2020. This Action Plan will include scheduled updates to the CAF-GEF Environmental and Social Safeguards (ESS) Policies and Procedures addressing GEF's ESS, gender equality and stakeholder engagement minimum requirements as well as concrete activities, application strategies and timelines able to undertake all 33 identified gaps.

CAF-GEF Environmental and Social Safeguards have in place procedures for specific management plans, operation guidance notes, screening tools, detailed terms of reference with minimum contents for external experts, requirements for second party opinion; this complete set of CAF-GEF ESS was cleared by the GEF Secretariat during CAF's Accreditation Process. This standards are applied to all GEF projects implemented by CAF. CAF-GEF ESS and CAF ESS (version 2016) will be analyzed during the execution of the Action Plan to support the design and validation of the upgraded CAF-GEF's Environment and Social Safeguards, Gender Equality and Stakeholder Engagement standards (version 2020).

The high level management of CAF continuous fully committed to maintain the accreditation as GEF's implementing agency, therefore it is also committed to achieve full compliance to the new GEF's policies on environmental and social safeguards, gender equality, and stakeholder engagement and work on an Action Plan which addresses the 33 identified gaps.

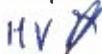
The action plan includes the necessary resources and activities in order to fully update CAF's policies and procedures that will address all 33 gaps. The expected outcome is CAF to have in place the necessary operation guidance notes and screening tools that will address the 33 identified gaps shown in attached Annex 1.

Sincerely,



René Gómez-García P.

Director (e) de Sostenibilidad, Inclusión y Cambio Climático, CAF-GEF Coordinator  
Vicepresidencia de Desarrollo Sostenible



Attachment: Annex 1, CAF's Action Plan

*Development Bank of Southern Africa (DBSA)*

30 October 2019

Ms. Gabriella Richardson Temm  
Coordinator – Gender and Social Issues: GEF Policy, Partnership and Operation Unit  
1899 Pennsylvania Ave NW  
Washington DC  
20006 USA

Dear Ms. Richardson Temm,

**RE: FINDINGS OF THE INDEPENDENT ASSESSMENT – DBSA COMPLIANCE WITH MINIMUM STANDARDS IN GEF POLICY ON ENVIRONMENTAL AND SOCIAL SAFEGUARDS, STAKEHOLDER ENGAGEMENT AND GENDER EQUALITY**

The DBSA acknowledges the findings and justifications arising from the independent assessment of the DBSA Environmental and Social Safeguard Standards (DBSA ESSS), Stakeholder Engagement and Gender Equality dated the 29 October 2019. The DBSA thanks GEF for the opportunity to participate in this international benchmarking exercise and commits to achieving full compliance with GEF requirements.

The DBSA commits to undertake the following steps to ensure full compliance:

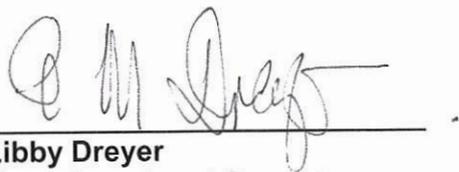
1. Addressing identified safeguards gaps identified by the independent review panel:
  - a. The DBSA E&S team has updated the DBSA ESSS to address gaps in respect of safeguard 1,2,3 4,5,8 and 9. The DBSA operations are presenting these changes to the relevant DBSA Board Committee for ratification by no later than the 27 November 2019.
2. Independent Grievance Redress Mechanism (IGRM):
  - a. The DBSA is undertaking a complete overhaul of our entire IGRM and commits to implementing a revised system by the 31 October 2020.

DBSA will inform the Secretariat of progress in finalisation of 1 and 2 above.

We hope the above will receive your favourable consideration.

Kindly contact Ms. Thakane Setlaba-Tsiane on Tel no. +27 11 313 3627 or via email on [thakanes@dbsa.org](mailto:thakanes@dbsa.org) should you require clarity or further information regarding the above.

Yours Sincerely,



**Libby Dreyer**  
Head: Investment Support



E Godongwana (Chairman), PK Dlamini\* (Chief Executive),  
M Swilling (Deputy Chairman), M Janse van Rensburg,  
B Mosako\*, Z Monnakgotla, B Mudavanhu, B Ndamase,  
L Nematswerani, MT Ngqaleni, L Noge-Tungamirai,  
P Nqeto, A Sing

\*Executive  
Bathobile Sowazi (Company Secretary)

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*Food and Agriculture Organization of the United Nations (FAO)*



Rome, 5 November 2019

**Subject: FAO Management Response on the Agency's compliance with the GEF Policies of Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement**

FAO acknowledges with appreciation the findings and recommendations of the Assessment of FAO's Compliance with the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement received on October 25<sup>th</sup>, 2019.

FAO takes note of your review findings with respect to FAO's full compliance with the standards on biodiversity (Minimum Standard - MS3) and resettlement (MS4) as well as on gender equality and the policy on stakeholder engagement.

FAO's acknowledges all identified gaps and partial gap areas for MS 1 (Assessment), MS 2 (Accountability, Grievance and Conflict Resolution), MS 5 (Indigenous Peoples), MS 6 (Cultural Heritage), MS 7 (Resource Efficiency and Pollution Prevention), MS 8 (Labor and Working Conditions), and MS 9 (Community Health, Safety and Security).

FAO management agrees with the finding and recommendation of the gap assessment and is committed to undertake adjustments to its policies, procedures, and/or guidelines in order to be *fully compliant* with the GEF requirements.

Major gaps and partial gaps are being already integrated in the ongoing process for the revision of FAO's Environmental and Social Management Guidelines (2015) to bring them in alignment with the UN Model Approach to Environmental and Social Standards for UN Programming endorsed by the 25<sup>th</sup> Senior Officials Meeting of the United Nations Environment Management Group on September 25<sup>th</sup>, 2019. The alignment process is expected to be completed with the adoption of the revised FAO's Environmental and Social Safeguards Standards policy by December 2020.

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In order to align the FAO's grievance and conflict resolution mechanisms with the GEF's and other multilateral donor requirements, including by addressing specific gaps identified for MS2 (Accountability, Grievance and Conflict Resolution), FAO is currently undertaking internal assessment of grievance redress and conflict resolution mechanisms at the country level to understand the gaps and access capacities. This is a complex process already initiated at the request of the FAO Governing Bodies session of 2019 and involves many stakeholders. It is expected, subject to internal governance review timelines that FAO's policy on compliance reviews following complaints related to environmental and social standards (2015) will be revised by December 2020.

Operational guidance notes/updated screening procedures integrated in the FAO's project cycle, technical reference documents, with general and industry specific examples of Good International Industry Practice (GIIP) and others relevant tools and capacity building activities to complement the revised policy are expected to be rolled out continuously in 2020-2021 at the headquarters and regional and country level.

Yours sincerely,



Alexander Jones

Director

Climate and Environment Division

*Inter-American Development Bank (IDB)*

November 15, 2109

Ms. Naoko Ishii  
CEO and Chairperson  
Global Environment Facility  
Washington, D.C.

Dear Naoko,

The Inter-American Development Bank (IDB) acknowledges receipt of the report containing the assessment. The IDB is committed to modernize its Environmental and Social policies, consolidate them into an integrated and coherent policy framework to more effectively respond to the challenges faced by countries in the Latin American and Caribbean region. To fulfill its commitment, the IDB is drafting a new Environmental and Social Policy Framework (ESPF) and its guidance notes within the framework of IDB's policies and procedures. The ESPF would address gaps identified in the assessment. The ESPF will incorporate a comprehensive set of Environmental and Social Performance Standards (ESPS), which describe the requirements that the Borrower/client/recipient must meet in the development and implementation of operations that are financed by the IDB. In the second half of 2021, the new ESPF is expected to be fully implemented.

The ESPF would adapt the eight IFC performance standards to the IDB context and will include two additional ESPSs on Gender Equality, and Stakeholder Engagement and Information Disclosure. The new ESPF will supersede the five existing environmental and social policies at the IDB. The proposed ESPS are the following: 1) Assessment and Management of Environmental and Social Risks and Impacts; 2) Labor and Working Conditions; 3) Resource Efficiency and Pollution Prevention; 4) Community Health, Safety and Security; 5) Land Acquisition and Involuntary Resettlement; 6) Biodiversity Conservation and Sustainable Management of Living Natural Resources; 7) Indigenous Peoples; 8) Cultural Heritage; 9) Gender Equality; and 10) Stakeholder Engagement and Information Disclosure.

The new IDB's ESPF, sets out a systematic approach to environmental and social risk management that protects people and the environment and is harmonized with international best practices. The Bank will only support projects that meet the ESPF's standards in a manner and timeframe acceptable to the IDB.

Management is also preparing an Implementation Plan of the ESPF describing the milestones required to reach implementation (e.g., update to the Bank systems; development of the Operational Guidelines; and training activities on the new ESPF for Bank staff and the executing agencies). The ESPF will become effective upon completion of the Implementation Plan's milestones. More information is available in this dedicated website: <https://www.iadb.org/en/mpas>

Sincerely,



Bernardo Guillamon  
Manager  
Office of Outreach and Partnerships

*International Fund for Agricultural Development (IFAD)*

05 November 2019

Dear Naoko,

On behalf of IFAD, I wish to acknowledge the findings of the assessment of IFAD's compliance with the updated environmental and social safeguards. The IFAD team had the opportunity to discuss the findings with the GEF Secretariat and assessment team and to provide additional supporting information. The transparent and collaborative process in which the assessment was conducted was very much appreciated.

The following partial gaps in IFAD's environmental and social safeguards are noted:

- *MS3 Biodiversity Conservation and the Sustainable Management of Living Natural Resources*: (i) the need to explicitly prohibit the introduction of invasive alien species; and (ii) the need for a reference on procurement policies that avoid the procurement of natural resource commodities that may potentially have negative impact on natural habitats;
- MS5 (include the triggering of FPIC for any activity that could result in a significant impact on Indigenous Peoples Cultural Heritage, and address risks and circumstances of indigenous peoples living in voluntary isolation);
- *MS5 Indigenous Peoples*: (i) the need to include a direct reference to the triggering of FPIC when a project or activity could potentially result in a significant impact on Indigenous Peoples Cultural Heritage; and (ii) the need to include guidance that addresses the risks and issues that may arise with indigenous peoples living in voluntary isolation);
- *MS8 Labour and Working Conditions*: the need to develop a separate Guidance Statement on Labor and Working Conditions that is compliant with the GEF standards; and
- *Stakeholder Engagement*: the need to broaden IFAD's requirements for public disclosure of stakeholder consultations and engagement to cover all.

../..

Dr Naoko Ishii  
Chief Executive Officer  
and Chairperson  
Global Environment Facility (GEF)  
Washington, D.C.

I wish to assure you of IFAD's commitment to address the few gaps identified above in order to be fully compliant with the updated environmental and social safeguards. The new Framework for Operational Feedback from Stakeholders: Enhancing Transparency, Governance and Accountability will be presented to the IFAD Executive Board for approval in December 2019, which would make IFAD compliant with the GEF stakeholder engagement policy. IFAD is currently updating its Social, Environmental and Climate Assessment Procedures (SECAP), and it will consequently update its How-to-do Note on FPIC. A draft revised SECAP should be completed by the end of December 2019 and approved in April 2020.

Yours sincerely,

A handwritten signature in cursive script that reads "Margarita A. Astralaga".

Margarita Astralaga  
Director  
Environment, Climate, Gender and Social Inclusion  
Division  
IFAD

*International Union for Conservation of Nature (IUCN)*



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Ms. Gabriella Richardson Temm  
Coordinator – Gender and Social Issues  
GEF Policy, Partnership and Operation Unit  
1899 Pennsylvania Ave NW  
Washington, DC 20006 USA

5 November 2019

Dear Ms Richardson Temm,

Thank you for sharing the Assessment of IUCN's Compliance with the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. IUCN is pleased with the positive review of the policies and procedures of IUCN's Environmental and Social Management System (ESMS) that we have put in place to promote environmental and social sustainability and to help ensure prevention and mitigation of undue harm to people and the environment. IUCN is particularly pleased to hear that our ESMS Standards corresponding to the GEF Minimum Standards MS3 (Biodiversity) and MS4 (Resettlement) and IUCN Policy on Gender Equality were assessed as fully compliant with GEF Policy and that with regards to Stakeholder Engagement the IUCN Policy was assessed as substantially compliant. It is further positively acknowledged that in relation to the other ESMS Standards only minor gaps have been identified.

IUCN understands that there are a few adjustments that would take our IUCN ESMS to an even more strengthened state and confirms its commitment to implement the recommendations of the expert assessment. Therefore, a Gap Closure Action Plan has been developed that includes concrete time-bound measures and which has been attached to this letter. The plan provides for actions to adjust the IUCN's Standard on Indigenous Peoples and the Standard on Cultural Heritage (expected to be approved by IUCN Senior Management by 31 December 2019); to amend IUCN's ESMS Questionnaire; to develop a new Guidance Note on Environmental and Social Assessment, Management and Monitoring (expected to be approved by IUCN Senior Management by 31 January 2020); and to revise IUCN's Grievance Mechanism Guidance Note (expected to be approved by IUCN Senior Management by 31 January 2020). IUCN commits to inform the GEF Secretariat of the progress of these actions.

Sincerely,

A handwritten signature in purple ink, appearing to read 'S. Aggarwal-Khan', is written over a light blue horizontal line.

Sheila Aggarwal-Khan Director

Global Environment Facility and Green Climate Fund  
IUCN

## Annex

### IUCN Compliance with GEF Policy on Environmental and Social Safeguards - Gap Closure Action Plan

The following actions will be implemented by IUCN to strengthen IUCN's Environmental and Social Management System (ESMS) and ensure full compliance with the GEF Policy:

1. Amendment of the ESMS Questionnaire with explicit sections related to (1) labour & working conditions, (2) community health, safety and security and (3) gender risks.

The revised questionnaire will ensure the identification of the following risks:

- risk of project activities causing exposure of communities to natural and accidental hazards
- risks related to labour and working conditions of project staff, contracted workers, primary supply workers and community workers
- explicit considerations of risks of Gender-Based Violence

**Timing:** The revised version of the Questionnaire will be available by 31 December 2019.

2. Development of a new Guidance Note on Assessment and Management of E&S risks with explicit sub-chapters on (1) labour & working conditions, (2) community health, safety and security, (3) gender risks and (4) pollution and waste and guidance on assessment and management of the respective risk issues.

More specifically, the Guidance Note will address the following gaps:

- Community health, safety and security: Guidance on emergency preparedness plans
- Labour and working conditions of project staff, contracted workers, primary supply workers and community workers: guidance on risk avoidance and management
- Gender-based violence: Inclusion of an enforceable requirement mechanism
- Pollution & Waste: explicit exclusion of projects that would entail use of any substance that has been listed under the Stockholm convention on POPs

**Timing:** The Guidance Note, approved by IUCN Senior Management, will be available by 31 January 2020.

3. Adjustment of the Standard on Indigenous Peoples:
  - Explicit requirement of a Grievance and Redress Mechanism available for indigenous peoples and provided in a culturally and appropriate format
  - Guidance on assessing and managing potential impacts of a given project on indigenous peoples who are living in voluntary isolation.

**Timing:** Revised Standard, approved by IUCN Senior Management, will be available by 31 December 2019.

4. Adjustment of the Standard on Cultural Heritage :
  - Explicit requirement to include and consult with qualified experts, local people and other stakeholders with regards to whether disclosure is appropriate in the context of cultural heritage

**Timing:** Revised Standard, approved by IUCN Senior Management, will be available by 31 December 2019.

5. Adjustment of the Grievance Mechanism Guidance Note: instructions for project-level grievance mechanism to ensure appropriate and timely measures to minimize the risk of retaliation to Complainants.

**Timing:** Revised Guidance Note, approved by IUCN Senior Management, will be available 31 January 2020.

6. IUCN ESMS / GEF disclosure website: description of procedures how to request further information on the projects and respective ESMS documentation

**Timing:** update available by 31 December 2019.

*United Nations Environment Programme (UNEP)*

Reference: CSD/GEF/KW

13 November 2019

Dear Ms. Clottes,

I am writing regarding UNEP's compliance with the GEF's Policies on Environmental & Social Safeguards, Gender Equality and Stakeholder Engagement.

First, thank you for sharing the Preliminary Assessment of our compliance. We note that we are fully compliant with the Gender Equality and Stakeholder Engagement policies and that we have a number of gaps in compliance with Environmental & Social Safeguards, especially minimum standards 1-3, 5-6, and 8-9.

As you know, we opted out of reviewing these with you on a line by line basis and providing further clarifications and/or justifications, because the assessment was conducted against UNEP's 2015 *Environmental, Social and Economic Sustainability Framework* and, we're happy to report that since February 2019, we have been working to update and revise this policy.

We now have a mature draft of UNEP's new *Environment and Social Sustainability Framework* which has already been through several rounds of consultation. We have shared the findings of your Preliminary Assessment with our team who are working on the revised policy and we are confident that the revision covers all of the identified gaps.

The revised policy has been shared with our Executive Director and a discussion amongst senior managers is planned prior to her approval of the revised Framework. While it is difficult to anticipate whether there will be additional modifications prior to her approving the document, we are hopeful that the multiple rounds of consultation we have had to date will mean that few, if any, modifications will be required. We assure you that we are prioritizing this matter and it is our hope that the new policy is approved by the end of the year.

UNEP has already started working on the specific guidelines for each of the minimum standards elaborated in the revised policy. Our screening tool, the *Environmental and Social Safeguards Review Note*, will be adapted accordingly. In addition, though not part of your assessment, I'm happy to report that we are making efforts to strengthen the monitoring and management of identified risks across the project cycle. We hope that the additional guidance and revised screening tools will be ready for use by mid 2020, at which point the new policy would become effective.

We are happy to discuss further if you have any additional questions and hope to be able to share our updated policy with you soon.

Yours sincerely,



Sonja Leighton-Kone  
Director, Corporate Services Division

**Ms. Francoise Clottes**

Director of Strategy and Operations

GEF Secretariat, Policy

1899 Pennsylvania Ave NW, Washington, DC 20006,

United States

Email: [fclottes@thegef.org](mailto:fclottes@thegef.org)

*United Nations Industrial Development Organization (UNIDO)*



# UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION

VIENNA INTERNATIONAL CENTRE

P.O. BOX 300, A-1400 VIENNA, AUSTRIA

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FAX: (+43 1) 269 26 69

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unido@unido.org

28 October 2019

Dear Ms. Ishii,

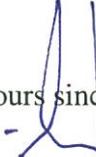
In my capacity as UNIDO's GEF Focal Point, I would like to acknowledge the findings and justifications included in the report "Preliminary Assessment of Agencies' Compliance with the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement" dated 21 September 2019.

The partial and potential gaps identified therein will be addressed through a variety of measures including the revision of UNIDO's Environmental and Social Safeguards Policies and Procedures (ESSPP) (AI/2017/04) issued on 18 July 2017, enhanced operational guidance and tools as well as close cooperation with UNIDO's Procurement, HR and Internal Oversight divisions.

Specifically, the partial gaps identified with regards to MS1, MS3 and MS5 as well as the potential gaps identified with regards to MS6 and MS7 will be addressed through the policy update. Partial gaps identified in relation to MS2 will be covered in close interaction with UNIDO's Internal Oversight. A similar approach will be taken for potential gaps identified with regards to MS8, where Procurement and HR will also be consulted. In addition, enhanced operational guidance and tools will be prepared to assure that all requirements of MS1 as well as the planned policy revisions are fully accounted for. It should be noted that no partial nor potential gaps were identified with regards to MS4 and MS9. Moreover, UNIDO is fully compliant with the Policy on Gender Equality and the Policy on Stakeholder Engagement.

UNIDO aims to achieve full compliance with the GEF Policy on Environmental and Social Safeguards in time for reporting to the 59<sup>th</sup> Council Meeting to take place in December 2020. Please rest assured of UNIDO's highest commitment to achieving full compliance.

Yours sincerely,



Philippe R. Scholtès  
Managing Director  
Programme Development and  
Technical Cooperation

Ms. Naoko Ishii  
Chief Executive Officer and Chairperson  
The Global Environment Facility  
1818 H St NW  
Washington, DC 20433

*West African Development Bank (BOAD)*



**LE PRÉSIDENT**

04 NOV 2019

Lomé, le

PRESID-DEFIC/DLE - 2019L 15395

Madame Gabriella RICHARDSON TEMM

Coordinator – Gender and Social Issues  
GEF Policy, Partnership and Operation Unit

Bur +1 202 473 8356 | Tél +1 202 243 8777  
Global Environment Facility - GEF  
1899 Pennsylvania Ave NW, Washington, DC 20006  
Email : [grichardsontemm@thegef.org](mailto:grichardsontemm@thegef.org)

WASHINGTON (USA)

Référence : Votre mail du 27 octobre 2019

Objet : Evaluation de la conformité de la BOAD au titre des Entités  
Accréditées par rapport aux nouvelles normes minimales  
du FEM en matière environnementale et sociale : Lettre de  
reconnaissance et d'engagement.

Madame,

Je voudrais vous féliciter pour l'excellence du partenariat qui existe entre nos deux institutions en vue de relever les défis de la protection de l'environnement.

Par ailleurs, la Banque Ouest Africaine de Développement (BOAD) a pris acte de la nouvelle Politique de Sauvegarde Environnementale et Sociale que le FEM a approuvée en décembre 2018. Aussi, pour faciliter le respect des politiques environnementales et sociales des entités accréditées dont la BOAD avec cette nouvelle politique, le FEM a initié à partir de mars 2019 une évaluation des politiques et procédures environnementales de ces entités accréditées.

Aux termes de l'évaluation de la nouvelle Politique et des procédures de la BOAD en matière de sauvegarde environnementale, sociale et genre, des améliorations à apporter ont été identifiées, notamment au niveau (i) des normes minimales de sauvegarde environnementale et sociale ; (ii) de l'intégration de l'égalité entre les sexes et (iii) de l'engagement des parties prenantes.

A cet effet, je voudrais vous assurer que j'ai pris note desdites améliorations à apporter et prends l'engagement au titre de la Banque, de procéder à une révision du document de Politique et procédures environnementales et sociales ainsi que de la politique genre de la Banque en vue de leur conformité avec les exigences du FEM en la matière, d'ici la fin de l'année 2020 (délai qui tient compte du processus d'approbation interne des textes).

Veuillez agréer, Madame, l'expression de ma considération distinguée.

Christian ADOVELANDE  
Président de la BOAD

*World Wildlife Fund (WWF-US)*

**World Wildlife Fund  
GEF Agency**

1250 24th Street, NW | Washington, DC 20037 | 202 293 4800 | 202 293 9211 fax

[wwfgef.org/gef/](http://wwfgef.org/gef/)  
[worldwildlife.org](http://worldwildlife.org)



November 5, 2019

Dear GEF Secretariat,

In response to the independent assessment on Agencies' compliance with Minimum Standards in the GEF Policy on Environmental and Social Safeguards, Stakeholder Engagement and Gender Equality, please find below the WWF GEF statement to be included in the Council report outlining WWF-US commitment, process, planned actions and timelines to address the identified gaps and achieve compliance:

WWF GEF Agency acknowledges the assessment and its findings as prepared by the consultant in collaboration with the GEF Secretariat. WWF GEF Agency is committed to achieving full compliance with the updated GEF Policy and Guidelines on Environmental and Social Safeguards.

In order to achieve compliance, WWF GEF Agency has reviewed the findings of the assessment and is presently updating WWF's Environment and Social Safeguards Integrated Policies and Procedures (SIPP) to reflect the minor changes specified in the GEF review (in Minimum Standards 1 through 7). To address gaps under Minimum Standard 1 (paragraphs 4.m-4.o) and Minimum Standard 8 respectively new guidance notes will be developed for Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA), Eco guards and Labor. All changes will be finalized by March 2020.

We appreciate the independent assessment carried out and the opportunity to discuss the findings with GEF Secretariat and the independent expert.

Sincerely,

A handwritten signature in black ink, appearing to read "David McCauley", is positioned below the word "Sincerely,".

David McCauley  
WWF Sr. Vice President  
and Global Lead  
Public Sector Partnerships