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INVESTING IN OUR PLANET

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

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INTRODUCTION

1. The GEF Policies on Environmental and Social Safeguards¹, Gender Equality², and Stakeholder Engagement³ set forth a number of minimum standards⁴, and require GEF Partner Agencies (hereafter referred to as “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, the GEF Secretariat presented for Council’s decision, at its 57th meeting, in December 2019, the Report on the Assessment of GEF Agencies’ Compliance with Minimum Standards in the Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement⁵ (hereafter referred to as the 2019 Compliance Assessment Report). This Report described the findings of the requested assessment of GEF Agencies’ compliance with the applicable minimum standards. The assessment had been facilitated by the Secretariat and undertaken by independent experts, in accordance with the methodology outlined in the Report⁶ and in line with the Policies and the Assessment Guidelines for GEF Agencies’ Compliance with Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement.^{7,8}

3. As part of the decision outlined in the 2019 Compliance Assessment Report, the Council requested, at the 57th Council meeting, Agencies to provide updates to the Secretariat, prior to every Council meeting, on progress implementing the actions contained in their plans of action until Agencies have come into full compliance. The GEF Secretariat, in turn, was requested to 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 notify Council when Agencies have met their commitments set out in their respective plans of action to achieve compliance. The GEF Secretariat was also asked to engage experts to carry out reassessments of updated Policies and procedures submitted by Agencies.

4. This document includes information on progress of the action plans submitted by the Agencies and the expert assessment/conclusion for each GEF Agency that submitted formally

¹ 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)

² SD/PL/02 (http://www.thegef.org/sites/default/files/documents/Gender_Equality_Policy.pdf)

³ SD/PL/01 (http://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Policy.pdf)

⁴ 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.

⁵ GEF/C.57/05 (https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF_C.57_05_Report%20on%20Assessment%20of%20Agencies%20Compliance.pdf)

⁶ GEF/C.57/05 (para 7 -8)

⁷ SD/GN/03

(https://www.thegef.org/sites/default/files/documents/20190301_agency_policy_compliance_assessment_guidelines.pdf)

⁸ The findings outlined in this document has been established and validated through an iterative process including bilateral consultations and discussions between GEF Agencies, expert reviewers and the Secretariat.

approved Policies as part of their process to complete their plans of actions as spelled out in their original plans of action in 2019.

PROGRESS ON PROCESS FOR AGENCIES TO ACHIEVE FULL COMPLIANCE

5. The 2019 Compliance Assessment Report indicated that, given 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 may require additional actions by some GEF Agencies. The three Policies and related Assessment Guidelines for Agency Compliance anticipated this situation and therefore set out a process for assessing any areas of non-compliance and developing time-bound action plans to come into full compliance.

6. Under the provisions of the Policy on Environmental and Social Safeguards, it was recommended that Council decide that Agencies may continue to seek GEF financing while they implement their time-bound plans of action.⁹ 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.¹⁰ If a plan of action for an Agency is not implemented according to the timeline set out in the 2019 Compliance Assessment Report, review of this decision may be warranted.

7. The below reiterates the process and concrete steps and actions that will be followed until all Agencies have fulfilled their commitments spelled out in their plans of actions and have met all minimum standards contained in the GEF Policies on Environmental and Social Safeguards, Gender Equality and Stakeholder Engagement:

- (i) Each Agency that still is implementing their plan of action continue to provide updates to the GEF Secretariat until they have completed their plan of actions and reach full compliance with each minimum standard in the three Policies;
- (ii) The Secretariat continues to compile, track and review Agency updates and report to the Council on progress on Agencies' implementation of the plans of action at subsequent Council meetings.
- (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 and Policy requirements.
- (iv) The Secretariat notifies Council when Agencies have met their commitments set out in their respective plans of action to achieve compliance.

⁹ 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.")

¹⁰ 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."

- (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 Agencies' Compliance¹¹.

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

8. As concluded in the 2019 Compliance Assessment Report, only four Agencies were determined to be in full compliance at the time of the 2019 Assessment, including the European Bank for Reconstruction and Development (EBRD); Foreign Economic Cooperation Office, Ministry of Environmental Protection of China (FECO); United Nations Development Programme (UNDP); and the World Bank (WB).

9. All fourteen Agencies that had been assessed to have some gap areas established concrete timebound plans of actions to address the identified gaps (outlined in detail in annex 1 of the 2019 Compliance Assessment Report). As part of the progress implementing the plans of actions, the expert assessments carried out in October 2020 for this Report conclude that six Agencies have now satisfactorily completed their plans of action and addressed significant gaps identified in the 2019 Compliance Assessment Report. These include the Brazilian Biodiversity Fund (FUNBIO), Conservation International (CI), Inter-American Development Bank (IDB), International Union for Conservation of Nature (IUCN), United Nations Environment Programme (UNEP) and World Wildlife Fund (WWF-US).

10. The remaining eight Agencies are making progress updating or revising their policies, preparing detailed guidance notes and or developing new screening procedures. These Agencies have, at this stage, provided updates to the GEF Secretariat and further committed to provide updates on their progress in completing their plans of action until they have completed the implementation of their plans of action and have been assessed to be in compliance with each minimum standard in the three Policies¹²

11. Table 1, below, provides an overview of the progress on the plans of actions for all the fourteen Agencies that had established concrete timebound plans of action to address the gaps identified in the 2019 compliance assessment. The information presented below is based on updates and assessment of documentation provided by Agencies in 2020. Further details of the assessments for each Agency that has completed its plans of action are summarized in paragraphs 12- 28 of this document, and the detailed reports prepared by the Expert reviewers are provided in Annex 1.

¹¹ SD/GN/03

https://www.thegef.org/sites/default/files/documents/20190301_agency_policy_compliance_assessment_guidelines.pdf

¹² 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.

Table 1. Overview of Agencies progress implementing their Plans of Action

	Plans of action to achieve full Compliance (submitted in 2019)	Update on Progress on Plans of action (as of October 2020)	Expert review of completed plans of actions
AfDB	Review and update the Integrated Safeguards System (by 2022)	No update has been provided. For further information please see formal letter of commitment provided by AfDB in 2019 (included in the Council Report: GEF/C.57/05)	Not applicable at this stage
ADB	Review/update the Safeguard Policy (by 2021), and issuance of an internal guideline for GEF-financed projects	ADB reports that: <ul style="list-style-type: none"> • ADB’s Independent Evaluation Department completed a Corporate Evaluation of the of the ADB 2009 Safeguard Policy. • A briefing on safeguard policy was held for the ADB Board in Aug 2020. • ADB Management officially launched a policy update process in September 2020 (to be completed in 2022). • ADB has committed to addressing any gaps that may occur in the context of GEF financed activities. This will be reflected in GEF project documents. To aid this process, ADB has developed an internal guidance highlighting issues to be addressed in the context of GEF financing. 	Not applicable at this stage
FUN BIO	Adjust the Environmental and Social Safeguards Policy (ESSP) (by Feb 2020), and approve a new Policy on Stakeholder Engagement (by Nov 2019)	Funbio has updated its ESSP and Policy on Stakeholder Engagement and submitted these for GEF review.	FUNBIO has satisfactorily completed its plan of action and addressed identified gaps in 2019
CI	Update Policies on Gender, Stakeholder Engagement and Environmental and Social Safeguards, including guidance notes/templates (by June 2020)	CI has undertaken a comprehensive revision of its ESMF including the addition of new Environmental and Social Standards and supporting tools and templates and submitted these for GEF’s review.	CI has satisfactorily and timely completed its plan of action and addressed identified gaps in 2019
CAF	Update Environmental and Social Safeguard Policy, including operational guidance	CAF reports that: <ul style="list-style-type: none"> • CAF has made substantial progress updating its Environmental and Social Safeguard Policy and development of 	Not applicable at this stage

	notes and screening tools (by Dec 2020)	<p>operational guidance notes and screening tools.</p> <ul style="list-style-type: none"> CAF has developed a draft Manual CAF-GEF Project Environmental and Social Safeguards; Based upon a complete internal review, a final draft Manual will be presented for CAF management review and approval at the end of March 2021. 	
DBSA	Update the Environmental and Social Safeguards Standards (by Nov 2019), and revise the Independent Grievance Redress Mechanisms (IGRM) by Oct 2020.	<p>DBSA reports that</p> <ul style="list-style-type: none"> A new version of DBSA's Environmental and Social Safeguard Standards was approved by the Board; Independent Grievance Redress Mechanism overhaul was completed on 31 October 2020. 	Not applicable at this stage
FAO	Revise the Environmental and Social Safeguards Standards (by Dec 2020) and integrate new guidance notes and screening procedures in the project cycle in 2020-2021	<p>FAO reports that</p> <ul style="list-style-type: none"> FAO is completing its major revision of FAO's Environmental and Social Management Guidelines (ESMG, 2015) for senior management review in 2020 and approval in 2021. In parallel, FAO is completing preparation of operational guidance notes to support the implementation of the revised Guidelines and the revision of operational procedures in the FAO's project cycle (to be rolled out in 2021.) FAO is strengthening capacities to ensure compliance with environmental and social safeguards policy, including tracking and recording of project-level grievances. 	Not applicable at this stage
IDB	Draft a new Environmental and Social Policy Framework (ESPF); incorporate Environmental and Social Performance Standards and develop implementation plan	IDB has undertaken a comprehensive revision of its safeguard policies and submitted its new Environmental and Social Framework for GEF review.	IDB has satisfactorily and timely completed its plan of action and addressed substantial gaps identified in 2019
IFAD	Update the Social, Environmental and Climate Assessment Procedures (SECAP) (by April 2020); and issue a new framework for	<p>IFAD reports that:</p> <ul style="list-style-type: none"> The update of SECAP is progressing as planned (The draft SECAP was presented to the IFAD Executive Board informally in Sept 2020 and the final version of 	Not applicable at this stage

	governance, transparency and accountability	<p>SECAP is expected to be reviewed by the Board in Dec 2020.</p> <ul style="list-style-type: none"> The new Framework for Operational Feedback from Stakeholders: Enhancing Transparency, Grievance and Accountability was approved in Dec 2019. 	
IUCN	Adjust ESS Standards, amend Management System (by Dec 2019), develop new guidance notes, and revise Grievance Mechanisms Note (by Jan 2020)	IUCN has revised and updated its ESS Standards (including on Indigenous Peoples and the Standard on Cultural Heritage) and developed an ESMS Questionnaire and submitted for GEF review.	IUCN has satisfactorily and timely completed its plan of action and addressed substantial gaps identified in 2019
UNEP	Update the Policy on Environmental, Social, and Economic Sustainability (by end of 2019), and develop guidelines and screening tools (by mid 2020)	UNEP has undertaken a thorough update of its Environmental and Social Sustainability Framework and its associated screening form (SRIF) and submitted these for GEF review.	UNEP has satisfactorily and timely completed its plan of action and addressed substantial gaps identified in 2019
UNIDO	Revise the Environmental and Social Safeguards Policies and Procedures, (ESSPP) and improve operational guidance and tools (by Dec 2020)	<p>UNIDO reports that:</p> <ul style="list-style-type: none"> The revision and update of UNIDO's ESSPP is progressing, as planned, and following further consultation, the final draft is expected to be internally approved by December 2020 	Not applicable at this stage
BOAD	Review and revise Policies and Procedures for Environmental and Social Management (by end of 2020).	<p>BOAD reports that:</p> <ul style="list-style-type: none"> Progress are being made to BOAD's operational Policies and Procedures for Environmental and Social Management in Financing Projects (POP), including ESS, Gender Equality and Stakeholder Engagement. The revisions of the Policies and Procedures have been delayed, however, due COVID-19: these now are expected to be approved by the BOAD's board by September 2021. 	Not applicable at this stage
WWF-US	Update Environmental and Social Safeguards Integrated Policies and Procedures (SIPP) and develop guidance notes (by March 2020)	WWF-US has revised its Environment and Social Safeguards Integrated policies and procedures (SIPP) and submitted this for GEF review	WWF-US has satisfactorily and timely completed its plan of action and addressed substantial gaps identified in 2019

SUMMARY FINDINGS OF THE EXPERT RE-ASSESSMENT FOR EACH GEF AGENCY THAT COMPLETED THEIR PLANS OF ACTION

12. The below describes the summary findings of the expert reviewers' assessment of the updated policies, procedures and systems submitted by Agencies in 2020, and provides the expert reviewer's findings. The Expert review concluded that all six Agencies, mentioned above, have now satisfactorily completed their plans of action and addressed significant gaps identified in the 2019 Compliance Assessment Report and in some cases, the experts provided some recommendations for further improvements. The detailed reports prepared by the Expert reviewers are provided in Annex 1.

Brazilian Biodiversity Fund (FUNBIO)

13. As described in the 2019 Compliance Report, FUNBIO was initially assessed against its Environmental and Social Safeguards Policy (ESSP, 2018) as well as its Grievance Policy and Gender Mainstreaming Policy (both 2018). FUNBIO was assessed, at that time, as follows:

- (i) *Policy on Environmental and Social Safeguards:*
 - No gaps with MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS4 (Resettlement), MS5 (Indigenous Peoples), MS8 (Labor), and MS9 (Community Health, Safety and Security); but some partial gaps in MS6 (Cultural Heritage) and MS7 (Resource Efficient and Pollution Prevention).
- (ii) *Policy on Gender Equality and Stakeholder Engagement:*
 - No gaps with the minimum standards contained in the Policy on Gender Equality, but some partial gaps related to minimum standards contained in the GEF Policy on Stakeholder Engagement.

Updated Expert Assessment

14. In its plan of action, FUNBIO committed to revising its relevant policies to address the identified gaps by November 2019. FUNBIO submitted to the GEF Secretariat, earlier in 2020, its approved and updated version of its Environmental and Social Safeguards Policy and their new Policy on Stakeholder Engagement. The Expert review, and assessment of these documents, indicate that FUNBIO now has completed its plans of action and addressed all the identified gap areas from the earlier assessment.

Conservation International (CI)

15. As described in the 2019 Compliance Report, CI was initially assessed against its Environment and Social Management Framework (ESMF, 2017) and supporting procedures and systems. CI was assessed, at that time, as follows:

- (i) *Policy on Environmental and Social Safeguards:*
 - A range of partial gaps across each of the minimum standards (1-9).

(ii) *Policies on Gender Equality and Stakeholder Engagement:*

- No gaps with the minimum standards contained in the Policy on Gender Equality, but one partial gap related to minimum standards contained in the GEF Policy on Stakeholder Engagement.

Updated Expert Assessment

16. In its plan of action, CI committed to update its policies on environmental and social safeguards, gender and stakeholder engagement as well as to update its guidance notes and safeguard templates. CI submitted to the GEF Secretariat its revised ESMF including a set of expanded supporting tools and templates. The expert review, and assessment of these documents, indicate that CI has completed its plan of action and addressed all the identified gaps from the earlier compliance assessment.

Inter-American Development Bank (IDB)

17. As described in the 2019 Compliance Report, IDB was initially assessed against its Environment and Safeguards Compliance Policy (ESCP) of 2006, along with a number of other additional free-standing policies. IDB was assessed, at that time, as follows:

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

- No gaps with MS7 (Resource Efficiency and Pollution Prevention) but 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) *Policies on Gender Equality and Stakeholder Engagement:*

- No gaps with the minimum standards contained in the Policy on Gender Equality, but one partial gap related to minimum standards contained in the GEF Policy on Stakeholder Engagement.

Updated Expert Assessment

18. In its plan of action, IDB informed the GEF Secretariat of its ongoing efforts to modernize its Environmental and Social Policies and to 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. Earlier in 2020, IDB submitted its new Environmental and Social Policy Framework (ESPF) to the GEF Secretariat. The Framework incorporates a comprehensive set of Environmental and Social Performance Standards (ESPS). The expert review, and assessment of these documents, confirm that IDB's new Environmental and Social Framework has addressed the identified gaps described in the 2019 compliance assessment.

19. While, the expert reviewer commends IDB for the comprehensive overhaul of its Environmental and Social Policy Framework, two minor issues were noted (i) the account for

seasonal variation in baseline studies in MS1 (4.d) and (ii) benefit-sharing with regard to utilization of genetic resources in MS3 (8.f). Given the rigour of IDB's approach to developing its new ESPF and the fact that new ESPF is fully aligned with international best practices on environmental and social safeguards, the expert reviewer suggests that these are minor issues that easily can be addressed, internally through, for example, the planned development of safeguard-specific guidance notes.

International Union for Conservation of Nature (IUCN)

20. As described in the 2019 Compliance Report, IUCN was initially assessed against its 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. IUCN was assessed, at that time, as follows:

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

- No gaps with MS3 (Biodiversity) and MS4 (Resettlement), but 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) *Policies on Gender Equality and Stakeholder Engagement:*

- No gaps with the minimum standards contained in the Policy on Gender Equality, but one partial gap related to minimum standards contained in the GEF Policy on Stakeholder Engagement.

Updated Expert Assessment

21. In its plan of action, IUCN committed to update its ESS Standards, amend its Management System, develop new guidance notes and to revise its Grievance Mechanisms Note. IUCN submitted to the GEF Secretariat, earlier in 2020, its revised and updated ESS Standards (including on Indigenous Peoples and the Standard on Cultural Heritage), revised ESMS Questionnaire and updated Guidance Notes on Environmental and Social Assessment and Monitoring and Grievance Mechanism. The expert review, and assessment of these documents, indicate that IUCN has completed its plan of action and addressed the main identified gaps described in the 2019 compliance assessment.

22. The Expert review, however, noted, that while IUCN's ESMS Screening questionnaire and Guidance Note on Assessment and Management of Environmental and Social Risks address issues related to labor and working conditions (GEF MS8), the GEF MS8 (15.g) requires respect for workers' rights to freedom of association and collective bargaining which are not explicitly addressed in the IUCN ESMS questionnaire. As such, it is recommended that IUCN considers these findings and makes sure that any future updates to its ESMS Manual include explicit and

free-standing standards that address the requirements and sub-criteria of GEF MS7, MS8, and MS9.

United Nations Environment Programme (UNEP)

23. As described in the 2019 Compliance Report, UNEP was initially assessed against its UNEP's Environmental, Social, and Economic Sustainability Framework (ESESF,2015) 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. UNEP was assessed, at that time, as follows

- (i) *Policy on Environmental and Social Safeguards:*
 - No gaps in MS4 (Resettlement) and MS7 (Resource Efficiency and Pollution Prevention); no standard on MS9 (Community Health, Safety and Security) and a range of partial gaps in MS1 (Assessment), MS2 (Accountability), MS3 (Biodiversity), MS5 (Indigenous Peoples), MS6 (Cultural Heritage), MS8 (Labor and Working Conditions).
- (ii) *Policies on Gender Equality and Stakeholder Engagement:*
 - No gaps with the minimum standards contained in the Policies on Gender Equality or Stakeholder Engagement.

Updated Expert Assessment

24. As described in the 2019 Compliance Report, UNEP was initially assessed against its Environmental, Social, and Economic Sustainability Framework (ESESF,2015) and other relevant UNEP policies, procedures, guidelines, and systems. Earlier in 2020, UNEP submitted to the GEF Secretariat its updated ESSF and associated screening material (SRIF), as well as updates on its efforts to complete its Guidance Notes and plans to carry out training/workshops to further strengthen its own internal capacity on safeguard related issues. The expert review, and assessment of these documents, confirm that UNEP's newly approved ESSF has addressed the identified gap areas from the earlier compliance assessment.

25. While, the expert reviewer commends UNEP for the comprehensive revision of its ESSF and the fact that it is now significantly in line with GEF minimum standards on ESS, it was noted that UNEP could provide further acknowledgement of the need for informing indigenous people of their rights under national law with respect to commercial development (as outlined in GEF MS5 11.g) and it is suggested that this could be addressed internally by, for example, the development of specific guidance note.

World Wildlife Fund (WWF-US)

26. As described in the 2019 Compliance Report, WWF-US was initially assessed against WWF's Environment and Social Safeguards Integrated policies and procedures (SIPP) and other relevant WWF-US policies, procedures, guidelines, and systems (as of September 2019) and the

various requirements of the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement. WWF-US was assessed, at that time, as follows:

- (i) *Policy on Environmental and Social Safeguards:*
 - No gaps in MS9 (Community Health, Safety and Security), but a range of partial gaps across minimum standards 1-8.
- (ii) *Policies on Gender Equality and Stakeholder Engagement:*
 - No gaps with the minimum standards contained in the Policies on Gender Equality or Stakeholder Engagement.

Updated Expert Assessment

27. In its plan of action, WWF-US committed to 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 submitted to the GEF Secretariat, earlier in 2020, its revised Environment and Social Safeguards Integrated Policies and Procedures (SIPP), including a range of updates such as revised Standards on Cultural Resources and Community Health and Security. In addition, WWF-US submitted its Guidance Notes on Gender-Based Violence and Labor and Working Conditions. The expert review, and assessment of these documents, indicate that WWF-US has completed its plan of action and addressed the main identified gaps from the 2019 compliance assessment.

28. The Expert review, however, noted, two issues that may require some further attention from WWF-US, including explicit adherence to the GEF ESS requirements to (i) avoid or minimize project- or program-related greenhouse gas emissions and black carbon (GEF MS7 14.b.iii); and (ii) respect for freedom of association and collective bargaining (GEF MS8 15.g). It is recommended that WWF-US reviews these findings and considers a minor update to its SIPP and Guidance Note on Labor and Working Conditions. In addition, it is recommended that WWF-US confirms that the submitted stand-alone Guidance Notes on Gender-Based Violence and Labor and Working Conditions will be integrated into the SIPP.

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)*
- *Policy on Environmental and Social Safeguards (SD/PL/03)*

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: RE-ASSESSMENT OF AGENCIES' COMPLIANCE WITH THE GEF POLICIES ON ENVIRONMENTAL AND SOCIAL SAFEGUARDS, GENDER EQUALITY, AND STAKEHOLDER ENGAGEMENT

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Brazilian Biodiversity Fund (FUNBIO)

1. In the Compliance Assessment presented to the 57th GEF Council meeting, the Brazilian Biodiversity Fund (Funbio) was assessed against its Environmental and Social Safeguards Policy (ESSP, 2018) as well as its Grievance Policy and Gender Mainstreaming Policy (both 2018). Funbio has aligned its safeguards policy with the IFC Performance Standards (2012), including 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.
2. Compared to GEF's Policy on Environmental and Social Safeguards (2018), Funbio was assessed as follows: 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). Some partial gaps were identified for MS6 (Cultural Heritage) and MS7 (Resource Efficient and Pollution Prevention). Some partial gaps were identified regarding Funbio's compliance with the GEF's Policy on Stakeholder Engagement. Funbio's policies were assessed as fully compliant with the GEF Policy on Gender Equality.
3. In its plan of action, Funbio committed to revising its relevant policies to address the identified gaps. For this review, Funbio has submitted an updated version of its ESSP (version P24/2020) and Policy on Stakeholder Engagement (version P40/2019). The table below lists the gaps identified between the earlier Funbio ESSP and the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement and examines the extent to which Funbio's updated ESSP and Stakeholder Engagement Policy address these gaps. The report concludes with an overall recommendation.

BRAZILIAN BIODIVERSITY FUND (FUNBIO)	
Gaps identified related to the Minimum Standards in the GEF Policy on Environmental and Social Safeguards (as described in GEF/C.57/05)	Expert Review of Agency Updates (2020)
Related to GEF Minimum Standard 6: Cultural Heritage: Para. 12.d: Funbio’s ESSP PS8 on Cultural Heritage does not address the need for withholding information on cultural heritage when necessary in order to safeguard its safety and integrity.	Funbio’s PS8 has been updated. Para. 51 notes that “precautions need to be taken with the dissemination of information on cultural heritage locations that can create or increase the risk of theft or damage. Thus, it is important to emphasize that, in these cases, only the competent bodies should be informed, and their guidelines followed to avoid these risks.” Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.
Related to GEF Minimum Standard 7: Resource Efficiency and Pollution Prevention: Para. 14.d: Funbio’s ESSP PS3 on Resource Efficiency and Pollution Prevention 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)	Funbio’s ESSP PS3 has been updated. Para. 37 notes that it will not use products that contain substances banned or restricted according to applicable international treaties and agreements or that meet the criteria for carcinogenicity, mutagenicity or toxicity reproduction, as established by the relevant international agencies. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.
Gaps identified related to the Minimum Standards in the GEF Policy on Stakeholder Engagement (as described in GEF/C.57/05)	Expert Review of Agency Updates (2020)
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	Funbio has updated its Policy on Stakeholder Engagement. The revised Policy addresses the identified gap areas as below: <ul style="list-style-type: none"> - Sections III and V specifically require stakeholder consultations throughout the project cycle - Section III stipulates criteria for consultations that align with the GEF criteria for meaningful consultations (constructive, inclusive, balanced, and responsible process, free from manipulation,

<p>required for indigenous peoples), public record of consultations, and broader access to information requirements.</p>	<p>interference, coercion, discrimination, intimidation, gender-sensitive)</p> <ul style="list-style-type: none"> - Paras. 14 and 25 note that every consultation process must be documented and freely available, with confidentiality exceptions where necessary - Sections V and VI reinforce the need for continuous information disclosure to stakeholders throughout the project cycle <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
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Conclusion and Recommendations

4. Funbio has completed its plan of action and its revised Environmental and Social Safeguards Policy and Policy on Stakeholder Engagement address all of the identified gap areas from the earlier assessment. No further actions are required

Conservation International (CI)

5. In the Compliance Assessment presented to the 57th GEF Council meeting (GEF/C.57/05), Conservation International (CI) was assessed against its Environment and Social Management Framework (ESMF- February 2017 version) and supporting procedures and systems. CI's ESMF was comprised 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. The assessment found a range of partial gaps across each of the minimum standards of the GEF Policy on Environmental and Social Safeguards. One partial gap was identified when compared with the GEF Policy on Stakeholder Engagement. CI's policy requirements were found to be fully compliant with the GEF Policy on Gender Equality.
6. In its plan of action (as described in the 57th GEF Council), CI committed to update its ESMF as well as develop guidance materials and safeguard planning templates. In 2020, CI submitted its revised Environmental and Social Management Framework (ver. 7, November 2020) which has been reorganized from the earlier version and includes a range of updates and revisions. Policy 1 on Environmental and Social Safeguards includes new standards on Labor and Working Conditions; Community Health, Safety and Security; Climate Risk and Related Disasters; Private Sector Direct Investments and Financial Intermediaries. The ESMF also includes Policy 2 on Gender Mainstreaming, Policy 3 on Stakeholder Engagement, and Policy 4 on Accountability and Grievance Mechanism, all supported by a range of forms, templates and tools.
7. The table below lists the gaps identified between CI's earlier ESMF and the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement and examines the extent to which CI's updated ESMF addresses these gaps. The report concludes with an overall conclusion and recommendation.

CONSERVATION INTERNATIONAL	
Gaps identified, in 2019, related to the Minimum Standards in the GEF Policy on Environmental and Social Safeguards (as described in GEF/C.57/05)	Expert Review of Agency Updates (2020)
<p>GEF Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring</p> <p>GEF MS1 (Para. 4.f) requires independent expertise in conducting assessments, where appropriate, and use of independent advisory panels for certain projects of high magnitude/impacts): <i>CI's ESMF did not explicitly require independent expertise or use of independent advisory panels.</i></p>	<p>CI's updated ESMF includes ESS1: Environmental and Social Impact Assessment. Para. 43 of this standard addresses the requirements for independent expertise and advisory panels. Based on assessment of new documentation, this gap has now been adequately addressed.</p>
<p>GEF MS1 (Para. 4g) requires third party monitoring to monitor project implementation: <i>Third party monitoring and/or independent audits are not specifically addressed in CI's ESMF.</i></p>	<p>CI ESS1 (para. 44) requires third party monitoring and/or independent audits to monitor implementation or to assess if risk/impact mitigation objectives are being achieved. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS1 (Para. 4.i) requires risks posed by climate change and other natural hazards are considered systematically in the screening, assessment and planning: <i>CI's screening form and ESIA requirements do not systematically address risks of climate change impacts and disaster risks.</i></p>	<p>CI ESS1 (para. 44) requires that projects be screened for short- and long-term risks posed by climate change and other natural hazards. In addition, the revised ESMF includes a new ESS10 on Climate Risk and Related Disasters that calls for project-related climate change risk analysis and mitigation. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS1 (Paras. 4.j and 4.k) requires the consideration of differentiated risks and impacts on disadvantaged and vulnerable groups in the screening, assessment and management process: <i>CI's screening and assessment requirements do not require that differentiated impacts to disadvantaged and vulnerable groups and individuals be</i></p>	<p>CI ESS1 (paras. 48-49) require screening for potential differentiated impacts on disadvantaged and vulnerable groups or individuals and measures to ensure such groups do not face discrimination or prejudice in accessing benefits and resources. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>

<p><i>identified, and that relevant differentiated mitigation measures be implemented. The assessment requirements do not address potential risks of discrimination and prejudice.</i></p>	
<p>GEF MS1 (Paras. 4.m and 4.n) requires gender-related risks and impacts and risks of gender-based discrimination be identified and addressed): <i>CI's 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.</i></p>	<p>CI ESS1 (paras. 51-52) require screening for potential gender-related risks and impacts and appropriate mitigation measures where relevant, including those to address impacts on gender equality, gender-based violence (GBV) and sexual exploitation and harassment (SEAH). Discrimination against women or girls, or any gender-based discrimination, is to be prevented. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEFMS1 (Para. 4.o) requires provision of reporting and response protocols specifically for cases of Gender-Based Violence and/or Sexual Exploitation and Abuse): <i>CI's ESMF does not address the need to establish reporting and response protocols for incidences of GBV.</i></p>	<p>CI ESS1 (para. 53) requires reporting and response protocols for incidences of GBV and SEAH, including special confidential procedures and modalities to provide services and redress to survivors. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 2: Accountability, Grievance and Conflict Resolution</p> <p>GEF MS2 (Paras. 5.f and 6.g) requires appropriate and timely measures to minimize risks of retaliation against complainants): <i>CI's policy does not address the need to take appropriate measures to minimize the risk of retaliation to complainants.</i></p>	<p>CI's ESMF includes Policy 4 on Accountability and Grievance Mechanism. Para. 246 requires anti-retaliation measures be undertaken to minimize risks to complainants. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources</p>	<p>CI's ESS2 (para. 71) requires that mitigation measures for areas of natural habitat be designed to achieve no net loss and preferable a net gain of the associated biodiversity values and/or ecosystem services. Para. 74 further</p>

<p>GEF MS3 (Para. 8.b) requires mitigation strategies for impacts on natural habitats to preferably seek a net gain of biodiversity values and sets criteria for use of offsets): <i>The CI ESMF does not specify that mitigation strategies for adverse impacts on natural habitats 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.</i></p>	<p>stipulates a set of criteria for the use of biodiversity offsets or compensation that align with GEF’s MS3 requirements. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS3 (Para. 8.c) requires that potential risks of significant conversion or degradation of natural habitats from procurement of natural resource commodities be identified and addressed, where feasible): <i>The ESMF does not address this GEF requirement.</i></p>	<p>CI’s ESS2 (para.75) requires avoidance of procurement of natural resource commodities that may contribute to significant conversion or degradation of natural habitats, limiting sourcing to suppliers that can demonstrate that they are not, such as sourcing of certified products or demonstrating progress toward certification. CI’s ESMF Exclusion List also prohibits adverse impacts to critical natural habitats, including from procurement of natural resource commodities. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS3 (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): <i>CI’s ESMF does not address this GEF criteria.</i></p>	<p>CI’s ESS2 (para. 76) requires conformance with applicable frameworks (such as the Nagoya Protocol) in the utilization of genetic resources. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement</p> <p>GEF MS4 (Para. 9.d) includes specification of potential eligibility categories for assistance, including those with formal rights, those without formal rights but recognizable claims, and those without such rights or claims): <i>While CI’s voluntary resettlement Action Plans (V-RAP)s are to be cognizant of all forms of asset ownership or use rights, the requirements are not specific regarding the potential eligibility categories per the GEF criteria.</i></p>	<p>CI’s ESS3 on Resettlement and Physical and Economic Displacement requires that resettlement take place on a voluntary basis (paras. 86, 88). Paras. 93-95 establish various assistance and compensation eligibility criteria that align with the GEF MS4 requirements. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS4 (Para. 9.f) stipulates criteria to be applied in cases of physical displacement, including provision of feasible</p>	<p>CI’s ESS3 (paras. 93 and 95) requires that physically displaced persons be provided with choices of feasible resettlement options (including land-based</p>

<p>resettlement options, land-for-land compensation where possible, and adequate replacement housing and services): <i>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 9f.</i></p>	<p>compensation, where possible, of equal potential and secure tenure), adequate replacement housing, relocation assistance, and assistance to improve, or at least restore livelihoods and living standards. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS4 (Para. 9.g) stipulates that compensation standards for economic displacement impacts include compensation of equal or greater value for loss assets or cash compensation at replacement cost): <i>CI's ESMF does not specifically address this requirement</i></p>	<p>CI's ESS3 (para. 94) regarding economic displacement requires prompt and adequate compensation for the loss of assets or access to assets with replacement property of equal or greater value, or cash compensation at replacement cost. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS4 (Para. 9.h) stipulates assistance standards for persons without formal legal rights to land or claims to such land that could be recognized under national law): <i>CI's ESMF (Policy 3) does not specifically address this requirement</i></p>	<p>CI's ESS3 (para. 95) stipulates the assistance requirements for those without formal land rights or recognizable claims which align with the GEF requirements (resettlement assistance to help improve or at least restore livelihoods, arrangements to obtain adequate housing with security of tenure, and compensation for assets other than land). Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS4 (Para. 9.j) stipulates that timing of compensation, assistance, and benefits be provided before displacement activities begin): <i>CI's ESMF (Policy 3) does not address this requirement</i></p>	<p>CI's ESS3 (para. 96) requires that compensation, assistance and benefits be provided in a timely manner, before activities begin on the acquired land. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 5: Indigenous Peoples GEF MS5 (Para. 11.g) requires that affected groups be informed of their rights, the nature of impacts, and equitable benefit sharing 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>CI's ESMF does not include this requirement</i></p>	<p>CI's ESS4 (para. 112) on Indigenous Peoples requires that where activities include the commercial development of lands and natural resources central to indigenous peoples identity and livelihood, or commercial use of cultural heritage, affected indigenous peoples are to be informed of their rights, under national and international law; the scope and nature of potential impacts, enabling indigenous peoples to determine the extent of such use and to share equitable in derived benefits. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>

<p>GEF MS5 (Para. 11.j) requires that projects recognize, respect and protect indigenous peoples living in voluntary isolation, adopting appropriate measures and avoiding all undesired contact): <i>CI's Policy does not address measures to respect the rights of indigenous peoples living in voluntary isolation per the GEF criteria.</i></p>	<p>CI's ESS4 (para. 113) requires that appropriate measures be adopted to recognize and respect indigenous peoples living in voluntary isolation and to protect their lands, territories and environment, health, culture and to avoid all undesired contact. Activities that would result in undesired contact are not to be processed further. The ESMF Exclusion List also prohibits activities that may result in exploitation of and access to lands and territories of indigenous peoples living in voluntary isolation and in initial contact. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 6: Cultural Heritage The scope of the CI Policy is not as broad as GEF's MS6 which encompasses both tangible (e.g. PCR) and intangible cultural heritage.</p>	<p>CI's ESS6 on Cultural Heritage has been broadened to encompass intangible cultural heritage (para. 137ff.). Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS 6 (Para. 12.d) requires consultations on and avoidance of disclosing information on cultural heritage where such disclosure may jeopardize its safety and integrity): <i>CI's Policy does not address the potential need for confidentiality regarding cultural heritage</i></p>	<p>CI's ESS6 (para. 147) stipulates that jointly with rightsholders, the Executing Agency shall determine whether disclosure of information regarding cultural heritage would compromise or jeopardize its safety or integrity. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS 6 (Para. 12.f) requires ensuring continued access to cultural heritage in the event of restricted access is not addressed): <i>CI's ESMF does not address this requirement.</i></p>	<p>CI's ESS6 (para. 150) requires continued access to cultural heritage where projects introduce restrictions to stakeholder access. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS 6 (Para. 12.g) stipulates criteria regarding potential commercial use of cultural heritage): <i>CI's ESMF did not address these criteria</i></p>	<p>CI's ESS6 (para. 151) requires that projects/programs that involve commercial use of cultural heritage that affected parties shall be informed of their rights under national law and the scope, nature and potential impacts of such use; arrangements are needed for fair and equitable sharing of benefits from such use, provided agreed through an FPIC process. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>

<p>Minimum Standard 7: Resource Efficiency and Pollution Prevention</p> <p>GEF MS7 (Para. 14.a) requires screening and assessment of pollution risks, including risks of wastes, hazardous materials, and climate pollutants): <i>CI's 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.</i></p>	<p>CI's ESMF includes ESS5 on Resource Efficiency and Pollution Prevention. The Standard requires application of a waste management risk hierarchy (para. 127), reduction of project-related GHGs (para. 128) and avoidance and minimization of community exposure to hazardous materials (para. 129). The ESMF Exclusion List also prohibits activities that propose the generation of wastes and effluents and emissions of short- and long-lived climate pollutants. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS7 (Para. 14.d) bans use of pesticides that contain active ingredients that are banned or restricted under applicable international treaties and agreements, or meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies): <i>CI's Policy bans the use of pesticides that fall into WHO classifications 1a and 1b (and limits use of WHO Class II pesticides), but does not specifically address the GEF criteria regarding carcinogenicity, mutagenicity, or reproductive toxicity</i></p>	<p>(CI's ESS5 (at para. 134) has been updated to address the GEF MS 7 para. 14d requirement, prohibiting the use of pesticides that meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS7 (Para. 14.e) requires efficient use of energy, water and other resources and material inputs, and where significant water consumption is involved, measures to avoid or reduce water use to avoid significant adverse impacts on communities, other water users, and the environment): <i>CI's ESMF does not specifically address resource efficiency issues, including issues regarding significant water consumption</i></p>	<p>The CI ESS5 (para. 126) requires application of feasible resource efficiency principles and techniques to improve efficiency in use of inputs and resources. Para. 132 includes requirements regarding high demand for water resources, ensuring that usage does not have significant adverse impacts on communities or ecosystems. It requires application of good industry international practice for water conservation and efficiency. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 8: Labor and Working Conditions</p> <p>CI noted that it did not have requirements regarding labor and working conditions for project workers other than direct employees and projects adhere to relevant national</p>	<p>CI's revised ESMF includes ESS7 (Labor and Working Conditions) which reflects the requirements of GEF MS8 in nearly all respects. Although CI ESS7 does not include specific requirements on forced labor and child labor (that is, beyond calling for consistency with ILO's Declaration Fundamental Principles and Rights at Work), these are covered by the ESMF Exclusion list (prohibiting the</p>

<p>laws and regulations: CI commits to address the criteria of MS8 when it updates its ESMF.</p>	<p>use of forced labor, trafficking in persons and child labor). The child labor prohibition addresses the GEF MS8 requirements regarding minimum age and hazardous work. CI's ESS7 also includes additional provisions regarding migrant workers, facilities and services, primary supplier workers, and third-party contractors. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 9: Community Health, Safety and Security</p> <p>GEF MS9 (Para. 17.a) requires that screening and assessment 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): <i>The CI ESMF does not fully address these requirements.</i></p>	<p>CI's new Standard on Community Health, Safety and Security (ESS8) has been integrated into the ESMF. The Standard addresses all of the GEF MS9 requirements and includes additional provisions regarding risks associated with the influx of project workers, traffic and road safety, and exposure to hazardous materials and substances. ESS8 para. 177 addresses the screening and assessment requirements identified in the gap assessment. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS9 (Para. 17.c) specifies that external experts, separate from design and construction teams, be engaged to review structural components of projects that are situated in high-risk locations): <i>The CI ESMF does not address this requirement.</i></p>	<p>The new CI ESS8 (para. 179) requires use of external experts separate from the design team be involved in the review of structural elements in high risk locations, and to be engaged throughout the project cycle. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Para. 17.d (requires potential need for emergency preparedness plans): <i>The ESMF does not address this requirement.</i></p>	<p>The new CI ESS8 (para. 180) addresses the need for emergency preparedness plans and establishes criteria for such plans. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Para. 17.e: (requires avoidance and minimization of risks of community exposure to disease and the need for analysis of differentiated exposure of disadvantaged and vulnerable groups and individuals): <i>The ESMF does not specifically address this requirement.</i></p>	<p>The new CI ESS8 (para. 181) requires avoidance and minimization of risks of community exposure to disease, taking into account differentiated levels of exposure of disadvantaged and vulnerable groups and individuals. Based on assessment of new documentation provided by Agency, this gap has now been closed.</p>

<p>Para. 17.f (requires that potential risks posed by project security arrangements be identified and addressed): <i>The ESMF does not address this requirement.</i></p>	<p>The new CI ESS8 (para. 184) requires that risks posed by project security arrangements to the potentially affected community be assessed to ensure that those providing security are appropriately vetted, trained and supervised. Allegations of unlawful or abusive acts will be monitored, reviewed, with actions taken to prevent recurrence against individuals and communities. Based on assessment of new documentation provided by Agency, this gap has now been closed.</p>
<p>Gaps identified related to the Minimum Standards in the GEF Policy on Stakeholder Engagement (as described in GEF/C.57/05)</p>	<p>Expert Review of Agency Updates (2020)</p>
<p>GEF MS on stakeholder Engagement (Para. SE16.c) defines criteria for meaningful consultations, i.e. gender responsive; free of manipulation, interference, coercion, discrimination and intimidation; and responsive to the needs and interests of disadvantaged and vulnerable groups): <i>While CI's ESMF Policy 9 notes that SEPs are to include differentiated measures to allow effective participation of vulnerable and disadvantaged, it does not define criteria for meaningful consultations.</i></p>	<p>CI's revised ESMF includes Policy 3 on Stakeholder Engagement. Among many elements, it requires that all CI-GEF funded projects must ensure that stakeholder consultations are gender responsive; free of manipulation, interference, coercion, discrimination and intimidation; and responsive to the needs and interests of disadvantaged and vulnerable groups. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>

Conclusion and Recommendation

8. CI has undertaken a comprehensive revision of its ESMF including the addition of new Environmental and Social Standards. The revised ESMF also includes an expanded set of supporting tools and templates. As indicated by the above review, CI has addressed all of the identified gaps from the earlier compliance assessment and no further action is recommended.

Inter-American Development Bank (IDB)

9. For the assessment presented to the 57th GEF Council meeting, IDB was assessed against its Environment and Safeguards Compliance Policy (ESCP) of 2006, along with the following additional free-standing policies: 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, the Indigenous Peoples Policy (OP-765). A number of gaps were identified compared with GEF's Policy on Environmental and Social Safeguards and one partial gap was identified regarding GEF's Policy on Stakeholder Engagement. IDB was found compliant with the GEF Policy on Gender Equality.
10. In its Plan of Action presented to the 57th GEF Council, IDB committed to produce an entirely new Environmental and Social Policy Framework (ESPF) and associated guidance notes, which would address gaps identified in the assessments. The IDB 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.
11. The Bank promised to incorporate a comprehensive set of Environmental and Social Performance Standards (ESPS), which would describe the requirements that the Borrower/client/recipient must meet in the development and implementation of operations that are financed by the IDB. The Bank expects 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 would 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.
12. The table below lists the gaps identified between the earlier ESCP and the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement and examines the extent to which the IDB's new ESPF addresses these gaps. The report concludes with an overall recommendation.

INTER-AMERICAN DEVELOPMENT BANK (IDB)	
Gaps identified related to the Minimum Standards in the GEF Policy on Environmental and Social Safeguards (as described in GEF/C.57/05)	Expert Review of Agency Updates (2020)
<p>Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring</p> <p><i>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</i></p>	In Section 3.16 of IDB’s new ESPF, the procedures for screening are made clear. Screening takes place against all of IDB’s new environmental and social standards (ESSs) on Labor and Working Conditions, and Community Health, Safety and Security. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.
GEF MS1 (Para. 4d) 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): <i>There is no focus on recognition for periodicity in the ESCP.</i>	Based on assessment of new documentation provided by Agency, the new IDB ESPF does not specifically address this gap (please see recommendations below).
GEF MS1 (Para. 4g) requires third party monitoring to monitor project implementation): <i>IDB does not have any specific requirement for third party monitoring to be used for monitoring project implementation.</i>	Section 3.8 of IDB’s new ESPF states that: “In accordance with project-specific circumstances and in consideration of the nature of the environmental and social risks, the IDB may require the Borrower to engage stakeholders and third parties, such as independent experts, local communities, or civil society organizations, to complement or verify project monitoring information”. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.
GEF MS1 (Para 4j) requires the consideration of disadvantaged and vulnerable groups (4j) as well as people with disabilities (4l) in the screening process): <i>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</i>	Para 14 of IDB’s new ESPF states that, “in the process of identifying individuals, groups, and communities that may be directly and disproportionately affected by the project, the Borrower is required to consider diverse cross-sectional groups historically disadvantaged in Latin America and the Caribbean, such as women, people of diverse sexual orientations and gender identities, persons with disabilities, Afro-descendants, and Indigenous and Traditional Peoples.

<p><i>disadvantaged or vulnerable groups in the project screening requirements outside of "consultation".</i></p>	<p>When those are identified as disadvantaged, the Borrower must propose and implement differentiated measures to avoid adverse impacts falling disproportionately on them". Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS1 (Para. 4o) requires the provision of reporting and response protocol specifically for cases of Gender-Based Violence and/or Sexual Exploitation and Abuse: <i>IDB does not have such a reporting and response protocol</i></p>	<p>The following paragraphs of the new ESPF address this issue:</p> <ul style="list-style-type: none"> • ESPS2 on Labor and Working Conditions (para 22): The Borrower will provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns and provisions for special protection for reports of sexual and gender-based violence. The Borrower will inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them in a language they understand. The mechanism will involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without retribution. The mechanism will also allow for anonymous or confidential complaints to be raised and addressed. • ESPS9 on Gender Equality: (para 18) ensuring the availability of effective grievance mechanisms that minimize the reporting burden on victims, provide services in a gender-sensitive manner, and minimize reprisal risk. These mechanisms should have specific procedures or SGBV, including confidential reporting with safe and ethical documentation; and (Para 13) stating that where such risks are identified, the Borrower will support measures such as communication and awareness campaigns, development of community prevention plans, contractors' codes of conduct, survivor support, and reporting systems. <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 2: Accountability, Grievance and Conflict Resolution</p> <p>GEF MS2 (Para. 5f) requires that a given agency takes appropriate and timely measures to minimize the risk of retaliation to complainants: <i>IDB does allow for</i></p>	<p>The following paragraphs of the new IDB ESPF address this issue including</p> <ul style="list-style-type: none"> • The Policy Statement (Grievance Mechanism, Section 7.2) states that IDB does not tolerate retaliation, such as threats, intimidation, harassment, or violence, against those who voice their opinion or opposition to an IDB-

<p><i>confidentiality of complainants and r, there is no requirement/policy for protection against retaliation</i></p>	<p>financed project or to the Borrower. The IDB takes seriously any credible allegations of reprisals.)</p> <ul style="list-style-type: none"> • IDB ESPS 1 (para 33): (consultation) is free of external manipulation, interference, coercion, discrimination, retaliation, and intimidation • IDB ESPS 10 (para 22): (meaningful consultation) is free of external manipulation, interference, coercion, discrimination, retaliation, and intimidation • IDB ESPS 10 (para 28): The Borrower will address allegations of retaliation, abuse, or discrimination and take appropriate remedial measures <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS2 (Para. 6i) 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: <i>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.</i></p>	<p>The following paragraphs of the new IDB ESPF address this issue:</p> <ul style="list-style-type: none"> • Policy Statement (IDB’s Commitment to Environmental and Social Sustainability), Section 1.3: The IDB requires its Borrowers to identify stakeholders potentially affected by and/or interested in IDB-financed projects, to engage with them in meaningful consultations free of fear of reprisals using accessible formats for different physical, sensory, and/or cognitive needs, and to develop and implement an accessible grievance mechanism for them to provide feedback, concerns, and inquiries in accordance with ESPPs 1 and 10. • Policy Statement (Roles and Responsibilities), Section 3.10: The IDB requires that Borrowers implement a grievance mechanism to receive and assist with the resolution of any concerns and grievances of stakeholders (project-affected people and interested parties) that may arise in connection with the project’s environmental and social performance. The grievance mechanism will be proportionate to the level of risk and impacts of the project. • Policy Statement (Grievance Mechanism) Section 7.1: The IDB requires its Borrowers to implement an effective grievance mechanism to receive and assist with the resolution of any concerns and grievances of stakeholders that may arise in connection with the project’s environmental and social performance.

	<p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources</p> <p>GEF MS3 (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: <i>This issue is not explicitly addressed by IDB in the ESCP.</i></p>	<p>The following paragraph of the new IDB ESPF addresses this issue:</p> <ul style="list-style-type: none"> • ESPS 6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources) para 25: Borrowers who are engaged in the primary production or harvesting of living natural resources—including natural and plantation forestry, agriculture, animal husbandry, aquaculture, and fisheries—will be subject to the requirements of paragraphs 26–29 below, in addition to the requirements in the rest of this ESPS. Where feasible, the Borrower will locate land-based agribusiness and forestry projects on unforested land or land already converted. Borrowers who are engaged in such activities will manage living natural resources in a sustainable manner, through the application of industry-specific good management practices and available technologies. <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS3 (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: <i>This issue is not addressed in the ESCP.</i></p>	<p>While benefit sharing is discussed in some detail in the Indigenous Peoples ESPS (7), there is no explicit mentioning of access and benefit sharing in the utilization of genetic resources in the new IDB ESPF. While, broader issues related to the GEF MS3 have been adequately addressed, the assessment of new documentation provided by Agency indicate that new IDB ESPF still does not explicitly address this issue (please see recommendation below).</p>
<p>Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement</p> <p>GEF MS4 (Para. 9i) stipulates that forced eviction without the provision of and access to appropriate forms of legal and other protection is prohibited: <i>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.</i></p>	<p>The second Objective of IDBs new ESPS 5 (Land Acquisition and Involuntary Resettlement) is to avoid forced eviction. In addition, paragraph 22 of the same ESPS states that: In the case of physically displaced persons under paragraph 17 (iii) above, the Borrower will offer them a choice of options for adequate housing with security of tenure so that they can resettle legally without having to face the risk of forced eviction. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>

<p>Minimum Standard 5: Indigenous Peoples</p> <p>GEF MS5 (para. 10a) includes provisions for the loss of access as a requirement for triggering Free Prior Informed Consent: The IDB (Op-765) <i>showed a general lack of detail on whether land use or the loss of access does in fact trigger the requirement for FPIC.</i></p>	<p>The following paragraph of the new IDB ESPF addresses this issue:</p> <p>IDB ESPS7 on Indigenous Peoples (para 14): Project-Affected Communities of Indigenous Peoples may be particularly vulnerable to the loss of, alienation from or exploitation of their land, territories, and access to natural and cultural resources. In recognition of this vulnerability, in addition to the General Requirements of this ESPS, the Borrower will obtain the FPIC of the Project-Affected Communities of Indigenous Peoples in the circumstances described in paragraphs 16–21 of this ESPS). Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS5 (para. 11e) requires that Grievance and conflict resolution systems are established, which are culturally appropriate, available in local languages, accessible to affected Indigenous Peoples: <i>There is no specific IDB policy that requires the establishment of a grievance and conflict resolution system, but only recommendation when appropriate.</i></p>	<p>The IDB ESPF Part 1 (Policy Statement) and section 7 (Grievance Mechanism and Accountability) outlines IDBs new approach to dealing with grievances. The new IDB grievance mechanisms are addressed in the IDB ESPS (4,5,7, and 10) and established as part of the assessment and management of risks in ESPS 1 (para 39) on the Assessment and Management of Environmental and Social risks and Impacts. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 6: Cultural Heritage</p> <p>The GEF MS6 (Para. 12f) requires, where feasible, that continued access to cultural heritage sites is arranged in consultation with stakeholders: <i>IDB has not provided any evidence or information for this element and it is not covered in the Bank’s ESCP.</i></p>	<p>The following paragraph of the new IDB ESPF addresses this issue:</p> <p>IDB ESPS8 on Cultural Heritage (para 9) state that: Where the Borrower’s project site contains cultural heritage or prevents access to previously accessible cultural heritage sites being used by, or that have been used by, the project-affected people within living memory for long-standing cultural purposes, the Borrower will, based on consultations, allow continued access to the cultural site or will provide an alternative access route, subject to overriding health, safety, and security considerations. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>The GEF MS6 (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: <i>There is no evidence provided by</i></p>	<p>The following paragraph of the new IDB ESPF addresses this issue:</p> <p>IDB ESPS8 ESPS 8 on Cultural Heritage (para 15) state that: Where a project proposes to use the cultural heritage, including knowledge, innovations, or practices of local communities, for commercial purposes, the Borrower will</p>

<p><i>IDB to demonstrate that the Bank is compliant with this section of the GEF's specific criterion of MS 6.</i></p>	<p>inform these communities of (i) their rights under national law, (ii) the scope and nature of the proposed commercial development, and (iii) the potential consequences of such development. The Borrower will not proceed with such commercialization unless it (i) enters into a process of ICP as described in ESPSs 1 and 10, and which uses a good faith negotiation process that results in a documented outcome and (ii) provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with their customs and traditions.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 8: Labor and Working Conditions IDB has no specific policy or standard that address GEF MS8 minimum standards on labor and working conditions</p>	<p>The new IDB ESPF addresses labor and working conditions (ESPS 8) and based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 9: Community Health, Safety and Security IDB has no specific policy or standard that address GEF MS9 minimum standards on Community Health, Safety and Security</p>	<p>The new IDB ESPS addresses community health, safety and security (ESPS 4) and based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Gaps identified related to the Minimum Standards in the GEF Policy on Stakeholder Engagement (as described in GEF/C.57/05)</p>	<p>Expert Review of Agency Updates (2020)</p>
<p><i>There is no specific IDB policy that addresses the need 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.</i></p>	<p>IDB new ESPS deals with stakeholder engagement and information disclosure. IDB (ESPS 10) now includes provisions on how information should be disclosed to stakeholders. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>

Conclusion and Recommendations

13. In its documentation presented to GEF prior to the 57th Council, IDB indicated that it was aware of gaps between its existing safeguard policies and the relevant Policies of the GEF. It indicated that it would be undertaking a “modernization” process in 2020. This process has been completed, and the new Environmental and Social Framework was published in September 2020.
14. The ongoing assessment undertaken in this report shows that IDB is now entirely compliant with the three GEF Policies, with the exception of two components (recognition of seasonal variation in baseline studies and benefit-sharing with regard to utilization of genetic resources). Given the rigor of IDB’s approach to developing its new ESPF, and that fact that it is now significantly in line with new developments in environmental and social safeguard thinking, it is suggested that these are only minor gaps. They could possibly be addressed internally, through the development of safeguard-specific Guidance Notes.

International Union for Conservation of Nature (IUCN)

15. At the 57th GEF Council meeting, the expert assessment of Agencies' Compliance with the Policy on Environmental and Social Safeguards, the Policy on Gender Equality, and the Policy on Stakeholder Engagement was presented (i.e. GEF/C.57/05). This review/report included an assessment of the alignment between the IUCN ESMS Manual (as well as other relevant IUCN policies, procedures, guidelines, and systems) and the various requirements of the GEF Policies.
16. During the assessment, several compliance gaps were identified compared to GEF's Policy on Environmental and Social Safeguards. One partial gap was identified regarding GEF's policy on Stakeholder engagement and IUCN was found fully compliant with the GEF Policy on Gender Equality. IUCN acknowledged the findings of the expert assessment and confirmed its commitment to implement the recommendations to address the identified gaps. IUCN's plan of action included 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 (which was 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 (which was expected to be approved by IUCN Senior Management by 31 December 2019); and revise IUCN's Grievance Mechanism Guidance Note (which was expected to be approved by IUCN Senior Management by 31 January 2020).
17. In correspondence with the GEF Secretariat on September 9th 2020 and October 19th 2020, IUCN provided documentation confirming that it had: updated its ESMS Questionnaire; adjusted its Standard on Indigenous Peoples and the Standard on Cultural Heritage; and, produced new or updated Guidance Notes on Environmental and Social Assessment and Monitoring, and on Grievance Mechanism.
18. The table below lists the gaps identified between the earlier IUCN ESMS/supporting documentation and the GEF Policies on Environmental and Social Safeguards and Stakeholder Engagement and examines the extent to which IUCN's new ESMS and documentation address these gaps. The report concludes with an overall recommendation.

INTERNATIONAL UNION FOR CONSERVATION OF NATURE (IUCN)	
<p>Gaps identified related to the Minimum Standards in the GEF Policy on Environmental and Social Safeguards (as described in GEF/C.57/05)</p>	<p>Expert Review of Agency Updates (2020)</p>
<p>Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring</p> <p>GEF MS1 (Para. 4a) requires that projects and programs are screened as early as possible to identify Environmental and Social Risks: <i>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.</i></p>	<p>IUCN has undertaken revisions to its ESMS questionnaire. These include the following revision/additions:</p> <ul style="list-style-type: none"> - an ESMS Questionnaire that now has a section devoted to assessing Labour and Working conditions risks (Section B5 of the ESMS Questionnaire); and provisions for Community Health, Safety, and Security-related risks (dealt with in section B4 of the revised ESMS Questionnaire) <p>Screening, assessing and managing risks/impacts related to Labor and Working conditions and CHSS are also now outlined within the newly produced Environmental and Social Management System (ESMS) Guidance Note on “Assessment and Management of Environmental and Social Risks” (approved 15th, October 2020). Sections 6.4 and 6.5 of this Guidance Note explicitly deal with assessing risks relating to: Labour and working conditions; and Community, Health Safety and Security, respectively. The Guidance on both of these key thematic areas are now in aligned to the requirements of GEF’s new Policy on Environmental and Social Safeguards.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS1 (para. 4 m) requires the provision of specific screening for gender-based violence and sexual exploitation and abuse: <i>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</i></p>	<p>IUCN has undertaken revisions to its ESMS questionnaire. Part of this revision includes a newly proposed set of questions concerning risks related to GBV and SEAH:</p> <ul style="list-style-type: none"> - Adverse gender-related impacts (including GBV) are outlined in section B.1 of the ESMS questionnaire. - Screening, assessing and managing gender-related risks/impacts is also outlined within the newly produced Guidance Note on “Assessment and Management of Environmental and Social Risks” (approved 15th, October

<p><i>and Sexual exploitation and abuse included in the screening questionnaire.</i></p>	<p>2020). This is most evident in Section 6.1 <i>Adverse gender-related impacts, including gender-based violence</i>, which includes the following elements (amongst others): Screening for GBV-related risks, Gender Analysis and Assessment of gender-related adverse impacts, Management of risks, and institutional arrangements with partners).</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 2: Accountability, Grievance and Conflict Resolution</p> <p>GEF MS2 (para. 5f) requires that a given agency takes appropriate and timely measures to minimize the risk of retaliation to complainants: <i>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.</i></p>	<p>Risk of retaliation (within the context of GRMs) has now been addressed by the updated Guidance Note on the “ESMS Grievance Mechanism”. The main adjustment that has been undertaken includes references/requirements on protection against retaliation. Protection against retaliation is now included as one of the core good practice principles of this guidance note.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 5: Indigenous Peoples</p> <p>GEF MS5 (para 11e) requires that Grievance and conflict resolution systems are established, which are culturally appropriate, available in local languages, accessible to affected Indigenous Peoples: <i>This is not explicitly outlined in the IUCN Standard on Indigenous Peoples.</i></p>	<p>IUCN has undertaken amendments to its Standard on Indigenous Peoples. It now includes explicit requirements for access to culturally appropriate Grievance Redress Mechanism (Paragraph 27)</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>GEF MS5 (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, 82 Annex I 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:</p>	<p>People living in voluntary isolation or initial contact is a new addition to the IUCN standard on Indigenous Peoples. The requirements/considerations for people living in voluntary isolation have been included in: Paragraph 5 (iv); Paragraph 8 (v), and Paragraph 24 of the Indigenous Peoples standard.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>

<p><i>In the IUCN ESMS Questionnaire, under Section B, there is a question that seeks to assess/establish the impact that a given 69 Annex I 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.</i></p>	
<p>Minimum Standard 6: Cultural Heritage</p> <p>GEF MS6 (para. 12c) requires that qualified experts, local people, and other relevant Stakeholders are also consulted on whether disclosure is appropriate, given that information regarding Cultural Heritage may be confidential, if disclosure would compromise or jeopardize the safety or integrity of the Cultural Heritage or would endanger sources of information: <i>IUCN, and its Standard 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</i></p>	<p>IUCN’s adjusted Standard on Cultural Heritage, include additions with regards to consultation with qualified experts on whether disclosure is appropriate in the context of cultural heritage (Paragraph 17, page 4).</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.</p>
<p>Minimum Standard 7: Resource Efficiency and Pollution Prevention</p> <p><i>Resource efficiency and pollution prevention are not codified in the IUCN ESMS Policy Framework as a distinct safeguard standard. In its self-assessment, IUCN 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.</i></p>	<p>Screening, assessing and managing resource efficiency/ pollution-related risks/impacts has been incorporated in IUCN’s newly produced Guidance Note on “Assessment and Management of Environmental and Social Risks” (approved 15th, October 2020). Most explicitly in Section 6.6: <i>Resource Efficiency and Pollution Prevention</i>. A key requirement of this section of the Guidance Note, is the strict avoidance of any activities that would involve promoting the trade in or use of any substances listed under the Stockholm Convention on Persistent Organic Pollutants, or other chemicals or hazardous materials subject to international bans, restrictions or phase-outs due to high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential depletion of the ozone layer, consistent with relevant international treaties and agreements. Resource Efficiency and Pollution Prevention is now</p>

	also addressed in the newly amended ESMS Screening Questionnaire, under section B.6 (questions 26-30). Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed.
<p>Minimum Standard 8: Labor and Working Conditions</p> <p><i>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.</i></p>	<p>The documentation provided by IUCN indicate that the requirements of GEF MS8 have been embedded in both the ESMS Screening questionnaire and the Guidance Note on “Assessment and Management of Environmental and Social Risks” (approved 15th, October 2020). While, IUCN has not developed a free-standing Standard on Labour and Working Conditions. The IUCN ESMS Questionnaire (Section B.5) now includes a number of relevant questions that indicate compliance)</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed. It is, however, recommended that IUCN explicitly include “Freedom of Association” as one of the elements addressed in the IUCN ESMS Screening questionnaire that IUCN considers to develop a free-standing standard on Labour and Working Condition in any update it undertakes on its ESMS.</p>
<p>Minimum Standard 9: Community Health, Safety and Security</p> <p>IUCN does not have a specific ESMS standard for Community Health and Safety. Certain aspects of this GEF MS are evident throughout the ESMS Manual and associated Policy Framework.</p>	<p>While, IUCN does not have a free-standing standard on Community Health, Safety and Security, the requirements of GEF MS9 are covered; throughout the ESMS Manual, and in section B.4 (questions 14-20) of the ESMS Questionnaire, and in section 6.4 of the Guidance Note on “Assessment and Management of Environmental and Social Risks” (approved 15th, October 2020).</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed</p>
<p>GEF MS9 (para. 17a) requires the screening and assessment of risks or potential impacts to the health, safety and security of project- or program-affected communities): <i>Considerations for the risk of exposure of communities to both natural and accidental hazards (17, a, i) is not sufficiently outlined in IUCN’s ESMS questionnaire</i></p>	<p>Risks of both natural and accidental hazards occurring is now addressed by the new addition of question 19 in IUCN ESMS Questionnaire which states “Is there a likelihood that project activities lead to accidents and exposure of communities to hazardous substances, including accidents involving vehicles and equipment and risks related to infrastructure built by the project, in particular in areas subject to natural hazards (floods, hurricanes, earthquakes, etc.).”</p>

	<p>While, based on assessment of new documentation provided by Agency, this gap has now been adequately addressed, it is recommended that IUCN considers developing a free-standing standard on Community Health, Safety and Security as part of any planned its ESMS.</p>
<p>GE MS9 (para. 17d) requires the development of emergency preparedness plans: <i>This requirement for the development of emergency preparedness plans is not addressed by any of IUCN’s policy or guidance note.</i></p>	<p>Section 6.4 <i>Community Health, Safety and Security risks</i> of the Guidance Note on “Assessment and Management of Environmental and Social Risks” (approved 15th, October 2020), explains IUCN’s guidance/approach to emergency preparedness. On page 38 (section 6.4) it states “Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts or in other situations as deemed relevant, emergency preparedness plans are prepared to allow responding to accidental and emergency situations associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment”. This is further supported by Annex 1 of the Guidance Note “Outline of an Emergency Preparedness Plan”. While, based on assessment of new documentation provided by Agency, this gap has now been adequately addressed, it is recommended that IUCN considers developing a free-standing standard on Community Health, Safety and Security as part of any planned its ESMS.</p>
<p>Gaps identified related to the Minimum Standards in the GEF Policy on Stakeholder Engagement (as described in GEF/C.57/05)</p>	<p>Expert Review of Agency Updates (2020)</p>
<p>Minimum standards in the GEF policy on Stakeholder Engagement (para. 16e) requires access to timely, relevant and understandable information about activities implemented by the Agency, and clear procedures to request information: <i>IUCN’s 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.</i></p>	<p>IUCN’s new Guidance Note on Stakeholder Engagement in IUCN Projects (Section 7) deals with disclosure requirements along the project cycle, including provisions for public access to information at different project cycle points. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed</p>

Conclusion and Recommendations

19. A comparison was undertaken between the sub-criteria of the GEF Environmental and Social Safeguards minimum standards, and the changes/adjustments undertaken by IUCN to its: Standard on Indigenous Peoples; Standard on Cultural Heritage; ESMS Questionnaire; Guidance Note on ESMS Grievance Mechanism; and the production of a new Guidance Note on Assessment and Management of Environmental and Social Risks. This comparison addressed the compliance gaps that were first identified in GEF/C.57/0513. The changes/adjustments made by IUCN has addressed all of these gaps, except the issue of Freedom of Association, which is not addressed in Question 21 of the ESMS questionnaire. It is recommended that IUCN explicitly include “Freedom of Association” as one of the elements addressed by question 21 in section B.5 of the ESMS Questionnaire.
20. In addition, IUCN still does not have free-standing standards on: Resource Efficiency and Pollution Prevention; Labor and Working Conditions; or, Community Health, Safety and Security. IUCN should ensure that any future updates to its ESMS Manual and supporting documents should include the production of free-standing standards that address the requirements and sub-criteria of GEF MS7, MS8, and MS9.

¹³ Report on the Assessment of Agencies’ Compliance with Minimum Standards in the GEF Policies on: Environmental and Social Safeguards; Gender Equality; and Stakeholder Engagement

UN Environment (UNEP)

21. For the assessment presented to the 57th GEF Council meeting, UNEP was assessed against its Environmental, Social, and Economic Sustainability Framework (ESESF). This Framework set minimum sustainability standards for UNEP and its implementing/executing partners, and enabled UNEP to anticipate and manage emerging environmental, social and economic issues. During the expert compliance assessment (which was presented at 57th GEF Council meeting) UNEP was found to have a number of compliance gaps compared to the GEF Policy on Environmental and Social Safeguards. No gaps were identified for the GEF Policies on Stakeholder engagement and Gender Equality.
22. In its Plan of Action presented to the 57th GEF Council, UNEP committed to produce an Update Policy on Environmental and Social Sustainability Framework (ESSF), along with guidelines and screening tools. UNEP has provided both an updated ESSF and associated screening material (SRIF). The ESSF was approved by the UNEP Executive Director on February 25th, 2020. UNEP is currently finalizing Guidance Notes to accompany the ESSF and is also planning training/workshops to further strengthen its own internal capacity on safeguard related issues.
23. The table below lists the gaps identified between the earlier ESSF and the GEF's new policies and examines the extent to which the updated UNEP Framework has addressed these gaps. The report concludes with an overall recommendation.

UN ENVIRONMENT (UNEP)	
Gaps identified related to the Minimum Standards in the GEF Policy on Environmental and Social Safeguards (as described in GEF/C.57/05)	Expert Review of Agency Updates (2020)
<p>Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring</p> <p>GEF MS1 (para. 4a) requires that projects and programs are screened as early as possible to identify Environmental and Social Risks): <i>There is a lack of consideration for key GEF minimum standard MS 9: Community Health, which is not explicitly covered in UNEP’s standards.</i></p>	<p>In the updated UNEP ESSF, a new standard on community health and safety has been included (SS4: Community Health, Safety, and Security).</p> <p>The Safeguard Risk Identification Form (SRIF), also now encompasses all GEF Minimum Safeguard Standards, including a specific set of project screening questions for Community, Health and Safety risks, aligned with key GEF MS 9 requirements.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed</p>
<p>GEF MS1 (para. 4c) requires that agencies offset residual impacts where avoidance or prevention, minimization, mitigation, and management are not feasible: <i>UNEP’s Offsetting harm" is not part of the UN Environment risk management hierarchy.</i></p>	<p>Offsetting harm, where residual impacts remain, is now addressed in UNEP’s updated ESSF. This is explicitly addressed in “Annex II: Safeguard Risk categories, assessment criteria and related mitigation approaches” (ESSF, Page 46). This section states: “The assessment applies a mitigation hierarchy by (a) anticipating and avoiding risks and impacts;; (b) where avoidance is not possible, minimizing or reducing risks and impacts; (c) once risks and impacts have been minimized or reduced, mitigating them; and (d) where residual adverse impacts remain, <i>compensating for or offsetting them</i>, where technically and financially feasible”. Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed</p>
<p>GEF MS1 (Para. 4d) 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): <i>There is a lack of recognition for periodicity and other variability that may require more robust baseline data in the ESESF.</i></p>	<p>The revised UNEP ESSF (Annex II: “Safeguard Risk categories, assessment criteria and related mitigation approaches) explicitly references the” direct recognition for considerations of periodicity and /or other variability). It states that: “Baseline data will be collected at an appropriate level of detail, recognizing variability over time (e.g. seasonal variations, movement of people) may require additional data collection Based on assessment of new</p>

	documentation provided by Agency, this gap has now been adequately addressed
GEF MS1 (para 4f) requires that Independent expertise is used in the assessment of Environmental and Social Risks and Impacts): <i>UNEP does explicitly mention the requirement for independent advisory panels</i>	The revised UNEP ESSF (Annex II: “Safeguard Risk categories, assessment criteria and related mitigation approaches(page 47)) explicitly includes provisions related to the direct guidance on the use of expert advisory panels for high risk projects, stating “For highly risky, complex or contentious activities, an independent advisory panel needs to be utilized” Based on assessment of new documentation provided by Agency, this gap has now adequately addressed
GEF MS1 (para. 4g) 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: <i>There is no mention of the potential use of third-party monitoring in UNEP’s ESESF</i>	The revised UNEP ESSF (para 65, section 4 on “Operationalizing the Framework” (page 18)) now includes explicit mentioning of the need for third party monitoring (para 65 states “Where appropriate, monitoring shall engage stakeholders and third parties, such as affected communities, independent experts, or NGOs, to complement or verify monitoring activities”). Based on assessment of new documentation provided by Agency, this gap has now adequately addressed
GEF MS1 (para 4i) requires that short- and long-term risks posed by climate change and other natural hazards are considered systematically in the screening: <i>Climate change and disaster risks are currently not explicitly included in the current UNEP’s ESESF.</i>	The revised UNEP ESSF includes a new safeguard standard devoted to “Climate Change and Disaster Risks” (safeguard Standard 2). This requires project screening against requirements of SS2 as part of the updated SRIF. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed
GEF MS1 (para 4l) requires the consideration of people with disabilities in the screening process: <i>There is no specific mention of inclusion of disability in the project screening requirements of UNEP.</i>	The revised UNEP ESSF includes considerations for people with disabilities. It is now addressed in project screening, through the SRIF and Guiding Principle (e.g. Question 2 of the SRIF states) the GP2, for example, states “Has the project identified and engaged vulnerable, marginalized people, including disabled people, through the informed, inclusive, transparent and equal manner on potential positive or negative implication of the proposed approach and their roles in the project implementation?” Based on assessment of new documentation provided by Agency, this gap has now adequately addressed
GEF MS1 (paras. 4 m,n,o) require the provision of specific screening for gender-based violence and sexual exploitation and abuse	The revised UNEP ESSF includes specific references to project screening of GBV-related risks. UNEP’s new Guiding Principle (para. 14 (page 6) states “UNEP projects and programmes will “Identify and address risks of potential exposure of affected people to gender-based violence and other abuse that may occur in

<p><i>These issues are not addressed in the ESESF or any other related safeguarding policy</i></p>	<p>connection with any of UNEP’s supported activities. GBV related risks are also addressed in the Guiding Principle questions of the SRIF. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>Minimum Standard 2: Accountability, Grievance and Conflict Resolution</p> <p>GEF MS2 (para. 5f) requires that a given agency takes appropriate and timely measures to minimize the risk of retaliation to complainants: <i>the UNEP ESESF does not deal with minimizing the risk of retaliation to complainants.</i></p>	<p>Risk of retaliation (within the context of GRMs) has now been addressed by the updated UNEP ESSF (Para. 73 of the ESSF). The sub-section on UNEP’s Grievance Redress states “measures will be undertaken to identify, address and reduce the risk of retaliation or reprisals against people accessing local grievance redress processes.” Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources</p> <p>GEF MS3 (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: <i>In UNEP’s 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.</i></p>	<p>The revised UNEP ESSF (SS1: Biodiversity, Ecosystems, and Sustainable Natural Resource Management) now includes requirement (SS1.17) “Primary Suppliers”, covering potential adverse risks/impacts arising through the supply chain. In addition, it states (section 1.17) “When purchasing natural resource commodities, where possible, limit procurement to those primary suppliers that can demonstrate that they are not contributing to significant conversion or degradation of natural or critical habitats.”</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS3 (para. 8.d) requires that any project- or program-supported production or harvesting of living natural resources is carried out consistent with good sustainable management practices: <i>UNEP 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.</i></p>	<p>The revised UNEP ESSF (SS1: Biodiversity, Ecosystems, and Sustainable Natural Resource Management, of the updated ESSF), now has a provision devoted to the sustainable management of living natural resources. Section 1.16 states that UNEP shall: “Ensure sustainable management of living natural resources in accordance with Article 10 of the CBD. Apply appropriate industry-specific best management practices and, where codified, credible certification and independent verification systems. Where relevant, support small-scale landholders to harvest and produce living natural resources in a sustainable manner. (page 24, ESSF)”. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS3 (para 8e) states that projects and programs involving forest restoration maintain or enhance</p>	<p>The revised UNEP ESSF (SS1: Biodiversity, Ecosystems, and Sustainable Natural Resource Management) now has a provision (1.5) that address potential</p>

<p>biodiversity and ecosystem functionality: <i>No explicit/distinct reference is made in UNEP's SS1 to the potential impacts that could be associated with forest restoration</i></p>	<p>impacts/risks involved with forest restoration activities. Section 1.5 of SS1 (page 22), states: "Ensure programmes and projects involving forest restoration maintain or enhance biodiversity and ecosystem functionality, and are environmentally appropriate, socially beneficial and economically viable." Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS3 (para 8f) requires that supported activities conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources: <i>Access and benefit sharing is not covered by any UNEP policy and is not addressed in the ESESF.</i></p>	<p>The revised UNEP ESSF (SS1: Biodiversity, Ecosystems, and Sustainable Natural Resource Management) now has a provision (1.15), that addresses requirements relating to Access and Benefit Sharing. Section 1.15 of SS1, states: "For programmes and projects that involve the utilization of genetic resources, ensure that the collection of such resources is conducted sustainably and that benefits derived from their utilization are shared in a fair and equitable manner, consistent with applicable access and benefit sharing (ABS) measures in the utilization of genetic resources in accordance with the CBD (Article 15) and its Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization". The addition of the requirements on ABS, as presented in section 1.15 of SS1 now meet the GEF MS requirements in this regard. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>Minimum Standard 5: Indigenous Peoples GEF MS5 (para. 10c) requires that FPIC be obtained when there are significant impacts on an Indigenous People's Cultural Heritage: <i>Impacts on cultural heritage are not explicitly included in UNEP's SS5 as a cause for the triggering of FPIC.</i></p>	<p>The revised UNEP ESSF (Safeguard Standard 7) deals with safeguard requirements concerning risks/impacts to indigenous peoples. SS7 has a new provision concerning the need for FPIC of IPs in situations where an impact on their cultural heritage is foreseen. This is explicitly addressed by section 7.18 of SS7 (page 40, ESSF), which states: "In addition to the relevant requirements under Safeguard Standard 5: Cultural Heritage, where supported activities may lead to significant adverse impacts to the cultural heritage of indigenous peoples, consult and cooperate in good faith with the affected indigenous peoples with the objective of obtaining their free, prior and informed consent before the approval of the relevant activities. If indigenous peoples affected by programme or project activities hold the location, characteristics or traditional use of cultural heritage in secret, put in place measures to maintain their confidentiality." Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>

<p>GEF MS5 (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: <i>There is no explicit requirement in UNEP’s SS5 for compensation to be considered as proportionate to the nature and scale of the impacts.</i></p>	<p>The revised UNEP ESSF (Section 1.12 of SS7, addresses the requirements concerning avoidance of impacts to Indigenous Peoples, lands and their cultural heritage). Section 1.12 (page 39) states: “Avoid adverse impacts on indigenous peoples to the maximum extent possible, including exploration of alternative programme or project strategies, designs and locations or consideration of not proceeding with the activities. Where avoidance of adverse impacts is not possible, minimize and mitigate residual impacts in a culturally appropriate manner per the mitigation hierarchy.” Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS5 (para 11c) states that mitigation and compensation plans are developed through Meaningful Consultations with the affected Indigenous Peoples that are gender and inter-generationally inclusive: In UNEP’s SS5 there is a lack of explicit inclusion of requirements for <i>“meaningful consultation to be gender and intergenerationally inclusive”</i>.</p>	<p>The revised UNEP ESSF includes a section (SS7) that addresses the need for meaningful consultation to be gender and intergenerationally inclusive. Section 7.9 (page 38 of the updated ESSF) now states that: “Engagement processes should be gender and inter-generationally inclusive, paying particular attention to groups and individuals at risk of marginalization and exclusion.” Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS5 (para 11e) requires that grievance and conflict resolution systems are established, which are culturally appropriate, available in local languages, accessible to affected Indigenous Peoples: <i>UNEP does not have any explicit mention of the requirement for a GRM to be culturally appropriate and available in local languages specifically for affected IPs.</i></p>	<p>The revised UNEP ESSF (Section 7.20, page 41) outlines UNEP’s approach to GRMs for projects and programs that may impact indigenous peoples. This section now includes the requirement for GRMs to be culturally appropriate and to be developed with due consideration for customary dispute settlement mechanisms. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS5 (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: <i>UNEP does not does mention in SS5 any requirements of projects to inform IPs of their rights under national law with respect to commercial development</i></p>	<p>The revised UNEP ESSF has addressed through their update many identified gaps related to GEF MS5. As there still is no explicit references to requirements for UNEP to inform IPs of their rights under national law with respect to commercial development, it recommended that UNEP address this issue internally by, for example, the development of specific guidance note.</p>
<p>GEF MS5 (para 11h) states that when entitled to benefits, Indigenous Peoples are engaged through Meaningful</p>	<p>The revised UNEP ESSF (section 7.13, “Culturally appropriate benefits” of SS7) now includes a provision that ensures that IPs are able to derive benefits from</p>

<p>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: <i>While UNEP’s 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</i></p>	<p>the project in question, in a “culturally appropriate and inclusive manner giving full consideration to options preferred by the indigenous peoples concerned.” Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS5 (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, 82 Annex I 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: <i>This is not covered by any of UNEPs Safeguard standards or policy documents.</i></p>	<p>The revised UNEP ESSF (Section 7.15 of SS7 (page 40) on people living in voluntary isolation or initial contact) fulfils the requirements of Para 11j of GEF MS5. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>Minimum Standard 6: Cultural Heritage GEF MS6 (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: <i>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.</i></p>	<p>In the updated ESSF, the scope of Cultural Heritage has been expanded to include intangible cultural heritage. This new expansion of the term “cultural heritage” is most evident in section 5.6 of SS5. Section 5.6 (page 32 of the ESSF) is devoted to issues/requirements pertaining to intangible cultural heritage. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS6 (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:<i>There is no evidence provided by</i></p>	<p>The updated ESSF (Section 5.7 of SS5) now states that “... inform the potentially affected communities and stakeholders of their rights and potential consequences of such integration and utilization.” Based on assessment of</p>

<p><i>UNEP to demonstrate that the agency is compliant with this section of the GEF's specific criterion of MS 6.</i></p>	<p>new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS6 (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: <i>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</i></p>	<p>The updated ESSF (Section 5.5 of SS5) deals with circumstances/requirements on chance finds, now also includes references to the need for meaningful consultations within the chance finds procedures. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>Minimum Standard 8: Labor and Working Conditions GEF MS8 (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 83 Annex I protects the fundamental rights of workers, consistent with the International Labour Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work: <i>UNEP does not have explicit safeguard requirements concerning freedom of association and the recognition of the right to collective bargaining.</i></p>	<p>The updated ESSF (section 8.6 on workers organizations) addresses "Freedom of association and the right to collective bargaining are now included in the updated" Based on assessment of new documentation provided by Agency, this gap has now adequately addressed.</p>
<p>GEF MS8 (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: <i>This issue is not covered by the UNEP SS6 of the ESESF.</i></p>	<p>The updated ESSF (Section 8.1-8.3) outlines UNEPs requirements for "terms and conditions of employment". Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>GEF MS8 (para 15g) requires that workers who participate, or seek to participate, in Workers' organizations and collective bargaining, do so without interference, are not</p>	<p>The updated ESSF (Section 8.6 on "Workers organizations") outlines UNEP's requirements on "Freedom of association, and the right to collective</p>

discriminated or retaliated against, and are provided with information needed for meaningful negotiation in a timely manner: <i>UNEP does not have explicit safeguard requirements concerning freedom of association and the recognition of the right to collective bargaining.</i>	bargaining. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed
GEF MS 8 (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: <i>Workplace GRMs are not covered by the UN Environment’s SS6.</i>	The updated ESSF (SS8 of UNEPs Workplace GRMs (section 8.17 (page 44))) specifically, now addresses the requirements pertaining to Workplace GRMs. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed
<p>Minimum Standard 9: Community Health, Safety and Security</p> <p>There is currently no specific UN Environment safeguard standard that meets the requirements of GEF’s MS 9.</p>	In the updated ESSF, a new standard on Community Health, Safety and Security has been included (as SS4). This has also resulted in the inclusion of Community Health safety, and Security issues being addressed in the SRIF. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed

Conclusions and Recommendations

24. In its documentation presented to GEF prior to the 57th Council, UNEP presented a Plan of Action that includes concrete and timebound action to complete the process to update the policy and developing guidelines and tools to support its effective implementation. The Action Plan indicated that the updated policy was 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 was envisaged that the updated policy will be approved by UNEP’s Executive Director by the end of 2019.
25. In practice, this revision process has been completed, and the new Environmental and Social Sustainability Framework was approved by the Executive Director on February 25th, 2020.
26. The ongoing assessment undertaken in this report shows that UNEP is now entirely compliant with the three GEF Policies, except for one issue (informing indigenous people of their rights under national law with respect to commercial development.). Given the rigor of UNEP’s approach to updating its Framework, and the fact that it is now significantly in line with new developments in environmental and social safeguard thinking, it is suggested that this is only a minor gap. It could possibly be addressed internally, through the development of safeguard-specific Guidance Notes, which UNEP has indicated are under development.

World Wildlife Fund (WWF-US)

27. For the assessment presented to the 57th GEF Council meeting, World Wildlife Fund (WWF-US) was assessed against its Environment and Social Safeguards Integrated policies and procedures (SIPP, not dated) with 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. WWF-US's 2011 Gender Policy (2011) was also assessed.
28. Compared to GEF's Policy on Environmental and Social Safeguards, WWF-US was assessed as follows: Fully compliant (no gaps) with MS9 (Community Health, Safety and Security) while some gap areas were identified across the other Minimum Standards. WWF-US was assessed as fully compliant with both the GEF Policy on Gender Equality and GEF Policy on Stakeholder Engagement.
29. In its **plan of action**, WWF-US acknowledged the assessment and committed to updating the 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.
30. For this review, WWF-US has made available a revised SIPP (downloaded Oct. 2020) which includes a range of updates, including a revised Standard on Cultural Resources and a new Standard on Community Health and Security. WWF-US has also submitted Guidance Notes on Gender-Based Violence and Labor and Working Conditions.
31. The table below lists the gaps identified between the earlier between the earlier WWF-US SIPP and supporting documentation and the GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement and examines the extent to which WWF-US's revised SIPP addresses these gaps. The report concludes with an overall recommendation.

WORLD WILDLIFE FUND (WWF-US)	
<p>Gaps Identified in GEF/C.57/05¹⁴</p> <p>Gaps identified related to the Minimum Standards in the GEF Policy on Environmental and Social Safeguards (as described in GEF/C.57/05)</p>	<p>Expert Review of Agency Updates (2020)</p>
<p><i>Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring</i></p> <p>In relation to GEF MS1 (paras. 4.j and 4.k) partial gaps were identified in WWF-US SIPP requirements for socioeconomic assessments and vulnerability analysis. 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.</p>	<p>WWF-US's updated SIPP (Annex 2 on Guidelines for Designing Terms of Reference for Socioeconomic Assessments, pp. 44-45) has been updated to ensure that disadvantaged or vulnerable groups or individuals (including persons with disabilities) who may be affected should be identified as early as possible, and associated risks and potential impacts should be addressed to ensure that these groups do not face discrimination or prejudice in accessing benefits and resources, and that differentiated mitigation measures are incorporated so risks and impacts do not fall disproportionately on these groups. Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>In relation to GEF MS1 (para. 4.l) a partial gap was identified regarding risks and impacts to vulnerable groups includes persons with disabilities. The GEF criteria are more specific, requiring that risks/impacts to persons with disabilities be systematically addressed to ensure non-discrimination and equal opportunity.</p>	<p>WWF-US's updated SIPP (Annex 2, pp. 44-45) has addressed this gap area (see above). Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>In relation to GEF MS1 (para. 4.o) a partial gap was identified. The WWF-US SIPP, screening tool, and specific guidance for GEF projects includes the need to identify</p>	<p>WWF-US has submitted a Guidance Note on Gender-Based Violence. WWF-US has stated that Guidance Notes are mandatory where relevant risks have been identified in the screening process. The comprehensive note outlines that</p>

¹⁴ Report on the Assessment of Agencies' Compliance with Minimum Standards in the GEF Policies on: Environmental and Social Safeguards; Gender Equality; and Stakeholder Engagement

<p>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.</p>	<p>where significant GBV risks are identified, a targeted GBV/SEAH Risk Assessment and Action Plan may be required. Procedures for addressing allegations and a response framework are outlined, including mechanisms to hold perpetrators to account, an appropriate GRM, and a referral pathway to appropriate support services for survivors.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p><i>Minimum Standard 2: Accountability, Grievance and Conflict Resolution</i></p> <p>In relation to GEF MS2 (para. 5.f) a partial gap was identified. The WWF-US SIPP addressed non-retaliation risks for grievances, however the requirements appeared to be limited to “employees” rather than applying to complainants.</p>	<p>The updated WWF-US SIPP includes a Policy on Accountability and Grievance Mechanism and supporting documents in Annex 8 which have been updated to include non-retaliation as a key principle. Annex 8 section 8.5 notes that WWF expressly prohibits any form of retaliation against any complainant for raising or reporting a bona fide complaint under this policy or for assisting in a complaint investigation. Any Project Team member who is found to have participated or engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination. Complainants who reasonably believe that they have been victims of any such retaliation should inform the PCO immediately.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p><i>Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources</i></p> <p>In relation to GEF MS3 (para. 8.c) a partial gap was identified. Risks of procurement of natural resource commodities to natural habitats are not covered.</p>	<p>The updated WWF-US SIPP Policy on Protection of Natural Habitats has been updated, stating that the procurement of natural resource commodities that may contribute to conversion or degradation of natural habitats should be avoided where feasible, or limited to suppliers that can demonstrate that they are not contributing to significant conversion or degradation of natural habitats.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>In relation to the GEF MS3 (para. 8.d) a partial gap was identified. While the WWF-US SIPP Policy and Annex 5 applies to projects that involve extraction of natural resources, including forestry, harvesting, agriculture,</p>	<p>The updated WWF-US SIPP Policy on Protection of Natural Habitats addresses this GEF requirement, noting that any project- or program-supported production or harvesting of living natural resources should be carried out</p>

<p>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.</p>	<p>consistent with good sustainable management practices, including industry-specific standards, where they exist.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>In relation to the GEF MS3 (para. 8.f) a gap was identified. The requirement to address access and benefit sharing in the utilization of genetic resources is not covered in the WWF-US SIPP.</p>	<p>The updated WWF-US SIPP Policy on Protection of Natural Habitats now includes a provision that projects which entail the utilization of genetic resources should conform with applicable frameworks and measures related to access and benefit sharing of such resources.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p><i>Minimum Standard 4: Restrictions on Land Use and Involuntary Resettlement</i></p> <p>In relation to the GEF MS4 (para. 9.i) the requirement to prohibit forced evictions is not covered in WWF policy or procedure</p>	<p>The updated WWF-US SIPP Policy on Involuntary Resettlement has been updated to prohibit forced eviction without the provision of and access to appropriate forms of legal and other protection.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p><i>Minimum Standard 5: Indigenous Peoples</i></p> <p>In relation to GEF MS4 (para. 11.g) partial gaps were identified. Although general requirements for FPIC and equitable benefit sharing are identified and would apply, the WWF-US SIPP does not specifically address the GEF criteria on commercial development/use of indigenous peoples' lands, natural resources or cultural heritage.</p>	<p>The updated WWF-US SIPP (Annex 7 on the Procedures for Implementation of the SIPP Indigenous Peoples Policy) has been updated to note 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 will inform 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.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>In relation to GEF MS4 (para. 11.j) the WWF-US SIPP does not address the risks and circumstances of indigenous peoples living in voluntary isolation.</p>	<p>The updated WWF-US SIPP (Annex 7 on the Procedures for Implementation of the SIPP Indigenous Peoples Policy) has been updated and now stipulates that where a project or program may affect Indigenous Peoples in voluntary</p>

	<p>isolation, WWF will take appropriate measures to recognize, respect, and protect their lands and territories, environment, health, and culture, as well as to avoid all undesired contact. Aspects of the project or program that would result in such undesired contact are redesigned so as to avoid undesired contact.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>Minimum Standard 6: Cultural Heritage</p> <p>In relation to GEF MS6 12.d: the WWF-US's SIPP 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.</p>	<p>The updated WWF-US SIPP Standard on Cultural Resources has been updated to require determining whether disclosure of information regarding cultural resources is appropriate given any threats to the safety and integrity of the resources.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>In relation to GEF MS6 (para. 12.f): WWF- US does not explicitly address the issue of ensuring continued access to cultural heritage when a project may impose access restrictions.</p>	<p>The updated WWF-US SIPP (Standard on Cultural Resources) has been updated and now requires arranging continued access to cultural resources in consultation with stakeholders where feasible, subject to overriding safety and security considerations, when a project or program introduces restrictions to stakeholder access to cultural resources.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>In relation to GEF MS6 (para. 12.g): WWF-US does not explicitly address the issue of commercial use of cultural heritage and equitable sharing of benefits thereof.</p>	<p>The updated WWF-US SIPP (Standard on Cultural Resources) has been updated and now requires that project- or program-affected parties be informed of their rights under national law when a project or program involves the commercial use of cultural resources and arrange for the fair and equitable sharing of benefits from such use.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>Minimum Standard 7: Resource Efficiency and Pollution Prevention</p>	<p>The updated WWF-US SIPP (Annex 5 on Guidelines for Implementation of the Policy on Protection of Natural Habitats) has been updated. As noted above, WWF-US states that Guidelines are considered mandatory when associated</p>

<p>In relation to GEF MS7 (para. 14.b): WWF-US’s screening tool identifies pollution risks, but the SIPP does not contain specific provisions regarding the GEF criteria on pollution control measures, waste and hazardous waste management, and hazardous materials.</p>	<p>risks have been identified in the screening process. The updated requirements note that should any pollution, waste or hazardous material risks and impacts be identified, the Project Team will use consultants to undertake further assessments and design mitigation measures to:</p> <ul style="list-style-type: none"> • Avoid the release of pollutants, where feasible, or minimize the impact of their release; • Apply control measures and performance levels consistent with applicable laws and good international industry practice; • Avoid the generation of hazardous and non-hazardous wastes, where feasible, or minimize waste generation, and reuse, recycle and recover waste in a safe manner, with environmentally sound waste treatment and disposal; • Treat hazardous waste in accordance with national laws, applicable international treaties and agreements, and/or good international industry practice, whichever is most stringent; and • Avoid the use and release of hazardous materials, where feasible, or minimize and control such use and release across production, transportation, handling, storage, and use. <p>Based on assessment of new documentation provided by Agency, this gap has now been adequately addressed, except for one issue related to the GEF 14.b requirement to “iii. Avoid or minimize project- or program-related greenhouse gas emissions and black carbon”. It is noted that WWF-US’s Safeguard Screening Tool Template (ver. mid-2019) includes a section on climate change and a specific question regarding project emissions of significant GHGs. This partially addresses the GEF requirement, however it does not establish an avoidance/minimization standard nor does it address risks of black carbon emissions.</p> <p>As such, it is recommended that WWF-US considers a minor update to its SIPP and or Guidance Note.</p>
<p>In relation to GEF MS7 (para. 14.d): the WWF-US 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).</p>	<p>The updated WWF-US SIPP (Standard on Pest Management) has been updated to include requirements to: not allow the procurement or use of products that contain active ingredients which are banned or restricted under applicable international treaties and agreements, or meet the criteria of carcinogenicity, mutagenicity, or reproductive toxicity as set forth by relevant international agencies (World Health Organization (WHO) Class IA, IB and formulations of Class II, Highly Hazardous Pesticides as part of the FAO/WHO Guidelines on Highly Hazardous Pesticides).</p>

	<p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p>In relation to GEF MS7 (para. 14e): the WWF-US SIPP does not have specific provisions regarding resource efficiency. It also does not have specific provisions regarding risks associated with significant water consumption.</p>	<p>The updated WWF-US SIPP (Annex 5 on Guidelines for Implementation of the Policy on Protection of Natural Habitats) has been updated to note that projects promote an efficient use of energy, water and other resources and material inputs, and where significant water consumption is involved, adopt measures to avoid or reduce water use to avoid significant adverse impacts on communities, other water users, and the environment.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed</p>
<p><i>Minimum Standard 8: Labor and Working Conditions</i></p> <p>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</p>	<p>WWF-US has developed a Guidance Note on Labor and Working Conditions (ver 14 Oct 2020). The GN states that WWF will ensure that any funding for activities that engage contract labor complies with WWF’s Environment and Social Safeguards Framework (ESSF) (network framework) and more specifically international labor and working condition standards such as the ILO Declaration on the Fundamental Principles and Rights at Work and any relevant local labor standards of the project specific countries. In addition, the GN outlines a range of measures that address most of the GEF MS requirements.</p> <p>Based on assessment of new documentation provided by Agency, this gap has now adequately addressed, except for one issue related to the GEF MS8 (15.g) requirements on freedom of association and collective bargaining (“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.”). As such, it is recommended that WWF-US considers a minor update to its SIPP and or Guidance Note</p>

Conclusion and Recommendations

32. WWF-US has updated its Environment and Social Safeguards Integrated policies and procedures (SIPP) to address nearly all of the gaps identified in the earlier assessment. Two gap areas require further attention: GEF MS7 14.b.iii requirement to avoid or minimize project- or program-related greenhouse gas emissions and black carbon; and GEF MS8 15.g requirement on freedom of association and collective bargaining. WWF-US should review this issue and provide a further update to its SIPP and Guidance Note on Labor and Working Conditions to address these two points.
33. In addition, WWF-US should confirm that the submitted stand-alone Guidance Notes on Gender-Based Violence and Labor and Working Conditions will be integrated into the SIPP.