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REVIEW OF THE GEF POLICY ON AGENCY MINIMUM STANDARDS ON ENVIRONMENTAL AND SOCIAL SAFEGUARDS

(Prepared by the Independent Evaluation Office of the GEF)

Abbreviations and Acronyms

ADB	Asian Development Bank
AF	Adaptation Fund
AfDB	African Development Bank
AIIB	Asian Infrastructure Investment Bank
BOAD	West African Development Bank
CAF	Development Bank of Latin America
CI	Conservation International
DBSA	Development Bank of South Africa
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Assessment
ESP	Environmental and Social Policy
FAO	Food and Agricultural Organization of the United Nations
FCPF	Forest Carbon Partnership Facility
FECO	Foreign Economic Cooperation Office, Ministry of Environmental Protection of China
FUNBIO	Brazilian Biodiversity Fund
GCF	Green Climate Fund
GEF	Global Environment Facility
IAMN	Independent Accountability Mechanisms Network
IEO	Independent Evaluation Office of the GEF
IADB	Inter-American Development Bank
IFAD	International Fund for Agricultural Development
IFC	International Finance Cooperation
IUCN	International Union for Conservation Fund
ILO	International Labor Organization
MDBs	Multilateral Development Banks
OECD/DAC	Organization for Economic Co-operation and Development/ Development Assistance Committee
OPS	Overall Performance Study
PIF	Project Identification Form
PIR	Project Implementation Report
TER	Terminal Evaluation Report
UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme
UNIDO	United Nations Industrial Development Organization
WWF-US	World Wildlife Fund

EXECUTIVE SUMMARY

1. The safeguard policies of multilateral development institutions and funding agencies promote the social and environmental sustainability of supported projects and programs. In 'safeguarding' people and the environment, these policies seek to strengthen project/program effectiveness and outcomes.

2. In November 2011, the GEF adopted its *Agency Minimum Standards on Environmental and Social Safeguards* (GEF Safeguards) to ensure a minimum-level of consistency across the GEF Partnership in addressing environmental and social risks associated with GEF-supported operations.

3. The purpose of this review is to provide insights and lessons for the GEF-7 replenishment cycle regarding GEF's experiences to date in implementing the GEF Safeguards. This review has focused on addressing four key issues: (a) the extent to which the GEF Safeguards have added value to the GEF Partnership, (b) the degree to which they are aligned with relevant international best safeguard standards and practices, (c) how the GEF is informed of safeguard- related risks in supported operations, and (d) recommendations for how might the GEF Safeguards evolve in coming years. The review does not focus on the safeguard policies and systems of GEF Agencies.

4. Key findings of the review include the following:

(a) The GEF Safeguards have added significant value to the GEF Partnership, serving as an important catalyst among many GEF Agencies to strengthen existing safeguard policies and, in a number of cases, to adopt comprehensive safeguard policy frameworks. During GEF's safeguards compliance review process, GEF Agencies, in particular the MDBs, had well developed safeguard policies that were broadly equivalent to the GEF Minimum Standards. The adoption of GEF Safeguards provided the impetus for many other Agencies to be more ambitious in developing and revising their safeguard systems. The GEF Safeguards have contributed to more harmonized approaches in managing project-level environmental and social risks and impacts.

(b) A range of environmental and social risks are identifiable in the GEF 6 portfolio. A small number of projects were categorized as potentially high social and environmental risk (e.g. Category A projects). Significantly, the majority of GEF 6 projects in the reviewed sample exhibit a wide range of moderate-level risks (e.g. Category B projects). These projects could lead to an array of social and environmental harms if not effectively managed. In addition, a number of projects identified potential stakeholder risks (e.g. lack of participation and acceptance) as well as the potential for adverse gender-differentiated impacts. Projects proposed a range of management measures and plans to manage identified risks and impacts.

(c) The GEF Safeguards, by design, have been applied principally at the Agency-level during the accreditation process for new agencies and compliance review for existing Agencies.

During GEF's project/programme cycle, the GEF Secretariat has developed several project templates and tools that reflect a degree of due diligence related to the GEF Safeguards. The Secretariat is informed ex-ante about potential project-level environmental and social risks and impacts. However, to date, the GEF Secretariat has not developed guidance regarding ongoing reporting on safeguard-related issues during project implementation. At the portfolio level, potential environmental and social risks are not systematically tracked. Both the Adaptation Fund and the Green Climate Fund include specific requirements for accredited entities to report on safeguard implementation issues during project implementation and completion. Many GEF Agencies are accredited to either or both of these other multilateral climate funds.

(d) When developed more than a decade ago, the key principles upon which the GEF Minimum Standards are based reflected a consensus on key operational safeguard principles. These requirements continue to underpin key thematic safeguard areas among many institutions and remain aligned with international good practice. However, in the intervening years, many Agencies (including GEF Agencies) have adopted more comprehensive safeguard frameworks. Importantly, some international climate funds have adopted broader safeguard frameworks together with more explicit procedural requirements for their implementation, including monitoring and evaluation. A high-level comparison of the GEF Safeguards with more recently adopted policy frameworks identified a range of gaps and/or areas of greater emphasis, including human rights, nondiscrimination equity; stakeholder engagement; climate change and disaster risk; biodiversity offsets; invasive alien species; supply chains; sustainable resource management; community health, safety and security; hazardous materials; involuntary resettlement; indigenous peoples and the application of free, prior informed consent (FPIC); cultural heritage; and labor and working conditions.

5. The review includes several recommendations that could help inform the future evolution of the GEF Safeguards. A summary of the recommendations includes the following:

(a) **Recommendation 1. Review the GEF Minimum Standards.** While the key requirements of the GEF Safeguards remain relevant and aligned with international good safeguards practice, a high-level comparative review identified a range of gaps in thematic coverage in the GEF Minimum Standards that appear germane for the types of environmental and social risks present in the GEF portfolio. A review and potential update of the GEF Minimum Standards may be warranted. A phased, collaborative review process could be undertaken, with more targeted analyses of potential gap areas. A potential revision process would need to strike a proper balance between addressing relevant policy gaps in the GEF Standards while avoiding such extensive changes that would require wholesale revisions to often newly adopted safeguard frameworks of many GEF Agencies. Avenues for minimizing costs of a review and potential update would need to be identified.

(b) **Recommendation 2. Improve safeguards monitoring and reporting**. GEF should consider tracking social and environmental risks at the portfolio-level and ensuring a

"flow-through" of monitoring information on safeguards implementation. Agencies should inform GEF of the safeguards risk categorization assigned to projects/ programmes and keep GEF informed of safeguards implementation issues through monitoring and reporting. Where available, this should ideally build off Agency systems rather than duplicating them. GEF could issue guidance regarding safeguards-related reporting in annual reporting and project/programme evaluations. Increased GEF attention of safeguards implementation reporting may support and strengthen relatively new safeguards systems among some GEF Agencies and promote greater consistency.

(c) **Recommendation 3. Support capacity development, expert convening, and communications.** The expanded GEF Partnership encompasses Agencies with widely diverse levels of safeguards experience and institutional capacity. Expanded networking, knowledge sharing, and expert convening may be beneficial. A number of GEF Agencies would welcome increased opportunities for knowledge sharing and capacity support regarding key challenges in addressing certain safeguard issues. GEF could seek opportunities to gain from existing international safeguard networks (not 'recreating the wheel') and leverage the significant safeguards expertise across the GEF Partnership. GEF and GEF Agencies could convene safeguard focused workshops during Expanded Constituency Workshops or other GEF events. GEF could also consider how best to communicate GEF's policy requirements, including the GEF Minimum Standards, with country partners to further build a shared understanding on the need for effective safeguards implementation.

TABLE OF CONTENTS

CHARTS, FIGURES AND TABLES

CHARTS

FIGURES

TABLES

BOX

I. INTRODUCTION

1. The safeguard policies of multilateral development institutions and funding agencies promote the social and environmental sustainability of supported projects and programs. In 'safeguarding' people and the environment, these policies seek to strengthen project/program effectiveness and outcomes. Environmental and social safeguard systems aim to ensure that agencies and their implementation partners identify potential environmental and social risks associated with supported interventions, assess the potential significance of these risks, and develop appropriately-scaled management measures to avoid, and where avoidance is not possible, minimize and mitigate residual impacts. Safeguard systems typically require stakeholder engagement in project development and implementation, disclosure of relevant information, and provision of complaints mechanisms, as well as monitoring and reporting.

2. In November 2011, the GEF adopted its *Agency Minimum Standards on Environmental and Social Safeguards* (GEF Safeguards) to ensure a minimum-level of consistency across the GEF Partnership in addressing environmental and social risks associated with GEF-supported operations.[1] The safeguard policies and capacities of both existing GEF Agencies and those seeking accreditation to the GEF were reviewed for compliance with the GEF Minimum Standards.

3. In 2013, the GEF Council requested the GEF Independent Evaluation Office to assess the GEF Minimum Standards after the pilot accreditation process of new Agencies had concluded.[2] The purpose of this review is to provide insights and lessons for the GEF-7 replenishment cycle. The review seeks to address both policy alignment and operational procedures related to the GEF Minimum Standards, and specifically focuses on (a) the extent to which the GEF Minimum Standards have added value to the GEF Partnership, (b) the degree to which they are aligned with relevant international best safeguard standards and practices, (c) how is GEF informed of safeguard-related risks in supported operations, and (d) how might the GEF Safeguards evolve in coming years.[3]

4. The review has utilized qualitative analytical methods and tools, including document review, interviews, surveys of GEF Agencies, together with a quantitative sampling and analysis of the recent GEF portfolio.

5. The review contains several limitations that should be noted at the outset. The focus here is how the GEF Safeguards are addressed at the GEF-level. The review does not focus on the specific safeguard policies and systems of GEF Agencies or how GEF Agencies applied their safeguard systems to address environmental and social risks of projects and programmes. The review examines information provided by Agencies to the GEF regarding project/programme implementation, but does not seek to evaluate Agency performance. Future targeted reviews could examine safeguard implementation by Agencies, but that aspect was beyond the scope of

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[1] This paper uses the terms "GEF Safeguards" and "GEF Minimum Standards" interchangeably to refer to the Agency Minimum Standards on Environmental and Social Safeguards, unless otherwise specified. Also, the term "GEF Agencies" or just "Agencies" capitalized refer to all Agencies of the GEF Partnership, unless otherwise specified.

[2] GEF, Joint Summary of the Chairs, 45th GEF Council Meeting, November 5-7, 2013, para. 26, at http://www.thegef.org/sites/default/files/council-meeting-documents/November_7_Joint_Summary_of_the_Chairs_v3_FINAL_4.pdf.

[3] See GEF IEO, Approach Paper: Evaluation of GEF Minimum Standards on Environmental and Social Safeguards, at http://www.gefieo.org/documents/minimum-standards-environmental-and-social-safeguards-approach-paper.

this review. This creates several limitations for the analysis. For example, while general types of social and environmental risks in the GEF portfolio are identified, conclusions on the effectiveness of potential safeguard measures that may have been applied are absent.

II. SAFEGUARDS IN THE GEF PARTNERSHIP

6. The adoption of environmental and social safeguard standards among a wide range of international development and finance institutions reflects a broad consensus among governments, development economists, environmental and social experts, civil society groups, and other stakeholders that such policies are critical to achieving sustainable development outcomes and avoiding and/or minimizing social and environmental harms.[4] Safeguard policies were largely pioneered by the multilateral and regional development banks and have since been adopted by most export credit agencies,[5] a number of UN agencies (including GEF Agencies), some bilateral development agencies,[6] and many leading private commercial banks.[7]

7. Effective implementation of safeguards can help avoid the emergence of social and environmental risks that could delay projects and undermine project/programme outcomes. The benefits provided by safeguards have been found, at least in limited studies to date, to outweigh the costs of their implementation. A 2010 evaluation by the World Bank's Independent Evaluation Group (IEG) found that "the [World Bank Group] safeguards framework generates significant benefits for the mitigation of environmental and social risks of projects." Costs incurred by World Bank clients on safeguards were estimated at about 5 percent of World Bank financing and 3 percent of total project cost. IEG's cost-benefit model found even larger benefit-to-cost ratios for IFC projects, which at the time implemented a more comprehensive safeguard framework, with additional benefits derived from attention to labor conditions and community impacts.[8]

8. Results of a more recent review undertaken by the ADB's Independent Evaluation Department coincided with the World Bank's IEG results, concluding that "overall, safeguard implementation adds value," particularly where ADB standards were implemented.[9]

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[4] This point is emphasized by the Adaptation Fund, Environmental and Social Policy, paras. 3-4.

[5] See OECD, Recommendations of the council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (Common Approaches) (rev. 2016), at http://www.oecd.org/tad/xcred/oecd-recommendations.htm.

[6] See for example Japan International Cooperation Agency, Environmental Policy (2015) and Guidelines for Environmental and Social Considerations (2010), at https://www.jica.go.jp/english/our_work/social_environmental/index.html.

[7] See the Equator Principles (rev. 2013), at http://www.equator-principles.com/. As of March 2017, 89 financial institutions in 37 countries have adopted the Equator Principles.

[8] IEG developed a stylized model to estimate costs and benefits for implementation of safeguards as information gaps inhibited systematic quantification. World Bank Independent Evaluation Group, Safeguards and Sustainability Policies in a Changing World: An Independent Evaluation of World Bank Group Experience, 2010, pp. xviii, 80, and chapter 4, at https://openknowledge.worldbank.org/handle/10986/2571.

[9] ADB Independent Evaluation Department, Real-Time Evaluation of ADB's Safeguard Implementation Experience Based on Selected Case Studies, 2016, p. xvi and chapter 4, at https://www.adb.org/documents/real-time-evaluation-adb-s-safeguard-implementation-experience-country-case-studies.

Background on adoption of GEF Safeguards

9. In 2010, the GEF Council agreed to broaden the GEF Partnership on a pilot basis through the accreditation of up to ten "GEF Project Agencies" to assist countries in implementing GEF-financed projects.[10] GEF Project Agencies would be accredited on the basis of meeting a range of criteria, including environmental and social safeguards.

10. At the 40th GEF Council Meeting, the GEF Secretariat presented the *GEF Policies on Environmental and Social Safeguard Standards and Gender Mainstreaming* that articulated standards for the accreditation process.[11] In specifying that GEF's key mission is to create global environmental benefits ("doing good"), the document also noted that the "GEF has not had a set of clear policies to prevent or mitigate any unintended negative impacts to people and the environment that might arise through GEF operations" ("do-no-harm").

11. In November 2011, the 41st GEF Council Meeting approved the GEF *Agency Minimum Standards on Environmental and Social Safeguards*,[12] together with a guideline document on *Application of Policy on Agency Minimum Standards on Environmental and Social Safeguards*.[13] The 41st Council also determined that the ten existing GEF Agencies would need to meet the same criteria as those of newly accredited GEF Project Agencies.

The GEF Safeguards

12. The GEF Safeguards establish minimum requirements that all GEF Agencies are expected to meet to ensure that GEF-financed operations avoid, minimize, and mitigate associated adverse environmental and social impacts.

13. The Policy states that the purpose of the GEF Safeguards are to (a) clarify the principles that shall apply specifically to GEF financed operations, and (b) establish minimum standards on environmental and social safeguard systems that all GEF Agencies are expected to meet in order to implement GEF-financed projects.[14]

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[10] See GEF, Broadening of the GEF Partnership under Paragraph 28 of the GEF Instrument: Key Policy Issues, GEF/C.39/7/Rev.2, November 18, 2010, at http://www.thegef.org/sites/default/files/council-meeting-documents/C.39.7.Rev_.2_Broadening_the_GEF_Partnership_4.pdf; and GEF, Procedure: Accreditation of GEF Project Agencies, PR/IN/04, updated ver. May 21, 2012, at https://www.thegef.org/sites/default/files/documents/PR.IN_.04.Accreditation_Procedure_for_GEF_Project_Agencies.05212012_0.pdf.

[11] See GEF/C.40/10/Rev.1, May 26, 2011, at http://www.thegef.org/sites/default/files/council-meeting-documents/C.40.10.Rev_1.GEF_Policies_on_Safeguards_and_Gender.May_25_2011_1.pdf.

[12] See updated policy document SD/PL/O3, updated February 19, 2015, at http://www.thegef.org/sites/default/files/documents/Policy_Environmental_and_Social_Safeguards_2015.pdf, based on the 41st Council document GEF/C.41/10/Rev.1, November 18, 2011, at http://www.thegef.org/sites/default/files/council-meeting-documents/C.41.10.Rev_1.Policy_on_Environmental_and_Social_Safeguards.Final%20of%20Nov%2018.pdf.

[13] See SD/GN/03, updated February 19, 2015, at https://www.thegef.org/sites/default/files/documents/Guidelines_Application_of_Environmental_and_Social_Safeguard_Policy_2015.pdf.

[14] GEF, Agency Minimum Standards, para. 4.

14. The GEF Safeguards are comprised of several sections:

(a) Key Principles for all GEF operations

(b) a statement regarding projects that may involve indigenous peoples

(c) a statement on the applicability of the Minimum Standards

(d) a statement on the role of the GEF Conflict Resolution Commissioner, and

(e) a set of eight "Minimum Environmental and Social Safeguard Standards."

15. The **Key Principles for GEF Operations** establish a set of "do not finance" conditions for GEF resources, mandating that GEF not support activities that degrade or convert critical natural habitats, construct or rehabilitate large or complex dams, introduce invasive alien species, cover the costs of physical relocation or displacement of people, and use any substances listed under the Stockholm Convention on Persistent Organic Pollutants.

16. The **Indigenous Peoples** statement articulates GEF's commitment to ensure operations fully respect the dignity, human rights, economies, cultures, and traditional knowledge of indigenous peoples. It requires that GEF-financed operations that may affect indigenous peoples adopt a standard of free, prior and informed consent (FPIC) in countries that have ratified ILO Convention 169. As of early 2017, this applies to 22 countries, with the majority located in Latin America and the Caribbean.[15] The statement notes that FPIC requires documentation of a mutually accepted consultation process and evidence of agreement between project proponents and affected indigenous communities.

17. **A section on the applicability of the Minimum Standards** clarifies that all GEF Agencies are required to meet the criteria of Minimum Standard 1 (Environmental and Social Impact Assessment) and Minimum Standard 2 (Protection of Natural Habitats). GEF also requires all Agencies to meet the criteria of Minimum Standard 8 on Accountability and Grievance Systems (while this requirement is not listed in the GEF Safeguards document, applicability of MS8 to all Agencies is noted in the safeguards guidelines and in practice by the GEF Secretariat). Minimum Standards 3-7 may be judged "inapplicable" on a case-by-case basis. Criteria for making this determination are included in each Minimum Standard. Where a standard is considered inapplicable by the GEF, the scope of potential GEF-supported projects is narrowed to ensure that activities do not extend into areas that would require application of the relevant requirements.

18. All eight Minimum Standards (MS) have been determined to be applicable to most GEF Agencies, with a few exceptions. As of early 2017, 4 Agencies (IUCN, CI, WWF-US, FUNBIO)

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[15] See ILO, Indigenous and Tribal Peoples Convention, 1989 (No. 169), at http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312314. Countries that have ratified ILO 169 (early 2017): *Latin America and Caribbean:* Argentina, Bolivia, Brazil, Chile, Columbia, Costa Rica, Dominica, Ecuador, Guatemala, Honduras, Mexico, Nicaragua, Paraguay, Peru, Venezuela; *Africa*: Central African Republic; *Asia and Pacific:* Fiji, Nepal; *Europe:* Denmark, Netherlands, Norway, Spain. See http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11300:0::NO:11300:P11300_INSTRUMENT_ID:312314:NO.

were not approved to undertake projects regarding dams and water infrastructure (Minimum Standard 7). FECO was not approved to undertake projects related to involuntary resettlement (MS3) and indigenous peoples (MS4). DBSA was not approved to undertake projects involving pest management (MS5), and WWF-US was not approved for projects that may involve physical cultural resources (MS6).[16]

19. **Conflict Resolution Commissioner:** The GEF Safeguards provide authority for potentially affected parties to bring "disputes and complaints about GEF projects directly to the Conflict Resolution Commissioner at the GEF Secretariat," stipulating that the Conflict Resolution Commissioner "will work directly with the complainant, the GEF Partner Agency, and the recipient country concerned to help address complaints and resolve disputes and other issues of importance to GEF operations.[17]"

20. **Minimum Environmental and Social Safeguard Standards:** The Minimum Standards seek to ensure that GEF-financed operations avoid, and where avoidance is not possible, minimize and mitigate adverse environmental and social impacts associated with GEF-financed operations. See Table 1 for a summary of key provisions of GEF Minimum Standards.

21. The Minimum Standards are based on key elements of earlier World Bank safeguard policies. In 2005, the World Bank adopted a pilot initiative to use borrower systems to address environmental and social safeguard issues. It distilled a set of objectives and principles from its then-existing safeguard policies to serve as a benchmark for determining the equivalency of a borrower's environmental and social safeguard system.[18]

22. GEF's Minimum Standards largely resemble those of the World Bank's pilot initiative, with some modifications. For example, GEF Minimum Standard 2: Protection of Natural Habitats combines some but not all principles from the World Bank's Natural Habitats and Forests policy principles (for example, certification standards regarding forest harvesting are not included). Also, Minimum Standard 8: Accountability and Grievance Systems was added.

23. When developed more than a decade ago, the key principles upon which the GEF Minimum Standards are based reflected a consensus on key operational safeguard principles. These key requirements continue to reflect the core principles of current safeguard frameworks. However, issues regarding their scope and alignment with GEF operations have existed since GEF adoption in 2011. For example, the standard on dam safety is not fully pertinent in light of GEF's Key Principle of not financing large dams. The pest management standard requires careful handling of pesticides, but does not address GEF's broader portfolio of work on hazardous chemicals and wastes. Requirements are absent regarding fair and equitable sharing of benefits from the use of genetic resources although GEF assists countries

[16] Applicability of GEF Minimum Standards confirmed with GEF Secretariat.
[17] GEF, Agency Minimum Standards, para. 11.
[18] World Bank, OP 4.00, Piloting the Use of Borrower Systems to Address Environmental and Social Safeguard Issues in Bank-Supported projects (March 2005), Table A1 Environmental and Social Safeguard Policies – Policy Objectives and Operational Principles, at http://siteresources.worldbank.org/OPSMANUAL/Resources/OP4.00andTableA1.pdf.

to ratify and implement their commitments in this regard under the Nagoya Protocol of the Convention on Biological Diversity.[19] Conditions on utilizing biodiversity offsets are not specified although these may be common features of GEF-supported biodiversity initiatives.

24. In the past decade, more comprehensive safeguard frameworks have been adopted by a range of multilateral development and finance institutions, including multilateral climate funds and many GEF Agencies. A comparison of the GEF Minimum Standards with more recent safeguard frameworks reveals a range of issues regarding scope and coverage. Section IV or this review examines each Minimum Standard and identifies key gap areas.

25. The GEF Safeguards are accompanied by several related policies, including the Policy on Public Involvement in GEF Projects (PIP) and its implementation guidelines.[20] The GEF Council has requested the GEF Secretariat to present an updated policy on stakeholder engagement and access to information in late 2017.[21] In 2012, GEF adopted a Policy on Gender Mainstreaming that also served as a compliance benchmark during the accreditation process and review of existing GEF Agencies.[22] Also in 2012 GEF adopted a set of guidelines for engagement with indigenous peoples.[23] This review focuses on the GEF Safeguards themselves, touching upon aspects of related policies and guidelines where relevant.

[19] See GEF, Progress Report on the Nagoya Protocol Implementation Fund, GEF/C.49/Inf.06, September 23, 2015, at https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.49.Inf_.06_PR_on_NPIF_0_4.pdf.

[20] See SD/PL/01, updated August 13, 2012, at https://www.thegef.org/sites/default/files/documents/Public_Involvement_Policy-2012.pdf, and SD/GN/01, December 10, 2014, at https://www.thegef.org/sites/default/files/documents/Guideline_for_Implementation_of_Public_Involvement_Policy_2014.pdf.

[21] GEF, Joint Summary of the Chairs, 51st Council Meeting, October 25-27, 2016, para. 22, at https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.51_Joint_Summary_of_the_Chairs.pdf. Also see GEF, Recommendations of the Working Group on Public Involvement, GEF/C.51/09/Rev.01, October 27, 2016, at https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.51.09.Rev_.01_Recommendations_of_the_WG_on_PI.pdf.

[22] See SD/PL/02, May 1, 2012, at https://www.thegef.org/sites/default/files/documents/Gender_Mainstreaming_Policy-2012_0.pdf.

[23] GEF, Principles and Guidelines for Engagement with Indigenous Peoples, October 22, 2012, at https://www.thegef.org/documents/indigenous-peoples-principles-and-guidelines.

Table 1: Summary of key provisions of GEF Minimum Standards

Table 1. Summary of key provisions of GEF Minimum Standards	
MS1.Environmental and Social Impact Assessment ▪ screen project to determine appropriate type of ESIA ▪ assess impacts on physical, biological, socio-economic, cultural and physical cultural resources, human health and safety. Include direct and, as relevant, indirect, cumulative, associated impacts and transboundary concerns ▪ assess adequacy of legal and institutional framework incl. obligations under international environmental agreements ▪ assess feasible investment, technical, and siting alternatives, including no action alternative ▪ apply mitigation hierarchy and utilize environmental planning and management that includes mitigation, monitoring, institutional capacity development ▪ involve stakeholders – including project-affected groups – as early as possible in project preparation, ensure stakeholder views and concerns are taken into account, consult throughout project implementation as necessary ▪ use independent expertise in ESIA preparation where appropriate ▪ apply minimum requirements to subprojects under investment and financial intermediary activities ▪ disclose draft ESIA in a timely manner, before appraisal, in accessible form and language	**MS2. Protection of Natural Habitats** ▪ use precautionary approach ▪ determine if benefits substantially outweigh potential environmental costs ▪ give preference to siting physical infrastructure investments on lands where natural habitat already converted ▪ avoid significant conversion or degradation of critical natural habitats ▪ if adverse impacts on non-critical natural habitats, proceed only if viable alternatives not available, and if appropriate conservation and mitigation measures in place ▪ mitigation measures to include those required to maintain ecological services, that minimize habitat loss and that establish/maintain ecologically similar protected areas ▪ screen early for impacts on health and quality of important ecosystems including forests and impacts on rights and welfare of people who depend on potentially affected ecosystem services ▪ do not finance projects that involve significant conversion or degradation of critical natural habitats, including natural forest harvesting or plantation in critical forest areas ▪ ensure forest restoration projects maintain or enhance biodiversity and ecosystem functionality ▪ ensure all plantation projects are environmentally appropriate, socially beneficial and economically viable ▪ consult appropriate experts and key stakeholders including local NGOs and communities ▪ involve stakeholders (incl. experts, local communities and NGOs) in design, implementation, monitoring, and evaluation of projects, including mitigation planning ▪ disclose draft mitigation plan in timely manner, before appraisal formally begins, in accessible form and language
MS3. Involuntary Resettlement ▪ assess all viable alternatives to avoid, where feasible, or minimize involuntary resettlement ▪ identify, assess, and address potential economic and social impacts that are caused by involuntary taking of land or involuntary access restrictions to legally designated parks and protected areas. use census and socio-economic surveys ▪ identify and address impacts of other related and contemporaneous activities ▪ develop participatory process for all aspects of projects involving involuntary access restrictions to legally designated parks and protected areas ▪ provide persons to be resettled with opportunities to participate in all aspects of resettlement program. Pay particular attention to needs of vulnerable groups ▪ inform displaced persons of rights; provide feasible resettlement alternatives; prompt compensation at full replacement cost; relocation assistance; housing or agricultural sites of equivalent productive potential; transitional support and development assistance; give preference to land-for-land resettlement strategies ▪ provide resettlement assistance in lieu of compensation to those without formal legal rights to lands or recognized claims	**MS4. Indigenous Peoples** ▪ screen early to determine presence of indigenous peoples (IPs) ▪ undertake free, prior, informed consultation with affected IPs to ascertain their broad community support ▪ solicit IP's full and effective participation in designing, implementing, and monitoring measures ▪ assess potential impacts and risks on IPs and identify measures to avoid, minimize and/or mitigate impacts ▪ provide socioeconomic benefits in a culturally appropriate inclusive manner ▪ support legal recognition of customary or traditional land tenure and management systems and collective rights ▪ if access restrictions to parks and protected areas, ensure affected IPs fully and effectively participate in all aspects of management plans, and ensure equitable sharing of benefits from the parks and protected areas ▪ refrain from utilizing the cultural resources or knowledge of IPs without obtaining their prior agreement ▪ Where adverse impacts likely, require a participatory Indigenous Peoples Plan (IPP) or framework that (a) specifies measures to ensure that affected IPs receive culturally appropriate benefits, (b) identifies measures to avoid, minimize, mitigate, or compensate for any adverse effects, (c)

▪ disclose draft plans in accessible form and language ▪ apply minimum requirements, as relevant, to sub-projects requiring land acquisition ▪ provide resettlement entitlements before displacement or restriction of access ▪ evaluate whether resettlement objectives have been achieved upon completion	includes measures for continued consultation during project implementation, grievance procedures, and monitoring and evaluation arrangements, and (d) specifies budget and financing plan for implementing measures ▪ disclose documentation of consultation process and IPP or framework in timely manner, before appraisal formally begins in accessible place form and language ▪ monitor project and IPP implementation using experienced social scientists
MS5. Pest Management ▪ promote Integrated Pest Management in agricultural projects and Integrated Vector Management in public health projects and reduce reliance on synthetic chemical pesticides ▪ include assessment of pest management issues and associated risks in EA process ▪ do not procure/use of products that are WHO Classes IA and IB, or formulations of Class II unless appropriate restrictions ▪ do not allow procurement or use of pesticides or chemicals specified as POPs under Stockholm convention ▪ follow minimum standards as described in UN FAO Intl Code of Conduct on the Distribution and Use of Pesticides ▪ procure only pesticides and equipment that will permit pest management to be carried out with well-defined and minimal risk to health, environment, and livelihoods ▪ support policy reform and institutional capacity development to (a) enhance implementation of IPM/IVM-based pest management, and (b) regulate and monitor the distribution and use of pesticides ▪ disclose draft mitigation plans in timely manner, before appraisal formerly begins, in accessible form and language	**MS6. Physical Cultural Resources** ▪ analyze alternatives to prevent or minimize or compensate for adverse impacts and enhance positive impacts on PCR ▪ if possible, avoid financing projects that could significantly damage PCR ▪ as appropriate, conduct field based surveys using qualified specialists to evaluate PCR ▪ consult local people and other relevant stakeholders in documenting presence of PCR, assessing potential impacts on PCR, and designing and implementing mitigation plans ▪ provide for use of "chance find" procedures ▪ disclose draft mitigation plans, in timely manner, before appraisal formally begins, in accessible form and language
MS7. Safety of Dams ▪ use experienced and competent professionals to design and supervise construction, operation, and maintenance of dams and associated works ▪ Develop plans, including for construction, supervision, instrumentation, operation and maintenance and emergency preparedness ▪ use independent advice on verification of design, construction, and operational procedures ▪ use qualified, experienced contractors to undertake planned construction activities ▪ carry out periodic safety inspections of new/rehabilitated dams after completion of construction/rehabilitation, review/monitor implementation of detailed plans and take appropriate action as needed ▪ disclose draft plans, in timely manner, before appraisal, in accessible form and language	**MS8. Accountability and Grievance Systems** GEF Agency Accountability system shall be: ▪ designed to address breaches of policies and procedures ▪ independent, transparent, and effective ▪ required to keep complainants informed of case progress ▪ required to maintain records on all cases and issues GEF Agency complaints systems shall: ▪ designate staff/division to receive and respond ▪ work proactively to resolve complaints with standing ▪ maintain records on all cases, with due regard for confidentiality ▪ publicly designate contact information ▪ inform stakeholders of existence of and how to access accountability and grievance systems

Application of the GEF Safeguards

26. The GEF Safeguards are applied at the Agency level, providing benchmarks for reviewing whether GEF Agencies have the policies, systems, and institutional capacities to satisfy the minimum requirements listed in each Minimum Standard. To date this has occurred during the accreditation process for new Agencies and the compliance review of existing GEF Agencies.

27. **Existing Agency compliance review.** With the adoption of the GEF Safeguards in 2011, the Council agreed that safeguard experts would assess whether the existing ten GEF Agencies met the newly adopted standards (excluding the World Bank as the GEF Safeguards were based on World Bank policies).[24] The review initially found that one Agency (ADB) fully met the GEF Safeguards requirements. GEF published the methodology and results of the compliance assessment and requested the remaining eight Agencies to develop time-bound action plans to demonstrate how they would come into compliance with provisions not met.[25] These plans were compiled and publicly posted by the GEF Secretariat, along with progress reports.[26] By May 2015, the eight GEF Agencies had completed the compliance process.[27]

28. **Accreditation process.** Stage 2 in the accreditation process for new GEF Project Agencies involved a review by the independent GEF Accreditation Panel of compliance with the GEF Minimum Standards, the GEF Gender Mainstreaming Policy, and the GEF Policy on Fiduciary Standards. By mid-2015, the Panel determined that 8 applicants had complied with the GEF policies and could proceed to the final stage of the accreditation process.[28] The 2015 accreditation progress report provided profiles of the eight applicants including general indications of safeguard policy areas that were strengthened in the review process (e.g. environmental assessment, grievance). However, the Panel's safeguards review methodology and identification of specific gaps and action items were not publicly disclosed, unlike the compliance review process of existing agencies.

29. **Monitoring Policy.** In October 2016, the Council approved a monitoring policy to review ongoing compliance of GEF Agencies with the GEF Safeguards, gender policy, and fiduciary standards.[29] The new policy requires Agencies to self-assess and certify that any changes that

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[24] Agencies were also reviewed for compliance with the GEF Gender Mainstreaming Policy and GEF Policy on Fiduciary Standards. See GEF Council Document GEF/C.41/10/Rev.1.

[25] GEF, Review of GEF Agencies on Environmental and Social Safeguards and Gender Mainstreaming, GEF/C.45/10, October 9, 2013, at https://www.thegef.org/sites/default/files/council-meeting-documents/GEF.C.45.10_Review_of_GEF_Agencies_on_Safeguards_and_Gender_October_9_2013_1.pdf.

[26] See GEF/C.46/Inf.06 and GEF/C.47/Inf.07, at https://www.thegef.org/documents/environmental-and-social-safeguards-policy.

[27] GEF, GEF Agency Compliance with Policies on Environmental and Social Safeguards, Gender, and Fiduciary Standards, GEF/C.48/06, May 7, 2015, at https://www.thegef.org/council-meeting-documents/gef-agency-compliance-policies-environmental-and-social-safeguards-gender.

[28] GEF, Progress Report on the Pilot Accreditation of GEF Project Agencies, GEF/C.48/10/Rev.01, June 1, 2015, at https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.48.10.Rev_.01_Progress_Report_on_the_Pilot_Accreditation_of_GEF_Project_Agencies_4.pdf.

[29] GEF, Monitoring Agency Compliance with GEF Policies on Environmental and Social Safeguards, Gender, and Fiduciary Standards: Implementation Modalities, GEF/C.51/08/Rev. 01, October 27, 2016, at

may have occurred to relevant policies, procedures, or capabilities maintain compliance with the GEF policies, with appropriate documentation provided. A third-party reviewer will verify that any changes reported by Agencies ensure ongoing compliance. In addition, the reviewer may consider cases where the Secretariat finds risks of Agency non-compliance independent of the Agency self-assessment process. Agency certification of compliance and findings of the third-party review will be presented to Council and publicly disclosed. Where gaps in ongoing compliance are found, actions plans would be developed to achieve compliance. Agency self-assessments and risk-based third-party reviews are to take place once per replenishment cycle, starting with the final year of the GEF 7 period, that is, in 2022.

30. In the GEF Partnership responsibility for project implementation and risk management resides with the Agencies. The GEF Instrument requires all GEF Agencies to be accountable to the Council for their GEF-financed activities, including for implementation of the operational policies, strategies, and decisions of the Council.[30]

31. GEF Agencies apply their own safeguard systems to the GEF-supported projects and programmes that they implement. Where Agency safeguard policies include more stringent standards than those of the GEF Minimum Standards, the more stringent requirements would be applied, consistent with the Agency's safeguard system.

32. The GEF Safeguards are not utilized as a project review standard, as is emphasized in the GEF Safeguards guideline document: "The GEF Secretariat will not conduct a project-by-project review of the application of the minimum safeguard standards.[31]" As noted in Section IV of this review, this distinguishes GEF's approach – based on a partnership across the GEF Agencies – from the procedures of some multilateral climate funds, such as the Adaptation Fund and Green Climate Fund.

33. The mechanism for ensuring application of the GEF Safeguard's Key Principles, which apply to all GEF-financed operations, is not specified. Adherence to these "do not finance" conditions relies on the professional judgement of GEF staff.

34. Consideration of environmental and social risks is, of course, not wholly absent from the GEF project/programme cycle. However, GEF's focus on tracking such risks is uneven and fragmentary. These issues are discussed below.

Safeguards in the GEF project/programme cycle

35. This section addresses to what extent the current GEF project/programme proposal, technical review, monitoring, reporting, and evaluation procedures address environmental and

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http://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.51.08.Rev_.01_Monitoring_Agency_Compliance_v2.pdf.

[30] GEF, Instrument for the Establishment of the Restructured Global Environment Facility, March 2, 2015, para. 22, at https://www.thegef.org/documents/instrument-establishment-restructured-global-environment-facility.

[31] GEF, Application of Policy on Agency Minimum Standards, para. 8.

social risks and safeguards. By design the GEF Minimum Standards are not explicitly applied at the project/programme level. A recent summary of GEF policies and guidelines related to the GEF project/programme cycle does not include the GEF Safeguards.[32]

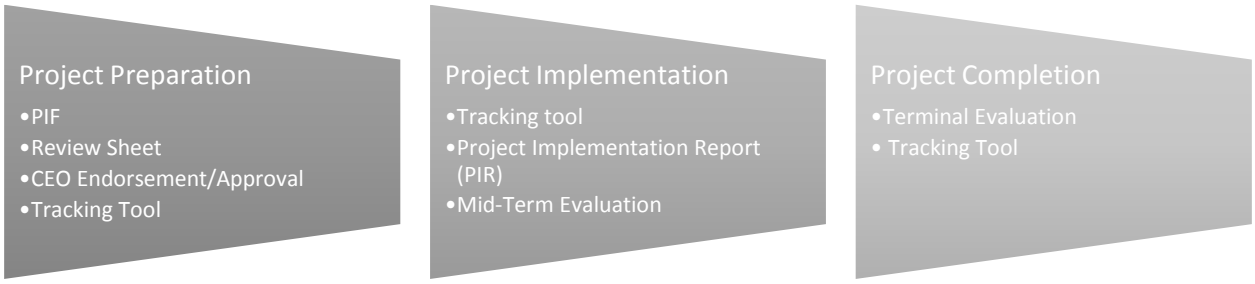
36. Per the GEF Instrument, the GEF Secretariat is responsible for key project cycle functions, including the following:

- in consultation with GEF Agencies ensuring implementation of the operational polices adopted by the Council through the development of guidelines that address project identification and development, including the proper and adequate review of project and work program proposals, consultation with and participation of local communities and other interested parties, monitoring of project implementation and evaluation of project results, and

- reviewing and reporting to the Council on the adequacy of arrangements made by GEF Agencies in accordance with the guidelines, and if warranted, recommending to the Council and the GEF Agencies additional arrangements for project preparation and execution.[33]

37. In this context, the Secretariat has developed a range of project templates and tools that reflect a degree of due diligence related to the GEF Safeguards, however uneven. Figure 1 outlines key milestones for potential documentation of safeguard issues at various stages of the GEF project/programme cycle.

Figure 1: Key Safeguards relevant documentation milestones



Project Preparation

38. GEF's Project Information Form (PIF) and CEO Endorsement/Approval template require GEF Agencies to identify stakeholder participation issues, including indigenous peoples, gender equality issues, and social and environmental risks that might prevent achievement of project

[32] GEF Project and Progamme Cycle Policy, GEF/c.50/08, May 19, 2016, Table 1, at https://www.thegef.org/council-meeting-documents/gef-project-and-program-cycle-policy-0. GEF's Policy on Gender Mainstreaming is also not listed, however GEF's Public Involvement Policy and guidelines are included, as is the indigenous peoples principles and guidelines document.
[33] GEF Instrument, para. 21.

objectives, including climate change risks. Measures to address the identified risks should be identified, "if possible" (see Table 2).

39. The Secretariat's technical review sheet for Full-size/Medium-size projects and programs includes a broad question at the PIF stage ("are socio-economic aspects, including relevant gender elements, indigenous people, and CSOs considered?") and a broad question regarding risk identification (including climate) and response measures at the CEO Endorsement stage.

40. GEF's project proposal or review templates do not seek to record Agency-designated environmental and social risk category levels assigned to projects/programmes. The lack of recording such information in GEF's Project Information Management System (PMIS) impedes the Secretariat's ability to maintain an overview of the level of social and environmental risks across the GEF portfolio, as determined by the Agencies. The project/programme review procedure also does not provide for assigning risk flags to any relevant potential areas of concerns for tracking through project implementation.

Table 2: GEF project proposal and review templates (excerpts)

Table 2. GEF project proposal and review templates (excerpts)		
Document type[34]	**Section**	
Project Information Form (PIF) (Aug. 2016)	PARTII: Project Justification	2. Stakeholders: Will project design include the participation of relevant stakeholders from civil society organizations (yes/no) and indigenous people (yes/no)? If yes, identify key stakeholders and briefly describe how they will be engaged in project preparation 3. Gender Equality and Women's Empowerment. Are issues on gender equality and women's empowerment taken into account? (yes/no). If yes, briefly describe how it will be mainstreamed into project preparation (e.g. gender analysis), taking into account the differences, needs, roles and priorities of women and men. 4. Risks: Indicate risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved, and, if possible, propose measures that address these risks to be further developed during the project design.
Project Review Sheet (Mar 2015, FSP/MSP)	PIF Review Project Design	6. Are socio-economic aspects, including relevant gender elements, indigenous people, and CSOs considered?
	CSO endorsement Review	4. Does the project take into account potential major risks, including the consequences of climate change, and describes sufficient risk response measures? (e.g., measures to enhance climate resilience)

[34] See GEF project/programme templates at https://www.thegef.org/documents/templates.

CEO Endorsement/ Approval Templates (Aug. 2016)	Part II Project Justification	A.3. Stakeholders. Elaborate on how the key stakeholder's engagement, particularly with regard to civil society organizations and indigenous peoples, is incorporated in the preparation and implementation of the project. A.4 Gender Equality and Women's Empowerment. Elaborate on how gender equality and women's empowerment issues are mainstreamed into the project implementation and monitoring, taking into account the differences, needs, roles and priorities of women and men. A.4. Gender Equality and Women's Empowerment. Elaborate on how gender equality and women's empowerment issues are mainstreamed into the project implementation and monitoring, taking into account the differences, needs, roles and priorities of women and men. A.5 Risk. Elaborate on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved, and, if possible, the proposed measures that address these risks at the time of project implementation (table format acceptable)

Project Implementation

41. GEF requires the completion of several reports/tools during project/programme implementation. For annual reports and mid-term evaluations, GEF does not require reporting on progress related to implementation of safeguard risk management measures unless these were specifically included in the project results framework as a project outcome, output, or indicator. The degree to which environmental and social risk management is reported to GEF relies on the Agency's own reporting guidelines and formats

1. **Project Implementation Reports (PIR):** GEF requires annual submissions of Project Implementation Reports.[35] GEF does not publicly disclose the PIR. A review of recent PIRs in GEF's Project Information Management System (PMIS) indicates that each GEF Agency utilizes its own format; however, some common features are found, including information on stakeholder involvement and social, cultural and economic factors. Regarding environmental and social risks, some Agencies include information on implementation of environmental and social risk management measures.

2. **Mid-term evaluations** are required for Full-size projects, and are strongly recommended for Medium-size projects.[36] Agencies establish their own guidance and formats which

[35] The GEF Monitoring and Evaluation Policy, 2010, para. 51, at https://www.thegef.org/documents/monitoring-and-evaluation-policy.

[36] The GEF Project and Programme Cycle Policy at para. 35 notes that "Agencies conduct project-level monitoring and evaluation activities in accordance with the Agency systems and consistent with the GEF Monitoring and Evaluation Policy. Agencies undertake mid-term reviews for FSPs under implementation and submit them to the Secretariat. Agencies submit FSPs and MSPs terminal evaluation reports to the GEF Independent Evaluation Office."

may or may not require reporting on implementation of environmental and social risk management measures.[37] Mid-term evaluations are not disclosed on the GEF website.

3. **Tracking Tools:** The GEF tracking tools[38] are designed for measuring progress in achieving the impacts and outcomes established at the portfolio level. The Tracking tools are reported to GEF Secretariat using the template for each focal area. For Full-size project, the timing for reporting are three times; CEO endorsement, mid-term and completion stages. For Medium size project, the submissions are required in the stage of CEO approval and project completion. There are seven tracking tools, namely, Biodiversity, Chemicals and Wastes, Climate Adaptation, Climate Mitigation, International Waters, Sustainable Forest Management, and land degradation. Three out of seven tracking tools to some extent include indicators for public involvement, Indigenous people's engagement, risk and vulnerability assessment, and monitoring (see Table 3).

Table 3:Safeguard-related issues addressed in the GEF Tracking Tools

Table 3. Safeguard-related issues addressed in the GEF Tracking Tools	
Tracking Tools (Biodiversity)	Objective 1. Section II, 7.a" Planning process: The planning process allows adequate opportunity for key stakeholders to influence the management plan". (Y/N)
	Objective 1. Section II, 23, "Indigenous people: Do indigenous and traditional peoples resident or regularly using the protected area have input to management decisions?" (Y/N)
	Objective 1. Section II, 24. "Local communities: Do local communities resident or near the protected area have input to management decisions?" (Y/N)
	Objective 1. Section II, 24 a. "Impact on communities: There is open communication and trust between local and/or indigenous people, stakeholders and protected area managers". (Y/N)
	Objective 1. Section II, 24 b. "Impact on communities: Programmed to enhance community welfare, while conserving protected area resources, are being implemented". (Y/N)
	Objective 1. Section II, 24 c. "Impact on communities: Local and/or indigenous people actively support the protected area". (Y/N)
Tracking Tools (Chemicals and Wastes)	None

[37] UNDP's guidance for conducting mid-term reviews of UNDP-supported GEF-Financed Projects includes guidance on addressing stakeholder engagement issues and some risks to projects sustainability, available at http://web.undp.org/evaluation/documents/guidance/GEF/midterm/Guidance_Midterm%20Review%20_EN_2014.pdf.
[38] GEF Tracking Tools, at https://www.thegef.org/documents/tracking_tools.

Tracking Tools (Climate Adaptation)	Objective 2. Strengthen institutional and technical capacities for effective climate change adaptation, Outcome 2.1: Increased awareness of climate change impacts, vulnerability and adoption; Indicator 5. Public awareness activities carried out and population reached
	Objective 2. Strengthen institutional and technical capacities for effective climate change adoption, Outcome 2.2: Access to improved climate information and early-warning systems enhanced at regional, national, sub-national and local level; Indicator 6. Risk and vulnerability assessments, and other relevant scientific and technical assessment carried out and updated
Tacking Tools (Climate Mitigation)	None
Tracking Tools (International Waters)	Water Environmental & Socioeconomics Status Indicators 18. Number of civil society stakeholders/participants engaged in Transboundary Diagnostic Analysis (TDA) /Strategic Action Plan (SAP)
	19. Types of mechanisms and project indicators in place to monitor the environmental status of the water body?
Tracking Tools (Sustainable Forest Management)	None
Tracking Tools (land degradation)	None

Project Completion

42. **Terminal Evaluations:** Terminal Evaluations are required by The GEF Monitoring and Evaluation Policy.[39] All projects and programs are required to include M&E plans. GEF terminal evaluations are designed to provide a comprehensive and systematic account of project performance, and specifically to evaluate for contributions to global environmental benefits. Management of project-related environmental and social risks typically are not addressed unless such risks may affect the sustainability of project outcomes. Terminal evaluations are disclosed on the GEF website.

43. GEF has issued "Guidelines for GEF Agencies in Conducting Terminal Evaluation" which identify four key risk areas that may affect sustainability of outcomes, namely, financial, socio-political, institutional framework and governance, and environmental risks.

44. A review of a limited sample of terminal evaluations from a cohort of GEF-4 projects found that some had identified specific project-related environmental and social risk issues as factors that contributed to low project outcome ratings, including limited stakeholder

[39] The GEF Monitoring and Evaluation Policy 2010, at https://www.thegef.org/documents/monitoring-and-evaluation-policy.

engagement, inadequate or untimely environmental and social assessment, impacts on natural habitats, underestimation of risks and capacities. Examples are listed in Table 4.

Table 4: Examples of safeguard-related risks identified in terminal evaluations

Table 4: Examples of safeguard-related risks identified in terminal evaluations
***Case1*: Development of a National Implementation Plan in India as a First Step to Implement the Stockholm Convention on Persistent Organic Pollutants (POPs)** (a) *Potential risks*: lack of stakeholder involvement and consultation ***Terminal Evaluation Report (TER)*:** The objective of this project was to develop National Implementation Plan (NIP) for India to implement the Stockholm Convention. In the TER, the evaluators pointed out the lack of consultation from the beginning of the project noting that it might cause risk project outcomes.
Case 2: Lake Skader-Shkoder Integrated Ecosystem Management (b) *Potential risks: insufficient* environmental impact assessment ***Terminal Evaluation Report (TER)*:** The risk assessment process for this Category B was insufficient regarding the installation of waste water treatment facilities and constructed wetlands. The TER noted that "the constructed wetlands are not yet a conventional technology in many places" and were very controversial to local communities and authorities.
Case 3: Integration of Ecosystem Management Principles and Practices into Land and Water Management of Laborec-Uh region (Eastern Slovakian Lowlands) (c) *Potential risks*: *inadequate* environmental and social impact assessment ***Terminal Evaluation Report (TER)*:** The final proposal was very ambitious and the potential risks were underestimated. During consultations with stakeholders, the lack of capacities and commitment to the project were identified in the preparation stage, and these risks became very crucial to project implementation due to absence of effective counter-measures.
Case 4: Sustainable Public Transport and Sport: A 2010 Opportunity (d) *Potential risks*: *insufficient* environmental and social impact assessment ***Terminal Evaluation Report (TER)*:** Displaced informal transport providers were not sufficiently consulted to the project sufficiently and were not adequately integrated into the new transport system. The TER noted that the transport development would face significant risks if it failed to adequately integrate them, from the viewpoints of project sustainability.
Case 5: SIP: Community Driven SLM for Environmental and Food Security (e) *Potential risks*: inadequate environmental and social impact assessment ***Terminal Evaluation Report (TER)*:** Inadequate environmental and social studies for first two years of project implementation because a hiring of environmental and social specialist was not in place.
Case 6: Extension of Kasanka Management System to Lavushi Manda National Park (f) *Potential risks*: inadequate environmental and social impact assessment

***Terminal Evaluation Report (TER)*:** The TER found that local people did not have enough familiarity with the promoted concept of green entrepreneurship, and the risk was very high that the regional parks would become "paper parks," not enhancing conservation, or that the parks would become a tool for tourism promotion.

GEF Secretariat Annual Report

45. The GEF Secretariat produces an Annual Portfolio Monitoring Report that "presents an overview of progress toward results, including outcomes, implementation issues, and portfolio-wide trends based on information submitted by the GEF Agencies through the project or program implementation reports and focal area tracking tools."[40] The report does not seek to provide an overview of environmental and social risks in the GEF portfolio. However, it does contain a section that seeks to quantify the number of projects that include a gender analysis and incorporated gender responsive results frameworks, involved civil society organizations (CSOs), and those that include indigenous peoples as key partners.

Benefits and challenges of GEF Safeguards in the GEF Partnership

46. Adoption of the GEF Minimum Standards in 2011 has served as an important catalyst among many GEF Agencies – both existing and newly accredited – to strengthen existing safeguard policies and, in a number of cases, to adopt comprehensive safeguard policy frameworks, together with supporting implementation systems and procedures.

47. The GEF Minimum Standards has contributed to more harmonized approaches in managing project-level environmental and social risks and impacts across the GEF Partnership, recognizing that some Agencies have also adopted additional, specific standards relevant to their operations. During the accreditation and safeguards compliance processes:

(a) the safeguard policies and systems of the multilateral development banks in the GEF Partnership either met the GEF Minimum Standards outright or required relatively minor clarifications and/or guidance.

(b) All of the UN-related GEF Agencies approved new and/or updated safeguard frameworks in 2014 and 2015.

(c) Each of the eight newly accredited GEF Project Agencies adopted either GEF-specific or Agency-wide safeguard frameworks as part of the GEF accreditation process.

(d) By 2015 all eighteen GEF Agencies were judged to have environmental and social safeguards in place that met the minimum requirements of the GEF Standards.

48. Interviews with Agencies that adopted new or recently updated safeguard frameworks reported that the GEF Safeguards served as an important driver, even where Agencies had already initiated developing safeguards ("it pushed us to be more ambitious," one Agency

[40] The GEF Monitoring and Evaluation Policy, para. 51. For the 2016 Annual Portfolio Monitoring Report, see https://www.thegef.org/council-meeting-documents/annual-portfolio-monitoring-report-2016.

noted). The compliance review of existing GEF Agencies of safeguard policies and capacities "created the necessary impetus to revisit and strengthen our safeguard policies and approach," noted another. The GEF Minimum Standards had relatively little impact on Agencies with well-established safeguard systems (e.g. the MDBs).

49. Some Agencies noted that adoption of their GEF-aligned safeguard policies have had positive impacts on the project design process, whereby safeguard-related risks are now flagged at project screening and addressed in management and monitoring frameworks.

50. Adoption of the GEF Safeguards of course has not been cost free. Agencies have devoted significant resources to develop or revise policies and institutional procedures. The costs of accrediting eight GEF Project Agencies were substantial, both for the Agencies and the GEF.[41]

51. Agency interviews also noted a number of ongoing challenges. Institutional capacity to manage safeguard review and implementation among Agencies with recently adopted systems is quite limited, in some cases handled by just one or a few staff members. The roll out process within Agencies is complex, requiring significant training and development of appropriate tools and procedures. Additionally, some Agencies report that their country counterparts are not familiar with the need for application of Agency safeguard requirements in addition to national regulations, and this can become a complicating factor in project development.

[41] See Evaluation of the GEF Accreditation Process for Expansion of the GEF Partnership, GEF/ME/C.48/Inf.03, May 14, 2015, at https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.ME_.C.48.Inf_.03_Eval_Accr_Process_4.pdf.

III. GEF 6 Portfolio and Social and Environmental Risks

52. The core mission of the GEF is to support sustainable development of recipient countries by providing new and incremental financing of agreed measures to protect the global environment across key focal areas: biological diversity, climate change, international waters, land degradation (primarily desertification and deforestation), chemicals and wastes.[42]

53. With a focus on securing global environmental benefits, there has been a general assumption that relatively few or minor environmental and social risks arise in GEF-supported projects and programs. For example, the GEF-Safeguards policy notes that "there is little evidence that GEF financing leads to adverse impacts,"[43] although, as seen in the previous section, there is currently little tracking of potential environmental and social risks in the portfolio to confirm this conclusion.

54. The following sections examine potential areas of environmental and social risk in GEF's operations and presents the results of a high-level review of environmental and social risk categorization and safeguard issue areas in the GEF-6 portfolio.

Types of environmental and social risk areas in GEF operations

55. In seeking to secure global environmental benefits, GEF has followed the principle, integral to sustainable development, that operations in one focal area should avoid generating adverse environmental or social impacts in other focal areas. The adoption of the GEF Safeguards acknowledges that GEF-supported operations may face trade-offs between competing environmental and socioeconomic objectives, and where adverse impacts cannot be avoided, they must be effectively assessed, mitigated and managed.

56. GEF typically does not support the development of large-scale infrastructure that typically generates significant adverse social and environmental risks and impacts. Nevertheless, the GEF portfolio does contain a small number of projects categorized as high social and environmental risk (e.g. Category A projects), and significantly, a wide range of moderate risk projects (e.g. Category B projects) which include components that may lead to an array of social and environmental harms if not effectively managed.

57. Table 5 lists a sample of environmental and social risks associated with a number of GEF 6 projects across different GEF focal areas that require appropriate assessment, mitigation and management measures.

[42] GEF Instrument, para. 2.
[43] GEF, Agency Minimum Standards, para. 2.

Table 5: Sample of social and environmental risks in GEF 6 focal area project

Table 5. Sample of social and environmental risks in GEF 6 focal area project	
Focal area and activities	***Identified risk areas***
Biodiversity, Land Degradation, Sustainable Forest Management	
Protected area creation and expansion	▪ Physical relocation ▪ Impacts on land tenure arrangements ▪ Economic displacement due to access restrictions ▪ Impacts on indigenous peoples' rights, lands, resources ▪ Impacts on cultural heritage ▪ Worker safety risks (enforcement activities) ▪ Community safety and security risks (from enforcement personnel)
Species conservation (combatting poaching and illegal wildlife trade)	▪ Worker safety risks (enforcement activities) ▪ Community safety and security risks (from enforcement personnel) ▪ Economic displacement
Invasive species control and eradication	▪ Pesticide use and management ▪ Impacts on other habitats/species from IAS eradication
Habitat restoration	▪ Biodiversity risks due to inappropriate species mix in reforestation, afforestation of grasslands, improper erosion control and irrigation techniques ▪ Introduction of invasive alien species in reforestation, revegetation activities
Sustainable landscapes and agriculture (water and rural infrastructure, forestry, agroforestry, livestock, aquaculture)	▪ Biodiversity risks due to planting fast growth production species ▪ Pesticide use and management ▪ Involuntary resettlement due to infrastructure ▪ Introduction of invasive alien species ▪ Nutrient loading and effluent buildup ▪ Altering environmental flows through expanded water usage (irrigation, storage)
Climate Change	
Renewable energy (solar, wind, geothermal, biogas)	▪ Land acquisition/use impacts, potential physical/economic displacement ▪ Soil, air, water impacts (clearing, soil compaction, vegetation impacts, drainage channels, runoff and erosion) ▪ Worker health and safety ▪ Community health and safety risks from construction ▪ Pollution risks (wastes, runoff, emissions) ▪ Biological and chemical hazards
Resilient water resources (water infrastructure)	▪ Impacts on habitats and water recharging (reservoirs, canals) ▪ Community health and safety risks (construction, structural failure)
Coastal barriers	▪ Construction risks and community health and safety ▪ Economic displacement ▪ Impacts on currents, sedimentation, sea life and vegetation
Chemicals and Waste	
Reduction and phase-out of hazardous chemicals and wastes (POPs, mercury, lead, PCBs)	▪ Risk of transport, storage, disposal hazardous chemicals and wastes ▪ Pollution risks from spills, emissions, wastes ▪ Construction related risks (waste disposal plants, incinerators) ▪ Community health and safety risks ▪ Worker health and safety ▪ Economic displacement from industrial relocation/closure
International Waters	
Protected areas and strengthened fisheries regulations	▪ Risks of economic displacement (fishers) ▪ Displacement of unsustainable practices to other areas

	▪ Worker safety (enforcement)
Integrated Approaches: Sustainable Cities	
Stormwater management, sustainable transport	▪ Physical and economic displacement ▪ Construction risks, community health and safety
Energy efficiency (retrofitting)	▪ Waste generation and hazardous materials (e.g. asbestos abatement) ▪ Construction risks and community health and safety ▪ Worker health and safety

58. In addition, a number of projects identified potential stakeholder risks (e.g. lack of participation and acceptance) as well as the potential for adverse gender-differentiated impacts. Management measures and plans were identified in project proposals to mitigate for these and many of the above identified risks. As noted in the introduction, the scope of this review is focused at the GEF-level and does not include analysis of the effectiveness of safeguard measures implemented by GEF Agencies.

59. Potential other factors that may increase challenges to effective environmental and social risk management in GEF-supported operations could be considered in future reviews and evaluations. These may include the wide-ranging differences in capacity among GEF Agencies to manage complex safeguards risks; increasing complex financing modalities (e.g. integrated approach pilots and programmes, use of financial intermediaries[44]), and the move among Agencies to rely more on country partner safeguard systems.

Table 6: Number of GEF-6 projects, by Agency, in risk categorization sample

Agency	# in original sample	Final # reviewed
ADB	7	7
AfDB	8	8
BOAD	1	2
CI	5	6
DBSA	3	3
EBRD	3	–
FAO	13	16
FUNBIO	1	1
IADB	3	5
IFAD	9	9
IUCN	7	11
UNDP	102	103
UNEP	33	34
UNIDO	20	20
World Bank	25	25
WWF-US	3	3
Total	**243**	**253**

Environmental and social risks in the GEF 6 portfolio

60. As noted in Section II, GEF does not track environmental and social risks in projects and programmes across the portfolio. Each GEF Agency applies its own risk screening and categorization system to classify the magnitude of potential project/programme-related environmental and social risks. For this review GEF Agencies were surveyed regarding the environmental and social risk categories assigned to their projects in the GEF-6 portfolio.

[44] For example, the IFC's Compliance Advisor/Ombudsman (CAO) recent monitoring report regarding previous audits of IFC financial intermediary lending found improvements in IFC review and supervision but noted "ongoing concerns that IFC does not, in general, have a basis to assess FI clients' compliance with its E&S requirements. This is of particular concern in relation to FI clients that are supporting projects with high E&S risks, and where IFC does not have assurance that the development of a client's E&S Management System (ESMS) is leading to implementation of IFC's Performance Standards at the sub-project level." See CAO, Compliance Audit of IFC's Financial Sector Investments, Third Monitoring Report, March 8, 2017, at http://www.cao-ombudsman.org/newsroom/documents/FIAUDIT.htm.

Of the projects assigned a risk category, the majority of GEF-6 projects were designated Moderate Risk, with very few High Risk projects.

61. Before summarizing the survey results, it is important to note the methodology used and its limitations. A data set of Medium- and Full-sized projects approved during the GEF-6 cycle (as of November 2016) were identified in the GEF Project Management Information System (PMIS). Questions were sent to each GEF Agency regarding the level of project risk classification of their GEF-6 projects. Nearly all GEF Agencies responded, and some Agencies included additional projects that had not been initially identified. In total, 253 projects were included in the sample (see Table 6).

62. Comparing environmental and social risk categories across multiple GEF Agencies has its limitations given that each Agency applies its own criteria and procedures for assigning risk categories, which may not be entirely consistent. In general, all GEF Agencies in the sample employ a tiered risk categorization scheme – High Risk (Category A or 1), Moderate Risk (Category B or 2), and Low/No Risk (Category C or 3). However, categorization depends on internal Agency procedures.[45] Timing of assigning risk categories may also differ. Nevertheless, the following survey results present the first attempt to summarize the level of environmental and social risks across the GEF portfolio. Future reviews should seek to control for potential differences in environmental and social risk categorization across GEF Agencies.

63. The following section summarizes responses to a set of questions sent to each Agency.

SUMMARY OF SURVEY RESULTS

1. Has the project been assigned an environmental/social risk category? (Charts 1a-1b)

- ✓ 49% of projects had been assigned a risk category in project preparation (“Yes”)
- ✓ 35% of projects will be categorized as the project moves to appraisal/approval stage (“In progress”)
- ✓ 16% of projects were not categorized (e.g. categorization system not fully operable at start of GEF 6, non-response to survey) (“No”)

[45] Some Agencies may utilize multiple categorization designations for a single project. For example, the ADB assigns risk categories for each applicable safeguard area for a project, and the AfDB assigns additional climate change risk categories to projects.

Chart 1a & Chart 1b: Q: Has the project been assigned an environmental/social risk category?

Chart 1a

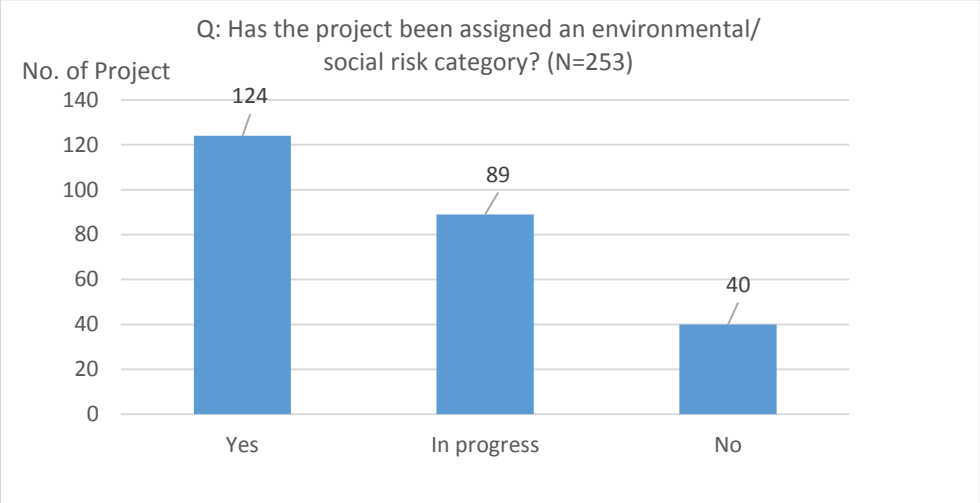
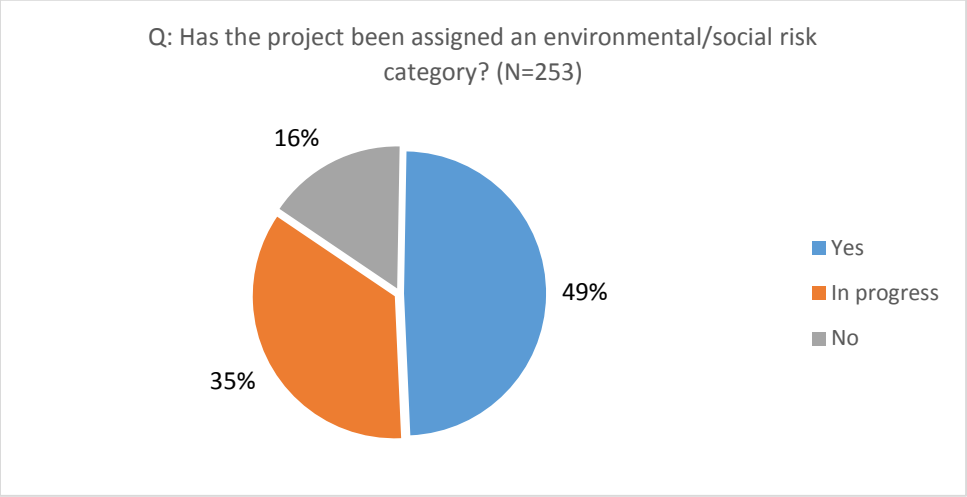


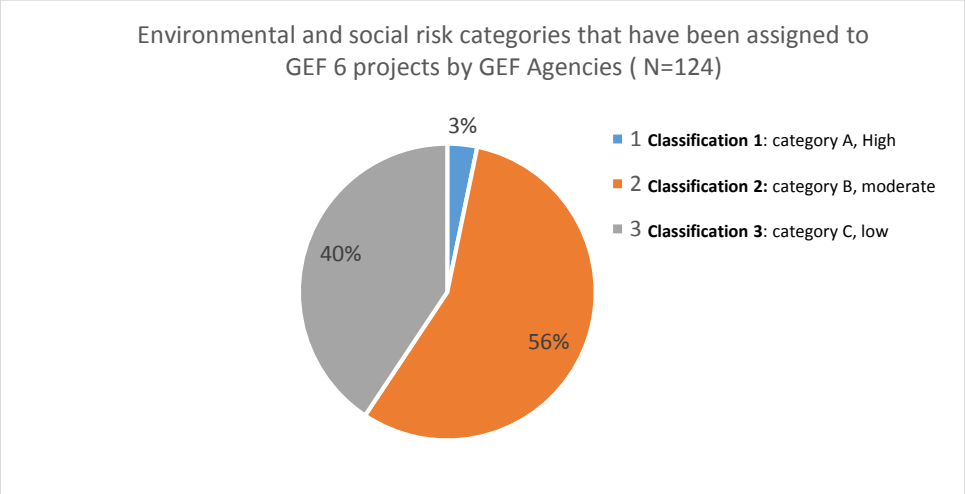
Chart 1b



2. What environmental/social risk category is assigned to this project? (Chart 2)

- ✓ Of the 124 categorized projects, 3% were rated High Risk (N=4), 56% Moderate Risk (N=69), and 40% Low Risk (N=50).
- ✓ One project classified as a financial intermediary project (FI)
- ✓ The chemicals and wastes focal area included 3 High Risk projects.
- ✓ Moderate risk projects were spread across all GEF focal areas

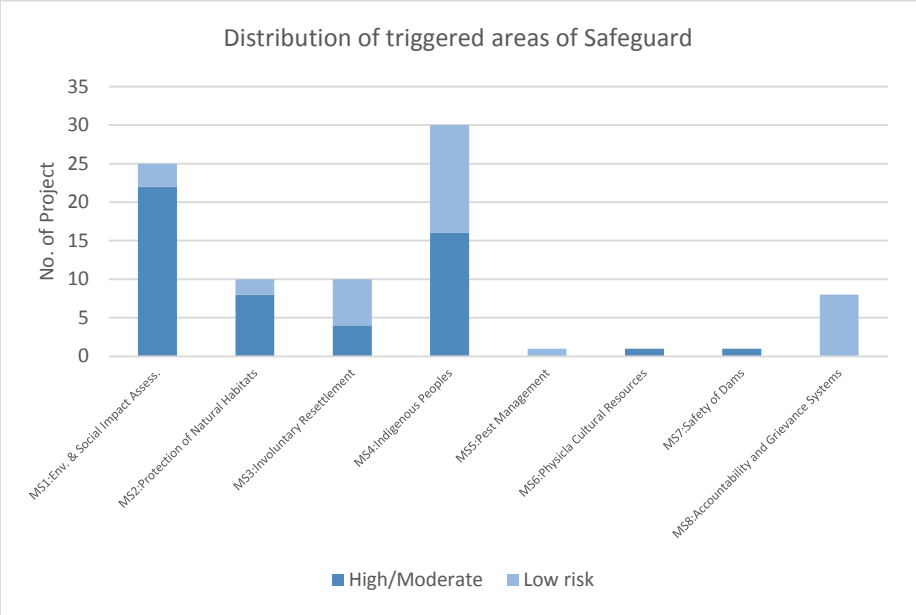
Chart 2: Environmental and social risk categories that have been assigned to GEF 6 projects by GEF Agencies



3. Which safeguard standards are triggered by GEF-6 projects? (Chart 3)

- ✓ Agencies were asked to identify which Agency safeguard policies were applicable/triggered for each categorized project. For comparison purposes, responses were mapped to the GEF Minimum Standards (noting that there is not always direct alignment)
- ✓ Standards on Environmental and Social Assessment and Indigenous Peoples were by far the most prevalently triggered safeguards, followed by Natural Habitats and Involuntary Resettlement
- ✓ Some Agencies indicate applicability of safeguard standards (e.g. Indigenous Peoples) for low risk projects
- ✓ Specific identified social and environmental risks include community health and safety risks due to infrastructure development; potential involuntary resettlement and loss of livelihoods; risks to indigenous peoples, lands, and cultural resources; conversion of natural habitats; and pollution risks.
- ✓ MS8: Accountability and Grievance Systems was not included here (always applicable at Agency level)

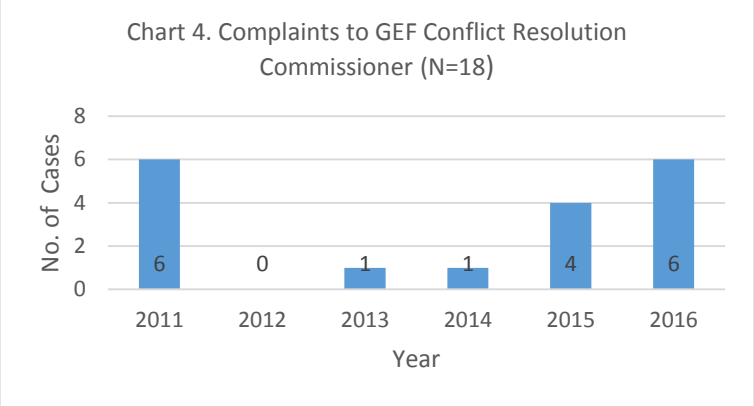
Chart 3: Distribution of triggered areas of Safeguard



Accountability and grievance issues

64. Complaints from stakeholders may highlight key social and environmental risks and impacts associated with projects and programmes. To date, there have been relatively few cases filed with the grievance and accountability mechanisms of GEF Agencies regarding GEF-financed projects and programs. The GEF Conflict Resolution Commissioner at the GEF Secretariat has received a range of complaints, although relatively few directly associated with project or programme safeguard issues.

Chart 4: Complaints to GEF Conflict Resolution Commissioner



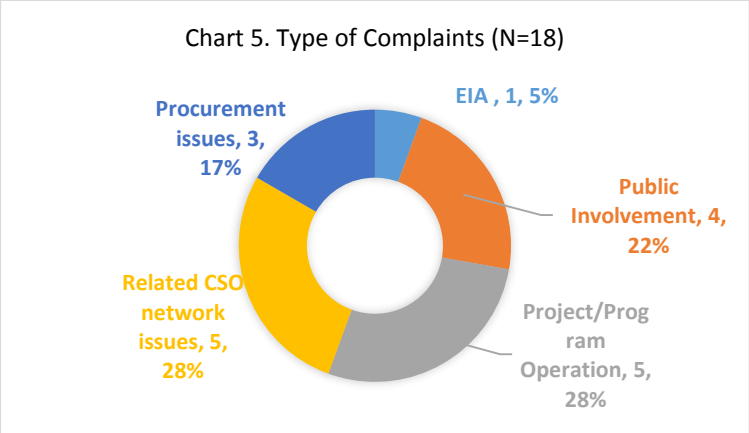


Chart 5: Type of Complaints

Complaints to the GEF Conflict Resolution Commissioner

65. GEF's Minimum Standards stipulate that "[p]otnetially affected parties may bring disputes and complaints about GEF projects directly to the Conflict Resolution Commissioner (CRC) at the GEF Secretariat. The Commissioner will work directly with the complainant, the GEF Partner Agency, and recipient country concerned to help address complaints and resolve disputes and other important issues of importance to GEF operations." Grounds for complaints are not restricted solely to safeguard-related issues. GEF's Minimum Standards also require GEF Agencies to report on cases brought to their respective conflict resolution systems as part of their annual project/programme reporting to GEF.[46]

66. Eighteen complaints and/or requests have been received by the CRC since 2011 (see Chart 4). Most complaints to date have concerned issues regarding procurement, the GEF CSO Network, and various project/programme operations. Regarding safeguard-related issues, four complaints (22% of the total) concerned the adequacy of public involvement and one concerned the lack of an environmental and social assessment (see Chart 5).

[46] See GEF, Conflict Resolution Commissioner website, at https://www.thegef.org/content/conflict-resolution-commissioner, and GEF, Agency Minimum Standards, paras. 11-12.

Complaints to GEF Agencies

67. Between 1998-2009 five cases regarding GEF projects were filed with the World Bank's Inspection Panel (Table 7). No complaints regarding GEF-supported operations have been filed at the World Bank since the GEF Safeguards came into force. The earlier complaints raised concerns related to the following GEF safeguard policy areas: Environmental and Social Impact Assessment, Protection of Natural Habitats, Involuntary Resettlement, Indigenous Peoples, and Physical Cultural Resources. The Inspection Panel ruled that three of the complaints were ineligible for further investigation. Of the two eligible complaints, the Panel found that World Bank safeguard policies were not fully complied with.

Table 7: Complaints to World Bank Inspection Panel regarding GEF-supported projects

Table 7: Complaints to World Bank Inspection Panel regarding GEF-supported projects					
Country	**Year**	**Project**	**Category**	**Safeguard issues raised in complaints**	**Inspection Panel Findings**
Peru	2009	Lima Urban Transport Project GEF TF No. 052856	B	**Environmental Assessment:** Inadequate environmental assessment and its approval procedures, absence of the citizen consultation **Physical Cultural Resources:** Impact on the lifestyle and architecture in historical distinguished area	Eligible for further investigation Environmental Assessment and Cultural Property safeguards not fully complied with
Brazil	2006	Parana Biodiversity Project GEF TF 051007	B	**Environmental Assessment:** Disregard of the original EIA methodology **Natural habitats:** destruction of natural habitat **Forestry:** destruction of native forests	Not eligible
Mexico	2004	Indigenous and Community Biodiversity Project (COINBIO) GEF TF 24372	B	**Indigenous peoples:** inadequate engagement	Not eligible Environmental Assessment safeguard not fully complied with
Kenya	1999	Lake Victoria Environmental Management Project GEF TF23819	C	**Environmental assessment:** Failures or omissions in design/implementation, inadequate EIA	Eligible for further investigation
India	1998	Ecodevelopment Project TF 028479	B	**Indigenous peoples:** disregard to indigenous peoples' culture and lack of meaningful consultation **Involuntary resettlement:** inadequate identification of tribal habitats in project area **Forestry:** destruction of forest area	Not eligible

68. In late-2015 UNDP's compliance mechanism – the Social and Environmental Compliance Unit (SECU) – received a complaint regarding a GEF project that raised issues regarding inadequate stakeholder engagement and access to information. The SECU "advisory review"

regarding the India High Mountain Landscape Project found gaps in these areas and advised remedial measures. The review noted that that the complaint involved a project that was approved before adoption of UNDP's Social and Environmental Standards.[47]

69. As of February 2017, no other complaints have been filed at GEF Agency accountability and grievance mechanisms concerning GEF-supported operations.[48]

IV. GEF Safeguards and Recent Safeguard Developments

70. Across the development finance landscape, institutional environmental and social safeguard frameworks are subject to periodic revision as lessons are learned and advancements made among peer institutions. In recent years safeguard systems have become more comprehensive and systematic, with greater harmonization among many development agencies.

71. As typified by the GEF, safeguards have also been adopted by international climate funds to ensure greater consistency in addressing environmental and social risks among increasingly diverse partners and accredited entities. In 2011, the Forest Carbon Partnership Facility (FCPF) adopted its Common Approach to Environmental and Social Safeguards which encompassed both MDBs and UN Agencies. Similar to GEF, the FCPF utilized key operational principles of the World Bank's safeguard policies as a common framework, together with requirements regarding stakeholder engagement, information disclosure, and grievance mechanisms.[49] In 2013 and 2014 the Adaptation Fund and the Green Climate Fund, respectively, adopted environmental and social safeguards.

[47] UNDP Social and Environmental Compliance Unit, Advisory Review India High Range Landscape Project, Case No. SECU0001 (21 November 2016), at https://info.undp.org/sites/registry/secu/SECUPages/CaseDetail.aspx?ItemID=6.
[48] Based on February 2017 review of GEF Agency websites and interviews with GEF Agency representatives.
[49] FCPF Common Approach to Environmental and Social Safeguards, at https://www.forestcarbonpartnership.org/common-approach-environmental-and-social-safeguards.

Box 1: Adaptation Fund Environmental and Social Policy

72. The following section (a) reviews the safeguard frameworks of other multilateral funds (the Adaptation Fund and Green Climate Fund), (b) summarizes key areas of expanded thematic coverage reflected in the safeguard policies adopted by a wide range of Agencies in recent years, and (c) presents a detailed review of potential gaps in the scope of the current GEF Minimum Standards when compared to these more recent safeguard frameworks.

Box 1. Adaptation Fund Environmental and Social Policy

Environmental and Social Commitment

Environmental and Social Principles:

1. Compliance with Law
2. Access and Equity
3. Marginalized and Vulnerable Groups
4. Human Rights
5. Gender Equality and Women's Empowerment
6. Core Labour Rights
7. Indigenous Peoples
8. Involuntary Resettlement
9. Protection of Natural Habitats
10. Conservation of Biological Diversity
11. Climate Change
12. Pollution Prevention and Resource Efficiency
13. Public Health
14. Physical and Cultural Heritage
15. Lands and Soil Conservation

E/S Management System

E/S Policy Delivery Process (Screening, Management Plan, Monitoring, Reporting, Evaluation, Disclosure, Consultation, Grievance)

Adaptation Fund

73. The Adaptation Fund (AF) finances climate adaptation projects and programmes for vulnerable communities in developing countries that are Parties to the Kyoto Protocol. Financing is provided through a range of implementing entities. As of March 2017, the AF has accredited 43 implementing entities (25 national, 6 regional, and 12 multilateral).[50]

74. **Environmental and Social Policy.** In 2013 the Adaptation Fund adopted its Environmental and Social Policy (ESP) "to ensure that the Fund's mission of addressing adverse impacts of and risks posed by climate change, projects and programmes supported by the Fund do not result in unnecessary environmental and social harms."[51] All implementing entities are expected to "demonstrate commitment and ability to comply" with the ESP "throughout all the project/programme implementation phases, including design, execution, monitoring, and evaluation.[52]"

75. The ESP is structured around 15 succinct Environmental and Social Principles that all AF-supported projects and programmes are expected to meet, where relevant (see Box 1 for list of the principles). Implementation of the principles are buttressed by requirements for implementing entities to adopt an environmental and social management system that provides for environmental and social risk identification (screening) and risk-appropriate forms of environmental and social assessment and adoption of avoidance, mitigation, and monitoring measures. Additional provisions require public disclosure and consultation (see Box 2) and access to grievance mechanisms.

[50] Per the Adaptation Fund website, at https://www.adaptation-fund.org/apply-funding/implementing-entities/ (reviewed March 31, 2017).
[51] Adaptation Fund, Environmental and Social Policy (2013, rev. in 2016), para. 1, available at https://www.adaptation-fund.org/wp-content/uploads/2015/09/Environmental-Social-Policy-approved-Nov2013.pdf.
[52] Adaptation Fund, Operational Policies and Guidelines for Parties to Access Resources from the Adaptation Fund (amended March 2016), para. 34, at https://www.adaptation-fund.org/wp-content/uploads/2016/04/OPG-amended-in-March-2016.pdf.

76. At the fund level, the AF in 2013 adopted a formal access to information policy (establishing a presumption of disclosure, a set of exemptions, and process guarantees on how requests for information would be addressed).[53] In 2016 the AF adopted a mechanism with specified procedures for addressing complaints from communities that may be adversely affected by the implementation of AF-supported projects/programmes.[54]

77. By design the AF's environmental social principles are broad, general statements reflecting key human rights and international environmental and social commitments. The AF safeguards are somewhat unique in that they generally do not include thematic-specific actions required to comply with the principles. An ESP guidance document provides interpretation of the principles for application in projects and programmes.[55]

78. The AF's ESP is operationalized at two key stages: (i) during the process of accrediting implementing entities, and (ii) during the process of project and programme review. It also includes specific monitoring and reporting requirements. These latter requirements differ from GEF's approach.

79. **Project/programme proposals.** The AF expects at the time of project/programme proposal review that the implementing entity has (a) the capacity and commitment to comply with relevant requirements of the ESP, (b) identified environmental and social risks associated with the project/programme, and (c) initiated the process of managing these risks.[56]

Box 2. Adaptation Fund General Stakeholder Engagement and Disclosure Requirements

Stakeholder Engagement

- identify stakeholders and involve them as early as possible in planning any AF-supported project/programme
- Conduct timely, effective, inclusive public consultations free from coercion

Disclosure

- Implementing entity discloses results of screening, draft assessment, proposed management plans for consultations
- AF Secretariat discloses through AF website:
  - all project/programme proposals
  - all technical reviews
  - final environmental and social assessment
  - Project Performance Reports

Box 2: Adaptation Fund General Stakeholder Engagement and Disclosure Requirements

80. The template for requesting AF project/programme funding requires implementing entities to specifically address compliance with the ESP through a series of direct questions as well as a checklist regarding each of the environmental and social principles. Implementing entities are required to "commit to implementing the project/programme in compliance with

[53] Adaptation Fund, Open Information Policy (OIP, July 2013), at https://www.adaptation-fund.org/document/open-information-policy-adopted-in-july-2013/.
[54] Adaption Fund, Ad Hoc Complaints Handling Mechanism (ACHM, approved October 2016), at https://www.adaptation-fund.org/document/ad-hoc-complaint-handling-mechanism-approved-october-2016/.
[55] Adaptation Fund, Guidance Document for Implementing Entities on Compliance with the Adaptation Fund Environmental and Social Policy, (undated), at https://www.adaptation-fund.org/document/guidance-document-implementing-entities-compliance-adaptation-fund-environmental-social-policy/.
[56] Adaptation Fund, Guidance Document, p. 1.

the Environmental and Social Policy of the Adaptation Fund.[57]" See Annex 2 for specific template language.

81. **Technical Review.** To support implementation of the ESP at the project/programme level, the AF engages expert consultants to review full project/programme proposals and to provide comments and queries back to applicants.[58] AF's project/programme Technical Review template prompts specific attention to ESP compliance, including management of social and environmental risks. See Annex 2.

82. **Monitoring, reporting, and evaluation.** The ESP requires explicit attention to environmental and social risks in monitoring, reporting, and evaluation by implementing entities, including the following:

- monitor and evaluate "all environmental and social risks identified by the implementing entity during the project/programme assessment, design, and implementation."
- annual project performance reports from implementing entities "shall include a section on the status of implementation of any environmental and social management plan, including those measures required to avoid, minimize, or mitigate environmental and social risks," including any adopted corrective actions.
- Mid-term and terminal evaluation reports "shall also include an evaluation of the project/programme performance with respect to environmental and social risks.[59]"

Box 3. Green Climate Fund Interim Environmental and Social Standards (ESS)

1. Assessment and Management of Social and Environmental Risks and Impacts
2. Labor and Working Conditions
3. Resource Efficiency and Pollution Prevention
4. Community Health, Safety, and Security
5. Land Acquisition and Involuntary Resettlement
6. Biodiversity Conservation and Sustainable Management of Living Natural Resources
7. Indigenous Peoples
8. Cultural Heritage

Box 3: Green Climate Fund Interim Environmental and Social Standards (ESS

83. The AF template for annual reporting includes a risk assessment section for tracking identified risks and steps to mitigate them (noting that all risks are included here, not solely environmental and social risks). The template includes a section for flagging critical risks (those with a 50% or greater chance of impeding progress) and a section for describing risk mitigation measures adopted during the reporting period and their effectiveness.[60] See Annex 2.

[57] Adaptation Fund, Request for Project/Programme Funding from the Adaptation Fund (amended October 2016), at https://www.adaptation-fund.org/document/opg-annex-5/).
[58] Interview with Adaption Fund, 14 February 2017.
[59] Adaptation Fund, Environmental and Social Policy, para. 32.
[60] Adaptation Fund, Project Performance Report Template, at https://www.adaptation-fund.org/projects-programmes/project-performance/.

Green Climate Fund

84. The Green Climate Fund (GCF) was established in 2010 as part of the financial mechanism of the UN Framework Convention on Climate Change, alongside the GEF. The GCF supports climate change adaptation and mitigation in developing countries. As of March 2017, 48 entities – national, regional and international implementing entities, including private sector entities – have been accredited to receive GCF funding, with another 160 entities in the process of applying.[61]

85. **Environmental and Social Standards (ESS).** The GCF's Governing Instrument from 2011 states that the GCF Board would "agree on and adopt best practice environmental and social safeguards, which shall be applied to all programmes and projects financed using the resources of the Fund.[62]" In 2014 the GCF adopted the International Finance Corporation's (IFC) Performance Standards on an interim basis to comprise the GCF's Environmental and Social Standards (ESS), supported by guidance materials developed by the IFC.[63] Once the GCF has built up a track record of experience implementing the interim safeguard standards, an in-depth multi-stakeholder review is to be undertaken in order to develop the GCF's own ESS.[64] The standards will be a core element of the GCF's future Environmental and Social Management System (ESMS, currently under development) that will provide an "overarching framework" of policies, processes and procedures "for achieving improvements in environmental and social outcomes while addressing any unintended adverse impacts in all the GCF-financed activities."[65]

86. The interim ESS serve as (a) accreditation standards to the GCF and (b) as project review and appraisal standards, and provide a reference point for project monitoring and reporting (as with the AF, these later requirements extend beyond GEF's approach to safeguard implementation). During the accreditation process, an entity's capacity to manage environmental and social risks is considered as part of the GCF's risk-based "fit-for-purpose" approach, whereby the GCF accredits an entity to undertake projects up to certain levels of

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[61] Green Climate Fund website (visited 31 March 2017), at http://www.greenclimate.fund/partners/accredited-entities/ae-composition.

[62] Green Climate Fund, Governing Instrument for the Green Climate Fund (2011), para. 65, at http://www.greenclimate.fund/documents/20182/574763/Governing_Instrument.pdf/caa6ce45-cd54-4ab0-9e37-fb637a9c6235.

[63] Green Climate Fund, Decisions of the Board – Seventh Meeting of the Board, 18-21 May 2014, GCF/B.07/11, at agenda item 6, Annex I section IV, and Annex III, available at http://www.greenclimate.fund/documents/20182/24943/GCF_B.07_11_-_Decisions_of_the_Board_-_Seventh_Meeting_of_the_Board__18-21_May_2014.pdf/73c63432-2cb1-4210-9bdd-454b52b2846b.

[64] Initially targeted to be developed within three years of GCF operationalization. See Green Climate Fund, GCF/B.07/11, at agenda item 6 and Annex I (sec. IV). Also see Green Climate Fund, Guiding Framework and Procedures for Accrediting National, Regional and International Implementing Entities and Intermediaries, Including the Fund's Fiduciary Principles and Standards and Environmental and Social Safeguards, GCF B.07/02, section V, at http://www.greenclimate.fund/documents/20182/24943/GCF_B.07_02_-_Guiding_Framework_for_Accreditation.pdf/a855fdf1-e89b-47fb-8a41-dfa2050d38b9.

[65] Green Climate Fund, Call for Inputs: GCF Environmental and Social Management System (ESMS), Consultation Draft 15 December 2016, at http://www.greenclimate.fund/documents/20182/24913/DCP_15-12-2016_-_GCF_Environmental_and_Social_Management_System.pdf/3b05eb86-4636-4179-aa1d-ebfcec34037e.

environmental and social risk (i.e. Category A – high risk, Category B –medium risk, and Category C – low/no risk). The fit-for-purpose accreditation also applies to fiduciary functions and sectoral involvement, resulting in different levels of access to resources and approval for certain types of activities.[66]

87. The GCF provides "fast track" accreditation for GEF Agencies given the due diligence undertaken by GEF to ensure compliance with GEF safeguard policies. However, a comparative analysis identified two-levels of gaps in coverage between the GCF and GEF safeguard frameworks that GEF Agencies would need to address when applying to the GCF. For accreditation, GCF noted that GEF Agencies would need to demonstrate that they have an overarching environmental and social policy and management system, including an external communications system. At the policy/programme level (e.g. evaluated by GCF as part of review process of funding proposals after accreditation), GCF identified a range of gaps with the GEF Safeguards, including the following: [67]

- emergency preparedness and response systems
- ongoing reporting to affected communities
- a wide range of labor and working conditions requirements
- measures for resource efficiency and reduction of GHGs
- requirement to minimize release of pollutants including wastes and hazardous materials
- infrastructure and equipment design and safety beyond dam safety
- hazardous materials and management safety
- protection of priority ecosystem services
- community exposure to disease
- security force management
- supply chain management (do not contribute to conversion of natural or critical habitat).

[66] Green Climate Fund, Accreditation to the Green Climate Fund (February 2017), at http://www.greenclimate.fund/documents/20182/319135/1.3_-_GCF_Accreditation_Introduction_February_2017.pdf/4d44997c-6ae9-4b0e-be5d-32da82e62725.

[67] See Green Climate Fund, Assessment of Institutions Accredited by Other Relevant and Their Potential Fast Track Accreditation (2014), GCF/B.08/03, at http://www.greenclimate.fund/documents/20182/24946/GCF_B.08_03_-_Assessment_of_Institutions_Accredited_by_Other_Relevant_Funds_and_Their_Potential_for_Fast-track_Accreditation.pdf/89454fd2-9b54-4654-bd58-44839a6adbd5.

88. The current IFC Performance Standards – in effect since 2012 and based on requirements initially adopted in 2006 – consist of eight standards that recipients of IFC financing and implementing parties are expected to meet throughout the project life-cycle.[68] Box 3 lists the thematic areas covered by the Performance Standards. Each standard contains a set of objectives supported by a range of requirements that need to be met when certain circumstances prevail. Performance Standard 1 establishes key requirements regarding environmental and social risk/impact identification (including those associated with other Performance Standards, where relevant), assessment, management, and monitoring. It also includes stakeholder engagement and information disclosure requirements, as well as a requirement for the establishment of grievance mechanisms for affected communities.

89. At the fund level, the GCF has adopted a formal access to information policy that establishes a presumption of disclosure, a set of exemptions, and process guarantees for information requests.[69] The disclosure policy also establishes disclosure timelines and conditions for environmental and social assessments and management plans (see Box 4). To ensure disclosure of project/programme environmental and social reports (e.g. ESIAs, ESMPs), the GCF requires completion and posting of

Box 4. Green Climate Fund General Stakeholder Engagement and Disclosure Requirements

Stakeholder Engagement

- identify stakeholders and develop a stakeholder engagement plan
- undertake early, inclusive consultations that provide stakeholders opportunity to express views for consideration
- ensure consultations are free from external manipulation or coercion
- if significant adverse impacts, undertake heighted process of Informed Consultation and Participation that provides more in-depth, iterative exchanges that lead to incorporation of stakeholder views in decisions that affect them
- document consultations
- engage in free, prior informed consent (FPIC) processes with indigenous peoples for specified circumstances

Disclosure

- entity discloses relevant information on project (purpose, scale, duration), any risks/impacts and mitigation measures, stakeholder engagement process, grievance mechanism
- entity provides relevant information prior to consultations in accessible, culturally appropriate local languages and formats
- provide periodic reports to affected communities on implementation of risk mitigation plans
- GCF Information Disclosure Policy requires:
  - disclosure of project environmental and social reports at least 120 days for Cat. A and 30 days for Cat. B projects before GCF's or accredited entity approval date, whichever earlier
  - accredited entity discloses environmental and social reports via electronic links on the accredited entity website and convenient locations for affected peoples
  - environmental and social reports available in English and local language (if not English)
  - monitoring and evaluation reports disclosed on accredited entity and GCF websites
- GCF requires completion of ESS disclosure form and posts on GCF website

Box 4: Green Climate Fund General Stakeholder Engagement and Disclosure Requirements

[68] See International Finance Corporation, Performance Standards on Environmental and Social Sustainability (2012), at http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/our+approach/risk+management/performance+standards/environmental+and+social+performance+standards+and+guidance+notes.

[69] Green Climate Fund, Comprehensive Information Disclosure Policy, GCF/B.12/32, at http://www.greenclimate.fund/documents/20182/319135/GCF_Information_Disclosure_Policy.pdf/3f725d99-85e9-4d1d-aa9c-2f7ad539e4e6.

an ESS disclosure form on the GCF website.[70]

90. The GCF has also established an Independent Redress Mechanism (IRM) to respond "to complaints by people who feel they have been adversely affected by GCF projects or programmes failing to implement GCF operational policies and procedures. This includes allegations of a failure to follow adequate environmental and social safeguards[71]".

91. **Project/programme proposals.** GCF's template for funding proposals requires applicants to summarize results of environmental and social assessments and specify how the project will avoid or mitigate negative impacts at each stage of the project, in compliance with the GCF's ESS. It includes a section for describing specific financial, technical and operational, and social and environmental risk factors and how mitigation measures will lower the risk's probability of occurring.[72] See Annex 3.

92. **Technical Review**. As part of the project review process, the GFC Secretariat assesses compliance with the interim ESS, gender policy, financial policies and any other policies promulgated by the Board.[73] Expert consultants are engaged to review ESS issues and to provide feedback and queries to applicants. GCF's "Assessment Sheet for Funding Proposals" is aligned section-by-section with the project proposal format, whereby feedback may be provided on identification and proposed management of environmental and social risks in a manner consistent with the interim ESS. See Annex 3.

93. The draft GCF ESMS, among other requirements, outlines key GCF Secretariat responsibilities regarding managing environmental and social risks in the project cycle, including at project review. These include the following:

(a) Require entities to implement their environmental and social management systems, and address any identified weaknesses

(b) Require appropriate screening and categorization

(c) Conduct environmental and social due diligence to determine consistency with ESS

(d) Require appropriate type and scale of environmental and social assessments and confirm risk categories

[70] For examples of GCF ESS disclosure forms, see http://www.greenclimate.fund/disclosure/ess-reports.
[71] Green Climate Fund, Independent Redress Mechanism, at http://www.greenclimate.fund/independent-redress-mechanism.
[72] Green Climate Fund, Funding Proposal (ver. 1.1, 2015), sections F. 3, G.1, G.2, at http://www.greenclimate.fund/library/-/docs/list/574044.
[73] Green Climate Fund, Decisions of the Board – Seventh Meeting of the Board, 18-21 May 2014, Initial Project Approval Process at agenda item 7 and Annex VII (2014), GCF/B.07/11, at http://www.greenclimate.fund/documents/20182/24943/GCF_B.07_11_-_Decisions_of_the_Board_-_Seventh_Meeting_of_the_Board__18-21_May_2014.pdf/73c63432-2cb1-4210-9bdd-454b52b2846b.

(e) Confirm that adequate Environmental and Social Management Plans (ESMPs) are in place and that any gaps or weaknesses be addressed.[74]

94. **Monitoring, reporting, and evaluation.** The GCF requires accredited entities to monitor and report on compliance with the ESS (in addition to GCF fiduciary standards and gender policy). In addition, the GCF Secretariat undertakes monitoring actions to support ESS compliance during project implementation. The monitoring framework calls for:

(a) accredited entities to self-assess and report on overall compliance with ESS on an annual basis

(b) at the funded activity level, reporting on ESS implementation as part of the annual performance report

(c) Secretariat "light touch" mid-term reviews of accredited entity compliance with GCF policies, including ESS

(d) Secretariat ad-hoc reviews undertaken as needed

(e) Assignment of risk flags at the project or entity level, possibly related to ESS implementation issues

(f) Secretariat annual risk-based reviews on sample of projects, including among other criteria Category A projects.[75]

[74] Green Climate Fund, Call for Inputs: GCF Environmental and Social Management System (ESMS), Consultation Draft 15 December 2016, section 4.1.

[75] Green Climate Fund, Initial Monitoring and Accountability Framework for Accredited Entities, Decisions B.11/10, available at http://www.greenclimate.fund/documents/20182/76153/DECISION_B.11_10_-_Initial_monitoring_and_accountability_framework_for_accredited_entities.pdf/b06dddfc-2d18-4675-9d2f-d3e81de6ba99.

Table 8: GEF Agencies accredited to Adaptation Fund and Green Climate Fund

GEF Agencies	AF	GCF
AfDB	✓	✓
ADB	✓	✓
BOAD	✓	✓
CI		✓
CAF	✓	✓
DBSA		✓
EBRD	✓	✓
FAO		✓
FECO		✓
FUNBIO		
IDB	✓	✓
IFAD	✓	✓
IUCN		✓
UNDP	✓	✓
UNEP	✓	✓
UNIDO		
World Bank	✓	✓
WWF-US		✓

Summary of key differences with the GEF Safeguards

95. The above survey of policies and practices at the Adaptation Fund and Green Climate Fund highlights several important differences with the GEF Safeguards and how they are implemented. Key points are summarized below:

(a) The Adaptation Fund has adopted a set of broad safeguards principles that encompass key elements of the GEF Safeguards but are far less specific in terms of requirements. The AF ESP extends the scope of social considerations to human rights, access and equity, nondiscrimination, public health, labor rights, and incorporates gender dimensions. The AF ESP also addresses GHG emissions, pollution prevention and resource efficiency, and emphasizes soil conservation.

(b) The GCF ESS encompasses the GEF Safeguards but the breadth of thematic coverage is broader with a wider range of specific requirements for each safeguard area. For an overview, see the gaps listed above between the two frameworks as identified by the GCF.

(c) The GCF accredits entities to undertake projects up to certain levels of environmental and social risk (based on the strength of their institutional policies, capacity, and track record), resulting in different levels of access to resources and approval for certain types of activities.

(d) Both the AF and GCF explicitly apply their safeguards at the project/programme level. Both entities provide more specific guidance on identifying environmental and social risks and necessary management measures in their project/programme proposal and technical review templates (see Annexes 2 and 3). Both entities engage safeguards experts to review funding proposals for compliance with safeguard policies.

(e) Both the GCF and AF specifically require monitoring and reporting on implementation of safeguards in annual project performance reports as well as in interim and final evaluations. The GCF Secretariat may also undertake ad hoc project reviews and assign risk flags, and undertakes an annual risk-based review of a sample of projects.

96. These differences are not unknown to most GEF Agencies. In fact, there is significant overlap between membership in the GEF Partnership and accreditation to the AF and GCF. Of the eighteen GEF Agencies, 10 are accredited to the AF and 16 are accredited to the GCF (see Table 8). Most GEF Agencies a familiar with addressing the broader range of safeguard requirements of the AF and GCF.

Recent Safeguard Developments

97. Over the past decade environmental and social safeguards have been adopted by an increasingly wide range of international financial institutions, reflecting a consensus on the need for effective environmental and social risk management when supporting development initiatives, as noted in Section II. The accreditation requirements for various international funds has further propelled this trend, which is likely to continue. For example, as noted above the GCF has accredited 48 entities to date, with another 160 under consideration.

98. When revising and/or adopting new safeguard frameworks, Agencies look to their specific mandates as well as lessons learned, internal evaluations, and international good practice regarding environmental and social risk management. For example, in 2010 the World Bank's Independent Evaluation Group (IEG) recommended, among other aspects, a broadening of social coverage of the IBRD/IDA safeguards. The World Bank's 2016 Environmental and Social Framework expanded the thematic scope of its safeguards and created closer alignment with the IFC Performance Standards.[76]

99. A survey of safeguard frameworks adopted over the past decade indicates a range of important advancements in safeguard design, both in terms of architecture and thematic coverage (Table 9 lists examples of more recently adopted safeguard frameworks). The typical architecture of recent safeguard systems includes the following elements:

(a) An overarching policy statement that sets out an agency's environmental and social commitments and responsibilities

(b) A set of operational standards that specify agency requirements and actions in relation to specific environmental and social issues

(c) Implementation procedures, including responsibilities of implementing entities and the agency

(d) Technical guidance to promote adoption of best practice environmental and social management

(e) Supporting institutional policies regarding access to information and complaints and accountability mechanisms.

100. Thematic coverage of safeguard frameworks has also expanded, including the following areas:

[76] World Bank Independent Evaluation Group, Safeguards and Sustainability Policies in a Changing World: An Independent Evaluation of World Bank Group Experience, 2010, recommendation 1, at https://openknowledge.worldbank.org/handle/10986/2571. The new Work Bank's Environmental and Social Framework is available at http://www.worldbank.org/en/programs/environmental-and-social-policies-for-projects/brief/the-environmental-and-social-framework-esf.

(a) expanded focus on potential social impacts resulting from projects and programmes, with greater attention to key human rights principles of equality, equity, and nondiscrimination and gender mainstreaming
(b) greater attention of impacts on biodiversity and ecosystems, including key ecosystem services
(c) increased recognition of rights of indigenous peoples
(d) strengthened stakeholder engagement information disclosure, and grievance requirements
(e) integration of climate change and disaster resilience considerations
(f) a focus on labor standards and working conditions
(g) social and environmental risks associated with supply chains.

101. As noted in Section II, evaluations by the World Bank and ADB independent evaluation departments have found significant benefits provided by institutional safeguards. These evaluations also note ongoing challenges regarding safeguards implementation, including the need for systematic supervision, monitoring and reporting of safeguards implementation and outcomes.[77] The need for appropriate safeguards monitoring and reporting is further heightened by the increasing adoption of programmatic and framework approaches (whereby specific activities may not be known at appraisal and need to be assessed and managed during project implementation).

102. Compliance issues regarding safeguards implementation also remain a challenge. For example, as of 2012 the independent accountability mechanisms of eight IFIs (and one bilateral agency) handled a total of 262 cases of eligible complaints regarding environmental and social issues.[78] As noted in Section III, there have been to date very few complaints regarding GEF-supported projects.

[77] The World Bank IEG found that while Category A projects were generally well supervised, significant gaps existed in the supervision, monitoring and completion reporting on safeguard implementation across a wide range of Category B projects. World Bank IEG, Safeguards and Sustainability Policies, chapter 2. ADB's IED safeguard evaluation noted that monitoring reports often did not include sufficient site-specific information and contained inconsistent ratings. See ADB IED, ADB Independent Evaluation Department, Real-Time Evaluation of ADB's Safeguard Implementation Experience Based on Selected Case Studies, 2016, pp. xii-xiii and conclusion and recommendations, at https://www.adb.org/documents/real-time-evaluation-adb-s-safeguard-implementation-experience-country-case-studies.

[78] See International Accountability Mechanism Network, Citizen-Driven Accountability for Sustainable Development (2012), at http://siteresources.worldbank.org/EXTINSPECTIONPANEL/Resources/Rio20_IAMs_Contribution.pdf.

Table 9: Examples of environmental/social safeguard frameworks adopted in past decade

Table 9. Examples of environmental/social safeguard frameworks adopted in past decade[79]			
Date	**GEF**	**Agencies**	**Safeguard Policies**
2006	✓	IADB	Environmental and Safeguards Compliance, Indigenous Peoples, Involuntary Resettlement (1998)
2009	✓	ADB	Safeguard Policy Statement
2011		FCPF	Forest Carbon Partnership Facility Common Approach to Environmental and Social Safeguards
2012		IFC	Policy on Environmental and Social Sustainability and Performance Standards
2013		AF	Environmental and Social Policy (updated 2016)
2013	✓	AfDB	Integrated Safeguards System
2013	✓	FUNBIO	Environmental and Social Safeguards Policy
2014	✓	EBRD	Environmental and Social Policy
2014		GCF	Interim Environmental and Social Standards (IFC Performance Standards
2014	✓	IFAD	Social, Environmental, Climate Assessment Procedure
2015	✓	BOAD	Environmental and Social Management in the Financing of Projects
2015	✓	CI	Environmental and Social Management Framework
2015	✓	CAF	Environmental and Social Safeguards for CAF/GEF projects
2015	✓	DBSA	Environmental and Social Safeguard Standards
2015	✓	FAO	Environmental and Social Management Guidelines
2015	✓	FECO	Environmental and Social Framework
2015	✓	UNDP	Social and Environmental Standards
2015	✓	UNEP	Environmental, social and Economic Sustainability Framework
2015	✓	UNIDO	Environmental and Social Safeguards Policies and Procedures
2015	✓	WWF-US	Environmental and Social Safeguards Integrated Policies and procedures
2016		AIIB	Environmental and Social Framework
2016	✓	IUCN	Environmental and Social Management System
2016	✓	World Bank	Environmental and Social Framework

[79] The dates on revision and adoption of safeguard frameworks presented here only reflect the date of the most recent revisions/adoption, and may not reflect the date when policies went into/will go into effect. for example, the World Bank's new ESF will be operational in 2018.

Gaps in the GEF Safeguards Framework

103. As outlined in Section II of this review, the GEF Minimum Standards reflect a consensus on core operational safeguards principles that existed at the time of their formulation (circa 2005). These core principles remain highly relevant today as key features of international good practice. However, there has been significant evolution in environmental and social safeguard standards in the intervening years in terms of thematic breadth, specificity and procedures.

104. A comparative analysis of the GEF Minimum Standards with more recent safeguard frameworks identifies a range of gaps in scope and coverage. The results of this analysis are presented standard-by-standard in Table 10 below. The gap analysis is meant to be comprehensive in order to provide GEF with a broad overview of areas that may require further attention in any potential future update of the GEF Safeguards. Further targeted analyses by the GEF of priority areas may be warranted. The summary below preliminarily identifies key thematic gaps or areas of emphasis that appear highly relevant to GEF-supported projects/programmes:

(a) ***Human rights, nondiscrimination and equity:*** emphasis on ensuring that adverse impacts do not fall disproportionately on disadvantaged or vulnerable groups, including women, youth, elderly, and ensuring nondiscrimination in access to development resources and project benefits. Some Agencies have explicit commitments to not finance projects that may infringe on human rights

(b) ***Stakeholder engagement:*** more comprehensive requirements regarding stakeholder identification (including marginalized groups), the need to stakeholder engagement plans, criteria for meaningful consultations, and implementation and reporting

(c) ***Climate change and disaster risk****:* greater emphasis on addressing risks associated with climate change and disaster

(d) ***Biodiversity offsets****:* expanded requirements and limitations on the use of biodiversity offsets

(e) ***Invasive alien species:*** requirements on avoidance and risk assessments regarding introduction of IAS

(f) ***Supply chains:*** requirements to address environmental and social risks associated with primary supply chains

(g) ***Sustainable resource management:*** requirements regarding standards and certification of sustainable natural resource production and harvesting and fair and equitable sharing of benefits from the use of genetic resources

(h) ***Community health, safety and security:*** more explicit requirements for protection of communities

(i) ***Labor and working conditions:*** requirements for respecting rights and safety of workers

(j) ***Hazardous materials:*** broader requirements regarding the management of hazardous materials

(k) ***Involuntary resettlement:*** prohibition on forced evictions, and broader scope than currently applied by GEF (e.g. scope of economic displacement extends beyond just restricted access to parks and protected areas as currently limited in GEF definition)

(l) ***Indigenous Peoples and FPIC****:* requirement of free, prior informed consent (FPIC) of indigenous peoples and broader application than currently pursued by GEF (e.g. only to countries that have adopted ILO 169). Also, requirements to respect indigenous peoples living in voluntary isolation

(m) ***Cultural heritage****:* broader scope that extends to both tangible and intangible forms of cultural heritage, not solely physical cultural resources, and inclusion of requirements for equitable benefit sharing for use of cultural heritage.

105. The following table identifies gaps in thematic coverage and additional areas of emphasis between the GEF Minimum Standards and more recently adopted safeguard frameworks of multilateral funds and development institutions. The table is meant to be comprehensive and the gap areas are not prescriptive recommendations for GEF adoption. Additional review and targeted analyses would be required.

106. The analysis takes a standard-by-standard approach, following the GEF Minimum Standards. Scope areas identified under the "coverage gaps" often employ thematic categories identified in the interim-GCF and World Bank safeguard frameworks for convenience. However, the coverage gap areas are identified from a wide range of agency safeguard policies, many of which do not utilize the same organizational scheme.

Table 10: Coverage gaps in GEF Minimum Standards in relation to recent safeguard frameworks

GEF Minimum Standards	Coverage gaps and additional areas of emphasis
MS1. Environmental and Social Impact Assessment	▪ Title could reflect broader focus on management of environmental and social (E/S) risks and impacts in addition to assessment
Overarching Criteria/objectives	▪ Emphasis on impact avoidance and application of mitigation hierarchy (addressed in a min. req. 1.5 but could be heightened objective) ▪ Focus on identifying, assessing and managing environmental and social risks and impacts, not just undertaking of ESIAs, to promote environmental and social sustainability
Risk identification/scope of assessment	▪ Emphasis that risks associated with all areas of GEF Minimum Standards to be included in risk identification, where relevant ▪ Emphasis on relevant environmental risks/impacts, including those related to climate change; protection and conservation of natural habitats and biodiversity; and risks to ecosystem services ▪ Emphasis on social risks/impacts, including gender and impacts on disadvantaged or vulnerable groups or individuals and discrimination in access to development resources and benefits ▪ Clarification that scope of assessment includes associated facilities
Supply chains	▪ Provision to address environmental and social risks/impacts associated with primary supply chains where entity can reasonably exercise control or influence
Applicable legal framework	▪ Broader reference to adherence to obligations under international treaties and agreements (not just international environmental agreements) ▪ Reference to applying leading standards, where relevant, for managing risks/impacts, such as Good International Industry Practice (GIIP), including WBG Environmental, Health, Safety Guidelines (EHSG)
Emergency preparedness	▪ Focus on addressing preparedness and response for potential emergencies or accidents associated with project activities
Monitoring and reporting	▪ Emphasis on need to monitor effectiveness of management program and compliance with legal/contractual obligations and regulatory requirements and implementing corrective actions ▪ Requirement that monitoring reports address status of implementation of environmental and social management plans ▪ Emphasis on involving project-affected groups in project monitoring program, where appropriate
MS 2. Protection of Natural Habitats	▪ Title could reflect broader focus on biodiversity conservation and sustainable natural resource management, including sustainable forestry, agriculture, animal husbandry, fisheries
Overarching Criteria/Objectives	▪ Inclusion of sustainable production and harvesting of natural resources ▪ fair and equitable sharing of benefits from the use of genetic resources
Risk identification/scope of assessment	▪ Emphasis on need to identify relevant threats to biodiversity, for example habitat loss, degradation and fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, pollution and incidental take, as well as projected climate change impacts ▪ Include need to take into account differing values attached to biodiversity and ecosystem services by affected communities, and where appropriate, other stakeholders
Impacts on natural habitats	▪ Mitigation measures designed to achieve no net loss of biodiversity, where feasible
Impacts on critical habitats	▪ Broader definition of critical natural habitats that includes areas of significant importance to endangered species, endemic and/or restricted-range species, concentrations of migratory or congregatory species, highly threatened and/or unique ecosystems. ▪ "No significant conversion or degradation" standard for critical natural habitats standard may be modified to include the need to ensure no adverse impacts on critical habitats unless can

	demonstrate no viable alternatives for projects in habitats of lesser biodiversity value; no net reduction in biodiversity values for which critical habitat designated; no net reduction in endangered species or restricted range species; mitigation measures reflected in robust management plan designed to achieve net gains in biodiversity ▪ Note: current GEF Principle (not part of Agency Minimum Standards) of not supporting projects that "degrade or convert critical natural habitats" applies a more stringent financing standard
Use of biodiversity offsets	▪ Establish conditions on use of biodiversity offsets, including consideration only as last resort if significant residual adverse impacts remain after avoidance, minimization, and restoration measures applied; designed to achieve measurable conservation outcomes expected to result in no net loss and preferable a net gain of biodiversity (with net gain required in critical habitats); adhere to the "like-for-like or better "principle; carried out with best available information, current practices, and expertise; and not allowed in unique, irreplaceable areas.
Alien and invasive species	▪ Not addressed in Agency Minimum Standards (although GEF Principle notes that it will not finance introduction or use of potentially invasive, non-indigenous species) ▪ Include minimum requirements regarding no deliberate introduction of any alien species with high risk of invasive behavior; no intentional introduction of new alien species unless done in accordance with existing regulatory framework; all introductions of alien species subject to risk assessment; implement measures to avoid accidental or unintended introductions; exercise due diligence not to spread established alien species to new areas.
Biosafety	▪ Ensure risk assessments undertaken in accordance with international protocols on the transfer, handling and use of genetically modified organisms/living modified organisms, consistent with CBD and Cartagena Protocol
Utilization of genetic resources	▪ Ensure collection of genetic resources is conducted sustainably, that benefits derived from their utilization are shared in a fair and equitable manner, consistent with CBD and Nagoya Protocol
Sustainable management of living natural resources	▪ Broaden requirements for sustainable management beyond forestry to include production and harvesting of living natural resources, including agriculture, animal husbandry, fisheries ▪ Include minimum requirements regarding application of good sustainable management practices to all living natural resource production and harvesting; where codified, application of credible industry-specific standards for sustainable management (often demonstrated through independent verification and certification) for large-scale operations; require small-scale producers to operate in sustainable manner with focus on continual improvement ▪ Apply siting preference to sustainable production and harvesting projects (on already converted or unforested lands, where feasible)
Supply chains	▪ Avoid project-related purchasing of natural resource commodities that may contribute to significant conversion or degradation of natural or critical habitats. Where such potential risks exist, systems and verification practices should demonstrate origin of supply and limit procurement to suppliers who can demonstrate they are not contributing to significant conversion of natural/crucial habitats
MS 3. Involuntary Resettlement	▪ Title could further reflect GEF's focus on potential impacts caused by restrictions on land use
Scope of application	▪ Standard applies to *temporary* and *permanent* economic and physical displacement ▪ Scope could be further clarified by providing definition of involuntary resettlement, such as: resettlement (physical and economic) is considered involuntary when affected persons do not have the right to refuse land acquisition or access restrictions that result in physical or economic displacement. This occurs in cases of (i) lawful expropriation or temporary/permanent land use restrictions and (ii) negotiated settlements in which buyer can resort to lawful expropriation or impose legal restrictions on land use if negotiations fail ▪ Scope of involuntary restriction of access provision typically extends beyond just "legally designated parks and protected areas" to restrictions on access to land or use of other resources including communal property, areas subject to customary usage, and to natural resources such a marine, aquatic resources, timber, non-timber forest products, freshwater, medicinal plants, hunting and gathering grounds, grazing and cropping areas ▪ Exclusions of scope of application may include voluntary land transactions; voluntary, consensual restrictions of access to natural resources under community-based natural resource management projects
Forced evictions	▪ Avoid forced evictions
MS 4. Indigenous Peoples	
Identification of indigenous peoples	▪ Specified criteria to aid in identifying presence of indigenous peoples could include not just "collective attachment to land" but collective attachment to geographically distinct areas and natural resources. Criteria that indigenous peoples engaged "primarily in subsistence-oriented production" may be too limiting
Meaningful participation	▪ Heightened participation requirements for projects affecting indigenous peoples widely recognized and partly reflected in Minimum Standard, such as need for "full and effective participation." However current GEF term calling for "free, prior informed consultation" may generate confusion with more recognized term of free, prior and informed consent (see below).

	Clarify that meaningful consultation and participation required for all projects, and additional levels of agreement and consent required for projects that may adversely impact the rights of indigenous peoples (see below). Meaningful consultation and participation includes involvement of indigenous peoples' representative bodies and organizations, provide sufficient time for decision-making processes of relevant indigenous groups, and allows effective participation in design of project activities or mitigation measures that could affect them
Circumstances for free, prior informed consent (FPIC)	▪ Currently limited. Section V., para. 6 of GEF Agency Minimum Standards adopts a standard of free, prior and informed consent (FPIC) for projects in countries that have ratified ILO Convention 169. In addition, Minimum Requirement 4.7 requires prior agreement for utilization of cultural resources or knowledge of indigenous peoples. ▪ Some agencies require FPIC for all projects affecting indigenous peoples, or where projects may affect their rights, lands, territories, resources, and traditional livelihoods. Some agencies specify the circumstances for required adherence to FPIC, such as projects that may cause: o adverse impacts on lands and natural resources subject to traditional ownership or under customary use or occupation o relocation of indigenous peoples from land and natural resources subject to traditional ownership or under customary use or occupation o significant impacts on important cultural heritage and use of indigenous people's cultural heritage including knowledge, innovations, practices ▪ FPIC builds on meaningful consultation and participation, pursued through good faith negotiations. FPIC process to document (i) mutually accepted process to carry out good faith negotiations, and (ii) outcome of good faith negotiations, including all agreements reached as well as dissenting views, noting that FPIC does not require unanimity
Voluntary isolation	▪ Where project may affect uncontacted or voluntarily isolated indigenous peoples, take appropriate measures to recognize, respect and protect their lands and territories, environment, health, culture as well as measures to avoid all undesired contact
MS 5. Pest Management	▪ Broader title to reflect expanded scope on pollution prevention and resource efficiency
Objectives/scope	▪ Broaden scope and objectives to encompass pollution prevention (including climate pollutants, wastes, pesticides and hazardous materials) and resource efficiency ▪ Additional objectives include promoting sustainable use of resources; avoiding adverse impacts to human health and the environment by avoiding/minimizing project-related pollution, generation of wastes and hazardous materials; avoiding and minimizing project-related emissions of climate pollutants; avoiding and minimizing generation of wastes
Pollution prevention	▪ Avoid release of pollutants, and if not feasible, minimize and control intensity, concentration and mass flow of their release, including routine, non-routine and accidental releases ▪ Apply control measures and performance levels specified in national law and Good International Industry Practice (GIIP) ▪ Adopt alternatives and/or feasible options to avoid or minimize project-related emissions and estimate GHG emissions where potentially significant
Wastes	▪ Avoid generation of hazardous/non-hazardous wastes. Where avoidance not possible, minimize waste generation, and reuse/recycle/recover waste in safe manner. Ensure waste treatment/disposal performed in environmentally sound and safe manner ▪ For hazardous waste, ensure compliance with national requirements and applicable international conventions, including on transboundary movement, and where such wastes managed by third parties, use contractors that are reputable and legitimate licensed by relevant regulatory agencies and obtain chain of custody documentation to final destination
Hazardous materials and chemicals	▪ Broaden coverage of current Minimum Standard that addresses hazardous pesticides and procurement of persistent organic pollutants (5.3) ▪ Avoid, or where avoidance is not possible, minimize and control the release and use of hazardous materials. Assess production, transportation, handling, storage and use of hazardous materials., and consider less hazardous substitutes ▪ Avoid the trade, use of chemicals and hazardous materials subject to international bans or phase-outs due to high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential depletion of ozone layer, consistent with international conventions or protocols
Pesticides	▪ Additional provision that pesticide application regime to (i) avoid, or where not possible, minimize damage to natural enemies of target pest, and (ii) avoid, or where not possible, minimize risks associated with development of resistance in pests and vectors
Resource efficiency	▪ Implement technically and financially feasible and cost effective measures for improving efficiency in consumption of energy, water, other resources and material inputs ▪ If the project is a significant consumer of water, in addition to resource efficiency measures adopt measures that avoid or reduce water usage so that it does not have significant adverse impacts on communities, other users, and the environment
MS 6. Physical Cultural Resources	▪ Title could reflect broader scope covering all forms of cultural heritage

Objectives/scope	▪ Broaden scope beyond "physical" cultural heritage to include both tangible and intangible cultural heritage. Definitions include: o Tangible cultural heritage includes moveable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. May be located in urban or rural settings, may be above or below ground o Intangible cultural heritage includes practices, representations, expressions, knowledge, skills – as well as the instruments, objects, artefacts and cultural spaces associated therewith – that communities/groups recognize as part of their cultural heritage, as transmitted from generation and constantly recreated by them in response to their environment, their interaction with nature and their history ▪ Objectives to include equitable sharing of benefits from use of cultural heritage
Stakeholder access	▪ Where project may restrict access to previously accessible cultural heritage sites, allow continued access to cultural site, based on consultations, provide alternative routes if access blocked, subject to overriding safety and security considerations
Equitable benefits sharing for use of cultural heritage	▪ Where project proposes use of cultural heritage, including knowledge, innovations, or practices of local communities for commercial purposes, inform communities of rights under national law, scope and nature of proposed commercial development, and potential consequences of such development. Do not proceed with project unless good faith negotiations with project-affected parties result in a documented outcome and provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, practice, consistent with customs and traditions of project-affected parties
MS 7. Safety of Dams	▪ Revise title to reflect broader scope of Community Health and Safety
Objectives/scope	▪ Current Minimum Standard limited to dam safety issues. With GEF Principle of not financing large or complex dams, there is less need for dedicated dam safety standard ▪ While MS1 generally encompasses infrastructure safety issues, including risks to human health and safety, more specific requirements can be utilized ▪ Scope to cover infrastructure safety, impacts on ecosystem services, management of hazardous materials, emergency preparedness, community exposure to disease, and security personnel
General risk/impact identification and management	▪ Evaluate risks/impacts on health and safety of affected community during project life-cycle and establish preventive and control measures consistent with Good International Industry Practice (GIIP, such as EHSG). Identify risks/impacts and propose mitigation measures commensurate with their nature and magnitude
Infrastructure safety	▪ Design, construct, operate, decommission structural elements in accordance with national regulations and GIPP, considering safety risks to third parties and communities ▪ Structural elements will be designed and constructed by competent professionals, and certified and approved by competent authorities or professionals ▪ Take into consideration potential risks associated with climate change and incremental risks of public's potential exposure to operational accidents or natural hazards ▪ If operate moving equipment on public rods and other forms of infrastructure, seek to avoid occurrence of incidents and injuries to public
Impacts on ecosystem services	▪ A project's direct impacts on key ecosystem services (such as provisioning and regulating services) may result in adverse health and safety risks to and impacts on communities. Avoid adverse impacts, and where avoidance is not possible, implement appropriate mitigation measures. Where appropriate and feasible, identify potential risks and impacts on ecosystem services that may be exacerbated by climate change
Hazardous materials management and safety	▪ Avoid or minimize potential community exposure to hazardous materials and substances that may be released by the project ▪ Where there is a risk of exposure to hazards, including to workers and their families, exercise special care to avoid and minimize exposure by modifying, substituting, eliminating the condition or material causing potential hazard ▪ If hazardous materials are part of existing project infrastructure, exercise special care when decommissioning in order to avoid exposure ▪ Exercise commercially reasonable efforts to control safety of deliveries and transportation and disposal of hazardous wastes
Emergency preparedness	▪ MS7 includes developing emergency preparedness plans for dams, but may be broadened ▪ Identify and implement measures to address emergency events and assist and collaborate with affected communities and local agencies and other relevant parties in their preparations to response effectively to emergency situations ▪ Document emergency preparedness and response activities, resources, and responsibilities and disclose appropriate information
Community exposure to disease	▪ Avoid or minimize the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable and non-communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups

	▪ Avoid or minimize transmission of communicable diseases that may be associated with influx of temporary or permanent project labor
Use of security personnel	▪ If retain direct or contracted workers to provide security to safeguard personnel or property, assess risks posed by these security arrangements to those within and outside project site ▪ Arrangements to be guided by principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers ▪ Make reasonable inquiries to verify personnel not implicated in past abuses, ensure they are trained adequately in use of force, and where applicable firearms, and appropriate conduct ▪ Require them to act within applicable law and requirements ▪ Consider and where appropriate investigate all allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to relevant authorities
MS 8. Accountability and Grievance Systems	▪ No additional provisions. Some recent safeguard frameworks emphasis that stakeholder access to grievance redress mechanisms is required for all projects
Additional areas/standards:	
Stakeholder Engagement	▪ GEF's Public Involvement Policy (PIP) outlines several requirements regarding project/programme-level stakeholder engagement (including engagement throughout the project cycle, provision of necessary financial and technical support, and the need for open, transparent process with full documentation and provision of relevant, timely, accessible information). The PIP Guidelines provide further elaboration on these requirements, and the GEF Safeguards include additional consultation and disclosure requirements. Noted below are additional requirements and areas of emphasis contained in more recently adopted safeguard frameworks. Some of these requirements are recommended in the GEF PIP Guidelines.
Objectives/scope	▪ Stakeholder engagement required for all projects, scaled-appropriately, including projects with low social and environmental risks ▪ Ensure stakeholder's views are taken into account ▪ Information disclosure and access to grievance mechanism integrated into stakeholder engagement requirements
Stakeholder identification and analysis	▪ Undertake stakeholder identification process ▪ Identify stakeholders who may be marginalized and/or disadvantaged and may require differentiated forms of engagement
Stakeholder engagement plans	▪ develop stakeholder engagement plans for all projects, scaled-appropriately to nature of project and social and environmental risks ▪ Elements of plans to include timing and methods of engagement and disclosure of information ▪ disclose draft plans and seek stakeholder input
Meaningful consultation	▪ Key characteristics of what constitutes meaningful consultations (e.g. commences early and continues throughout project cycle, encourages stakeholder feedback, based on prior disclosure of relevant and accessible information, free of external manipulation or coercion, documented and reports disclosed)
Implementation and reporting	▪ Stakeholder engagement continues throughout project implementation, scaled-appropriately ▪ Include stakeholders in monitoring and verification of relevant project components ▪ Provide periodic reports to stakeholders regarding project implementation, including implementation of environmental and social management plans and areas of concern
Grievance mechanism	▪ Ensure stakeholder access to mechanism for expressing concerns and complaints, and ensure timely response [GEF MS8 includes this requirement]
Labor and Working Conditions	▪ Standard to promote safe and healthy working conditions
Objectives/scope	▪ Promote safe and healthy working conditions, and health of workers ▪ Promote fair treatment, non-discrimination and equal opportunity of project workers and compliance with national employment and labor law ▪ Protect project workers, including vulnerable such as women, persons with disabilities, children (of working age, in accordance with this ESS), and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate ▪ Prevent use of all forms of forced labor and child labor
Terms and conditions of employment	▪ Establish written labor management procedures that set out how project workers will be managed in accordance with national law and project requirements, including provision of clear, understandable documentation of employment terms and conditions, including rights under national law; regular payment of workers, permitting only allowable deductions; provision of adequate periods of rest, holiday, sick, maternity and family leave, as required under national labor laws; written termination notice, where required, and payment of all owed wages on or before termination
Non-discrimination and equal opportunity	▪ Decisions regarding employment and treatment of workers will not be made on personal characteristics unrelated to inherent job requirements. Employment decisions to be based on principles of non-discrimination and equal opportunity and fair treatment.

	▪ Provide appropriate measures to prevent harassment, intimidation, exploitation, and to assist vulnerable workers (e.g. women, migrants, disable, children)
Workers organizations	▪ Respect workers' rights to form or join workers' organizations of their choosing and to bargain collectively without interference
Occupational health and safety	▪ Provide safe and healthy working environment, taking into account inherent risks in particular sector and specific classes of hazards, incl. physical, chemical, biological, radiological, and specific threats to women ▪ Take steps to prevent accidents, injury, disease arising from work by minimizing as far as reasonable the causes of hazards
Forced labor	▪ Will not employ forced labor (any work of service not voluntarily performed that is extracted from an individual under threat of force or penalty. Provision covers any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements)
Child labor	▪ Do not employ children in any manner that is economically exploitative or is likely to be hazardous or to interfere with child's education, or to be harmful to child's health or physical, mental, spiritual, moral, or social development ▪ Where national laws provide for employment of minors, comply with national laws and regulations ▪ Children under the age of 18 will not be employed in hazardous work, and all work of children under 18 years old will be subject to appropriate risk assessment and regular monitoring of health, working conditions, and hours of work
Contracted and supply chain workers	▪ Make reasonable effort to ascertain third parties who engage contracted workers are legitimate, reliable and have labor management procedures in place that allow them over time to operate in accordance with Minimum Standards ▪ Identify risks of child labor, forced labor and serious safety issues in relation to primary suppliers, and require they be remedied where identified
Grievance mechanism	▪ Provide and inform workers of accessible grievance mechanism to raise workplace concerns

V. CONCLUSION AND RECOMMENDATIONS

107. This review has focused on addressing four key questions regarding the GEF Safeguards: (a) the extent to which the GEF Minimum Standards have added value to the GEF Partnership, (b) the degree to which they are aligned with relevant international best safeguard standards and practices, (c) how is GEF informed of safeguard-related risks in supported operations, and (d) how might the GEF Safeguards evolve in coming years. Findings and recommendations regarding these questions are summarized below.

108. **Value proposition of the GEF Safeguards**. The review has demonstrated that the GEF Safeguards have served as an important catalyst among many GEF Agencies – both existing and newly accredited – to strengthen existing safeguard policies and, in a number of cases, to adopt comprehensive safeguard policy frameworks, together with supporting implementation systems and procedures. The compliance review of existing GEF Agencies found that some Agencies, particularly the MDBs, had well developed safeguard policies that were broadly equivalent to the GEF Minimum Standards, and the accreditation and compliance review process provided the necessary impetus for many Agencies to revisit and strengthen their respective safeguards policies and approaches.

109. By establishing a set of minimum requirements, the GEF Safeguards have contributed to more harmonized approaches in managing project-level environmental and social risks and impacts across the GEF Partnership. The GEF Safeguards have also provided "fast track" access to GCF accreditation for some other GEF Agencies.

110. A high-level review of the GEF 6 portfolio found a range of potential environmental and risks across all GEF focal areas, including a small number of projects categorized as high risk dealing with chemicals and wastes. These wide-ranging risks reinforce the need and value of the GEF Safeguards, which have reinforced and strengthened risk identification and management systems among a number of GEF Agencies (noting that some existing GEF Agencies have long maintained comprehensive environmental and social risk management systems).

111. **Alignment with good international safeguards practices**. When developed more than a decade ago, the key principles upon which the GEF Minimum Standards are based reflected a consensus on key operational safeguard principles. These requirements continue to underpin key thematic safeguard areas among many institutions and remain aligned with international good practice. However, the intervening years have witnessed a number of changes regarding both the breadth and depth of safeguard frameworks adopted by a wide range of institutions, including many GEF Agencies.

112. A comparison of the GEF Safeguards with more recently adopted policy frameworks identified a range of thematic coverage gaps and/or areas of greater emphasis, including human rights, nondiscrimination equity; stakeholder engagement; climate change and disaster risk; biodiversity offsets; invasive alien species; supply chains; sustainable resource management; community health, safety and security; hazardous materials; involuntary

resettlement; indigenous peoples and the application of free, prior informed consent (FPIC); cultural heritage; and labor and working conditions. Many of these thematic gap areas appear relevant to GEF-supported operations.

113. **Reporting on safeguard risk levels and implementation in the GEF**. Effective safeguards systems include monitoring and reporting on implementation of environmental and social management measures over the course of a project/programme. Safeguard issues may be addressed in detail up front, at project preparation and appraisal, but receive less attention during implementation. In addition

114. At the GEF portfolio level, potential environmental and social risks are not systematically tracked. GEF is informed ex-ante about potential project-level environmental and social risks and impacts. The PIF and CEO Endorsement/Approval templates require Agencies to identify "potential social and environmental risks that might prevent the project objectives from being achieved" and to propose measures to address them. GEF's project tracking systems however do not record Agency designated environmental and social risk category levels or assign risk flags to any relevant potential areas of concern. Project monitoring and evaluation reports are not required to report on progress related to implementation of safeguard elements unless these were specifically included in the project results framework as a project outcome, output, or indicator. Both the Adaptation Fund and the Green Climate Fund include specific requirements for accredited entities to report on safeguard implementation issues during project implementation and completion.

115. The expanded GEF Partnership includes Agencies with less-developed experience with safeguard implementation and monitoring. Strengthened GEF safeguards reporting guidance may help drive consistency.

116. Some Agencies have established monitoring and reporting systems that can be used as a base for providing GEF with information on safeguard implementation. Agencies typically require implementing entities to report on project implementation, including implementation of environmental and social management plans and measures. A number of GEF Agencies that are also accredited to the AF and GCF are already required to provide this information.

Recommendations regarding evolution of the GEF Safeguards

Recommendation1. Review the GEF Minimum Standards

117. The catalytic role of the GEF Minimum Standards in promoting the adoption of strengthened, more consistent safeguard frameworks among many GEF Agencies has been noted above. The key requirements of the GEF Safeguards remain relevant and aligned with international good safeguards practice. At the same time, a preliminary review identified a range of gaps in thematic coverage in the GEF Minimum Standards that appear germane for the types of environmental and social risks present in the GEF portfolio. A review and potential update of the GEF Minimum Standards may be warranted. Further analysis by GEF would be required regarding substantial gap areas.

118. A potential review process could take a phased approach and should aim to strike a proper balance between addressing relevant, substantive policy gaps in the GEF Minimum Standards while avoiding extensive changes that would require significant revisions to often newly adopted safeguard frameworks of many GEF Agencies – a concern expressed by a number of GEF Agencies. A collaborative "working group" model of GEF constituents could potentially be a viable model for reaching such a balance. Substantial safeguards expertise exists across the GEF Partnership that could be utilized in any potential update process.

119. GEF may wish to review the Safeguards' Key Principles on not supporting certain types of activities to ensure they are comprehensive and that mechanisms exist for their implementation. Should GEF consider adopting a revised safeguards framework with broader thematic safeguard standards, it may wish to consider how best to approach the "applicability/inapplicability" of certain standards for GEF Agencies based on their policy frameworks and capacity. Under current practice, most Agencies appear to be interested in ensuring that they are able to undertake GEF-supported operations in all safeguard areas.

120. GEF should consider engaging the Green Climate Fund and Adaptation Fund regarding future development of harmonized safeguard policy approaches. The GCF, for example, will undertake a safeguard policy review process in the near future.

121. Reviewing and potentially adopting a revised GEF Safeguards framework would present a range of costs and challenges. Some Agencies devoted significant resources to develop or revise policies and institutional procedures to meet the current GEF Safeguards. The costs of accrediting the eight new GEF Project Agencies were substantial, to both the Agencies and GEF as a whole. Resetting the safeguards "goal posts" may generate some confusion and frustration among country partners. Avenues should be explored for minimizing such costs should GEF determine that a revision of the Safeguards is in order. For example, the review process outlined in GEF's recent policy on Monitoring Agency Compliance with GEF Policies (whereby Agencies undertake a self-assessment which is verified and supplemented by third-party review) could be adjusted to include a review of Agency compliance with a revised GEF Safeguards framework, and perhaps brought forward. The first compliance review process is slated for the end of the GEF 7 cycle, that is in 2022.

Recommendation 2. Improve safeguards monitoring and reporting

122. To date, environmental and social risks are not monitored at the GEF portfolio-level. Project-level environmental and social risks are typically monitored by GEF Agencies, however GEF does not request Agencies to summarize this information in Project Implementation Reviews or Mid-Term and Terminal Evaluations unless safeguards-related issues are specifically included in the project results framework as a project outcome, output, or indicator. One reporting requirement that is included in the GEF Minimum Standards is for Agencies to include information on relevant cases submitted to their grievance and accountability mechanisms, however a mechanism for such reporting has not yet been developed. In the GEF Partnership, Agencies bear responsibility for project implementation. Nevertheless, GEF should consider whether tracking environmental and social risks at the portfolio-level and ensuring a "flow

through" of monitoring information on safeguards implementation would provide relevant information for programming decisions, and help manage GEF reputational risk. Both the Adaptation Fund and the Green Climate Fund include specific requirements for accredited entities to report on safeguard implementation issues during project implementation and completion.

123. Agencies should inform GEF of the safeguards risk categorization assigned to projects/ programmes and keep GEF informed of the safeguards implementation issues through monitoring and reporting. Where available, this should ideally build off Agency systems rather than duplicating them.

124. Interviews among Agencies with newly adopted safeguard frameworks indicated that increased GEF interest and requests for information on safeguard implementation would help reinforce their own internal efforts and systems. As one Agency noted, such reporting "would make all our efforts worthwhile." Another Agency (with an established safeguard system) noted "GEF should not be kept in the dark" regarding safeguard issues during implementation.

125. A collaborative pilot initiative could be considered on developing tracking, monitoring, and reporting procedures to ensure that GEF is appropriately informed regarding environmental and social risks and safeguard implementation. Such a pilot could consider a unified approach of reporting on implementation of related GEF policies and guidelines, such as on gender mainstreaming, indigenous peoples, and public involvement.

Recommendation 3. Support capacity development, expert convening, and communications

126. The expanded GEF Partnership encompasses Agencies with widely diverse levels of safeguards experience and institutional capacity. Interviews of some GEF Agencies indicated significant interest in knowledge sharing and capacity support, in particular from Agencies with newly adopted safeguard frameworks. GEF could explore utilizing its convening role to support capacity development and knowledge-sharing regarding key safeguards issues. At the same time, the GEF itself could strengthen its own capacity and institutional knowledge on safeguards, as it has done with gender and indigenous peoples issues. Costs of convening and providing capacity support would need to be addressed. However, leveraging established expertise may not entail significant costs.

127. GEF could explore knowledge sharing and staying up to date on good safeguard practice implementation and challenges by accessing established networks, such as the Multilateral Financial Institutions Working Group on the Environment (MFI-WGE) and the International Association for Impact Assessment (IAIA), rather than seeking to establish new networks.

128. There are opportunities in the context to GEF-organized events for safeguards knowledge sharing, such as Expanded Constituency Workshops (ECWs) and other GEF annual events. The GEF Partnership encompasses leading safeguards-related expertise among its Agencies and country partners. Agencies could share approaches to relevant thematic

challenges, such as screening and assessing climate change risks or how best to support free, prior informed consent processes among indigenous peoples.

129. Where concerns may exist regarding a GEF Agency's capacity to fully address challenging safeguard implementation issues, targeted support could be considered.

130. GEF could also consider how best to communicate GEF's policy requirements, including the GEF Minimum Standards, with country partners to further build a shared understanding on the need for effective safeguards implementation.

ANNEX 1: ADAPTATION FUND TEMPLATES

EXCERPTS

Request for Project/Programme Funding from the Adaptation Fund

(amended October 2016, available at https://www.adaptation-fund.org/document/opg-annex-5/)

Part II. Project/Programme Justification

B. Describe how the project / programme provides economic, social and environmental benefits, with particular reference to the most vulnerable communities, and vulnerable groups within communities, including gender considerations. Describe how the project / programme will avoid or mitigate negative impacts, in compliance with the Environmental and Social Policy and Gender Policy of the Adaptation Fund.

E. Describe how the project / programme meets relevant national technical standards, where applicable, such as standards for environmental assessment, building codes, etc., and complies with the Environmental and Social Policy

H. Describe the consultative process, including the list of stakeholders consulted, undertaken during project preparation, with particular reference to vulnerable groups, including gender considerations, in compliance with the Environmental and Social Policy and Gender Policy of the Adaptation Fund.

K. Provide an overview of the environmental and social impacts and risks identified as being relevant to the project / programme.

Checklist of environmental and social principles	No further assessment required for compliance	Potential impacts and risks – further assessment and management required for compliance
Compliance with the Law		
Access and Equity		
Marginalized and Vulnerable Groups		
Human Rights		
Gender Equity and Women's Empowerment		
Core Labour Rights		
Indigenous Peoples		
Involuntary Resettlement		
Protection of Natural Habitats		
Conservation of Biological Diversity		
Climate Change		
Pollution Prevention and Resource Efficiency		
Public Health		
Physical and Cultural Heritage		
Lands and Soil Conservation		

Part III. Implementation Arrangements

C. Describe the measures for environmental and social risk management, in line with the Environmental and Social Policy and Gender Policy of the Adaptation Fund.

D. Describe the monitoring and evaluation arrangements and provide a budgeted M&E plan, in compliance with the ESP and the Gender Policy of the Adaptation Fund.

Part IV: Endorsement by government and certification by the Implementing Entity

B. Implementing Entity certification: *Provide the name and signature of the Implementing Entity Coordinator and the date of signature. Provide also the project/programme contact person's name, telephone number and email address*

> I certify that this proposal has been prepared in accordance with guidelines provided by the Adaptation Fund Board, and prevailing National Development and Adaptation Plans (……list here…..) and subject to the approval by the Adaptation Fund Board, commit to implementing the project/programme in compliance with the Environmental and Social Policy and Gender Policy of the Adaptation Fund *[emphasis in original]* and on the understanding that the Implementing Entity will be fully (legally and financially) responsible for the implementation of this project/programme.

Adaptation Fund Board Secretariat Technical Review of Project/Programme Proposal

(undated, shared by Adaptation Fund, February 2017)

Project Eligibility Section:

3. Does the project / programme provide economic, social and environmental benefits, particularly to vulnerable communities, including gender considerations, while avoiding or mitigating negative impacts, in compliance with the Environmental and Social Policy of the Fund?

6. Does the project / programme meet the relevant national technical standards, where applicable, in compliance with the Environmental and Social Policy of the Fund?

9. Has a consultative process taken place, and has it involved all key stakeholders, and vulnerable groups, including gender considerations?

13. Does the project / programme provide an overview of environmental and social impacts / risks identified?

Implementation Arrangements Section:

3. Are there measures in place for the management of for environmental and social risks, in line with the Environmental and Social Policy of the Fund? Proponents are encouraged to refer to the draft Guidance document for Implementing Entities on compliance with the Adaptation Fund Environmental and Social Policy, for details.

Project Performance Report Template: Risk Assessment

https://www.adaptation-fund.org/projects-programmes/project-performance/.

RISK ASSESMENT

IDENTIFIED RISKS

List all Risks identified in project preparation phase and what steps are being taken to mitigate them

Identified Risk	Current Status	Steps Taken to Mitigate Risk

Critical Risks Affecting Progress (Not identified at project design)

Identify Risks with a 50% or > likelihood of affecting progress of project

Identified Risk	Current Status	Steps Taken to Mitigate Risk

Risk Measures: Were there any risk mitigation measures employed during the current reporting period? If so, were risks reduced? If not, why were these risks not reduced?

Add any comments relevant to risk mitigation (word limit =

ANNEX 2: GREEN CLIMATE FUND TEMPLATES

EXCERPTS

Green Climate Fund, Funding Proposal

(ver. 1.1, 2015, available at http://www.greenclimate.fund/library/-/docs/list/574044.

F.3. Environmental, Social Assessment, including Gender Considerations
Describe the main outcome of the environment and social impact assessment. Specify the Environmental and Social Management Plan, and how the project/programme will avoid or mitigate negative impacts at each stage (e.g. preparation, implementation and operation), in accordance with the Fund's Environmental and Social Safeguard (ESS) standard. Also describe how the gender aspect is considered in accordance with the Fund's Gender Policy and Action Plan.

G.1. Risk Assessment Summary
Please provide a summary of main risk factors. Detailed description of risk factors and mitigation measures can be elaborated in G.2.

G.2. Risk Factors and Mitigation Measures			
Please describe financial, technical and operational, social and environmental and other risks that might prevent the project/programme objectives from being achieved. Also describe the proposed risk mitigation measures.			
Selected Risk Factor 1			
Description	Risk category	Level of impact	Probability of risk occurring
	Select	Select	Select

Mitigation Measure(s)			
Please describe how the identified risk will be mitigated or managed. Do the mitigation measures lower the probability of risk occurring? If so, to what level?			
Other Potential Risks in the Horizon			
Please describe other potential issues which will be monitored as "emerging risks" during the life of the projects (i.e., issues that have not yet raised to the level of "risk factor" but which will need monitoring). This could include issues related to external stakeholders such as project beneficiaries or the pool of potential contractors.			

H.2. Arrangements for Monitoring, Reporting and Evaluation

Besides the arrangements (e.g. semi-annual performance reports) laid out in AMA, please provide project/programme specific institutional setting and implementation arrangements for monitoring and reporting and evaluation. Please indicate how the interim/mid-term and final evaluations will be organized, including the timing.

Please provide methodologies for monitoring and reporting of the key outcomes of the project/programme.

I. Supporting Documents for Funding Proposal

- ☐ NDA No-objection Letter
- ☐ Feasibility Study
- ☐ Integrated Financial Model that provides sensitivity analysis of critical elements (xls format, if applicable)
- ☐ Confirmation letter or letter of commitment for co-financing commitment (If applicable)
- ☐ Project/Programme Confirmation/Term Sheet (including cost/budget breakdown, disbursement schedule, etc.) – *see the Accreditation Master Agreement, Annex I*
- ☐ **Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plan (If applicable) [emphasis added]**
- ☐ Appraisal Report or Due Diligence Report with recommendations (If applicable)
- ☐ Evaluation Report of the baseline project (If applicable)
- ☐ Map indicating the location of the project/programme
- ☐ Timetable of project/programme implementation

GCF Assessment Sheet for Funding Proposals

	Remarks	AE response
F.3. Environmental and social assessment, including gender considerations		
G.1. Risk assessment summary G.2. Risk factors and mitigation measures		
H.2. Arrangements for monitoring, reporting and evaluation		

III. Assessment

[section for GCF comments on the proposal which may include discussion of safeguard and gender-related issues]

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