Complying with the Environmental and Social Policy, the Gender Policy, and lessons for NIEs

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The Environmental and Social Policy and Gender Policy

- Operational Policy and Guidelines (OPG) determining the modalities for financing by the Fund
- AF Board adopted ESP in November 2013 and GP in March 2016
- New OPGs, operationalisation with tiered introduction
The Environmental and Social Policy and Gender Policy

- ESP and GP: similarities but also different
  - Main difference:
    - ESP focuses on preventing unwanted negative environmental and social impacts from AF activities
    - GP focuses on promoting desired positive impacts from AF activities
  - Reflected in the approach to project/programme formulation, implementation, monitoring and evaluation
Main characteristics of the ESP

- Goal: avoid unnecessary environmental and social harms as a result of AF-funded projects/programmes

- Compared to other, similar policies – e.g. World Bank, Development Banks, GCF – similarities and differences: Innovative and more objective and more accountable
THE ENVIRONMENTAL AND SOCIAL POLICY

- Underlying principles and concepts:
  - Not prescriptive on how compliance is achieved or demonstrated
  - Evidence-based
  - Risk-based
  - Comprehensive
  - Safeguarding efforts commensurate with the risks
  - Categorisation
  - Risks to be identified against 15 principles
The Environmental and Social Policy

- Integrated in Direct Access modality
  - Key role for IEs (and EEs)
  - Identification of risks → risk/impact assessment → Environmental and Social Management Plan (ESMP) → monitoring and reporting
  - Link with the Environmental and Social Management System (ESMS) of the IE
## The Environmental and Social Policy

### The 15 principles of the ESP (1/3)

- The substance of the ESP is built on 15 principles of environmental and social safeguarding
- Some principles always apply (*), some may or may not be relevant for a specific project/programme

1. Compliance with the Law *
2. Access and Equity
3. Marginalized and Vulnerable Groups
4. Human Rights *
The Environmental and Social Policy

The 15 principles of the ESP (2/3)

5. Gender Equality and Women’s Empowerment* (also see Gender Policy)
6. Core Labour Rights*
7. Indigenous Peoples
8. Involuntary Resettlement
9. Protection of Natural Habitats
10. Conservation of Biological Diversity
The Environmental and Social Policy

The 15 principles of the ESP (3/3)

11. Climate Change
12. Pollution Prevention and Resource Efficiency
13. Public Health
14. Physical and Cultural Heritage
15. Lands and Soil Conservation
The Gender Policy

- The Gender Policy (GP) builds on the ESP, in particular its risk principles on
  - Access and Equity
  - Marginalised and vulnerable groups
  - Human rights
- The GP expands the ESP principle of Gender equity and women’s empowerment’ to promote gender equality: equal rights, responsibilities and opportunities and access of women and men; equal consideration of their respective interests, needs and priorities
THE GENDER POLICY

Gender Policy in project/programme proposals (1/2)

- Comprehensive
- Specific gender elements in the design of its adaptation activities and expected outputs.
- Initial gender assessment
  - Selecting gender-responsive indicators
  - Designing gender-responsive implementation and monitoring arrangements
The Gender Policy

Gender Policy in project/programme proposals (2/2)

- Screening of proposals for gender responsiveness by AFBS and partners
- Consultation of stakeholders in a gender-equal way
- Guidance document (March 2017)
Implementing the ESP

Common issues and problems with ESP compliance in project/programme applications (1/2)

- Unsubstantiated (lack of) risk identification
- Risk management must be comprehensive
- ESMP: structure, roles and responsibilities
- Link between project/programme-level environmental and social safeguarding measures and the NIE’s ESMS, how will NIE’s capability (→ accreditation process) be applied to this project/programme?
IMPLEMENTING THE ESP

Common issues and problems with ESP compliance in project/programme applications (2/2)

- Inconsistencies in application documents
- Too much/irrelevant information in the application documents
- Include unknown or unidentified project activities: Unidentified Sub-Projects (USP) approach. ❗ Main cause of approval delays.
IMPLEMENTING THE ESP

When can USPs be used?

➤ Policy is clear: E&S risks need to be identified prior to submission of the funding request

➤ Ensuing ESMP should be included in the proposal

➤ When (i) cat. B, AND (ii) minor part of the project, AND (iii) assessment or ESMP cannot be completed in time, or mitigation measures run into project implementation: approval possible but requires assurances from NIE: ESMP with USP review mechanism.

➤ Example: SANBI Small grant facility.
IMPLEMENTING THE ESP

Implications of USP use in projects: comparing project compliance with ESP with and without USPs

» Please see whiteboard
IMPLEMENTING THE ESP

Conclusions: using USPs (1/2)

- It is not recommended: ESP requires prior identification of risks prior to submission of the funding request
- Some cases: USP use is practically inevitable because of the nature of the activities
- Most of the cases: avoidable, but perceived as beneficial by IEs as (i) formulation time and effort is reduced and (ii) formulation costs can partially be sourced from project implementation funds.

However:
- Weakens the environmental and social safeguarding overall
IMPLEMENTING THE ESP

Conclusions: using USPs (2/2)

- Complex/demanding review process that in almost all cases exceeds the capacities of the IE and/or EE
- Far more performant ESMP required, as well as more performant Environmental and Social Management System @ NIE
- Costs of ESMP implementation is considerably higher
- Increases risk for and liability of IE (and EEs)
- Delays project approval
- No access to AF expertise
AFB Secretariat ❤ NIEs