# **ADAPTATION FUND**

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

> Dr Dirk Lamberts 27 July 2017



CLIMATE FINANCE READINESS SEMINAR FOR NIEs #4

# 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

#### 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

#### Integrated in Direct Access modality

Key role for IEs (and EEs)

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- 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 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 15 principles of the ESP (2/3)

- 5. Gender Equality and Women's Empowerment\* (also see Gender Policy)
- 6. Core Labour Rights\*

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- 7. Indigenous Peoples
- 8. Involuntary Resettlement
- 9. Protection of Natural Habitats

10. Conservation of Biological Diversity

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)



AFB/B 29/Inf 8 3 March 2017

aptation Fund Board enty-ninth meeting an, Germany, 16-17 March 2017

GUIDANCE DOCUMENT FOR IMPLEMENTING ENTITIES ON COMPLIANCE WITH THE ADAPTATION FUND GENDER POLICY

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?

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.

### 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.

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

Please see whiteboard

## Conclusions: using USPs (1/2)

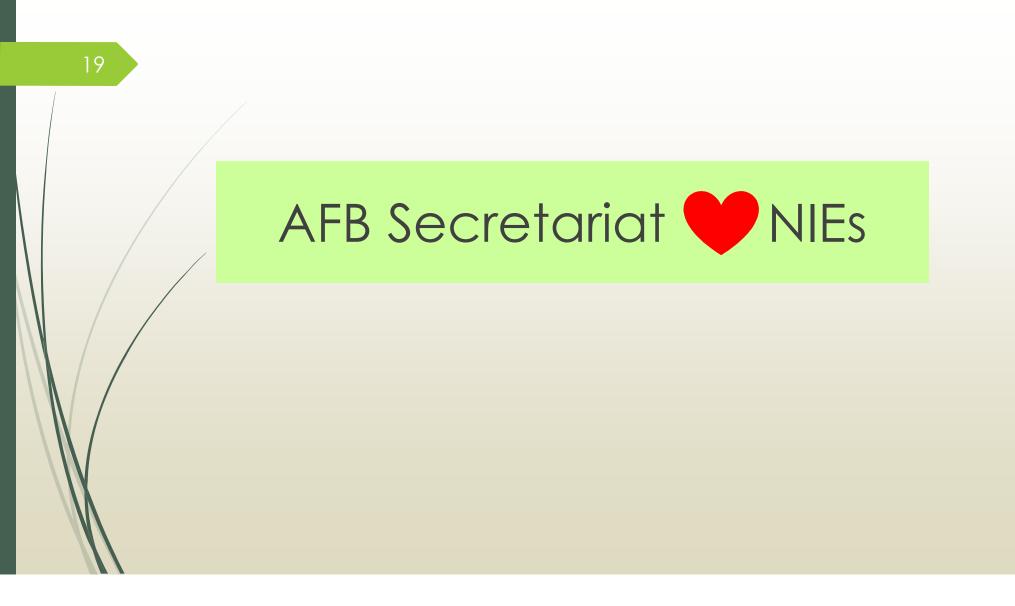
- It is not recommended: ESP requires prior identification of risks prior to submission of the funding request
- Some cases: USP use is practically inevitable because of the nature of the activities
- Most of the cases: avoidable, but perceived as beneficial by IEs as (i) formulation time and effort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

However:

 Weakens the environmental and social safeguarding overall

### 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





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