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Agenda Item 13

UPDATED GUIDANCE FOR IMPLEMENTING ENTITIES ON THE USE OF UNIDENTIFIED SUB-PROJECTS

Introduction

1. The Adaptation Fund Board (Decision B.38/41) requested the secretariat to prepare a document containing updated guidance on unidentified sub-projects (USPs), including further elaborated criteria on the use of USPs in a project/programme.
2. Existing guidance on the use of USPs is published as Annex 2 of document AFB/B.32-33/7 (please see Annex 1). The guidance has been updated to reflect current practices of the use of USPs, and to be more specific to the targeted users of the guidance. As such, this guidance document has been prepared primarily for Implementing entities (IEs).

Background

3. The Operational Policies and Guidelines of the Fund require that projects and programmes funded by the Fund comply with the Fund's Environmental and Social Policy (ESP) and the Gender Policy (GP). This implies, among other matters, that environmental and social risks related to a project or programme are identified by the time of submission of a proposal. For projects/programmes that are submitted using the two-step process, already the concept note needs to include that environmental and social risks identification.
4. To identify environmental and social risks of project/programme activities, these activities need to be sufficiently formulated. The nature and the characteristics of the activity need to be known, as well as the environment and the specific social setting in which the activity will take place. In general, projects and programmes need to be formulated to the point where adequate risks identification is possible before being submitted for funding. The project formulation process should take that into consideration.
5. However, sufficiently formulating project activities is not always possible because certain aspects of a project/programme may not yet be known. Sometimes it is not desirable to have all the project/programme activities fully identified at the time of submission of the funding request. This may be the case for activities that depend on the outcome of other major project activities, or where there are clear benefits to not identifying all activities beforehand. This is the case e.g. when a project/programme includes a small grants facility where the project/programme will provide grants to certain activities on the basis of applications.
6. Nevertheless, the ESP and GP require that for all activities risks are identified before they can be implemented.

Definition of Unidentified Sub-Projects

7. Project/programme activities that have not been formulated, at the time of submission of a funding request, to the extent that their environmental and social risks can be identified in line with the ESP are called Unidentified Sub-Projects (USPs).
8. This is a functional definition and may involve the whole range of minor activities of a project or programme to entire components.

9. The environmental and social risks associated with an activity are determined by the combination of two factors: (i) risk components that are inherent to the activity, and (ii) risk components related to the environment and social setting in which an activity will take place. In general, if one of those two factors is not or insufficiently known, adequate environmental and social risk identification is not possible. It is important that locations are known with sufficient precision and certainty.

10. Based on the combination of these two factors, different types of USPs can be distinguished, as shown in Table 1 below.

Table 1.

Type of USP	Characteristics
Fully unidentified: both the activity and the location are not determined	These are the most flexible type of activities as they will be identified and selected during implementation. These are also the type of the USPs with the highest risk of not complying with the ESP and/or GP.
Fully unidentified, within fixed framework	Similar to fully unidentified USPs, but within a framework that determines which kind of activities are allowed or acceptable locations. The framework usually includes eligibility or exclusion criteria for types of activities or locations that are often based on considerations for ESP and GP compliance.
Partially unidentified: specific activity identified, location to be determined	The inherent risks of the activities are already known so that much of ESP and GP compliance determination can be done during project formulation. Compliance with ESP and GP may be much less demanding as tailored tools for risks identification and management can be designed during project/programme formulation.
Partially unidentified: specific location identified, activity to be determined	The environmental and social settings for the activities are already known, permitting much GP and ESP compliance work to be done during project formulation; ability to select the most suitable activity for each location, and to build capacity or carry out other preparatory activities prior to final location selection.
Mix of USP types	Different types of USPs may be included in a project/programme. Depending on the mix, this could have all the disadvantages of the fully unidentified USP type.
Fully identified activity ¹	Both the location and the nature of the activity are determined so that environmental and social risks can be fully identified.

¹ This is not a USP type but included here as reference

11. The use of USPs in a project/programme increases the overall risk of unwanted negative environmental and social impacts. The challenges for an IE to meet the ESP and GP requirements increase considerably with the use of USPs. Compared to projects/programmes without USPs, the funding approval of projects/programmes with USPs tends to take considerably longer because of the challenge posed to meet the additional safeguard requirements to ensure comprehensive and adequate compliance with the ESP and the GP during project implementation.

Requirements for the use of USPs

12. As a principle, all environmental and social risks should be identified by the time of submission of a project/programme proposal. Project/programme activities should be sufficiently formulated for this to be possible. USPs should be avoided whenever possible.

13. When such risks identification is not possible because some project/programme activities have not been sufficiently formulated, these activities may be included as USPs, if certain conditions are met:

a) Justification

14. The use of USPs in a project or programme needs to be duly justified. A justification for the proposed use of USPs needs to be included in a project/programme proposal. The justification (i) needs to provide the reasons why an activity cannot be formulated at the design stage and (ii) must describe the specific benefits of not formulating an activity at that stage. It should further (iii) explain how these benefits outweigh the increased risk on non-compliance with the ESP and GP.

15. All Adaptation Fund funded projects/programmes need to go through an extensive process of consultations during the design stage. Stakeholder identification and consultations of stakeholders are a normal part of all projects/programmes formulations and are not sufficient justification for the use of USPs.

b) Permissible types of USPs

16. Based on the type of USP, some activities cannot be allowed as USP. USPs that are fully unidentified – for which both the nature of the activity and the environmental and social setting in which the activity will take place are unknown – must not be included in a project/programme as USP.

17. A notable exception to this rule would apply to some types of innovation project. This is due to the inherent/structural differences in the definition and design of some innovation projects, specifically those for which the emphasis is on designing and implementing a *process*, rather than on achieving a defined set of outputs.

c) Environmental and Social Management Plan

18. Projects/programmes with environmental and social risks may need to implement measures to avoid, minimize, mitigate or otherwise manage these risks. This means that an Environmental and Social Management Plan (ESMP) needs to be prepared and included in a project/programme proposal. An ESMP describes the risks that have been identified, the negative impacts that are expected and the measures that are needed to manage or avoid those negative impacts. An ESMP needs to be a real plan, so must also include information on who will be responsible for the implementation of the ESMP, who will have which role, how the management activities will be funded, and what information will be collected to monitor the implementation of the ESMP and report on it accordingly.

19. Under the access modality of the Fund, the IE is accountable for all environmental and social damage caused by a project or programme it implements. In practice, most risks of negative impacts exist with the execution of project/programme activities, for which executing entities (EEs) are responsible. The role of the IE is to supervise and monitor the EEs in their execution of project/programme activities. The EEs are the ones that will have to apply most of the management measures included in an ESMP, and it is the role of the IE to ensure that the EEs do so, that they have the capacity to do this well (both in human resources and in operational capacity) and that they are committed to avoid unwanted negative impacts.

20. An ESMP needs to explain how the IE will supervise the EEs and ensure they have the required capacity.

21. For the allowed and justified USPs, a proposal needs to ensure through the ESMP that the USPs will go through the same risks identification process and subsequent safeguards steps as the fully formulated activities that are included in a project or programme proposal, including consultation.

22. This needs to be achieved by developing an ESMP for the project/programme, or by expanding the ESMP already prepared for the fully formulated activities with environmental and/or social risks. For the fully identified activities, the environmental and social risks need to be identified before submission of the proposal, and any management measures should be included in an ESMP.

Implications of the use of USPs

a) During project/programme formulation

23. ESP and GP are project or programme design tools. USPs diminish or exclude this function during project or programme design.

24. Using USPs increases the amount of work and the resources needed during implementation to ensure compliance with the ESP and GP.

25. Using USPs in a project/programme has consequences for a number of elements of its formulation. Already during preparation of the proposal, some information will not yet be available, e.g. on vulnerable groups involved or the gender composition of the target population. This should be taken into account when preparing a proposal and be reflected where needed.

26. The use of USPs affects not only the ability to demonstrate compliance with the ESP and GP. Other essential elements of a project or programme proposal are also affected, to a varying degree. Specifically, this involves the demonstration of cost-effectiveness of the proposal; demonstrating economic, social and environmental benefits, particularly to vulnerable communities; showing consistency with national policies and plans; demonstrating the justification of the financing based on the full cost of adaptation reasoning; and demonstrating sustainability of project/programme outcomes. These elements need to acknowledge the uncertainties associated with any USPs and explain how the funding requirements are met regardless.

27. Monitoring and evaluation (M&E) arrangements and alignment with the Fund's results framework need to describe how any USPs will be accounted for. The budgeted M&E plans and sex-disaggregated data, targets and indicators need to acknowledge the uncertainties associated with any USPs and explain how the funding requirements are met regardless. The same applies to the realistic, quantified expected results with indicators and targets that are gender responsive and disaggregated by sex as appropriate for the results framework.

28. A grievance mechanism is an element of all projects/programmes. For those with USPs, the design of the grievance mechanism needs to be adequate to accommodate grievances from the whole range of possible USPs. It also needs provisions so that it will also be known to stakeholders involved in USPs and able to receive complaints related to the USPs. The ESMP may need to include specific provisions to publicize the grievance mechanism.

29. The environmental and social risks reported in a proposal for a project/programme with USPs may only include those risks associated with the project/programme's already fully identified activities. The risks associated with the USPs – by definition – are unknown at this stage and should not be included.

30. Depending on the number of USPs, their complexity and scale, and the sensitivity of the environments and social settings in which they will take place, the effort to comply with the ESP may be substantial and may require allocation of funds for this purpose. Such budgetary provisions should be adequate to cover the worst-case scenario as would become apparent from the ESP compliance work during project formulation. In addition to identifying ESP risks, budgetary provisions should be made for impact assessments and the identification of avoidance, mitigation or management measures as required. The annotated budget should show how the budget allocated to this purpose is adequate. Contingency provisions may be needed as well. The budget allocations should take into account, for each USP, which entity is responsible for the risks identification and any subsequent safeguards work.

b) During project/programme implementation

31. The review process of USPs during project/programme implementation follows the same steps as those specified in the ESP for activities that are formulated prior to submission: (1) identification of environmental and social risks according to the 15 ESP principles following an evidence-based and comprehensive process; (2) commensurate assessment of anticipated impacts for those risks that have been identified; (3) the identification of adequate measures to avoid, minimise or manage such impacts; (4) a plan to apply and implement these measures. Consultation and gender considerations are essential elements of this process.

32. The review process should be included in the ESMP. The outcomes of the risks identification and any impact assessments for the USPs, as well as any subsequent management measures, must be included in the ESMP so that it contains at all times the most recent and relevant information, including that of any identified USPs. For this purpose, it is recommended that the ESMP for the project/programme is written in a way suitable to be also used as a stand-alone document.

33. Compliance with the relevant and applicable national regulations is a requirement under the Fund's ESP. During formulation of a USP, these need to be identified and the subsequent requirements need to be met. Usually, this relates to national processes of environmental and social safeguarding as well as national standards or codes that may apply.

34. For each USP, records will be kept of the ESP and GP compliance process. Evidence of consultation of affected stakeholders on the ESP and GP findings should be included.

c) Monitoring and reporting

35. The presence of USPs in an approved project or programme needs to be reported in the Project Progress Report (PPR).

36. The annual PPR needs to report (i) which USPs have been further identified during the year reported on; (ii) if the ESMP has been applied to those USPs; (iii) all the environmental and social risks that have been identified for each of the USPs formulated; (iv) whether an impact assessment been carried out for each ESP risk that has been identified for the USP; (v) if adequate consultation has been held during risks and impacts identification for the USP; (vi) whether the data used to identify risks and impacts had been disaggregated by gender as required; (vii) the environmental and social safeguard measures (avoidance, mitigation, management) that have been identified for each USP; and (viii) the monitoring indicator(s) for each impact identified. The Board secretariat will review the information on USPs contained in each annual PPR, and if necessary, request further information, in the context of ensuring compliance with operational policies and guidelines and the project legal agreement.

37. The final evaluation and – the case being – mid-term evaluation shall expressly include USPs in their terms of reference when these are present in a project/programme. They will evaluate the extent to which the ESMP has been applied to the USPs during implementation of the project and the effectiveness of the process. It will review the extent to which safeguards measures have been integrated in the project/programme ESMP following USP identification, and if this was done comprehensively. It will also review if all project activities – both USPs as those that were fully identified at the time of funding approval – have been subject of a comparable risks identification process and subsequent environmental and social management measures. In this, specific attention will be attributed to the use of gender-disaggregated data and adequate stakeholder consultation throughout. The evaluation will also consider the effectiveness of the implementation of the grievance mechanism and the adequacy with which any complaints were addressed.

Support

38. Implementing entities are encouraged to consult with the Adaptation Fund secretariat on matters related to USPs during project/programme formulation.

Recommendation

39. The PPRC may wish, having considered document AFB/PPRC.30/54, to recommend to the Board to:

- (a) Adopt the updated guidance for implementing entities on the use of Unidentified Sub-Projects (USPs) contained in document AFB/PPRC.30/54, thus superseding that of Annex 2 of document AFB/B.32-33/7;
- (b) Request the secretariat to inform the implementing entities of the Fund of the new guidance;
- (c) Request the secretariat to provide an update to the PPRC on the use of USPs in the proposal design no later than its thirty-fourth meeting.

Annex 1: Annex 2 of document AFB/B.32-33/7

Document AFB/B.32-33./7 contains the previous guidance on USPs that is currently being updated.

Annex 2

Projects/programmes with Unidentified Sub-Projects (USPs): compliance with the ESP and GP

Background

The Environmental and Social Policy (ESP) requires that environmental and social risks associated with all the activities that will be undertaken by a project/programme have been identified at the time of submission of the proposal.⁵ This either assumes that all project/programme activities have been identified and formulated at that time to the extent that effective identification of all environmental and social risks is possible, or, alternatively, implies that environmental and social risk identification will be completed once all project/programme activities have been identified.

Effective environmental and social risks identification takes into account risk factors inherent to an activity as well as the specific environmental and social context in which the activity will take place. The combination of both inherent and environmental factors determines the level and nature of the risk of undesirable negative environmental and social impacts.

The ESP has no provisions for projects/programmes where comprehensive risks identification has not been possible or has not been carried out by the time the proposal is submitted. As such, this is a ground for not approving an application for project/programme funding. Part of the justification for requiring that all ESP-related risks be identified for all project/programme activities by the time of submission is to ensure that all funding requests are treated equally and fairly in terms of ESP compliance.

In some particular cases, it is acceptable that not all project/programme activities have been identified by the time of submission of the funding application. For examples, projects/programmes may include activities that are critically dependent for their formulation on the outcome of other project/programme activities and that can only be fully formulated on the basis of these prior achievements. This is for instance the case for projects/programmes that include a grants facility, where applications for funding of (small) activities will be invited during implementation, within an objectives and operational framework that is clearly defined in the project/programme proposal. The establishment of the grants facility, with the required capacity building, including development of rules, is a

⁵ *Adaptation Fund Operational Policies and Guidelines Annex 3: Environmental and Social Policy (approved in November 2013; revised in March 2016)*: Para 30: [...] As a general rule, the environmental and social assessment shall be completed before the project/programme proposal submission to the Adaptation Fund. Para 8: The policy requires that all projects/programmes be screened for their environmental and social impacts, that those impacts be identified, and that the proposed project/programme be categorized according to its potential environmental and social impacts. [...] all environmental and social risks shall be adequately identified and assessed by the implementing entity in an open and transparent manner with appropriate consultation; Paras 27, 32, 33.

pre-condition for the formulation of the activities it will fund. In such cases, it may be impossible to identify by the time of submission all the environmental and social risks associated with these grant activities since the nature of the activities or the specific environment in which they will take place, or both, may not be known. Such activities are then referred to as Unidentified Sub-Projects (USPs).

The present document is intended to guide IEs in the process of ensuring ESP compliance in the development of project/programme proposals that include USPs. Projects/programmes with such type of activities must include a justification as to why these activities cannot be identified prior to submission of the funding application. In all other cases, identifying project/programme activities to the extent that adequate and comprehensive ESP risks identification is possible is considered to be a part of project/programme formulation.

Furthermore, in case a project/programme includes justified USPs, the IE has to ensure that the same level of ESP-risks identification and subsequent compliance is comprehensively applied to all the USPs during implementation and to the same standards as if all risks had been identified at the time of submission.

Funding applications for projects/programmes are reviewed by the Adaptation Fund Board Secretariat in terms of compliance with the ESP among other issues. The applying implementing entity is always informed of the outcome regarding the funding application and in most cases the IE will receive (detailed) feedback on any outstanding ESP compliance issues, as well as suggestions on how to achieve and to demonstrate compliance. In most cases, the Secretariat is available to provide further guidance and recommendations to the IE on how to comply with the ESP and to reflect compliance in the funding application. In case of projects/programmes with USPs, such review and subsequent guidance are not available to the IE as the Secretariat is not involved during project/programme implementation in the identification of ESP risks and any subsequent actions. The ensuing requirements for demonstrating ESP compliance have been a challenge to most implementation partners, especially under the direct access modality where the NIE is accountable for the adverse impacts of its project/programme.

Generally, including USPs in AF projects/programmes makes it more difficult to demonstrate compliance with the ESP. Compared to projects/programmes without USPs, the funding approval of projects/programmes with USPs takes considerably longer, because of the challenge posed to IEs to meet the additional safeguard requirements to ensure comprehensive and adequate compliance with the ESP during project implementation. Whilst the same standards apply to all AF-funded projects/programmes, the burden on the IE to demonstrate ESP compliance for projects/programmes with USPs is considerably high.

Similarly, the Gender Policy applies to all the activities of a project/programme. Gender-responsive consultations, the identification of key gender goals and target groups, the formulation of gender-responsive project/programme indicators and the initial gender assessment are accordingly required but may not be adequate when not all project/programme activities have been formulated.

Formulating a project/programme with USPs – additional requirements

When the use of USPs is justified, the IE must ensure that during project/programme implementation all USPs also comply with the ESP. This implies that during implementation for each USP the environmental and social risks are identified, that impact assessments are conducted for the USPs for which risks are found, and that measures are identified and implemented to prevent, mitigate or manage the unwanted negative impacts.

The requirements for each USP in terms of ESP compliance are the same as for activities that have been fully formulated by the time of funding application submission. The project/programme proposal, therefore, has to include a detailed description of the process that will be applied during project implementation to ensure ESP compliance for the USPs. During the review of the funding application for a project/programme with USPs, such process will be reviewed for its potential and likelihood to deliver the same ESP compliance outcome as is required for fully formulated applications. Projects/programmes with USPs are therefore required to include an Environmental and Social Management Plan (ESMP).

The ESMP of a project/programme with USPs contains two main elements. For the already fully formulated activities, it describes how the unwanted environmental and social impacts that have been identified and assessed during project/programme formulation will be addressed. For the USPs, it includes the review process that will ensure that as for a USP, as and when it is being formulated to the point where effective ESP risks identification is possible, such risks are identified and subsequent measures are taken according to the risks findings. Effective risks identification requires that the risks inherent to both an activity and the specific environment and social setting in which it will take place, are known.

The review process of USPs during project/programme implementation follows the same steps as are specified in the ESP for activities that are formulated prior to submission: (1) identification of environmental and social risks according to the 15 ESP principles following an evidence-based, comprehensive and commensurate process; (2) assessment of anticipated impacts for those risks that have been identified; (3) the identification of adequate measures to avoid, minimise or manage such impacts; (4) a plan to apply and implement these measures. Consultation and gender considerations are essential elements of this process.

The project/programme-wide ESMP is updated with the outcome of the safeguard activities for the USPs. For this purpose, it is recommended that the ESMP for the project/programme is written in a way suitable to be also used as a stand-alone document.

The proposal should demonstrate what the capacity requirements are and how these are met by the responsible entities and what capacity gaps may exist therein. Whilst it is a growing global trend in environmental and social safeguard mechanisms for large development funds⁶ that findings are required to be evidence- rather than opinion- based, and that safeguard efforts should be commensurate to their involved risks, there is generally little experience with these innovative aspects of the Fund's ESP, especially as it is not prescriptive.

⁶ See e.g. the new Environmental and Social Framework of the World Bank.

Depending on the number of USPs, their complexity and scale, and the sensitivity of the environments and social settings in which they will take place, the effort to comply with the ESP may be substantial and may require allocation of funds for this purpose. Such budgetary provisions should be adequate to cover the worst-case scenario as would become apparent from the ESP compliance work during project formulation. In addition to identifying ESP risks according to its 15 principles, budgetary provisions should be made for impact assessments and the identification of avoidance, mitigation or management measures as required. The annotated budget should show how the budget allocated to this purpose is adequate. Contingency provisions may be needed as well. The budget allocations should take into account, for each USP, which entity is responsible for the risks identification and any subsequent safeguards work.

It is in the interest of the IE and the executing entities to limit as much as possible the scope of the USPs that are included in a project/programme. The effort, expertise and resources required for the ESP risks identification and impact assessments for each USP can be considerably reduced by including eligibility restrictions on USPs. This can be done by limiting USPs to those located in certain areas, involving certain sections of the population, or by creating an exhaustive list of eligible activities and/or their characteristics. Similarly, during project/programme formulation common ESP compliance elements can be prepared that will reduce the effort required for each USP during implementation. This could, for instance, entail the identification or mapping of sensitive habitats or of cultural heritage or an analysis of core labour rights issues.

The grievance mechanism should be adequate to accommodate grievances from the whole range of possible USPs.

Implementation of a project/programme with USPs

According to the OPG of the Fund, it is the responsibility of the IE to ensure compliance with the relevant policies of the Fund. In the case of ESP compliance for projects/programmes that include USPs, the IE may apply its own Environmental and Social Management System (ESMS) or use a specific process to achieve comprehensive compliance with the ESP, as long as the outcome of the process meets the requirements of the ESP. The ESMS of an IE is never vetted as being equivalent to the ESP, and the methodology, concepts and principles used do not need to be those of the ESP.

During inception, the adequacy of the implementation arrangements of the ESMP is verified by the IE and relevant stakeholders and the arrangements may be updated or adjusted as required. Such updates and/or changes are reported to the Fund. The inception phase is also a suitable time and opportunity to identify additional eligibility criteria for USPs, which may considerably simplify and reduce the safeguard efforts required for each USP, for instance, by formulating admissibility or exclusion criteria for USPs.

During implementation, a substantial effort is likely to be required to identify the ESP risks of the USPs, which may require the involvement of specialists. This may imply that the allocation of additional specific resources is required.

The IE has the responsibility to ensure that the project/programme is executed in a way that meets ESP and GP requirements. The Executing Entities play an essential role in this process. The IE needs to assess the capacity of an EE to carry out all the aspects of ESP and GP compliance related to the activities it implements. This may include the entire process of ESP risks identification and subsequent safeguard actions for the USPs that the EE may be involved in. The IE needs to ensure that any capacity that is lacking at the EE is built or otherwise addressed.

Compliance with the relevant and applicable national regulations is a requirement under the Adaptation Fund's ESP. During formulation of a USP, these need to be identified and the subsequent requirements need to be met. Usually, this relates to national processes of environmental and social safeguarding as well as national standards or codes that may apply.

The IE is also responsible for reporting on project/programme implementation to the AF. For projects/programmes with USPs there are additional requirements compared to fully formulated projects/programmes.

Monitoring and reporting

In the case of a project/programme with USPs, the IE will need to report on a regular basis to the AF on its progress and performance in applying the ESP to the USPs and demonstrating compliance of all the project/programme activities with the ESP. For this purpose, the IE will need to update the ESMP of the project/programme with the following information for each USP it has identified during the relevant reporting period:

- a brief description of the fully formulated USP, with details on (i) the characteristics of the USP and (ii) the specific environmental and social setting in which the USP will be implemented. This information needs to be provided to an extent sufficient to appreciate the effectiveness of the risks identification that was carried out;
- the outcome of the ESP risks identification process, using the same structure as that of Section II.K (Section II.L for regional projects/programmes), identifying risks according to each of the 15 ESP principles, justifying the risk findings, and showing that this is the outcome of an evidence-based and comprehensive effort;
- for each of the identified risks, a description of the subsequent impact assessment that was undertaken and the findings thereof, showing that the assessment was commensurate with the risks identified;
- the findings of the impact assessments, and the safeguard measures that have been formulated to avoid, mitigate or manage undesirable impacts;
- the updated detailed safeguard arrangements in the implementation component of the ESMP, identifying and allocating roles and responsibilities to implementation partners for the application of the ESMP. This should include an assessment or a confirmation of the required capacity and skills with the relevant implementation partners;
- information on the consultations that were held on the risks identification and impact assessments outcome as well as on any proposed management measures, and how any feedback was responded to;
- gender-disaggregation of the information used in the risks identification and subsequent safeguards actions;

- information on disseminating information to stakeholders on the grievance mechanism.

The updated ESMP is to be attached to the annual PPR report.