Annex 9: Draft Environmental and Social Management Framework (ESMF)

Date of last revision – December 20, 2023

For the following (UNDP-supported) National Child Projects under the GEF Africa Minigrids Program (AMP):

Country	**Project Name**	**UNDP ID**	**GEF ID**
Benin	Benin National Child Project under the Africa Minigrid Program	6658	10831
Madagascar	Madagascar National child project under the Africa Mini-grids Program	XXX	-
Mali	Mali national child project under the Africa Minigrids Program	6660	10834
Niger	Niger national child project under the Africa Minigrids Program	6659	10833
São Tomé and Príncipe	São Tomé and Príncipe National Child Project under the Africa Minigrid Program	6657	10832
Zambia	National child project under the GEF Africa Minigrids Program: Zambia Minigrids (ZMG) Project	6613	10841

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Abbreviations and Acronyms

AMP	Africa Minigrids Program
E&S	Environmental and social
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FPIC	Free, Prior and Informed Consent
GEF	Global Environment Facility
GRM	Grievance Redress Mechanisms
IP	Indigenous Peoples
IPP	Indigenous Peoples Plan
LAP	Livelihoods Action Plan
LMP	Labour Management Procedures
M&E	Monitoring and evaluation
PAI	Project's area of influence
PIF	Project Identification Form
PIR	GEF Project Implementation Report
PMU	Project Management Unit
PPG	Project Preparation Grant (GEF)
PV	Photovoltaic
RAP	Resettlement Action Plan
SECU	Social and Environmental Compliance Review Unit (UNDP)
SEP	Stakeholder Engagement Plan
SES	Social and Environmental Standards
SESA	Social and Environmental Strategic Assessment
SESP	Social and Environmental Screening Procedure.
SRM	Stakeholder Response Mechanism (UNDP)
STP	São Tomé and Príncipe
UNDP	United Nations Development Programme

1 SECTION I - Executive Summary

This Environmental and Social Management Framework (ESMF) covers seven UNDP-supported, GEF-financed national projects, which are part of the Africa Minigrids Program (AMP), a technical assistance program for minigrids, developed by UNDP with initial funding from the Global Environment Facility (GEF). The AMP is comprised initially of 1 regional project and 21 national projects grouped in three different cohorts:

- A first round of 11 countries approved in the GEF December 2019 work program. These 11 countries are: Angola, Burkina Faso, Comoros, Djibouti, Ethiopia, Eswatini, Madagascar, Malawi, Nigeria, Somalia and Sudan. The 1st round national projects are expected to begin implementation in 2022.
- A second round of 7 countries approved by the GEF in the June 2021 work program. Countries included in the second round are: Benin, Chad, Mali, Mauritania, Niger, São Tomé and Príncipe (STP), Zambia. The 2nd round of projects are expected to begin implementation in 2023 (with a 12-month lag with respect to the first cohort).
- A third round of 3 countries approved by the GEF in the June 2022 work program: Burundi, Democratic Republic of the Congo and Liberia. The 3rd round of projects are expected to begin implementation in 2024 (with a 24-month lag with respect to the first cohort).

This ESMF was prepared by UNDP and covers one of the first round projects and five of the second round projects under AMP. **The countries covered by this Framework are Madagascar (first round), Benin, Mali, Niger, STP, and Zambia (second round).**

The AMP's objective is to increase access to electricity by improving the financial viability and promoting scaled-up commercial investment in renewable energy minigrids ('minigrids'). The objective of each national project (hereafter, the "project") is to provide technical assistance and investment support to improve energy access in rural areas through the introduction of renewable technologies. Each project consists of specific components to be implemented over the course of a 4-year period as described in the project documents.

The objective of the ESMF is to ensure compliance with relevant policies, **including UNDP's Social and Environmental Standards (SES)**, and to direct the project personnel and stakeholders during the implementation of the project in tackling the social and environmental concerns identified. Among those, the ESMF aims to manage the Environmental & Social (E&S) impacts through appropriate mitigation measures that may arise with the implementation of the project providing specific guidance to be followed consistently with the existing policies at the local, national and international level and the UNDP.

The conclusions and recommendations contained in this document were drawn from a study undertaken by an Environmental and Social Safeguards expert, in coordination with national consultants and AMP team members at the project preparation phase of the first round of AMP national projects. The following methods were used to produce the results:

- Site visits
- Stakeholder interviews
- Concertation with UNDP on the scale of the assessment to be undertaken during project design
- Review of the previous work conducted at the Project Identification Form (PIF) stage
- Online research
- Review of existing relevant documentation
- Expert knowledge of the team members

This ESMF covers the full project cycle, from initiation to closure. The cycle stages are design and planning, including site selection; construction; operation and maintenance; and decommissioning.

This ESMF identifies the steps that will be followed for each project for avoiding, and where avoidance is not possible, reducing, mitigating, and managing adverse impacts (as justified based on results of the procedures).

In conjunction with the preparation of this ESMF and in accordance with UNDP SES policy, a Social and Environmental Screening Procedure (SESP) has been developed for each of the projects[1] covered in this ESMF in order to: (i) identify potential social and environmental risks associated with planned activities; and (ii) assess their likely significance. This, in turn, determined both the project's risk category (Low, Moderate, Substantial, High) and the level of social and environmental assessment and management measures required to address potential risks and impacts. All projects considered in this ESMF will update their SESP as needed during implementation as part of project risk management and monitoring. At a minimum, projects that undergo substantive revision or experience a change in context that affects the risk profile will be re-screened and potentially recategorized.

A**ll projects covered by this ESMF have been categorized as Substantial risk**.

This is in part attributable to the nature of the AMP intervention and the adoption of a conservative, prudent approach, since some of the project activities, and particularly the minigrid pilots - including the pilots' locations and type - **are still to be fully defined**. The measures outlined in this ESMF reflect the UNDP SES requirements for that categorization:

The present ESMF is organized into ten sections:

- Section I presents this executive summary.
- Section II describes the project scope and coverage, and objectives of the ESMF in relation to the project preparation phase.
- Section III identifies the potential social and environmental impacts due to the project activities and the methodology used.
- Section IV analyses the legal and institutional framework relevant to the safeguards.
- Section V describes the SESP used for screening, assessment and management of environmental and social risks identified.
- Section VI describes the stakeholder engagement, disclosure process, access to the grievance mechanisms and Accountability Mechanism.
- Section VII describes the grievance redress mechanism to be provided during the project.
- Section VIII provides an overview of institutional arrangements and capacity building, including the assignment of roles and responsibilities along the project cycle.
- Section IX establishes the monitoring and evaluation arrangements
- Section X presents the action plan and budget for ESMF implementation.

The main sections of the ESMF are complemented by several Annexes that provide project/country-level details and other relevant information:

- Annex I – Project Description
- Annex II – Draft SES Screening Checklist for Minigrid Development
- Annex III - Guidance on Screening for Indigenous Peoples
- Annex IV - Indicative Outline of Environmental and Social Impact Assessment Report
- Annex V - Indicative Outline of an Environmental and Social Management Plan
- Annex VI - Indicative Outline of an Indigenous People's Plan (or equivalent)
- Annex VII - Labour Management Procedures Template
- Annex VIII – Indicative Steps and Guidance for Documenting FPIC Process
- Annex IX - Sample Terms of Reference: Project-level Grievance Redress Mechanism

[1] The project document (ProDoc) for each National Project includes the SESP, which details the specific environmental and social risks associated with each project. See in the annexes of each project document.

2 SECTION II - Project description and ESMF purpose

This section aims to describe the proposed projects and their social and environmental context. Additionally, it summarizes project components, including typology of the future activities, policies, and/or regulations to be supported by the project(s).

2.1 Project Context – Introduction to the Africa Minigrids Program (AMP)

The Africa Minigrids Program (AMP) is a technical assistance program for minigrids, developed by UNDP with initial funding from the Global Environment Facility (GEF), and executed in partnership with relevant government entities.

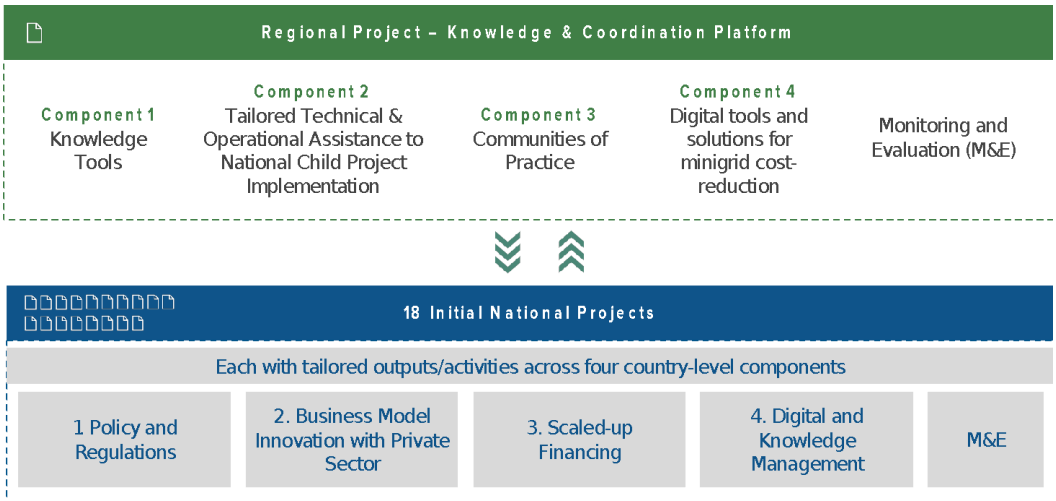
Program Objective: The program's objective is to support access to clean energy by increasing the financial viability and promoting scaled-up commercial investment in renewable minigrids, with a focus on cost-reduction levers and innovative business models.

The programmatic approach aims to achieve greater impact by creating new minigrid markets across the continent, which, in aggregate, will create scale and momentum, attracting private sector interest and investment. The programmatic approach will also allow for a broader sharing of good practice and create economies of scale in providing program services.

Program Design: The program architecture, as shown in Figure 2-1 below, has two main elements:

- A cohort of **National Projects**, each with a set of tailored activities structured across four components: (i) policy and regulations, (ii) business model innovation with private sector, (iii) scaled-up financing and (iv) digital, knowledge management, and monitoring and evaluation (M&E).
- A **Regional Project**, acting as the knowledge, advocacy and coordinating platform of the Africa Minigrids Program. The regional project is structured across five components: (i) knowledge tools for both public and private actors; (ii) tailored technical and operational assistance to countries; (iii) communities of practice, (iv) digitalization for minigrid cost-reduction, and (v) M&E.

Figure 2-1: Architecture of the Africa Minigrids Program



Country Participation: The primary form of country participation in the program will be as national projects. The program is initially supporting three rounds of national projects, totaling 21 in number:

- A first round of 11 national projects approved at the concept stage in the GEF December 2019 work programme. These 11 countries are: Angola, Burkina Faso, Comoros, Djibouti, Ethiopia, Eswatini,

Madagascar, Malawi, Nigeria, Somalia and Sudan.

- A second round of 7 national projects approved at the concept stage in the GEF June 2021 work programme. These 7 countries are Benin, Chad, Niger, Mali, Mauritania, STP and Zambia.
- A third round of 3 national projects approved at the concept stage in the GEF June 2022 work programme. These 3 countries are Burundi, Democratic Republic of the Congo and Liberia.

The initial 21 AMP national projects can be grouped into two categories depending on the funding source.

- 15 '**GEF-funded**' national projects: national child projects directly receiving GEF STAR financial resources. Project documentation required to prepare and approve the 'GEF-funded' national projects includes: (i) a full Project Document and all its annexes, **including an Environmental and Social Management Framework (ESMF)**, meeting the UNDP requirements; and (ii) a CEO Endorsement Request or CEO Approval Request document (as applicable) and all its annexes meeting GEF requirements.
- 6 '**third-party-funded**' national projects: national projects not directly receiving GEF STAR financial resources, and instead funded by other sources, including UNDP and AfDB financial resources. The 6 'Third-party funded' countries are Angola (AfDB), Madagascar (UNDP, AfDB) in the first round, Chad (UNDP) and Mauritania (UNDP) in the second round, and Burundi (UNDP) and Liberia (UNDP) in the third round. Project documentation required to prepare and approve the 'Third-party funded' national projects include only a full Project Document and all its annexes, **including an Environmental and Social Management Framework (ESMF)**, meeting the UNDP requirements.

2.2 ESMF scope

In line with the programmatic approach described above, a **Combined Environmental and Social Management Framework (ESMF) document** has been prepared during the project preparation phase for the second round of AMP national projects.

ESMF Scope by Country/Project

The countries covered by this Framework are Benin, Madagascar, Mali, Niger, STP and Zambia. There are additional second and third round AMP national projects (Chad, Mauritania, Burundi and Liberia) that are still under development and will be added to an updated version of this ESMF as they are finalized.

Table 2-1 - Projects covered by this ESMF

Country	Project Name	PIMS Id	GEF Id
Benin	Benin National Child Project under the Africa Minigrid Program	6658	10831
Madagascar	Madagascar, National child project under the Africa Mini-grids Program	NA	NA
Mali	Mali national child project under the Africa Minigrids Program	6660	10834
Niger	Niger national child project under the Africa Minigrids Program	6659	10833
STP	São Tomé and Príncipe National Child Project under the Africa Minigrid Program	6657	10832
Zambia	National child project under the GEF Africa Minigrids Program: Zambia Minigrids (ZMG) Project	6613	10841

Any reference to 'project' or 'projects' under this ESMF refers to the AMP national child projects listed in above.

Considerations around co-financing

The project has identified additional sources of co-financing from UNDP and third parties which have been confirmed by letters of co-financing received. Additional sources of co-financing can also be identified and can materialize during project implementation. For the purpose of this document, co-financing includes funding as well as well as other non-monetary (in-kind) contributions[2].

Based on co-financing towards concrete activities, co-financing activities can be categorized as follows:

- **Co-financing activities included as project results**. Activities funded by sources of co-financing mobilized by UNDP or other co-financing partners that are essential to realizing the project objectives because they contribute to specific project outputs/activities and are therefore included as project results. Co-financing activities included as project results can be further categorized based on how the funds flow to the project as follows:
    - Co-financing activities included as project results, funded with **resources that flow through UNDP accounts** (i.e., GEF, UNDP TRAC)
    - Co-financing activities included as project results, funded with **resources that DO NOT flow through UNDP accounts** (e.g., minigrid developers' capital contributions to minigrid pilots).
- **Co-financing activities NOT included as project results**. Activities funded by parallel financing, i.e., funds mobilized by other players (AfDB, WB, etc.) that contribute to the mini-grid sector as a whole, but without a direct contribution to specific project activities and outputs. Hence activities funded by these resources by definition DO NOT flow through UNDP accounts.

The different types of co-financing activities are contextualized for the project in the table below and UNDP's accountability regarding SES compliance described.

Table 2-2. UNDP's SES compliance accountability for co-financing activities

Type of co-financing activities	Description	UNDP's SES compliance accountability
Co-financing activities included as project results funded with resources that flow through UNDP accounts	These activities are mainly funded by **UNDP TRAC funds that complement the GEF grant** in the project budgets.	UNDP will be accountable for compliance with the UNDP Programme and Operations Policies and Procedures and ensuring "adherence" to SES for this kind of co-financed activities.
Co-financing activities included as project results funded with resources that DO NOT flow through UNDP accounts	These activities are funded by third parties. In particular, the mini-grid pilots to be built in the projects will be funded through a CAPEX (partial) subsidy from the project budget (GEF funds and UNDP TRAC), and the remaining of the CAPEX will be funded by third parties (who could be private sector developers, government, etc., this is not defined yet). While the funds from these third parties will not flow through UNDP accounts, they will directly contribute to the same minigrid pilots the GEF and UNDP funds are contributing to and will be essential to realizing the project objectives. For all AMP national projects, these are "**co-financing activities included as project results**". The precise sources and amounts of these co-financing activities will only be known at	UNDP is accountable to monitor all project results, including results to be delivered by these co-financing activities, to ensure consistency with UNDP and GEF policies and procedures, including social and environmental safeguards policies and requirements (SES).

[2] Therefore, any in-kind contribution, i.e. goods or services offered free or at less than the usual charge result in an in-kind contribution. The expenditure made by any person or entity in cooperation, consultation or concert with, or at the request or suggestion of, the AMP.

Type of co-financing activities	Description	UNDP's SES compliance accountability
	implementation stage.	
Co-financing activities NOT included as project results	These activities are funded by sources of co-financing from third parties which have been confirmed by letters of co-financing received during the PPG phase, or which could materialize during project implementation. These sources represent parallel financing, i.e., funds mobilized by other players (AfDB, WB, etc.) and contributing to the mini-grid sector as a whole, but without a direct contribution to the project.	UNDP is accountable to monitor the risk to realization of co-financing amounts and realization amounts annually in the GEF PIR, at mid-term and at terminal evaluation. Specifically, potential risks associated with co-financing that may affect the Project, including safeguards related risks that fall within the project context or area of influence, will be considered in safeguards due diligence and the project risk register and monitored accordingly. Risk management measures identified will be only those within the control of the UNDP project (e.g. managing reputational risk).

The precise sources and amounts of co-financing, the extent to which co-financing activities are included as project results, and the extent to which co-financing flows through UNDP accounts or not, will be known/confirmed at implementation stage. Therefore, for each activity where a third-party is involved, the inventory of its contributions to the AMP will be determined for example through the agreement and/or co-financing letter established.

The procedures described in this ESMF (Section 5) apply to all project activities funded by GEF resources as well as any **co-financing activities included as project results**. Particularly for **Co-financing activities included as project results funded with resources that DO NOT flow through UNDP accounts,** Section 5.2 describes the procedures that will need to be applied **before co-financing activities start**.

This ESMF is based on the Social and Environmental Risk Screening Procedures (SESPs) conducted for each project during the project preparation phase, and the specific characteristics of each project understanding that implementation will take place as described in the UNDP Project Documents. The specific character of each project is described in Annex I of this ESMF document. For more information, details of project components, outcomes, outputs and activities is provided in the respective Project Document.

2.3 Project description

The social and environmental objectives of the national child projects under this ESMF are:

- Promote energy access through renewable technology systems;
- Strengthen the enabling conditions, including legal frameworks, institutional arrangements, and institutional and individual capacities, required for transition to mini-grid systems based on clean energies;
- Promote sustainable livelihoods and management practices in relation to people and the environment;
- Increase climate resilience and adaptive capacity of communities; and
- Strengthen knowledge, information management, and monitoring systems on people and the environment, and the value of the AMP in the country.

AMP national projects have a common project architecture (components, outputs and activities) which have been defined at the program level and then tailored for each national project. The following are the four main components through which national projects will be implemented. With a few exceptions all projects have these five components.

- **Component 1 – Policy and Regulation.** This component seeks to contribute to Outcome 1: Stakeholder ownership in a national minigrid delivery model is advanced, and appropriate policies and regulations are adopted to facilitate investment in low-carbon minigrids. Component 1 activities are by definition upstream

activities involving energy sector and rural electrification planning, policy reform, and capacity building of public institutions and/or officials. There is a standard menu of outputs from which specific project outputs have been selected for each country based on their legal/policy setting and level of minigrid market development. The specific outputs per country are listed in the table below.

- **Component 2 – Business Model Innovation with Private Sector.** This component seeks to contribute to Outcome 2: Innovative business models based on cost reduction are operationalized, with strengthened private sector participation in low-carbon/renewable energy minigrid development. Component 2 activities include (a) upstream activities, namely capacity building of minigrid operators and industry associations, and (b) downstream activities, namely the development of minigrid investments pilots. All projects covered by this ESMF include funds, under this component, for supporting minigrid investment pilots seeking to demonstrate innovative business models and cost-reduction opportunities. More details on the project minigrid pilots can be found in a following separate section.
- **Component 3 – Scaled-up Financing.** This will contribute to Component 3: Financial sector actors are ready to invest in a pipeline of low-carbon minigrids and concessional financial mechanisms are in place to incentivize scaled-up investment. Component 3 activities are by definition upstream activities involving capacity building of financial sector actors and design of financial instruments for minigrids scale-up. There is a standard menu of outputs from which specific project outputs have been selected for each country based on the minigrids financing context. The specific outputs per country are listed in the table below.
- **Component 4 – Digital, Knowledge Management and Monitoring and Evaluation.** This component seeks to contribute to Outcome 4: Digitalization and data mainstreamed, across stakeholders, into local minigrid market development. Increased knowledge, awareness and network opportunities in the minigrid market and among stakeholders, including benefitting from linkages to international good practice.
- **Component 5 – Monitoring and Evaluation**

A complete description of the projects can be found in the respective UNDP Project Document. Table 2-3 below summarizes the outputs for each country under each component.

Table 2-3 Summary of Outputs by Project

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
Benin National Child Project under the Africa Minigrid Program GEF USD 1,326,147	▪ Output 1.1. An inclusive national dialogue in support of minigrid delivery models is facilitated through articulation of national electrification strategies and updating of sector regulation. ▪ Output 1.2. Minigrid DREI techno-economic analyses carried out to propose most cost-effective basket of policy and financial de-risking instruments and contribute to AMP Flagship Report on Cost Reduction. ▪ Output 1.3. Capacity building provided to public officials (regulator, ministries) specifically to design procurement/tender processes that incorporate cost-reduction levers and innovative business models. ▪ Output 1.4. Domestication of quality standards for solar mini-grid components, and institutional capacity of national standards organizations/bureau strengthened. ▪ Output 1.5. Support provided to establish the environmental and social policies and plans to ensure mini-grid risks are properly handled ▪ Output 2.1. Pilots developed, including on productive use and innovative appliances and modular hardware and system design, leading to cost-reduction in minigrids. ▪ Output 2.2. Investment and commissioning of selected pilots in alignment with AMP principles (Plan to implement one "lighthouse" pilot through rehabilitation of an existing MG). ▪ Output 2.3. Enhancement of minigrid business model by strengthening operator and community capacities, development of PUE and other energy nexus, and the integration of local RE sources. ▪ Output 3.1. Innovative financing solutions for minigrid development are identified and

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	implemented through the Minigrid Funding Facility with supporting human and institutional strengthening. ▪ Output 3.2. Domestic financial sector capacity-building on business and financing models for minigrids. ▪ Output 4.1. A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project ▪ Output 4.2. Specification and implementation of Minigrids Digital Platform to track minigrid pilots and support scale-up and cost-reduction. ▪ Output 4.3. Adoption and operationalization of the project's Quality Assurance and Monitoring Framework (QAMF). ▪ Output 4.4. Engage with regional project by participating in Communities of Practice and capturing and sharing of lessons learnt. ▪ Output 5.1. Inception workshop is conducted and M&E plan is implemented. ▪ Output 5.2. Project Mid-Term Review is conducted. ▪ Output 5.3. GEF Terminal Evaluation is conducted.
National child project under the Africa Minigrids Program - Madagascar GEF USD 1,000,000 UNDP USD 1,000,000	▪ Output 1.1: Strengthen the technical capacities and support the operationalization of the key technical departments of the Ministry of Energy at the national (including ADER) and regional levels. ▪ Output 1.2: Support the application of key application decrees of the Electricity Code, in order to facilitate access to the off-grid solar market ▪ Output 1.3: Conduct a techno-economic analysis of off-grid electricity, including a DREI analysis, to gain an understanding of the context, defining village characteristics, customer demand, and an assessment of capacity and willingness to pay. ▪ Output 1.4: Define at the level of established mini-grids models of energy-efficient appliances, income-generating activity transformation units and machines in a circular economy model in order to stimulate development, especially in the management of waste, and promote related investments. ▪ Output 2.1: Develop a detailed project plan (the "mini-grid pilot plan" of the project) to scale up the mini-grid pilot(s) especially in the far south and in particular in the Atsimo region Andrefana from Madagascar. ▪ Output 2.2: Selection of the pilot(s), contracting and payments to the beneficiaries of the selected pilot ▪ Output 2.3: Monitor pilot project(s), collect and aggregate data shared by pilot project(s). ▪ Output 2.4: ESPs selected for the development and implementation of innovative business models and value-added levers are effectively monitored ▪ Output 3.1: Capacity building of the national financial sector in business and financial models for mini-grids. ▪ Output 4.1: A quality assurance and monitoring framework for measuring, reporting and verifying the sustainability impacts of all supported off- grid/mini-grid pilots, including GHG emission reductions, is adopted and implemented based on standardized regional project guidelines. ▪ Output 4.2: Lessons learned are captured and shared with the regional project. ▪ Output 5.1: The AMP project is implemented correctly.
Mali national child project under the Africa Minigrids Program GEF	▪ Output 1.1. The National Inclusive Off-grid Platform, currently being institutionalized/operationalized under the leadership of the DNE, is supported to identify minigrid delivery models, clarifying priority interventions for an integrated approach to off-grid electrification ▪ Output 1.2. A dialogue following the Minigrid DREI techno-economic analyses is facilitated, de-risking instruments are developed and an update of the DREI is conducted in Year 4

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
USD 1,784,476 UNDP USD 300,000	▪ Output 1.3. An update of the Great Green Wall Strategy and action plan is conducted for a better consideration of energy infrastructures in climate actions and green economy ▪ Output 1.4. Capacity building is provided to public officials (agencies, regulator, ministries) specifically to support cost-reduction levers and innovative business models ▪ Output 1.5. Quality standards for solar mini-grid components are domesticated, and institutional capacity of AER Mali and the Electrotechnical Standards Committee is strengthened ▪ Output 2.1. Pilots developed, including on productive use/innovative appliances and modular hardware/system design, leading to cost-reduction in minigrids ▪ Output 2.2. National report and technical assistance on opportunities to boost economic activities through electricity access and productive use ▪ Output 2.3. Capacities of private minigrid developers and communities are strengthened ▪ Output 3.1. Support financing mechanisms to scale up RE minigrids investment is provided ▪ Output 3.2. Domestic financial sector capacity-building on business and financing models for minigrids ▪ Output 3.3. Replication plan (including investment plan) for scaling up rural energy access is developed ▪ Output 4.1. A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project ▪ Output 4.2. A 'Minigrids Digital and Data Management Platform' is implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction ▪ Output 4.3. A Quality Assurance and Monitoring Framework for measuring, reporting and verification of the sustainable development impacts of all minigrids pilots supported, including GHG emission reductions, is adopted and operationalized based on standardized guidance from the regional project ▪ Output 4.4. Engage with regional project, including, but not limited to, via (i) participating in Communities of Practice and (ii) capturing and sharing lessons learned ▪ Output 4.5. Awareness raising campaigns, including lessons learned, are developed and disseminated at all levels nationally (including intervention zones) and with the regional project ▪ Output 5.1. M&E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation
National child project under the Africa Minigrids Program - **Niger** GEF USD 1,606,376	▪ Output 1.1: An inclusive national dialogue to identify minigrid delivery models is facilitated, clarifying priority interventions for an integrated approach to off-grid electrification ▪ Output 1.2: A minigrid regulatory framework, including tariff model, tax regime, and grid expansion risk, is developed in close coordination with the authorities concerned and other development partners ▪ Output 1.3: Analysis of existing (pre)-feasibility studies conducted for selected minigrid sites to enhance sector planning and decision-making on a delivery model for minigrid development ▪ Output 1.4: Minigrid DREI techno-economic analyses carried out to propose most cost-effective basket of policy and financial derisking instruments and contribute to AMP Flagship Report on Cost Reduction ▪ Output 1.5: Capacity building provided to public officials (regulator, ministries) to support specifically to design procurement/tender processes that incorporate cost-reduction levers and innovative business models ▪ Output 1.6: Domestication of quality standards for solar minigrid components, and institutional capacity of national standards organizations/bureau strengthened ▪ Output 1.7: Customs procedures and import requirements harmonized, and capacities of public officials to implement and enforce simplified import process strengthened ▪ Output 1.8: Public programmes (apprenticeships, certificates, university programs) to develop

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	competitive, skilled labour market in minigrids ▪ Output 2.1: Pilots developed, including on productive use/innovative appliances and modular hardware/system design, leading to cost-reduction in minigrids ▪ Output 2.2: National report on opportunities to boost economic activities through electricity access and productive use ▪ Output 2.3: Capacities of private minigrid developers are strengthened to consider innovative business models and cost-reduction levers ▪ Output 2.4: Support provided to establish and grow a national industry association for private sector developers ▪ Output 3.1: Design support, including development of operational guidance, provided for Minigrid Funding Facility (MFF, or equivalent financial mechanism) under rural electrification agencies/funds ▪ Output 3.2: Innovative financing solutions for minigrid development are identified and implemented through the MFF (or equivalent) with supporting human and institutional strengthening o Activity 3.2.1: Identify innovative financing solutions o Activity 3.2.2: Assess the potential of aggregation of minigrid assets ▪ Output 3.3: Feasibility study support provided to minigrid developers ▪ Output 3.4: Domestic financial sector capacity-building on business and financing models for minigrids ▪ Output 4.1: A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project ▪ Output 4.2: A 'Minigrids Digital and Data Management Platform' implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction ▪ Output 4.3: A Quality Assurance and Monitoring Framework for measuring, reporting and verification of the sustainable development impacts of all minigrids pilots supported, including GHG emission reductions, is adopted and operationalized based on standardized guidance from the regional project ▪ Output 4.4: Monitoring and Evaluation (M&E) and Reporting, including (i) Conducting Inception workshop and preparing report, (ii) Ongoing M&E, (iii) Mid-Term Evaluation and (iv) Terminal Evaluation ▪ Output 4.5: Engage with regional project, including, but not limited to, via (i) participating in Communities of Practice and (ii) capturing and sharing lessons learnt. ▪ Output 4.6: Awareness raising campaigns, including lessons learned, are developed and disseminated at all levels nationally (incl. intervention zones) and with the regional project ▪ Output 4.7: Replication plan (including investment plan) for scaling up rural energy access developed
National child project under the Africa Minigrids Program – **STP** GEF USD 1,968,349	▪ Output 1.1: An inclusive national dialogue to identify minigrid delivery models is facilitated, clarifying priority interventions for an integrated approach to off-grid electrification. ▪ Output 1.2: DREI techno-economic analyses carried out to propose most cost-effective basket of policy and financial de-risking instruments and contribute to AMP Flagship Report on Cost Reduction. ▪ Output 1.3: A mini-grid regulatory framework, including tariff model, tax regime, and settlement model for electricity transaction, is developed in close coordination with the authorities concerned and other development partners. o Activity 1.3.1: Definition in legal terms of minigrid concepts. o Activity 1.3.2: Assessment and recommendation of alternative tariff schemes for minigrids o Activity 1.3.3: Assessment and recommendation of financial and tax incentives o Activity 1.3.4: Modalities for interaction with the utility grid.

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	○ Activity 1.3.5: Assessment and recommendation of legal status of minigrids. ▪ Output 1.4: Preparatory studies conducted for selected mini-grid sites to enhance sector planning and decision-making on a delivery model for minigrid development. ▪ Output 1.5: Domestication of quality standards for solar mini-grid components, and institutional capacity of national standards organizations/bureau strengthened ▪ Output 1.6: Support provided to establish the environmental and social policies and plans to ensure mini-grid risks are properly handled ▪ Output 1.7. Public programmes (apprenticeships, certificates, university programs) to develop competitive, skilled labour market in mini-grids. ▪ Output 2.1: Minigrids pilot proposals prepared, evaluated and selected through a competitive process, leading to cost-reduction in mini-grids. ▪ Output 2.2: Capacity of private sector and end-user groups strengthened for developing innovative, resilient minigrid business models. ▪ Output 2.3: Minigrids pilots fully designed, constructed and monitored, including productive uses and modular hardware and system design (INV). ▪ Output 3.1: Design support for a financial facility for minigrids, distributed electricity grids and services. ▪ Output 3.2: Domestic financial sector capacity-building on business and financing models for minigrids. ▪ Output 4.1: A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project ▪ Output 4.2: A Minigrids Digital Platform implemented to track minigrid pilots, and to support minigrids scale-up and cost-reduction. ▪ Output 4.3: A Quality Assurance and Monitoring Framework (QAMF) is adopted. ▪ Output 4.4: Engage with regional project by participating in Communities of Practice and capturing and sharing of lessons learnt. ▪ Output 5.1: M&E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation
National child project under the Africa Minigrids Program - **Zambia** GEF USD 1,363,947	▪ Output 1.1: An inclusive national dialogue to identify minigrid delivery models is facilitated, clarifying priority interventions for an integrated approach to off-grid electrification ▪ Output 1.2: Minigrid DREI techno-economic analyses carried out to propose most cost- effective basket of policy and financial derisking instruments ▪ Output 2.1: Pilots developed, including on productive use/innovative appliances and modular hardware/system design, leading to cost-reduction in minigrids (INV) ▪ Output 2.2: Pre-feasibility conducted for selected minigrid sites and replication plan for minigrid development ▪ Output 3.1: Innovative financing solutions for minigrid development are identified and designed with supporting human and institutional strengthening ▪ Output 3.2: Domestic financial sector capacity-building on business and financing models for minigrids ▪ Output 3.3: National report on opportunities to boost economic activities through electricity access and productive use and financial support mechanisms ▪ Output 4.1: A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project ▪ Output 4.2: A 'Minigrids Digital and Data Management Platform' implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reductio ▪ Output 4.2: Quality Assurance and Monitoring Framework for measuring, reporting and verification is adopted and operationalized ▪ Output 4.3: Engage with regional project, via (i) Communities of Practice and (ii) capturing and sharing lessons learnt

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	▪ Output 5.1: Ensuring compliance with all mandatory monitoring and reporting requirements of the GEF

Minigrid Pilots (also referred to as sub-projects)

As already mentioned, all projects covered by this ESMF include funds, under program Component 2, for supporting minigrid investment pilots seeking to demonstrate innovative business models and cost-reduction opportunities. Depending on the country context, minigrid pilots will be designed to demonstrate (for example) site selection, energy generation and storage technology options, distribution design, metering systems, value-chain embedded productive uses, demand stimulation, revenue diversification or innovative business models and regulatory approaches.

Any reference to sub-projects under this ESMF refers to minigrid investment pilots developed with project support or as co-financing activities that contribute to project results.

During the project preparation phase, projects have identified, on an indicative basis, the type of minigrid investment pilot that will be implemented with support from the project. This selection will be confirmed during project implementation when the Minigrid Pilot Plan is developed defining all aspect of pilots implementation including specific minigrid site selection.

Table 2-4 presents the three types of minigrid pilots that could be implemented under an AMP national project and the projects that have identified each type of pilot for inclusion (on an indicative basis).

Table 2-4 Three types of minigrid pilots under AMP

Type of minigrid pilot	Description	National Child project (Indicative)
#1 Greenfield minigrids	Complete minigrid systems, including generation and distribution assets, as well as productive use equipment.	• Niger • Mali • STP • Zambia • Madagascar
#2 Hybridized diesel minigrids	Retrofitting (i.e. hybridization) of existing diesel-based minigrids increasing the renewable fraction of power generation.	• Benin • STP • Zambia
#3 Productive use overlays	New investments in productive use equipment to an existing minigrid generating additional income, improving user's ability to pay for services, and improving utilization of minigrid assets.	• Zambia • Madagascar

2.4 Purpose and objectives of the ESMF

This ESMF is a management tool to assist in managing potential adverse social and environmental impacts associated with activities of the AMP projects, in line with the requirements of UNDP's SES. The implementing partner of each project and the relevant members of the Project Management Unit will follow this ESMF during project implementation and ensure the environmental and social risks and impacts are fully assessed and management measures are put in place prior to the implementation of the relevant project activities.

This ESMF identifies the steps for detailed screening and assessment of the project's potential social and environmental risks, and for preparing and approving the required management plans for avoiding, and where avoidance is not possible, reducing, mitigating, and managing these adverse impacts. Its scope covers all project activities, which include co-financing in terms of in-kind contributions, grants and equity investment by various government agencies and the private sector needed to implement the project.

The ESMF also provides the requirements to meet UNDP Standard 6 on Indigenous Peoples for the relevant country projects.

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3 SECTION III - Potential social and environmental impacts

This section provides a description of the potential social and environmental risks and impacts, both positive and negative, related to typology of likely activities, sub-projects, policies, and/or regulations to be supported during project implementation. This includes a summary of the SESP findings, with discussion of the risks and impacts covered by the ESMF.

3.1 Methodology used for identification of potential impacts

The ESMF has been prepared in accordance with applicable UNDP safeguard policies and is based on different techniques embracing mainly literature review on similar projects in the region, consultation with the identified stakeholders at the design phase and professional knowledge including the expert consultants involved in the Project Document preparation.

The UNDP Social and Environmental Screening Procedure (SESP) was used to identify potential social and environmental risks associated with the project. Each project was individually reviewed with UNDP's SESP. This analysis identified a range of potential social and environmental impacts associated with the projects' activities. A summary of the main risks for each child project in this ESMF is found in each SESP (refer to the annexes of the UNDP Project Document).

Each project is scrutinized as to its type, location, scale, sensitivity and the magnitude of its potential social and environmental impacts. All project activities are screened, including planning support, policy advice, and capacity-building, and site-specific, physical interventions. Activities that will be completed under project co-financing are also included in the scope of this screening.

During project preparation, and due to various restrictions, sites for the mini-grids were not identified nor were the exact mini-grid activities defined for each country. Therefore, this document provides the requirements to be followed in the future around the E&S assessments. As a consequence, at a future stage when all variables are known, a series of activity-specific E&S measures will have to be conducted to identify suitable mitigation measures with the support of the key stakeholders. These have been budgeted and included in the design for their implementation to the whole project cycle.

Below is the detailed list of expected positive and negative impacts expected from the project.

3.2 Expected positive impacts

Depending on the option chosen among the mini-grid technologies and other features, the following positive environmental effects will be achieved through the implementation of the project applying the best practices and measures established at the project preparation phase.

- Development of economic activities and job creation due to the development of the energy sector. This is particularly relevant for the project activities dedicated to productive energy (versus household).
- Women empowerment by project design.
- Reducing the rural exodus due to the creation of new economic activities and related facilities. This is particularly relevant for the project activities dedicated to productive energy (versus household).
- In cases where the project mini-grid (based on renewable energy) will replace the existing diesel mini-grid, the positive impacts expected are as follows:
    - The installation of mini-grids based on renewable energy will reduce the consumption of fuel and greenhouse gas (GHG) emissions in the atmosphere because it will replace in some cases the existing mini-grids based on diesel.
    - Pollution and noise from diesel generators will be greatly reduced. This will preserve the tranquility

of the residents and natural life of its sites where the mini-power plants will be installed.

- When the project mini-grid will power public spaces/services, the positive impacts expected are as follows:
    - Increase community, in particular women, safety/heath conditions. For example, with available electricity in community health centers, schools, collective-social facilities, street lighting.
- When the project replaces other fuels in the household for the basic tasks (i.e. cooking and lighting), the positive impacts expected are as follows:
    - Reduction on the consumption of fuel and greenhouse gas (GHG) emissions in the atmosphere because it will replace the use of traditional/readily available fuels (i.e. wood/charcoal/kerosene/paraffin and other fossil based fuels).
    - Improvement of family (and in particular women and children) indoor air quality due to a reduction to smoke exposure in a closed space and associated illnesses.
    - Improve dangerous conditions of cooking and lighting fuels, this affects mainly women and children.
- The project will benefit Indigenous Peoples and local communities by facilitating their rights of expression and participation to decision making process and to the market related to clean energy and can increase their ownership on processes regarding access to clean energy.
- New opportunities given by the partnership with private sector can enhance the role and the expertise of Indigenous Peoples and local communities and create new opportunities to enhance their access to energy, clean energy and its benefits. The project will also enhance their access to financial mechanisms and strengthens their presence in the market related to access to clean energy.
- The possibility of replication and the sharing of experiences at regional project level can enhance the access to regional networks also for Indigenous Peoples and local communities. The process will enhance the sustainability of the interventions with benefits for Indigenous Peoples and local communities in the long term.

3.3 Potential negative impacts

Although the ultimate goal of this project is to reduce GHG emissions, a combination of the safeguards challenges at different levels the current scenario which may undermine the goals of the project if the appropriate measures are not taken during the project cycle.

All child projects in this ESMF pose a range of potentially negative social and environmental impacts. Amongst others, this includes potential damage to ecosystems/biodiversity; potential economic or physical displacement; potential harm to cultural heritage; and potential impacts to indigenous peoples.

In the national environmental, social and economic contexts, large and medium infrastructures projects of similar purpose can have significant cumulative impacts. However from the analysis of the baseline and implementation readiness for mini-grids implementation, there are clear indications that the cumulative impacts resulting from the increased number of mini-grid plants shall be negligible in the near future due to the scale of the plants and the stand-alone characteristics, while the negative socio-economic impacts of not conducting any investment on the sector shall be considerable taking into consideration the current region's economies characterized by poor energy access/management practices and poor infrastructure development.

All national child projects considered in this ESMF have been categorized under the "substantial" risk categorization and their potential negative impacts are summarized in Table 3-1 below.

Table 3-1 - Summary of project Environmental and Social Risks

E&S Risk	Benin	Mali	Niger	STP	Zambia	Madagascar
Risk 1: Discrimination or marginalization of vulnerable communities through the proposed tariff model, tax incentives, strategies or investment selection in the replication plan	Income levels in project sites are generally low. This creates a risk that low-income households would not be able to benefit from the project pilot and from minigrids that may be established as a result of upstream activities. Under Benin's concession model, minigrid operators must propose a competitive, yet inclusive, differentiated tariff scheme, to be ratified by the Regulator. The Project's demonstration pilot will abide by this model. If not taken into consideration, this model may lead to setting tariffs that would discriminate against vulnerable communities (including low-income households) and prevent them from having access to essential energy services. Associated with Output 1.1. **Significance: Substantial**	The project may propose a tariff model for minigrids. Therefore, there is a likelihood that the project may lead to setting tariffs that would discriminate against vulnerable communities (including low-income households) and prevent them from having access to essential energy services. Selection of the RE initiatives to be integrated into the Great Green Wall Strategy and developing the replication plan for minigrids, if not done in consultation with all stakeholders taking into consideration vulnerability and economic conditions risks marginalizing or discriminating against certain groups, including Indigenous Peoples. Associated with Activity 1.2.2, Activity 1.3.1 and Activity 3.3.1 **Significance: Substantial**	The project will propose a tariff model for isolated minigrids based on the equity principle that is enshrined in the legal and regulatory framework as well as the recent switch to an affermage-lease MG delivery model and ANPER's strategy. Therefore, there is a low likelihood that the project may lead to setting tariffs that would discriminate against vulnerable communities (including the poor) and prevent them from having access to essential energy services. In addition, lack of transparency and tedious or costly procedures of people/customers to claim their rights may exist within the pilot areas and often the legal or contractual basis for claiming these rights is not well defined or even absent. Associated with Activity 1.2.3 **Significance: Moderate**	Income levels in most potential project sites are, on average, very low. A uniform, regulated tariff scheme exists, currently under revision, incorporates a social level, but this is still high for many rural households. Income disparities are substantial and the regulated (utility) tariff will likely be applied. This creates a risk that low-income households would not be able to benefit. Current practices may lead to tampering and informal connections, deteriorating minigrid technical and financial performance. The project will assess and recommend alternative tariff schemes for minigrids and financial and tax incentives. If not taken into consideration, this model may lead to setting tariffs that would discriminate against vulnerable communities (including low-income households) and prevent them from having access to essential energy services. Associated with Activities 1.3.2 and 1.3.3. **Significance: Substantial**	As part of the Project, a plan will be formulated as a basis for scaling up minigrid investments. During preparation of this plan, vulnerable communities (such as low-income households) may not be adequately consulted on their priorities and the tariffs that may be set and may thus be discriminated against once priority investments are determined. Associated with Output 2.2 **Significance: Moderate**	-
Risk 2: Marginalization of vulnerable groups when developing standards and selecting the pilot minigrids	Domestication of quality standards for solar mini-grid components may marginalize stakeholders from participating in this sector, or from having access to energy by setting stringent technical criteria. Selection of pilot minigrids, if not done in collaboration with all stakeholders also risks marginalizing certain groups, including indigenous peoples. Associated with Outputs 1.4 and 2.1. **Significance: Moderate**	Domestication of quality standards for solar mini-grid components may marginalize stakeholders from participating in this sector, or from having access to energy by setting stringent technical criteria. Selection of the RE initiatives to be integrated into the GGW Strategy and pilot minigrids, if not done in consultation with all stakeholders also risks marginalizing certain groups, including Indigenous Peoples. Associated with Activity 1.1.1 Activity 1.7.2 and Activity 2.1.1. **Significance: Substantial**	Development of standards for Clean Energy Minigrids may marginalize stakeholders from participating in this sector, or from having access to energy by setting stringent technical criteria. Selection of the pilot minigrids, if not done in collaboration with all stakeholders also risks marginalizing certain groups, including Indigenous Peoples. Associated with Activities 1.6.2 and 2.1.1 **Significance: Moderate**	Domestication of quality standards for solar mini-grid components may marginalize stakeholders from participating in this sector, or from having access to energy by setting stringent technical criteria. Selection of the pilot minigrids, if not done in collaboration with all stakeholders also risks marginalizing certain groups. Associated with Outputs 1.5 and 2.1. **Significance: Moderate**	Selection of the pilot minigrids, if not done in collaboration with all stakeholders risks marginalizing certain groups. Associated with Output 2.1 **Significance: Moderate**	The selection of pilot minigrids, if not done in collaboration with all stakeholders, risks marginalizing certain groups. Associated with Output 2.2 **Significance: Moderate**
Risk 3: Reproducing existing discriminations against women through excluding them from decision-making on project activities, benefiting from project outputs and capacity building initiatives	Social and cultural factors leading to different roles between men and women in Benin and the current prevalence of men in the electricity sector may pose a challenge to ensure that women will have the chance to participate at the decisions-making level. Associated with all project activities **Significance: Substantial**	Social and cultural factors leading to different roles between men and women in Mali, and the current prevalence of men in the electricity sector, may pose a challenge to ensure that women will have the chance to participate at the decisions-making level. Associated with all project activities **Significance: Substantial**	The male dominated nature of the energy sector and the limited social status and opportunities identified for women. This may pose a challenge to ensure that women will have the chance to participate at the decisions-making level. Associated with all project activities **Significance: Substantial**	Social and cultural factors leading to different roles between men and women in STP, and the current prevalence of men in the electricity sector, may pose a challenge to ensure that women will have the chance to participate at the decisions-making level. Associated with all project activities **Significance: Substantial**	The male oriented nature of energy and the limited social statues and opportunities identified for women. This may pose a challenge to ensure that women will have the chance to participate at the decisions-making level. Associated with all project activities **Significance: Substantial**	In Madagascar, the labor force participation rate among females is 83.7% and among males is 88.1% for 2022. Vulnerable employment among women is 87.2% and among men is 79.8% in Madagascar for 2019[3]. Therefore, women may be excluded from trainings and various workshops organized by the project. Associated with all project activities **Significance: Substantial**
Risk 4: Damage to	Pilot minigrids may be located within or	Pilot minigrids may be located within or	Pilot minigrids may be located within or	Pilot minigrids may be located within or	Pilot minigrids may be located within or	Overcharging, high temperatures and

[3] World Bank. Gender Data Portal. Retrieved from https://genderdata.worldbank.org/countries/madagascar/ (Accessed 16 June 2023)

E&S Risk	Benin	Mali	Niger	STP	Zambia	Madagascar
biodiversity, natural resources and cultural heritage sites due to installation and operation of pilot minigrids	near critical habitats, environmentally sensitive areas or cultural heritage sites. However, as the pilot will only entail rehabilitation of an existing MG, changes to the use of lands and resources, affecting natural ecosystems may only result from associate infrastructure such as extension of the network. Furthermore, mini-grids with a productive use entail unforeseen impacts should be expected according to the type of sector and activity to develop. Associated with Output 2.1. **Significance: Moderate**	near critical habitats, environmentally sensitive areas or cultural heritage sites (including those of value to Indigenous Peoples). As the pilots will mostly entail greenfield activities, this will require changes to the use of lands and resources, affecting natural ecosystems. All minigrids, as well as their aggregation, involve the construction of new infrastructure and operational activities, which will lead to changes in nearby ecosystems or land uses and lead to various impacts including air emissions. Excavation activities may lead to the removal, destruction or displacement of the existing cultural heritage to allow the new structures to be built. Due to the fact that the sites have not yet been selected, the likelihood of this risk is not known and a conservative approach is adopted, rating it a Substantial risk. This risk is also applicable to RE and minigrids planned under the GGW Strategy and investment plan that may be implemented outside the scope of the project. Associated with Output 2.1, Activity 3.1.2, Activity 1.3.1 and Activity 3.3.1 **Significance: Substantial**	near critical habitats, environmentally sensitive areas or cultural heritage sites (including those of value to Indigenous Peoples). As the pilots will mostly entail greenfield activities, this will require changes to the use of lands and resources, affecting natural ecosystems. All minigrids, as well as their aggregation, involve the construction of new infrastructure and operational activities, which will lead to changes in nearby ecosystems or land uses and lead to various impacts including air emissions. Excavation activities may lead to the removal, destruction or displacement of the existing cultural heritage to allow the new structures to be built. Due to the fact that the sites have not yet been selected, the likelihood of this risk is not known and a conservative approach is adopted, rating it a Substantial risk. Associated with Output 2.1 and Activity 3.2.2. **Significance: Substantial**	near critical habitats, environmentally sensitive areas or cultural heritage sites. As some pilots will entail greenfield activities, this will require changes to the use of lands and resources, affecting natural ecosystems. Most pilot minigrids involve the construction of new infrastructure and operational activities, which may lead to changes in nearby ecosystems or land uses and lead to various impacts including air emissions into the atmosphere. Excavation activities may lead to the removal, destruction or displacement of the existing cultural heritage to allow the new structures to be built. Furthermore, mini-grids with a productive use entail unforeseen impacts should be expected according to the type of sector and activity to develop. However, as the footprint for the minigrids is expected to be small, the impact is not foreseen to be high. Associated with Output 2.1. **Significance: Moderate**	near critical habitats, environmentally sensitive areas or cultural heritage sites. As some pilots will entail greenfield activities, this will require changes to the use of lands and resources, affecting natural ecosystems. Most pilot minigrids involve the construction of new infrastructure and operational activities, which may lead to changes in nearby ecosystems or land uses and lead to various impacts including air emissions. Excavation activities may lead to the removal, destruction or displacement of the existing cultural heritage to allow the new structures to be built. Furthermore, mini-grids with a productive use entail unforeseen impacts should be expected according to the type of sector and activity to develop. This risk is also applicable to minigrids planned under the investment plan that may be constructed outside the scope of the project. Associated with Outputs 2.1 and 2.2. **Significance: Substantial**	physical stress to batteries used in the minigrids can lead to the destruction of the battery, fire and even explosions. In addition, deep discharging of batteries can also cause battery fires. In addition, battery recycling can lead to the release of hazardous substances such as lead into the environment[4]. Madagascar has 84 Important Bird Areas (IBAs)[5]. In addition, Madagascar has 2 World Heritage Sites and 19 Ramsar Sites, Wetland of International Importance as well as 147 nationally designated protected areas[6]. If located near these or other sites of biodiversity or cultural heritage value, pilot minigrids can lead to damage to these sites due to installation and operation activities. Furthermore, mini-grids with a productive use entail unforeseen impacts should be expected according to the type of sector and activity to develop. Associated with Output 2.2. **Significance: Substantial**
Risk 5: Exposure to electrocution risks for humans and any fauna (ex. animals or birds) using the minigrid area	All mini-grids involve electrical equipment. At the operational stage, the electrical structure alien to pre-existing conditions in the area, may cause the damage/death/fire/et due to the interaction with people living nearby, fauna and flora. Associated with Output 2.1. **Significance: Moderate**	All mini-grids involve electrical equipment. At the operational stage, the electrical structure alien to pre-existing conditions in the area, may cause the damage/death/fire/et due to the interaction with people living nearby, fauna and flora. **Significance: Moderate**	All mini-grids involve electrical equipment. At the operational stage, the electrical structure alien to pre-existing conditions in the area, may cause the damage / death /fire due to the interaction with people (including Ips) living nearby, fauna and flora. Associated with Output 2.1. **Significance: Moderate**	All mini-grids involve electrical equipment. At the operational stage, the electrical structure alien to pre-existing conditions in the area, may cause the damage/death/fire/et due to the interaction with people living nearby, fauna and flora. Associated with Output 2.1. **Significance: Moderate**	All mini-grids involve electrical equipment. At the operational stage, the electrical structure alien to pre-existing conditions in the area, may cause the damage/death/fire/et due to the interaction with people living nearby, fauna and flora. Associated with Output 2.1. **Significance: Moderate**	All mini-grids involve electrical equipment. At the operational stage, the electrical structure alien to pre-existing conditions in the area, may cause the damage/death/fire/et due to the interaction with people living nearby, fauna and flora. Associated with Output 2.2. **Significance: Moderate**
Risk 6: Climate events and disasters (including floods) on new and existing infrastructure due to installation and operation of pilot minigrids	Benin is considered highly vulnerable to global climate change, ranking 155 out of 181 countries in the ND-GAIN index for climate vulnerability. Current trends include intensification of droughts and rains (by 100 mm/h) exacerbating soil erosion and leading to floods. Climate projections expect sea level rise by 0.4 to 0.7 meters by 2100, probably	Droughts, storms, strong winds, and increased temperature variability are among the projected impacts of climate change in Mali. In terms of heavy rainfall, these values are expected to increase in the south of the country but to decrease in the north. All mini-grids are open air structures exposed to climate events and involve built	Climate change is expected to significantly affect infrastructure in Niger through extreme weather events. High precipitation amounts, expected to increase over time, can lead to the flooding of infrastructure. All mini-grids are open air structures exposed to climate events and involve built structures that may be vulnerable to the	STP is a small insular country extremely vulnerable to rising sea levels and impacts such as inundation. Heavy precipitation rates are expected to increase, especially in the south-southwestern parts of the Sao Tome islands. All mini-grids are open air structures exposed to climate events and involve build structures that may be	Zambia is considered highly vulnerable to natural hazards, especially floods and drought. All mini-grids are open air structures exposed to climate events and involve build structures that may be vulnerable to the impacts of climate change or disasters. This risk is also applicable to minigrids planned under the investment plan that may be	Madagascar is ranked 167 out of 182 countries on the 2022 ND-GAIN climate vulnerability index[8]. Madagascar is exposed to a multitude of climate hazards such as tropical cyclones, droughts, and floods[9]. As mini-grids are open air structures, they are exposed to climate events and

[4] Manhart, A.; Latt, K. & Hilbert, I. (2018). Report on the Fact Finding Mission on Management and Recycling of End-of-life Batteries used in Solar Home Systems in Myanmar. Freiburg & Yangon. Retrieved from https://www.oeko.de/fileadmin/oekodoc/Batteries-from-SHS-Myanmar.pdf (Accessed 16 June 2023)

[5] BirdLife International (2023) Country profile: Madagascar. Retrieved from http://datazone.birdlife.org/country/madagascar (Accessed 16 June 2023)

[6] Protected Planet. (2023). Retrieved from https://www.protectedplanet.net/country/MDG (Accessed 16 June 2023)

[8] Retrieved from https://gain-new.crc.nd.edu/country/madagascar (Accessed 16 June 2023)

[9] IMF (2022). Republic of Madagascar: Technical Assistance Report-Climate Macroeconomic Assessment Program. Retrieved from https://www.imf.org/en/Publications/CR/Issues/2022/11/14/Republic-of-Madagascar-Technical-Assistance-Report-Climate-Macroeconomic-Assessment-Program-525665#:~:text=Republic%20of%20Madagascar%3A%20Technical%20Assistance%20Report%2DClimate%20Macroeconomic%20Assessment%20Program,-Publication%20Date%3A&text=Summary%3A,sectors%2C%20thereby%20undermining%20development%20efforts. (Accessed 16 June 2023)

E&S Risk	Benin	Mali	Niger	STP	Zambia	Madagascar
	resulting in coastal disasters (complete coastal erosion, floods, and storm waves). Overall, the coastal, north-western, and far northern zones of Benin are considered to be particularly vulnerable to the impacts of climate change[7]. As mini-grids are open air structures, they are exposed to climate events and involve build structures that may be vulnerable to the impacts of climate change or disasters. Associated with Output 2.1. **Significance: Moderate**	structures that may be vulnerable to the impacts of climate change or disasters. Due to the fact that the sites have not yet been selected, the likelihood of this risk is not known and a conservative approach is adopted, rating it a Moderate risk. This risk is also applicable to RE and minigrids planned under the GGW Strategy and investment plan that may be implemented outside the scope of the project. Associated with Output 2.1, Activity 3.1.2, Activity 1.3.1 and Activity 3.3.1 **Significance: Substantial**	impacts of climate change or disasters. Due to the fact that the sites have not yet been selected, the likelihood of this risk is not known and a conservative approach is adopted, rating it a Substantial risk. Associated with Output 2.1 and Activity 3.2.2. **Significance: Substantial**	vulnerable to the impacts of climate change or disasters. However, since most inhabited areas in the country are located inland and not close to the coast, it is not expected that minigrids located there will be exposed to sea level rises. Associated with Output 2.1. **Significance: Moderate**	constructed outside the scope of the project. The risk applies more to hydropower (damage of civil works in floods and water shortage in times of drought) than to solar PV, which will constitute the bulk of minigrids in Zambia. Associated with Outputs 2.1 and 2.2. **Significance: Substantial**	involve build structures that may be vulnerable to the impacts of climate change or disasters. Lead-acid batteries degrade more quickly in high-temperature environments. In hot climates like those of many developing countries, lead-acid batteries have a lower cycle life[10]. Associated with Output 2.2. **Significance: Substantial**
Risk 7: Risk on the community and biodiversity due to generation of hazardous materials (mainly batteries, e-waste) due to installation and operation of pilot minigrids.	While minigrids are small-scale technology, construction and maintenance involves the use of minor amounts of chemicals (paints, solvents, cleaning liquids, solder). Montreal Protocol chemicals can be present in appliances power by minigrids (i.e., cooling equipment). Persistent organic pollutants will not be used under this project. However, proper work procedures and equipment handling are sufficient measures to prevent releases into the environment. In addition, modest amounts of waste will be generated during construction (ground movement and concrete residues); electric wiring and insulator ends; broken or rejected parts and components. Operation of minigrids will lead to the generation of different types of waste, in particular electronic waste ("e-waste") in the form of solar panels and/or batteries at the end of their useful lives will be generated. Without proper handling directives, disposal and/or recycling mandate for obsolete equipment, this could result in additional waste generation, including of hazardous/phase-outs materials, chemicals or other pollutants (e.g. from batteries). Failure to recycle non-hazardous waste could also contribute to additional waste generation. Associated with Output 2.1. **Significance: Moderate**	While minigrids are small-scale technology, construction and maintenance involves the use of minor amounts of chemicals (paints, solvents, cleaning liquids, solder). Montreal Protocol chemicals can be present in appliances power by minigrids (i.e., cooling equipment). Persistent organic pollutants will not be used under this project. However, proper work procedures and equipment handling are sufficient measures to prevent releases into the environment. In addition, modest amounts of waste will be generated during construction (ground movement and concrete residues); electric wiring and insulator ends; broken or rejected parts and components. Operation of minigrids will lead to the generation of different types of waste, in particular electronic waste ("e-waste") in the form of solar panels and/or batteries at the end of their useful lives will be generated. Without proper handling directives, disposal and/or recycling mandate for obsolete equipment, this could result in additional waste generation, including of hazardous/phase-outs materials, chemicals or other pollutants (e.g. from batteries). Failure to recycle non-hazardous waste could also contribute to additional waste generation. Associated with Output 2.1. **Significance: Substantial**	While minigrids are small-scale technology, construction and maintenance involves the use of minor amounts of chemicals (paints, solvents, cleaning liquids, solder). Montreal Protocol chemicals can be present in appliances power by minigrids (i.e., cooling equipment). Persistent organic pollutants will not be used under this project. However, proper work procedures and equipment handling are sufficient measures to prevent releases into the environment. In addition, modest amounts of waste will be generated during construction (ground movement and concrete residues); electric wiring and insulator ends; broken or rejected parts and components. Operation of minigrids will lead to the generation of different types of waste, in particular electronic waste ("e-waste") in the form of solar panels and/or batteries at the end of their useful lives will be generated. Without proper handling directives, disposal and/or recycling mandate for obsolete equipment, this could result in additional waste generation, including of hazardous/phase-outs materials, chemicals or other pollutants (e.g. from batteries). Failure to recycle non-hazardous waste could also contribute to additional waste generation. Associated with Output 2.1. **Significance: Substantial**	While minigrids are small-scale technology, construction and maintenance involves the use of minor amounts of chemicals (paints, solvents, cleaning liquids, solder). Montreal Protocol chemicals can be present in appliances power by minigrids (i.e., cooling equipment). Persistent organic pollutants will not be used under this project. However, proper work procedures and equipment handling are sufficient measures to prevent releases into the environment. In addition, modest amounts of waste will be generated during construction (ground movement and concrete residues); electric wiring and insulator ends; broken or rejected parts and components. Operation of minigrids will lead to the generation of different types of waste, in particular electronic waste ("e-waste") in the form of solar panels and/or batteries at the end of their useful lives will be generated. Without proper handling directives, disposal and/or recycling mandate for obsolete equipment, this could result in additional waste generation, including of hazardous/phase-outs materials, chemicals or other pollutants (e.g. from batteries). Failure to recycle non-hazardous waste could also contribute to additional waste generation. Associated with Output 2.1. **Significance: Moderate**	While minigrids are small-scale technology, construction and maintenance involves the use of minor amounts of chemicals (paints, solvents, cleaning liquids, solder). Montreal Protocol chemicals can be present in appliances power by minigrids (i.e., cooling equipment). Persistent organic pollutants will not be used under this project. However, proper work procedures and equipment handling are sufficient measures to prevent releases into the environment. In addition, modest amounts of waste will be generated during construction (ground movement and concrete residues); electric wiring and insulator ends; broken or rejected parts and components. Operation of minigrids will lead to the generation of different types of waste, in particular electronic waste ("e-waste") in the form of solar panels and/or batteries at the end of their useful lives will be generated. Without proper handling directives, disposal and/or recycling mandate for obsolete equipment, this could result in additional waste generation, including of hazardous/phase-outs materials, chemicals or other pollutants (e.g. from batteries). Failure to recycle non-hazardous waste could also contribute to additional waste generation. Associated with Output 2.1. **Significance: Substantial**	While minigrids are small-scale technology, construction and maintenance involves the use of minor amounts of chemicals (paints, solvents, cleaning liquids, solder). Montreal Protocol chemicals can be present in appliances power by minigrids (i.e., cooling equipment). Persistent organic pollutants will not be used under this project. However, proper work procedures and equipment handling are sufficient measures to prevent releases into the environment. In addition, modest amounts of waste will be generated during construction (ground movement and concrete residues); electric wiring and insulator ends; broken or rejected parts and components. Operation of minigrids will lead to the generation of different types of waste, in particular electronic waste ("e-waste") in the form of solar panels and/or batteries at the end of their useful lives will be generated. Without proper handling directives, disposal and/or recycling mandate for obsolete equipment, this could result in additional waste generation, including of hazardous/phase-outs materials, chemicals or other pollutants (e.g. from batteries). Failure to recycle non-hazardous waste could also contribute to additional waste generation. Associated with Output 2.2. **Significance: Substantial**

[7] Ministry of Foreign Affairs of the Netherlands. 2019. Climate Change Profile: Benin.
https://www.government.nl/binaries/government/documenten/publications/2019/02/05/climate-change-profiles/Benin.pdf

[10] USAID. What are the key advances in mini-grid energy storage? Retrieved from https://www.usaid.gov/energy/mini-grids/emerging-tech/storage (Accessed 16 June 2023)

E&S Risk	Benin	Mali	Niger	STP	Zambia	Madagascar
Risk 8: Community health and safety risks due to construction of the pilot minigrids and relevant infrastructure and new economic activities subsequent from productive use of the energy	Some new activities and/or structures may interact with the surrounding area and/or involve the alteration of the normal functioning of the community health, safety and/or security in the project's area of influence, mainly as noise and physical hazards. This risk may also affect Indigenous Peoples if present nearby. Associated with Output 2.1. **Significance: Moderate**	Some new activities and/or structures may interact with the surrounding area and/or involve the alteration of the normal functioning of the community health, safety and/or security in the project's area of influence, mainly as noise and physical hazards. This risk may also affect Indigenous Peoples if present nearby. Associated with Output 2.1 and Activity 3.1.2. **Significance: Moderate**	Some new activities and/or structures may interact with the surrounding area and/or involve the alteration of the normal functioning of the community health, safety and/or security in the project's area of influence, mainly as noise and physical hazards. This risk may also affect Indigenous Peoples if present nearby. Associated with Output 2.1 and Activity 3.2.2. **Significance: Moderate**	Some new activities and/or structures may interact with the surrounding area and/or involve the alteration of the normal functioning of the community health, safety and/or security in the project's area of influence, mainly as noise and physical hazards. Associated with Output 2.1. **Significance: Moderate**	Some new activities and/or structures may interact with the surrounding area and/or involve the alteration of the normal functioning of the community health, safety and/or security in the project's area of influence, mainly as noise and physical hazards, however, these are very small in case of PV.. On the other hand, electricity may improve the functioning to existing health centre or clinic (e.g., cold storage of vaccines) and does improve the health situation. Associated with Output 2.1. **Significance: Moderate**	Some new activities and/or structures may interact with the surrounding area and/or involve the alteration of the normal functioning of the community health, safety and/or security in the project's area of influence, mainly as noise and physical hazards. Associated with Output 2.2. **Significance: Moderate**
Risk 9: Risk on community health, safety and/or security due to the influx of people, mainly project workers due to installation and operation of pilot minigrids	New activities in the project's area of influence may attract newcomers affecting community health, safety and/or security as this new influx of people, expected to be mainly men, may interact with the local residents (including indigenous peoples) and/or involve the alteration of the normal functioning of the community leading to new diseases and/or gender safety concerns. Associated with Output 2.1. **Significance: Moderate**	New activities in the project's area of influence may attract newcomers affecting community health, safety and/or security as this new influx of people, expected to be mainly men, may interact with the local residents (including Indigenous Peoples) and/or involve the alteration of the normal functioning of the community leading to new diseases and/or gender safety concerns. . Associated with Output 2.1 and Activity 3.1.2. **Significance: Moderate**	New activities in the project's area of influence may attract newcomers affecting community health, safety and/or security as this new influx of people, expected to be mainly men, may interact with the local residents (including Indigenous Peoples) and/or involve the alteration of the normal functioning of the community leading to new diseases and/or gender safety concerns. Associated with Output 2.1 and Activity 3.2.2. **Significance: Moderate**	New activities in the project's area of influence may attract newcomers affecting community health, safety and/or security as this new influx of people, expected to be mainly men, may interact with the local residents and/or involve the alteration of the normal functioning of the community leading to new diseases and/or gender safety concerns. Associated with Output 2.1. **Significance: Moderate**	New activities in the project's area of influence may attract newcomers affecting community health, safety and/or security as this new influx of people, expected to be mainly men, may interact with the local residents and/or involve the alteration of the normal functioning of the community leading to new diseases and/or gender safety concerns. Associated with Output 2.1. **Significance: Moderate**	New activities in the pilot's area of influence may attract newcomers affecting community health, safety and/or security as this new influx of people, expected to be mainly men, may interact with the local residents and/or involve the alteration of the normal functioning of the community leading to new diseases and/or gender safety concerns. Associated with Output 2.2. **Significance: Moderate**
Risk 10: Physical or economic displacement and loss of livelihood due to eviction from land on which pilot minigrid may be installed	All minigrids involve the construction of new infrastructure. New built structures occupy land, and access to the area may be restricted. Expected impacts include the displacement of existing legal or illegal inhabitants (including indigenous peoples) to allow the new structures to be built. However, as the only pilot that will be selected will involve rehabilitation of an existing MG, this risk is expected to be Low. Associated with Output 2.1. **Significance: Low**	All minigrids involve the construction of new infrastructure. New built structures occupy land, and access to the area may be restricted. Expected impacts include the displacement of existing legal or illegal inhabitants (including Indigenous Peoples) to allow the new structures to be built. Due to the fact that the sites have not yet been selected, a conservative approach is adopted and this risk is rated as Substantial. This risk is also applicable to minigrids planned under the investment plan that may be constructed outside the scope of the project. Associated with Output 2.1, Activity 3.1.2, Activity 1.3.1 and Activity 3.3.1 **Significance: Substantial**	All minigrids involve the construction of new infrastructure. New built structures occupy land, and access to the area may be restricted. Expected impacts include the displacement of existing legal or illegal inhabitants (including Indigenous Peoples) to allow the new structures to be built. However, this is very limited in Niger given the setup of villages and the large low-land areas with limited forestation. Due to the fact that the sites have not yet been selected, a conservative approach is adopted and this risk is rated as Moderate. Associated with Output 2.1 and Activity 3.2.2. **Significance: Moderate**	All minigrids involve the construction of new infrastructure. New built structures occupy land, and access to the area may be restricted. Expected impacts include the displacement of existing legal or illegal inhabitants to allow the new structures to be built. Many rural people have no land tenure rights and occupy a plot of land for subsistence farming – using fuelwood or charcoal to meet current energy needs. The provision of electricity may indirectly lead to local (small-scale) migration in which potentially, people will lose access to their food source. The processes are not well mapped. It must be noted that demographic expansion in STP is very high, and population will double before end-of-life of Project investments. Invasion of private property and encroachment of natural parks is common today, and pressure on land resources will become higher during the Project. Associated with Output 2.1.	All minigrids involve the construction of new infrastructure. New built structures occupy land, and access to the area may be restricted. Expected impacts include the displacement of existing legal or illegal inhabitants to allow the new structures to be built. This risk is also applicable to minigrids planned under the investment plan that may be constructed outside the scope of the project. Associated with Outputs 2.1 and 2.2. **Significance: Substantial**	The largest ethnic group are Merina, followed by Côtier, Betsileo, with smaller minorities of Comorans, Creole, French and Indians[11]. The construction of minigrids and new infrastructure can lead to the occupation of indigenous land or restriction of access Associated with Output 2.2. **Significance: Substantial**

[11] Minority Rights. (2018). Retrieved from https://minorityrights.org/country/madagascar/ (Accessed 16 June 2023)

E&S Risk	Benin	Mali	Niger	STP	Zambia	Madagascar
				Significance: Substantial		
Risk 11: Loss of income for fuel sellers once pilot minigrids are operational	Traditional fuels supplied by local providers, including those from the informal/traditional sectors see their market diminished. Some mini-grid systems and project appliances to be implemented may replace an activity that was fueled with other energy sources such as diesel, charcoal and fuelwood. The decrease in fuel demand will lead to the loss of income for fuel suppliers, some of whom may be vulnerable people working in the informal market. Due to the fact that the pilot site has not yet been selected, the likelihood of this risk is not known but is not expected to be significant. Associated with Output 2.1. **Significance: Moderate**	Traditional fuels supplied by local providers, including those from the informal/traditional sectors see their market diminished. Some mini-grid systems and project appliances to be implemented may replace an activity that was fueled with other energy sources like wood charcoal, paraffin, kerosene and diesel. The decrease in fuel demand will lead to the loss of income for fuel suppliers, some of whom may be vulnerable people working in the informal market. Due to the fact that the sites have not yet been selected, the likelihood of this risk is not known and a conservative approach is adopted, rating it a Substantial risk. Associated with Output 2.1. **Significance: Substantial**	Traditional fuels supplied by local providers, including those from the informal/traditional sectors see their market diminished. Some mini-grid systems and project appliances to be implemented may replace an activity that was fueled with other energy sources like wood charcoal, paraffin, kerosene and diesel. The decrease in fuel demand will lead to the loss of income for fuel suppliers, some of whom may be vulnerable people working in the informal market. Due to the fact that the sites have not yet been selected, the likelihood of this risk is not known and a conservative approach is adopted, rating it a Substantial risk. Associated with Output 2.1. **Significance: Substantial**	Traditional fuels supplied by local providers, including those from the informal/traditional sectors see their market diminished. Some mini-grid systems and project appliances to be implemented may replace an activity that was fueled with other energy sources lsuch as diesel. The decrease in fuel demand will lead to the loss of income for fuel suppliers, some of whom may be vulnerable people working in the informal market. However, it is likely that the pilot minigirds will be complementing a community genset that already exists. The diesel used will be the same while the electricity supply will increase to more hours, making the likelihood of this risk low. Associated with Output 2.1. **Significance: Low**	Traditional fuels supplied by local providers, including those from the informal/traditional sectors see their market diminished. Some mini-grid systems and project appliances to be implemented may replace an activity that was fueled with other energy sources like wood charcoal, paraffin, kerosene and diesel. The decrease in fuel demand will lead to the loss of income for fuel suppliers, some of whom may be vulnerable people working in the informal market. Associated with Output 2.1. **Significance: Substantial**	Traditional fuels supplied by local providers, including those from the informal/traditional sectors see their market diminished. Some mini-grid systems and project appliances to be implemented may replace an activity that was fueled with other energy sources like wood charcoal, paraffin, kerosene and diesel. The decrease in fuel demand will lead to the loss of income for fuel suppliers, some of whom may be vulnerable people working in the informal market. Due to the fact that the sites have not yet been selected, the likelihood of this risk is not known and a conservative approach is adopted, rating it a Substantial risk. Associated with Output 2.2. **Significance: Substantial**
Risk 12: Working conditions not in line with national and international standards (by contractor or other entities involved in the minigrid pilots)	All stages of the pilot minigrids will require labour, some of which may be sourced to unskilled/manual labourers who could be less familiar with the type of installations considered for this project and the concomitant occupational health and safety requirements and risks. Maintenance of the right-of-way and bush-clearing under transmission lines by manual labourers is especially relevant in this context. This may lead to the use of child, forces, discriminatory, under-minimum practices and/or occupational health and safety accidents/incidents. Associated with Output 2.1. **Significance: Moderate**	All stages of the pilot minigrids will require labour, some of which may be sourced to unskilled/manual labourers who could be less familiar with the type of installations considered for this project and the concomitant occupational health and safety requirements and risks. Maintenance of the right-of-way and bush-clearing under transmission lines by manual labourers is especially relevant in this context. This may lead to the use of child, forces, discriminatory, under-minimum practices and/or occupational health and safety accidents/incidents. In addition, manufacturers, suppliers, subcontractors and subcontractors within the solar supply chain may not be in line with SES and thus procurement of solar panels for the demonstration pilots may contribute to working conditions that undermine worker human rights, health and safety. Associated with Output 2.1. **Significance: Moderate**	All stages of the pilot minigrids will require labour, some of which may be sourced to unskilled/manual labourers who could be less familiar with the type of installations considered for this project and the concomitant occupational health and safety requirements and risks. Maintenance of the right-of-way and bush-clearing under transmission lines by manual labourers is especially relevant in this context. This may lead to the use of child, forces, discriminatory, under-minimum practices and/or occupational health and safety accidents/incidents. In addition, manufacturers, suppliers, subcontractors and subcontractors within the solar supply chain may not be in line with SES and thus procurement of solar panels for the demonstration pilots may contribute to working conditions that undermine worker human rights, health and safety. Associated with Output 2.1. **Significance: Moderate**	All stages of the pilot minigrids will require labour, some of which may be sourced to unskilled/manual labourers who could be less familiar with the type of installations considered for this project and the concomitant occupational health and safety requirements and risks. Maintenance of the right-of-way and bush-clearing under transmission lines by manual labourers is especially relevant in this context. This may lead to the use of child, forces, discriminatory, under-minimum practices and/or occupational health and safety accidents/incidents. In addition, manufacturers, suppliers, subcontractors and subcontractors within the solar supply chain may not be in line with SES and thus procurement of solar panels for the demonstration pilots may contribute to working conditions that undermine worker human rights, health and safety. Associated with Output 2.1. **Significance: Moderate**	All stages of the pilot minigrids will require labour, some of which may be sourced to unskilled/manual labourers who could be less familiar with the type of installations considered for this project and the concomitant occupational health and safety requirements and risks. Maintenance of the right-of-way and bush-clearing under transmission lines by manual labourers is especially relevant in this context. This may lead to the use of child, forces, discriminatory, under-minimum practices and/or occupational health and safety accidents/incidents. In addition, manufacturers, suppliers, subcontractors and subcontractors within the solar supply chain may not be in line with SES and thus procurement of solar panels for the demonstration pilots may contribute to working conditions that undermine worker human rights, health and safety. Associated with Output 2.1. **Significance: Moderate**	Excessive charging of lead-acid batteries can cause an explosion. Such explosions are particularly risky because of the involved acid, which can cause severe damages to eyes and skin. Overcharging, high temperatures and physical stress to Li-ion batteries can cause the so-called thermal runaway, which commonly leads to the destruction of the battery, fire and even explosions[12]. Children are commonly involved in the energy sector in Africa including the collection and recycling of lead acid batteries which can have an adverse impact on their health[13]. The prevalence of child labor among children between the ages of 5 and 14 in Madagascar is 43.2%. The government has established institutional mechanisms for the enforcement of laws and regulations on child labor. However, gaps exist within the operations of enforcement agencies that may hinder adequate enforcement of their child labor laws[14]. Associated with Output 2.2. **Significance: Moderate**

[12] Manhart, A.; Latt, K. & Hilbert, I. (2018). Report on the Fact Finding Mission on Management and Recycling of End-of-life Batteries used in Solar Home Systems in Myanmar. Freiburg & Yangon. Retrieved from https://www.oeko.de/fileadmin/oekodoc/Batteries-from-SHS-Myanmar.pdf (Accessed 14 June 2023)

[13] Manhart, A.; Amera, T.; Kuepouo, G.; Mathai, D.; Mng'anya, S. & Schleicher, T. (2016). The deadly business– Findings from the Lead Recycling Africa Project. Freiburg. Retrieved from https://www.oeko.de/oekodoc/2549/2016-076-de.pdf (Accessed 16 June 2023)

[14] Department of labor (2021). 2021 Findings on the Worst Forms of Child Labor: Madagascar. Retrieved from https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/Madagascar.pdf (Accessed 16 June 2023)

E&S Risk	Benin	Mali	Niger	STP	Zambia	Madagascar
Risk 13: Productive activities expanded due to availability of reliable power supply may lead to unsustainable fishing or agricultural practices	-	All pilot minigrids will support productive activities including conservation and agro-food transformation. This could be related to fishing or an agricultural value chain (local rice/rice steaming; peanuts/peanut oil, poultry farming, etc.). However, this would likely increase fishing practices and expand agricultural land, leading to risks such as overfishing, overapplication of pesticides and overconsumption of water resources. Associated with Output 2.1, Activity 1.3.1 and Activity 3.3.1 **Significance: Substantial**	-	-	-	-

3.4 Presence and potential negative impacts on Indigenous Peoples

While this EMSF defines Indigenous Peoples using the UNDP characteristics[15], in some cases locally these groups are not identified or self-identify as such. A preliminary due diligence was conducted for all the target countries using standard international resources that publish information on indigenous peoples and found that Standard 6 is applicable to four of these countries, namely Benin, Mali, Niger and Zambia. The table below shows the results of the preliminary due diligence for countries where Standard 6 may apply.

Table 3-2Results of Standard 6 Preliminary Due Diligence

Country	Due Diligence Results
Benin	Questionnaire to Indigenous Peoples' Organizations with an NGO in Benin found on the UN website / Department of Economic and Social Affairs / Indigenous Peoples refers to the following indigenous peoples and local communities: Toffin, Anii, Kotokoli, Bariba, Lokpa, Sahouè, Nagot, Wémè, Aïzo, Adja, Fon of Benin
Mali	The International Work Group for Indigenous Affairs (IWGIA) refer to the Tuareg, the Moors, the Songhay and Peuls, the African Development Bank Group identified Tuareg and Amazigh while the Report of the African Commission's Working Group of Experts on Indigenous Populations/ Communities mentions Tuareg and Mbororo.
Niger	The International Work Group for Indigenous Affairs (IWGIA) refer to the Tuareg, Fulani and Toubou, the African Development Bank Group identified Tuareg, Fulani, Toubou and Peul while the Report of the African Commission's Working Group of Experts on Indigenous Populations/ Communities mentions Tuareg and Mbororo.
Zambia	The Report of the African Commission's Working Group of Experts on Indigenous Populations/ Communities mentioned San as Indigenous Peoples/Local Communities.

[15] UNDP uses the following characteristics to define Indigenous Peoples: (1) self-identifies as indigenous peoples; (2) has pursued its own concept and way of human development in a given socio-economic, political and historical context; (3) has tried to maintain its distinct group identity, languages, traditional beliefs, customs, laws and institutions, worldviews and ways of life; (4) has exercised control and management of the lands, natural resources, and territories that it has historically used and occupied, with which it has a special connection, and upon which its physical and cultural survival as indigenous peoples typically depends; and/or (5) whether its existence pre-dates those that colonized the lands within which it was originally found or of which it was then dispossessed.

4 SECTION IV - Legal and institutional framework

4.1 National framework

The national legal and institutional framework for each country is described in this section.

In **Benin**, the main entities responsible for environmental protection are the Ministry of Living Environment and Sustainable Development (MLESD), the Beninese Environment Agency (BEA), the Directorate General for the Environment and Climate (DGEC), Ministry of Energy, Water and Mines, and the Ministry Responsible for Justice. The MLESD is responsible for developing and ensuring the implementation of state policies and strategies in the environment, climate change management, reforestation, natural and forest resource protection, preservation of urban planning ecosystems, protection of banks and coasts, mining and energy, sanitation, housing, construction, land and domains, and spatial planning. Implementation of project activities is governed by a number of environmental and social legal texts. General ones are found below while specific legislation can be found in Table 4-1:

- The Constitution of 11 December 1990 guarantees in its Title II, Article 27 that "everyone has the right to a healthy, satisfying, and sustainable environment, and it is everyone's responsibility to protect it". The state assures environmental protection. Other clauses of the constitution elevate environmental infractions to the level of high treason, for which the President of the Republic must account. Article 28 states that "the storage, handling, and removal of toxic wastes or pollutants originating from factories and other industrial or cottage industry units installed in the national territory shall be regulated by law" while Article 29 decrees that "the transportation, importation, storage, burying and the discharging on the national territory of toxic wastes or foreign pollutants and any agreement relating to it shall constitute a crime against the Nation.
- Law No. 98-030, enacted on February 12, 1999, establishes the framework law for the environment in Benin, outlines the foundations of national environmental policy, and organizes its execution in conformity with the constitution. This law sets the obligation to conduct environmental impact studies and to provide contingency plans and incentives prior to the implementation of any important project or establishment in a fragile environment (including wetlands). Decree No. 2001 - 235 of 12 July 2001 details the environmental impact assessment process.
- Law No. 97-029 of 15 January 1999 on territorial organization granted municipalities the right to exercise exclusive, shared and delegated functions in seven main areas: environment protection; waste management (collection, treatment and disposal of waste); flood protection; natural resource management and sustainable development; parks and green spaces; nature protection; and soil and groundwater protection.

In **Madagascar,** there are several entities designated with environmental protection responsibilities, including the National Environment Authority (ONE), Ministry of the Environment, Ecology and Forestry (MEEF) and Ministry of Energy and Hydrocarbons. The responsibility of the ONE includes reviewing EIAs and issuing environmental permits, coordinating the monitoring of the compliance of environmental management plans. The MEEF is responsible for supervising the ONE and for ensuring the process for ensuring that investments are compatible with the environment. The Ministry of Energy and Hydrocarbons is responsible for ensuring that environmental and social concerns are taken into account in energy-related activities. General legislation relevant to the project are found below while specific ones can be found in Table 4-1:

- Constitution of Republic of Madagascar: Article 37 states that the "The State guarantees the freedom of enterprise within the limit of the respect for the general interest, the public order, morality and the environment."
- Law No. 90-033 of 21 December 1990 on the Malagasy Environment Charter, as amended and supplemented by Laws No. 97-012 of 6 June 1997 and No. 2004-015 of 19 August 2004 requires that a conclusive Environmental Impact Assessment (EIA) be performed for public or private investment projects of any nature, carried out on the Malagasy territory and that might have an adverse impact on the environment.

- Order No. 6830/2001 sets forth conditions and procedures of public participation in environmental assessment. The project is required to hold public consultations organized with the local authorities.
- Decree No. 99-954 of December 15, 1999 amended by Decree no. 2004-167 of February 3, 2004 relating to the implementation compatibility of investments with the environment (MECIE) sets forth the rules and procedures to be followed in conducting an EIA.

In **Mali,** there are several entities designated with environmental protection responsibilities, including the Ministry of Environment, Sanitation, and Sustainable Development (MEADD), the Environment and Sustainable Development Agency (AEDD) and the National Directorate for Sanitation, Pollution and Nuisance Control (DNACPN), the Renewable Energy Agency (AER), the Malian Agency for Development of Domestic Energy and Rural Electrification (AMADER), Ministry of Energy and Water, and Ministry of Development Planning and Transport, Ministry of Agriculture, Livestock and Fisheries. MEADD is in charge of carrying out the country's Environmental Policy. Its mission is to ensure the creation of basic environmental infrastructure to support national and foreign investment; to monitor and market structure programs to combat desertification, clean up the living spaces, silt-up, and control activities classified as risks to the environment; to protect the ecosystems of rivers and their basins; and to conserve and develop green spaces, forest areas, and conservation areas. Implementation of project activities is governed by a number of environmental and social legal texts. General ones are found below while specific legislation can be found in Table 4-1:

- The constitution's preamble proclaims the Malian people's commitment to "ensuring the enhancement of quality of life, the protection of the environment, and the cultural legacy," and acknowledges the "right to a healthy environment" for everyone. According to Article 15, "the conservation and defense of the environment, as well as the enhancement of quality of life, are a duty for all and for the State".
- The national environmental protection policy NEPP seeks to "ensure a healthy environment and sustainable development by taking the environmental dimension into account in all decisions affecting the design, planning, and implementation of development policies, programs, and activities, and by empowering all actors." It establishes the basis for successful and long-term environmental management and planning. Environmental issues will be addressed through the execution of action plans at the national (national action plans), regional (regional action plans), and local (local action plans) levels, as well as legislative, legal, and regulatory actions and relevant institutional changes.
- Act No. 92-013/AN-RM of September 17, 1991 establishes a national system of standardization and quality control with the goals of ensuring the protection of health and life; the safety of men and property; the improvement of the quality of goods and services; and the protection of the environment.
- The duty to undertake ESIAs is specified in Act No. 01-020 of 30th May 2001, through the terms of Decree No. 08-346/P-RM of 26th June 2008 on ESIA, as revised by Decree No. 09-318/P-RM of 26th June 2009. The ESIA decree is an important legislative instrument for environmental protection applicable to the various sectors of activity affecting the environment including electricity transmission.

In **Niger**, there are several entities designated with environmental and social protection responsibilities, including the Ministry of the Environment, Urban Sanitation and Sustainable Development, Ministry of Energy, Ministry of Employment, Labor and Social Protection, National Environmental Council for Sustainable Development, and other institutions including local authorities and Tribal Chieftains. Implementation of project activities is governed by a number of environmental and social legal texts. General ones are found below while specific legislation can be found in Table 4-1:

- Constitution of November 25, 2010 of the Republic of Niger. In its Article 35, it is clearly noted that "any person has the right to a healthy environment. The state has an obligation to protect the environment in the interest of present and future generations". This article empowers "everyone to contribute to safeguarding and improving the environment in which he lives. In the same spirit, Article 37 stipulates that "National and international companies have the obligation to respect the legislation in force in environmental matter. They are required to protect human health and contribute to the preservation and improvement of the environment". The Constitution obliges the public authorities to "ensure the evaluation

and control of the environmental impacts of any project and program of development ".

- Environmental Management Law, 1998: Article 3.1. Activities, projects, and development programs that, due to their scale or influence on the natural and human environment, may have an impact on the latter must be approved in advance by the minister responsible for the environment. However, the requirement for an environmental and social impact study for Clean Energy MiniGrid projects could be lifted according to the pilot size and location according to the relevant office at the Ministry in charge of Environment. A request for lifting (based on objective arguments) should be provided for each pilot in advance and approved by this office.
- Law No. 2018-22 determining the fundamental principles of social protection: Article 2: Social protection: all formal and informal policies and programs helping to protect vulnerable sections of the population from the risks associated with the following areas: legal and judicial assistance; social assistance; access to leisure, infrastructure; the communication; education; housing; participation in political and economic life; the catch in charge of health; food and nutrition security; transportation; work, employment and social security
- Law No. 2018-28 determining the fundamental principles and environmental assessment in Niger: Article 14 stipulates that: "development activities or projects at the initiative of public authorities or a private person who, by the size of their size or their impact on the environment biophysical and human, may affect them, are subject to an ESIA. Article 22 states that any promoter of policies, strategies, plans, programs, and projects, or any other activities likely to have an impact on the environment informs and consults from the start of the process and by any means, the public, in particular the administrative and customary authorities, the population as well as associations and NGOs working in the implementation area.
- Ordinance No. 2010-54 on the General Code of Communities of the Republic of Niger, the municipalities ensure the preservation and protection of the environment; ensure the sustainable management of natural resources with the effective participation of all stakeholders involved; draw up, in accordance with development options, local action plans and schemes for the environment and the management of natural resources; give their opinion on any infrastructure construction or installation project dangerous, unhealthy or inconvenient establishments (living quarters, for example) in the communal territory.

The Government of **STP** has had a single organization responsible for environmental concerns within its governance structure since the 1990s, namely the "Direcço General do Ambiente - DGA" (Directorate-General for the Environment) inside the Ministry of Public Works, Infrastructure, Natural Resources, and the Environment (MOPIRNA). The DGA is the ministerial authority in charge of coordinating all environmental efforts, including climate change. It is divided into two technical units: environmental and social. The DGA is in charge of developing environmental rules. Furthermore, the Projects Administration Agency (AFAP), a federal agency designed to handle DFI-funded programs in the nation, is another body dealing with environmental projects (in addition to the DGA). AFAP has an experience in a variety of sectors, including environmental and social protections. General environmental legislation are found below while specific ones that may be relevant to the project can be found in Table 4-1.

- Law 1/2003 (Constitution of the Democratic Republic STP): Article 10d of the Republic's constitution identifies the preservation of nature's and the environment's harmonic balance as an essential goal of the state. Article 49, point 1 specifies that everyone has the right to housing and a human life environment, as well as the obligation to defend it.
- Law 10/1999 (Environmental Framework Law): Articles 7 and 8 describe the principle of citizen and social group participation in decision-making processes and ensure everyone the right to appropriate access to environmental information.
- Decree No. 37/1999 (Environmental impact assessment regulation): The legislation states that the first step of this process is carrying out of the environmental pre-assessment by the responsible governmental entity, such that all activities listed in Annex I to the regulation must be subject to this pre-assessment. Annex I activities include electricity transmission lines and projects that involve the permanent or temporary

displacement of population or communities. Public consultation process is outlined in Article 7, requiring stakeholder participation and describing the process followed, concerns raised, and responses given.

Zambia developed its National Policy on Environment (NPE) in 2007 in response to the country's varied environmental issues. It emphasizes the need for an Environmental Impact Assessment (EIA) in all development projects in order to minimize or reduce negative environmental consequences and maximize project benefits. The Zambia Environmental Management Agency (ZEMA) is in charge of EIA legislation, which includes the Environmental Management Act (EMA) No. 12 of 2011 and Statutory Instrument No. 28 of 1997 - EIA Regulations.

Other entities designated with environmental protection responsibilities are the Ministry of Mines, Energy and Water Development, the Ministry of Lands, Natural Resources and Environmental Protection, the Ministry of Local Government and Housing, the Ministry of Chief and Traditional Affairs, and the Ministry of Health.

An EIA study should be prepared before implementing any development project that may have a potentially harmful impact on the environment and should be submitted to the ZEMA for approval. Screening of the project is at first required in the EIA process to determine whether it requires an EIA or not. A scoping meeting is then held by ZEMA, and other stakeholders to decide the scope of the EIA. Once the EIA report is reviewed, the EIA Decision Note is issued and requests a commitment to all environmental monitoring requirements as a condition for approval of the report. Environmental impact studies are mandatory most of the time but can be simplified for small-scale projects with, for example, an Environmental Project Brief which essentially is a simplified EIA. Both studies require the approval of the Zambia Environmental Management Agency (ZEMA).

General legislation relevant to the project are found below while specific ones can be found in Table 4-1:

- Environmental Management Act (EMA) No. 12, 2011: The Ministry of Lands, Natural Resources and Environmental Protection and ZEMA are the responsible institutions for the act. This act calls for environmental preservation and conservation, integrated environmental management, and sustainable management and use of natural resources. It also includes provisions for the prevention and control of pollution and environmental deterioration.
- Local Government Act 1990: The Ministry of Local Government and Housing, and the Local authorities are responsible for the implementation of this act by providing for the formation of district councils, the tasks of local authorities, and the local government system. These functions are related to pollution control and environmental protection in general.

Table 4-1: Relevant national legislation by country

Topic	Benin	Madagascar	Mali	Niger	STP	Zambia
Biodiversity Conservation and Cultural Heritage	• Law n° 2002-16 of 18 October 2004 on the regime of fauna in the Republic of Benin. This law protects wildlife and its habitat through measures for the conservation, development and sustainable use of wild animals, their living environments and their biological diversity. • Interministerial Order No.0121 for the sustainable "management", legal recognition, and integration of sacred forests as protected areas.	• Ordinance No. 60-126 of October 3, 1960 establishing the hunting, fishing and wildlife protection regime • Inter-ministerial Decree No. 4355-97 of May 13, 1997 on the definition and delineation of sensitive areas • Inter-ministerial Decree No. 4355-97 of May 13, 1997 on the definition and delineation of sensitive areas • Decree No. 2001-122 establishing the conditions for the implementation of contractualized management of State forests • Decree No. 2005-849 of December 13, 2005 describes the forest regime • Decree No. 2006-400 on the classification of wildlife species • Ordinance No. 82-029 relating to the protection, safeguarding and conservation of national heritage • Law No. 2015-005 of February 26, 2015 revising the Protected Areas Management Code	• Act No. 19-028 of July 12, 2010, establishing the principles of national forestry resource management. It specifies the criteria for forest resource conservation, protection, extraction, transportation, marketing, development, and sustainable usage. • Decree No. 10-387/P-RM of July 26, 2010 establishes the list of protected forest species and forest species of economic value. • Act No. 95-031/AN-RM of 20/03/1995 establishes the conditions of management of wildlife and its habitat, which establishes the general conditions of conservation, protection, enhancement, and exploitation of wildlife and its habitat in the national wildlife area. • Decree No. 96-050/P-RM of 14/02/1996 establishes the procedures for classifying reserves, wildlife sanctuaries, and areas of hunting interest.	Law No. 2004-040 on the forestry regime in Niger: Article 3: The State is the guarantor of the preservation of national forest resources in consultation with the actors concerned.	• Law No. 11/1999 (Conservation of Fauna, Flora, and Protected Areas Act): Defines the regime for the preservation of fauna and flora, as well as the formation of protected areas as national and global heritage, and sets lists of protected species. • Law No. 5/2001 (Forest Law): The law defines the fundamental forestry legislation. Forests are considered public property and must be maintained in accordance with the principles of sustainable and reasonable usage, as well as biodiversity protection. • Law No. 13/2007 is related to the regulation of safe seas and preventing of marine pollution • Law No. 4/2003 is relative to the management of cultural and natural heritage and its registration.	• Natural Resources Conservation Act, Cap 315, 1970: The Ministry of Lands, Natural Resources and Environment Protection is responsible for the Conservation and enhancement of natural resources. • The Forest Act No. 7, 1999: Zambia Forestry Commission is responsible for the Control, management, conservation, and administration of national and local forests, Participation of local communities, traditional institutions, and others, forest and tree conservation, and sustainable usage. • The Zambia Wildlife Act, No. 12 of 1998: Zambia Wildlife Authority is responsible to control and maintain national parks, GMAs, and bird sanctuaries with the goal of protecting and improving wildlife ecosystems.
Land Acquisition and Land Use Restriction, and Management	Law No. 2017-15 of August 10, 2017 governs land and property ownership whereby the National Agency of Property and Land. It carries out the mission of expropriation and relocation of communities impacted by public projects on behalf of the state.	• Law No. 2006-031 of 24 November 2006 on the legal regime of ownership of untitled land, puts an end to the presumption of State ownership of unregistered, un-surveyed land whose occupation is ascertained in both urban and rural areas • Ordinance No. 60-106 of 30/10/1960 creates a reserve right-of-way along national and provincial roads • Act No. 2005-019 of October 17, 2005 establishes the general principles governing the various legal statuses of all land on national territory (whether public and private land owned by the State and decentralized authorities, or land owned by private persons) • Law No. 2008-013 of July 23, 2008 on the public domain defines the legal regime of the public domain of the State and decentralized authorities • Law No. 2008-014 relating to the private domain of the State, decentralized communities and legal persons governed by public law. • Ordinance No. 60-146 of October 3, 1960 on the land registration system, which regulates land registration issues	• Law No.85-53/AN-RM of 21st June 1985 establishes administrative easements in urban planning, Act No. 95-034/AN-RM of 12th April 1995 on the Local Authorities Code, amended by Act • Ordinance No. 00-027/P-RM of 22nd March 2000 on the Land and Property Code, amended and ratified by Act No. 02-008 of 12th February 2002 • Decree No.02-111/P-RM of 06th March 2002 defines the forms and conditions of land management in the public real estate domains of the State and local authorities.	Law No. 61-37 on expropriation for public utility and temporary occupation as amended and completed by law 2008-37: Article 15: it provides that an owner can only be deprived of his right for reasons of public utility, after fair and prior compensation of landowners.	Law No. 3/91 (Land property management law) outlines the land holding categories through which state that land can be transferred to private parties for various uses. When the State requires land for public benefit, the originating agency prepares a requisition for the Prime Minister's office, which subsequently publishes the Declaration of Public Utility in the official gazette.	• The Land Act, 1995 (CAP 292, CAP 289, CAP 288) for the allocation and alienation of land. Land is demarcated into categories, namely the state, local authority, and traditional land. The traditional authorities (Chiefs) have rights over the traditional land, with a mandate to recommend to Government lease to those who want to acquire land • Land Acquisition Act, 1995 provides for the compulsory acquisition of land • Local Government Act (No. 22 of 1991) which provides for control of land by Local Authorities.
Employment and Working Conditions	• The Constitution affirms the right of citizens to work and requires the state to establish conditions in which this right can be exercised and employees are given reasonable pay for their services or output. • In accordance with the Labor Code of	• Law No. 68-23 of December 17, 1968 establishes a pension scheme and creates the National Social Security Fund • Law n°2003-044 of July 28, 2004 on the Labor Code specifies working conditions and occupational health	• Minimum Wage: Labour Code, 1992 (Law No. 92–020 of the 23 September 1992) establishes the minimum wage, health and safety regulations, minimum age for employment (14 years) and prohibits discrimination between men and women.	Decree No. 2021-289/PRN modifying and supplementing Decree No. 2018-476/PM: Ministry of Employment, Labor and Social Protection are responsible, in conjunction with the other Ministers concerned, for the design, the development, implementation, control,	• Law No.62091 of 2018, which approves the Labor Code • Law no.692 which establishes the legal regime for individual working conditions	• The Employment Code Act 3/ 2019) regulates the employment of persons; prohibits discrimination and provides for the engagement of persons on contracts of employment, employment entitlements and other benefits, and employee wage

Topic	Benin	Madagascar	Mali	Niger	STP	Zambia
	1998, the employer must take all measures to protect the health and safety of the workers. Workers in their turn are required to properly use safety and security devices and prohibited from removing them without the permission from the employer. Workers have the right to stop working in any dangerous situation or unsafe workplace environment. • Regulations setting working conditions in Benin include the Constitution, Labor Code of 1998, and General Collective Labor Agreement of 2005. • Child labour is regulated under Law No. 2015-08 of January 23, 2015 on the Children's Code (Articles 19, 20, and 39) and Labor Code Law No. 98-004 on January 27, 1998 which state that children should be protected from exploitation and abuse.	and safety requirements • Decree No. 2007-563 of July 3, 2007 relating to child labour.	• According to Article 19 of the Constitution, everyone has an equal right to labor and rest	monitoring and evaluation of national policies related to employment, labor and social protection.		protection • Industrial and Labor Relations Act, 1993 Chapter 269 governs trade unions, employers' associations, the Zambia Federation of Employers, recognition agreements and collective agreements, collective bargaining, strikes, lockouts, essential services, and the Industrial Relations Court.
Resource Efficiency and Pollution Prevention and Management	• Law No. 87-016 of 21 September 1987 instituting the Water Code governs the management of water and hydrological resources in Benin Republic. • Noise regulation (Decree n ° 2001-294 of 08/08/01 • Decree No. 2001-110 of April 2001 concerning air quality standards • Decree No. 2003-332 of August 27, 2003 on solid waste management in the Republic of Benin • Decree n°2003-330 of August 27, 2003 on the management of used oils in the Republic of Benin	• Law No. 98-029 on the Water Code regulates water resource management • Decree No. 2018-1145 Prohibiting the import and regulating the export of waste, hazardous waste, hazardous substances and materials containing them in Madagascar • Decree No. 2015-930 of June 9, 2015 on the classification and environmentally sound management of waste electronic and electrical equipment (WEEE) in Madagascar • Decree No. 2013-685 of September 10, 2013 adopting the National Water, Sanitation and Hygiene Strategy (2013-2018) • Law No. 99-021 on industrial pollution management and control policy • Law No. 96-025 on the local management of renewable natural resources	• Decree No.01-394 /P-RM of September 6, 2001 defines the objective of proper waste management and the principles associated with this type of pollution. • Decree No. 90-355/P-RM of August 8, 1990 establishes the list of toxic waste and the procedures for applying Act No. 89-61/AN-RM; • Decree No. 01-397 P - RM of September 6, 2001 defines the objective of atmospheric pollution control and ideas connected to this type of pollution; • Act No. 01-020, dated May 30, 2001, pertaining to pollution and nuisances, defines the polluter-pays concept, which is intended to encourage developers to apply good environmental practices, carry out pollution abatement initiatives, or utilize cleaner technology.	Law No. 66-033 relating to dangerous establishments supplemented by Ordinance No. 76-21 requires every person producing or holding waste that is harmful to the soil, flora or fauna and likely to harm human health and the environment to ensure or have ensured its elimination so as to avoid harmful effects.	Decree No. 36/1999 (Waste Decree) governs the standards for solid waste disposal. It states that the generator of solid waste, regardless of its kind or origin, must support its collection, storage, transport, disposal, or usage in a manner that does not threaten persons or animals or harm the environment. However, this regulation only applies to solid waste and does not address hazardous waste.	• Environmental Management Act (EMA) No.12, 2011: Regulates the management of water, air, hazardous and municipal waste, pesticides and poisonous chemicals, noise, ionizing radiation, and natural resources
Energy	• The legislative framework is established by Law No.98-032 of 1998, Structural Reform of the Electricity Sector. This law contains regulations related to authorization and concession, electricity tariffs and the entity to the electricity market on the private sector.	• Law No. 98-032 reforming the Electricity Sector to accelerate the electrification of the country; promote access to basic electricity service for the rural population; develop renewable energy sources • Law No. 2017-020 of November 22, 2017 on the Electricity Code in Madagascar • Law No. 2002-001 of October 7, 2002 establishing the National Electricity Fund (FNE) sets up a National Sustainable Energy Fund (FNED) intended to contribute to the financing of electricity infrastructure development projects in rural and peri-urban areas	• Law No. 03-006 of May 21, 2003 establishes the Ministry of Energy and Water, The Malian Agency for Development of Domestic Energy and Rural Electrification (AMADER) and its organization and operational techniques are outlined in Decree No.03-226/P-RM of May 30, 2003.	• Decree No.2021-289/PRN modifying and supplementing Decree n°2018-476/PM: Provides the mandate of the Ministry of Energy • Electricity Code, 2016: Ends the monopoly of NIGELEC, opening up the sector to private sector participation, particularly in generation and rural electrification. • Specific electricity tax, 2015: A tax that applies to all grids, including off-grid, that are subject to a delegation of services agreement to fund rural electrification, public lighting, and traffic lights.	According to point 4 in Annex I of Decree No. 37/199 of "Regulation on the Environmental Impact Assessment Process" include activities related to energy (namely electricity transmission lines) as activities that may have major environmental consequences and necessitate environmental impact assessments.	• Energy Regulation Act Cap. 436, 1995: The Ministry of Mines, Energy and Water Development's roles in this act are ensuring that all energy utilities in the sector are licensed, monitoring competition levels and structures, and investigating and resolving consumer complaints. • Electricity Act No.433 of 1995: where also the Ministry of Mines, Energy, and Water Development's role is to provide for the regulation of electricity generation, transmission, distribution, and supply.

Topic	Benin	Madagascar	Mali	Niger	STP	Zambia
Indigenous people	The State does not consider specific measures to support indigenous people[16]. However, there the country issued interministerial decree N ° 0121 / MEHU / MDGLAAT / DC / SGM / DGFRN/SA of November 16, 2012 fixing the conditions of sustainable management of the sacred forest in the Republic of Benin, which are valued by indigenous people.	Madagascar's Constitution forbids associations that 'call into question the unity of the nation, and those that advocate totalitarianism or ethnic, tribal, or religious segregation'.	The constitution of Mali prohibits discrimination. It states, "every Malian shall be born and remain free and equal in rights and obligations. All discrimination founded on social origin, colour, language, race, sex, religion and political opinion shall be prohibited."	Ordinance No. 93-028 on the status of the traditional chieftaincy of Niger, amended and supplemented by Law No. 2008-22: The customary chief has powers in the context of the conciliation of the parties in customary, civil and commercial matters and rules according to custom, the use by families or individuals, of croplands and spaces pastoral land, over which the customary community in his charge has customary rights recognized.	-	-

[16] OHCHR (2022). Experts of the Committee on the Elimination of Racial Discrimination Commend Benin on National Human Rights Institution, Ask Questions on Repatriation of Artefacts from Europe and Discrimination Against People with Albinism (https://www.ohchr.org/en/press-releases/2022/08/experts-committee-elimination-racial-discrimination-commend-benin-national)

4.2 International framework

The list of international conventions and treaties signed and/or ratified by each country can be found in Table 4-2.

Table 4-2: Relevant international treaties and conventions by country

Title	Benin	Madagascar	Mali	Niger	STP	Zambia
United Nations Framework Convention on Climate Change (UNFCCC)	1995	1999	1994	1995	1999	1993
Stockholm Convention on Persistent Organic Pollutants	2004	2005	2003	2006	2006	2006
United Nations Convention on Biological Diversity (UNCBD)	1994	1996	1995	1995	1999	1993
Convention concerning the Protection of the World Cultural and Natural Heritage	1982	1983	1977	1974	2006	1984
Convention on the Elimination of All Forms of Discrimination against Women	1992	1989	1985	1999*	2003	1985
United Nations Declaration on the Rights of Indigenous Peoples	2007	-	2007	2007	-	2007
Rotterdam Convention on the Prior Informed Consent	2004	2004	2003	2006	2013	2011
International Convention on the Elimination of All Forms of Racial Discrimination	2001	1969	1974	1967	2017	1972
Convention on the Protection and Promotion of the Diversity of Cultural Expressions	2007	2006	2006	2007	-	2023
Convention for the Safeguarding of the Intangible Cultural Heritage	2012	2006	2006	2007	2006	-
Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property	2017	1989	1987	1972	-	1985
C029 - Forced Labour Convention	1960	1960	1960	1961	2008	1964
C087 - Freedom of Association and Protection of the Right to Organise Convention	1960	1960	1960	1961	1992	1996
C098 - Right to Organise and Collective Bargaining Convention	1968	1998	1964	1962	1992	1996
C100 - Equal Remuneration Convention	1968	1962	1968	1966	1982	1972
C105 - Abolition of Forced Labour Convention	1961	2007	1962	1962	2005	1965
C111 - Discrimination (Employment and Occupation) Convention	1961	1961	1964	1962	1982	1979
C138 - Minimum Age Convention (Minimum age specified)	2001 (14 years)	2000	2002 (15 years)	1978 (14 years)	2005 (14 years)	1976 (15 years)
C155 - Occupational Safety and Health Convention, 1981	-	2023	2016	2009	2005	2013
C182 - Worst Forms of Child Labour Convention	2001	2001	2000	2000	2005	2001

Title	Benin	Madagascar	Mali	Niger	STP	Zambia
C187 - Promotional Framework for Occupational Safety and Health Convention, 2006	-	2023	-	2009	-	2013

*With reservations

4.3 UNDP's Social and Environmental Standards

All AMP projects covered by this ESMF will comply with UNDP's updated Social and Environmental Standards (SES), which came into effect 1 January 2021. These Standards underpin UNDP's commitment to mainstream social and environmental sustainability in its programs and projects to support sustainable development and are an integral component of UNDP's quality assurance and risk management approach to programming. Through the SES, UNDP meets the requirements of the GEF's Environmental and Social Safeguards Policy.

The objectives of the SES are to:

- Strengthen the social and environmental outcomes of Programs and Projects
- Avoid adverse impacts to people and the environment
- Minimize, mitigate, and manage adverse impacts where avoidance is not possible
- Strengthen UNDP and partner capacities for managing social and environmental risks
- Ensure full and effective stakeholder engagement, including through a mechanism to respond to complaints from project-affected people

In accordance with UNDP SES policy, the Social and Environmental Screening Procedure (SESP) has been applied to each of the projects covered in this ESMF during the project development phase. In accordance with UNDP SES policy, a SES principle or standard is 'triggered' when a potential risk is identified and assessed as having either a "moderate", "substantial" or "high" risk rating based on its probability of occurrence and extent of impact. Risks that are assessed as 'low' do not trigger the related principle or standard.

When screening indicates that a project presents risks associated with specific SES Programming Principles and/or Project-level Standards (e.g. Human Rights, Indigenous Peoples, Pollution Prevention), it is necessary to review the SES to ensure the relevant requirements related to these standards are addressed in the assessment and management process.

The Social and Environmental Risk Screening Checklist conducted at the PIF stage identified a number of potential risks that were scored, assessed and managed with the appropriate measures. Further research and the involvement of expert knowledge led to new findings during the project preparation (PPG) phase, and these show the need to consider other potential risks, as identified in the Screening Checklist (Annex 5 to the ProDoc) for each country. Thus, the analysis of these additional risks as well as the review of all previously identified issues have resulted in a more comprehensive context to be considered on future chosen sites/activities as reflected in the procedures for project activities as per Section V.

The review of the SESP during the PPG phase has led to the project risk categorization shown in Table 4-3 below.

Table 4-3 - Summary of principles and standards triggered by projects based on screening conducted during project preparation

Principle / Standard	Benin	Madagascar	Mali	Niger	STP	Zambia
Overarching Principle: Leave No One Behind						
Human Rights	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial
Gender Equality and Women's Empowerment	Substantial	Moderate	Substantial	Moderate	Moderate	Moderate
Sustainability and Resilience						

Principle / Standard	Benin	Madagascar	Mali	Niger	STP	Zambia
Accountability	Substantial	Moderate	Substantial	Moderate	Moderate	Moderate
Project-level Standards						
Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management	Substantial	Substantial	Substantial	Substantial	Moderate	Substantial
Standard 2: Climate Change and Disaster Risks	Moderate	Substantial	Substantial	Substantial	Moderate	Substantial
Standard 3: Community Health, Safety and Security	Substantial	Substantial	Substantial	Substantial	Moderate	Substantial
Standard 4: Cultural Heritage	Moderate	Substantial	Substantial	Substantial	Moderate	Substantial
Standard 5: Displacement and Resettlement		Substantial	Substantial	Moderate	Substantial	Substantial
Standard 6: Indigenous Peoples	Moderate	Substantial	Substantial	Moderate	-	Substantial
Standard 7: Labour and Working Conditions	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate
Standard 8: Pollution Prevention and Resource Efficiency	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial
Number of principles/standards triggered in each category						
High	0	0	0	0	0	0
Substantial	3	6	8	4	4	5
Moderate	8	5	5	8	7	7
Low	1	0	0	0	1	0
Total number of project risks	12	11	13	12	12	12
Overall Project Risk Categorization	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial
Number of safeguard standards triggered	10	11	11	11	10	11

4.4 Gaps in policy framework

Further analysis of the legal and policy frameworks that apply to all Child Projects covered in this ESMF will be completed during the implementation of this ESMF (i.e. during the completion of Environmental and Social Impact Assessments (ESIA)s). At this stage, the gaps identified are summarised below:

- For all Child Projects, the current country framework is not fully aligned with the UNDP SES so cannot be adopted as the only requirement. The social and environmental risks associated with each project will be mitigated through the requirements established in the SESP and this ESMF. In light of this, a gap analysis will be conducted to bring all activities to comply with the UNDP SES based on the risks triggered in the SESP. Country frameworks may be used to address such risks only when they demonstrate an equivalent level of compliance. Similarly, for mini-grid systems considering to join efforts to existing projects, the existing environmental and social studies in place could be used to satisfy the requirements in the SESP/ESMF to address the potential risks if they demonstrate an equivalent level of compliance to the UNDP SES.
- The foundation for the environmental and social legal framework varies from country to country. However, the general challenge in all countries remains to ensure that social and gender safeguards are underpinned at the same level as environmental safeguards either through additional requirements to strengthen analysis or through the linkage to other appealing social and gender policies at the national framework. There is, likewise, need to increase measures at both central and local level to improve public consultation requirements and ensure ways of integrating them into the decision-making of the activities. For example, through institutionalised communication with the community and public consensus in a way that input is allowed to relevant decisions and in particular public/private agreements.
- A known common challenge is also with the one linking innovative technology and gender empowerment, due to insufficient law enforcement and public awareness, both in terms of law,

management expertise, equipment and/or facilitation. There is a need to emphasise the relevance of training and capacity building among law enforcers and government officials and to include an enforcement plan to overcome this limitation. In this regard the challenge extends to ensuring preventive monitoring that will be closely supervised by the designated parties.

- Where the Governments have successfully used economic and social incentives/disincentives as an approach to environmental regulation since years ago, this has provided a basis for payment of fees, levies and charges under the permit and license system. It could be emphasised, however, that the use of incentives/disincentives should go hand in hand with positive discrimination for first-of-its-kind activities and those with sound E&S benefits. For example, as it is the case of renewable energies, mini-grids still show a minor presence in the renewable energy share in the countries. This could be favoured considering the cost that development activities have on the environment and calculating the contribution of the environment sector to the gross domestic product (GDP), among other factors, to alleviate the cost of compliance.
- The other common challenge for all countries relates to bringing existing systems up to date with established legal requirements. Bringing those systems to comply with such environmental and social standards may be laborious and will require visits of environmental and social experts, compliance schedules and agreed benchmarks intended to achieve gradual compliance to the extent possible.

5 SECTION V – Required procedures for screening, assessment and management

Based on the risk categorization assigned to the various country projects and the associated environmental and social risks, the following procedures for screening, assessing and managing those risks must be undertaken during project implementation of each country project. This section specifies the procedures for screening, assessing and managing potential social and environmental risks and impacts of specific project activities, sub-projects/minigrid pilots (for which assessments should be done and management plans put in place prior to their commencement) and preparation of policies and/or regulations to be adopted/implemented (during which the assessments should be undertaken), including the following:

- **Screening.** Screening of social and environmental risks and impacts and determining applicable social and environmental standards and requirements (including UNDP SES). The screening process utilizes UNDP's SESP and develops a specific screening procedure for the forthcoming type of sub-projects/activities.
- **Assessment.** Appropriate types of social and environmental assessment to identify, document and address potential social and environmental risks and impacts.
- **Management.** Preparing and approving time-bound action plans for avoiding, and where avoidance is not possible, reducing, mitigating, and managing adverse impacts, including development of specific management plans according to applicable policies and regulations, including UNDP's SES (i.e. Environmental and Social Management Plans which would be completed post-assessment). Where likely project activities would involve impacts to indigenous peoples or cause physical or economic displacement, then targeted management frameworks are required (i.e. Indigenous Peoples Planning Framework, Resettlement Planning Framework; see the relevant SES guidance notes).

5.1 Further Screening

During project implementation, certain circumstances require the revision of the completed design-stage screening. These include, but are not limited to: (a) where new information becomes available such as through a social and environmental assessment, (b) where there are substantive changes to the project (e.g. changes in design, additional components), or (c) where changes in the project context might alter the project's risk profile. If the revised screening results in a different risk category then a revised SESP needs to be reviewed and approved by UNDP and the Project Board.

5.2 Special procedure for co-financing activities included as project results funded with resources that DO NOT flow through UNDP accounts

UNDP is accountable to monitor all project results, including results to be delivered by co-financing activities, to ensure consistency with UNDP and GEF policies and procedures, including the UNDP SES. Therefore, general procedures described in this section apply to any co-financing activities included as project results.

For Co-financing activities included as project results funded with resources that DO NOT flow through UNDP accounts (as defined in Section 0), the following special procedures will need to be applied before co-financing activities start:

1. The co-financing partner's capacities will be assessed through the Partner Capacity Assessment Tool (PCAT) and the co-financing partner will develop a risk management strategy if gaps are identified, for UNDP's approval and subsequent oversight/assurance.
2. The co-financing partner will sign an agreement with UNDP or the Implementing Partner to confirm accountabilities, including in particular the following sentence: *"The co-financed activities will be undertaken in full compliance with [co-financing partner's] policies and procedures. However, because the activities are included in the results of the project the [co-financing partner] commits to monitor these activities consistent with the UNDP Project Document. The Project Board and UNDP will also assume an oversight and assurance role to further ensure the project, including the co-financed activities covered by this letter, remains consistent with UNDP policies and procedures. These arrangements will be confirmed through [signature of Project Document OR signature of Responsible Party Agreement with reference to the Project Document]."*.
3. Risks stemming from and/or to co-financed activities – as with risks from/to all other project activities – will be identified and included in the project risk register and monitored accordingly. The risk description will clarify relation to the specific co-financing.
4. Social and environmental risks associated with the co-financed activities will be identified during project design and included in the SESP and relevant safeguard management plans. Relevant safeguards instruments prepared by the co-financing partner will be reviewed by UNDP for consistency with UNDP's SES, during project development and implementation; any gaps will be resolved in discussion with the co-financier.

5.3 Procedures for Minigrid Pilots and Planned Investments

All minigrid pilots and site-specific minigrids that may be supported during project implementation are subject to this procedure, which includes screening.

The screening will be undertaken for each pilot to determine, based on size, nature (greenfield or rehabilitation, new transmission lines) and location of activities, whether a site-specific Environmental and Social Impact Assessment (ESIA), targeted assessment or no assessments are required. After the required assessment is undertaken, if any, an Environmental and Social Management Plan (ESMP) or other management plans will be developed and implemented. **Only once the relevant ESMP or other required management plans are in place can the specific minigrid pilot proceed.**

Figure 5-1 below presents the indicative steps for planning, implementing and monitoring each minigrid pilot and the milestones related to environmental and social screening, assessment and management (to be adapted for each pilot context and approach).

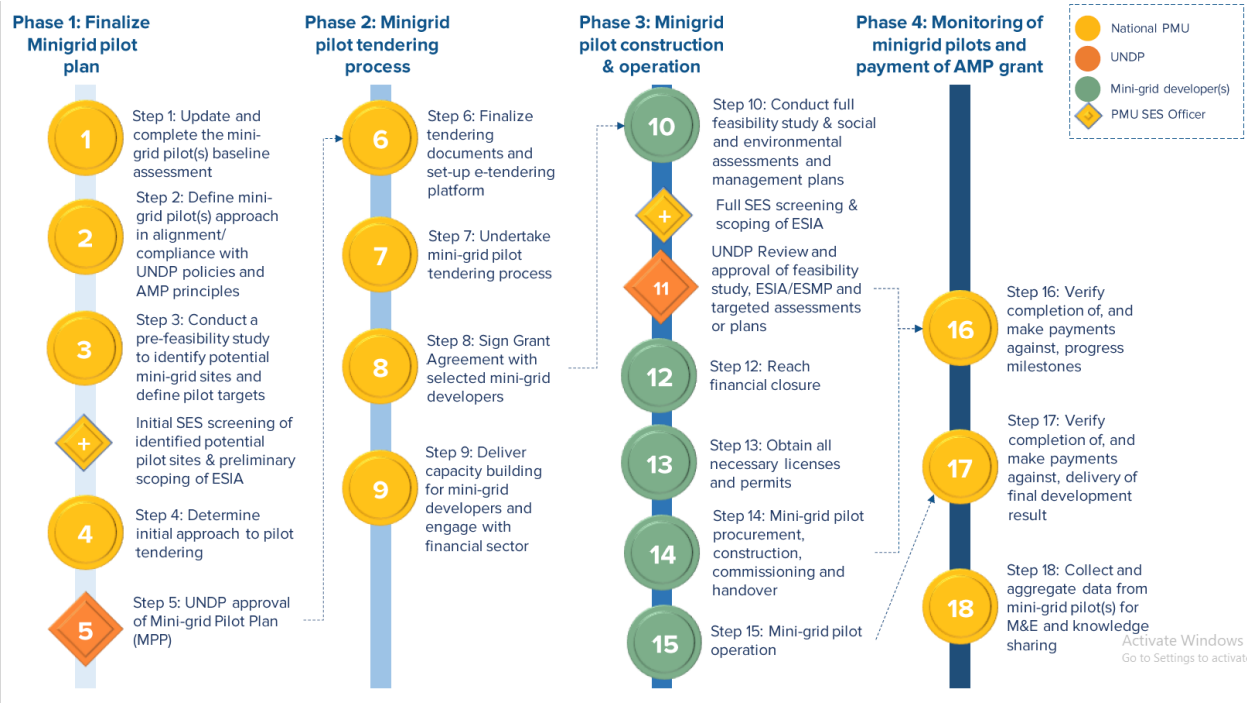

Figure 5-1: Indicative Sequencing of Pilot Minigrid Development

Screening

Once a potential site is identified for a minigrid, a preliminary screening process will be undertaken by filling out the checklist in Annex II. The screening will be done by the PMU. Minigrids that receive a Moderate Risk Rating will require, at a minimum, a targeted assessment followed by a site-specific ESMP. Substantial Risk minigrids will require an ESIA and ESMP, which will include the necessary sub-plans. Where possible, national requirements can and should be applied to meet UNDP SES requirements (e.g. through national EIA requirements). In addition, the relevant assessments and management plans can be scoped to include multiple pilot sites or to be site-specific.

Given that the original project SESP identified potential "Substantial" risks related to the minigrid pilots, if subsequent screenings (once more details are known of the potential sites and design) determine a "Moderate" risk is more appropriate, the SESP for the overall national project should be updated accordingly.

Screening for Indigenous Peoples (or local communities): As part of the screening, potential impacts on indigenous peoples (or what may be considered as local communities or other affected groups) that would trigger UNDP SES Standard 6 (S6) requirements shall be investigated through thorough research and, if found possible, visits to the site. Potential impacts on indigenous peoples may trigger the need for an Indigenous Peoples Plan (or equivalent) as part of the ESMP. To ensure that all threats to indigenous peoples are identified, assessed, and addressed in line with national regulations and international standards, an **Initial Screening** is required. The objective of this screening is to determine and verify whether an intervention might impact (positively or negatively, directly or indirectly) indigenous peoples. This initial screening informs whether an IPP (or equivalent plan) needs to be prepared by a qualified consultant. This screening should be **iterative** and conducted before and throughout the assessment process and drafting of environmental and social mitigation and management measures. The SESP may need to be updated during project implementation due to new information from the IPP or substantial design changes, conflict, disaster, disease, etc. The country Project Risk Register would also need to be updated.

Additional guidance on screening for indigenous peoples can be found in Annex III and the UNDP SES Guidance Note on Standard 6: Indigenous Peoples.

Assessment and Management

Based on the screening results, the appropriate assessments will be conducted, and management plans developed. The ESIA or targeted assessment will assess all risks identified in the screening checklist (including gender aspects) and any additional associated risks that are identified. As part of the social baseline assessment, screening should be carried out at each site during the ESIA to ensure the identification of indigenous peoples/ethnic groups in target sites, or lack thereof. This screening will be conducted for all minigrids regardless of whether S6 has been triggered or not at the PPG Phase. The screening provides a basic assessment to identify such groups – the information gathered will be verified with project staff (including the PMU M&E officer), and findings discussed with UNDP regional technical advisors to determine the applicability of S6. The specific requirements related to screening for indigenous peoples are included below.

Based on the findings of the assessment undertaken, an appropriately scoped ESMP will be developed. The ESMP may include multiple pilots but will include site-specific management measures. The ESMP will provide a set of avoidance, mitigation, monitoring and institutional measures – as well as actions needed to implement these measures – to achieve the desired social and environmental sustainability outcomes. The measures will be adopted and integrated into the project activities, monitoring and reporting framework and budget, and captured in a revised SESP for the project. The site-specific ESMP will likely include relevant elements of a Waste Management Plan, Pollution Prevention and Management Plan, Occupational Health and Safety Plan and Labour Management Procedures, as well as Resettlement Action Plan (RAP) and IPP (or equivalent plan) if required. The ESMPs will also include requirements related to the procurement of solar panels and related components to ensure the risk of forced labour in the supply chain is considered, including through a Forced Labour Bidder Declaration.

IPP (or equivalent plan) and RAP: When screening has determined that an IPP (or equivalent plan) needs to be established, this IPP should be based on the findings of a comprehensive assessment process and needs to be developed with full, effective and meaningful participation of potentially affected indigenous peoples. The IPP shall establish a timebound, fully budgeted action plan for ensuring that identified impacts of a specific intervention or a group of interventions affecting the same group of indigenous peoples are appropriately addressed, culturally appropriate benefits are provided, participatory processes are followed, and needed capacity support and institutional arrangements are in place. The IPP should have a level of detail proportional to the complexity of the nature and scale of the proposed interventions and their potential impacts on indigenous peoples and their rights, lands, territories, and resources. Enhancement and mitigation measures outlined in the IPP should reflect an appropriate response to the assessment's findings and adhere to the requirements outlined in Annex VI of this ESMF and the following guidance note:

Ensuring culturally appropriate benefits: The IPP needs to detail the arrangements agreed to by the indigenous peoples concerned regarding the equitable sharing of benefits to be derived by the project in a manner that is culturally appropriate and inclusive and that does not impede land rights or equal access to basic services including health services, clean water, energy, education, safe and decent working conditions, and housing. Those arrangements should be evidenced in the written outcomes of the consultation and consent process undertaken. Indigenous peoples should be provided with complete information on the scope of potential income streams, services and benefits the project may generate for all possible beneficiaries. In determining what constitutes fair and equitable benefit sharing – mainly where lands, resources, and territories are involved – indigenous peoples should be treated as stakeholders and appropriately as rights holders.

When activities include the commercial development of indigenous peoples' lands, territories and resources, the PMU informs the affected people of their rights and the scope, nature and impacts of the potential use, enabling the indigenous peoples to share equitably in the benefits from such commercial development or use.

Legal recognition of indigenous peoples' rights to lands, territories and resources: Certain project activities may not be successful or may lead to adverse impacts unless the rights of indigenous peoples to traditional lands, territories and resources are officially recognized. For example, initiatives to support indigenous peoples` farms on their traditional lands may first require obtaining some land title to secure the project's investment in this land.

Resettlement Action Plan and Livelihood Action Plan: When indigenous peoples' physical or economic displacement is unavoidable, the project needs to establish a RAP or a Livelihood Action Plan (LAP) that has been developed transparently with the individuals and communities to be displaced. No indigenous peoples' relocation shall occur without the Free, Prior and Informed Consent (FPIC) of the indigenous peoples, only after agreement on just and fair

compensation. The RAP/LAP must meet the requirements of UNDP's Environmental and Social Standard 5 and 6, including documentation of agreement through FPIC. The objectives, activities, and timelines for both plans shall be harmonized and incorporated into the IPP.

Expertise requirements: IPPs should be established by qualified and experienced independent experts on indigenous peoples. Beyond the qualifications obtained through formal technical training, close work with indigenous groups should have gained at least five years of experience. Conflicts of interest between project proponents, designers and assessment specialists should be avoided.

An IPP needs to be in place and mitigation measures taken before any activity that may cause adverse impacts on indigenous peoples, including the existence, value, use or enjoyment of their lands, resources or territories.

The output of the ESIA (if required) will be an ESIA report (indicative outline can be found in Annex IV of this ESMF) and an ESMP. The ESMP will define desired social and environmental management outcomes and specify social and environmental indicators, targets, or acceptance (threshold) criteria to track ESMP implementation and effectiveness. It will also provide estimates of the human and financial resources required for implementation and monitoring and identify organizational structure and processes for implementation. An indicative outline of the ESMP can be found in Annex V of this ESMF.

The ESMP for each pilot minigrid (or group of minigrids) will be kept by the developer on file for verification by the PMU during sample checks/audits. During mini-grid construction and throughout its operating life, the developer needs to:

- Maintain compliance with E&S requirements;
- Maintain a grievance redress mechanism to address community concerns;
- Inform PMU immediately of any incidents or accidents that can interfere with maintaining E&S compliance;
- Submit E&S reporting as part of regular progress reports to PMU.

Meanwhile, the PMU will Monitor E&S performance throughout the project cycle.

Labour Management Procedures

UNDP S7 requires that written labour management procedures (LMP) be established that set out the conditions under which project workers will be employed or engaged and managed. This applies to all third-party contractual arrangements with the private sector (or any other entity). In the context of the project, the LMP has particular relevance for the minigrid pilots (sub-projects) and will be incorporated in the ESIA/ESMP that will be undertaken for these activities.

The LMP will include requirements and terms/conditions related to the selection, procurement and management of primary suppliers of solar panels. Private enterprises that will provide services within the project shall also sign a safeguards commitment letter to implement all measures stipulated in the ESMF.

Annex V provides a template for these LMP together with a risk assessment and action plan. These procedures need to be appropriate to the size, locations and workforce of project activities. To the extent that provisions of national law and employer policies satisfy the requirements of S7, these would be applied and the applicable party would not need to duplicate such provisions in additional project-specific labour management procedures (e.g. an employer's human resources policies may address the terms and conditions elements of the LMP template). The assessment, undertaken as part of the ESIA, should identify whether the applicable party (employer, contractor) has appropriate human resources policies and Occupational Health and Safety management procedures to address and manage identified labour risks and impacts and to meet the S7 requirements.

Additional guidance can be found in the UNDP SES Guidance Note on Standard 7: Labour and Working Conditions.

5.4 Other Relevant Assessments and Plans

The findings of the targeted assessments and ESIAs will be used to update the project's Gender Action Plans and Stakeholder Engagement Plans (SEP) as determined appropriate by the ESIA/ESMP consultants.

6 SECTION VI – Stakeholder engagement and information disclosure process

6.1 Stakeholder engagement

UNDP is committed to meaningful, effective and informed stakeholder engagement in the design and implementation of all UNDP projects. Government agencies (national and local), civil society actors and organizations, indigenous peoples, local communities, the private sector and other key stakeholders are crucial partners for advancing human rights-based development. The following summarize key stakeholder engagement requirements from UNDP's SES that will be applied in the context of the AMP:

- Ensure meaningful, effective, informed participation of stakeholders in the formulation and implementation of UNDP programmes and projects, providing stakeholders opportunities to express their views at all points in the project decision-making process on matters that affect them
- Conduct stakeholder analysis and engagement in a gender-responsive, culturally sensitive, non-discriminatory and inclusive manner, identifying potentially affected vulnerable and marginalized groups and providing them opportunities to participate
- Develop appropriately-scaled Stakeholder Engagement Plans, with level and frequency of engagement reflecting the nature of the activity, magnitude of potential risks and adverse impacts, and concerns raised by affected communities
- Meaningful, effective and informed consultation processes need to be free of charge and meet specified criteria, including free of intimidation and external manipulation; initiated early and iterative; inclusive; gender and age responsive; culturally appropriate and tailored to language preferences; and based on timely disclosure of relevant, accessible information regarding the project and its social and environmental risks and impacts
- Include differentiated measures to allow effective participation of disadvantaged or vulnerable groups, including persons with disabilities
- Undertake measures to ensure effective stakeholder engagement occurs where conditions for inclusive participation are unfavourable
- Document consultations and report them in accessible form to participants and the public
- Ensure early and iterative meaningful stakeholder engagement throughout the assessment and management of potential social and environmental risks and impacts
- Ensure that stakeholders who may be adversely affected by the project can communicate concerns and grievances through various entry points, including when necessary an effective project-level grievance mechanism, and also UNDP's Stakeholder Response Mechanism and Social and Environmental Compliance Unit
- For activities that affect rights, lands, territories, resources, and traditional livelihoods of indigenous peoples, ensure meaningful consultations and FPIC
- For activities that may involve physical or economic displacement, ensure activities are planned and implemented collaboratively with meaningful and informed participation of those affected
- Provide ongoing reporting to affected communities and individuals for projects with significant adverse social and environmental impacts
- Seek to identify, reduce and address the risk of retaliation and reprisals against people who may seek information on and participation in project activities, express concerns and/or access project-level grievance redress processes/mechanisms or UNDP's Stakeholder Response Mechanism or Social and Environmental Compliance Unit

For the AMP, a stakeholder platform will be established to be representative vertically (i.e. are all the groups affected

well represented) and horizontally (i.e. weight of voice within platform), appropriate channels of communication will be provided for each represented group (i.e. in particular for the informal sector that may be illiterate), and will be provided with an active role throughout all phases of the Project (i.e. from the design to commissioning). For that a Stakeholder Engagement Plan for consultation and communication (see ProDoc annexes) that will be implemented clearly disseminate information and gather feedback in time regarding the needs and priorities of all stakeholders.

Discussions with project stakeholders commenced during the project preparation phase (PPG) of the project at the national level. A list of the stakeholders engaged in these consultations has been Annexed to the Project Documents.

As noted above, the minigrid pilots will require further social and environmental assessment and management plans which also need to be accompanied by stakeholder engagement processes, particularly with potentially affected people. The purpose of these ESMPs is to be appropriate and relevant to the local context, gather stakeholder input and feedback into minigrid development and design, and be effective of mitigation measures for example through public consultations. The methods employed at the stakeholder engagement process must be culturally appropriate, delivered in a timely manner and centrally managed to ensure a consistent and ongoing consultation process. Consultation opportunities/sessions will include special outreach efforts and be tailored to the need of vulnerable groups, particularly women, so that the process is socially inclusive and a range of stakeholder views and perspectives are adequately represented. Please refer to UNDP's SES guidance on stakeholder engagement.

6.2 Free, Prior and Informed Consent

Numerous international and regional instruments have affirmed FPIC as a legal norm imposing clear affirmative duties and obligations that should be pursued in various circumstances. While there is no single internationally agreed definition of FPIC, there is a sufficient and growing consensus around what FPIC comprises and the bare minimum measures that must be taken to guarantee its respect, protection and enjoyment. At a very general level, FPIC may be understood as the right of indigenous peoples to approve or reject specific proposed actions that may affect them, and the process for reaching such a decision must possess particular characteristics in line with the following definitions endorsed by the UNPFII at its Fourth Session in 2005.

FREE refers to the consent given voluntarily without coercion, intimidation or manipulation. Free refers to a process that is self-directed by the community from whom consent is being sought, unencumbered by coercion, expectations or timelines that are externally imposed:

- Stakeholders determine the process, timeline and decision-making structure;
- Information is transparently and objectively offered at stakeholders' request;
- Process is free from coercion, bias, conditions, bribery or rewards;
- Meetings and decisions take place at locations and times and in languages and formats determined by the stakeholders; and
- All community members are free to participate regardless of gender, age or standing.

PRIOR means consent is sought sufficiently before any authorization or commencement of activities. Prior refers to a period before an action or process when consent should be sought and between when consent is sought and when consent is given or withheld. Prior means at the early stages of a development or investment plan, not only when the need arises to obtain approval from the community:

- Prior implies that time is provided to understand, access, and analyze information on the proposed activity. The amount of time required will depend on the decision-making processes of the rights-holders;
- Information must be provided before activities can be initiated, at the beginning or initiation of an action, process or phase of implementation, including conceptualization, design, proposal, information, execution, and following evaluation; and
- The decision-making timeline established by the rights-holders must be respected, as it reflects the time needed to understand, analyze, and evaluate the activities under consideration following their customs.

INFORMED refers mainly to the nature of the engagement and the information that should be provided before seeking consent and as part of the ongoing consent process. Information should:

- Be accessible, clear, consistent, accurate, constant, and transparent;

- Be delivered in the appropriate language and culturally appropriate format (including radio, video, graphics, documentaries, photos, and oral presentations);
- Be objective, covering both the positive and negative potential of project activities and the consequences of giving or withholding consent;
- Be complete, covering the spectrum of potential social, financial, political, cultural, and environmental impacts, including scientific information with access to sources in an appropriate language;
- Be delivered in a manner that strengthens and does not erode indigenous or local cultures;
- Be delivered by culturally appropriate personnel in culturally relevant locations and include capacity building of indigenous or local trainers;
- Be delivered with sufficient time to be understood and verified;
- Reach the most remote, rural communities, women and the marginalized; and
- Be provided on an ongoing and continuous basis throughout the FPIC process.

CONSENT refers to the collective decision made by the rights-holders and reached through the customary decision-making processes of the affected peoples or communities. According to each community's unique formal or informal political-administrative dynamic, consent must be sought, granted, or withheld. Consent is:

- A freely given decision that may be a "Yes" or a "No," including the option to reconsider if the proposed activities change or if new information relevant to the proposed activities emerges;
- A collective decision determined by the affected peoples (e.g. consensus, majority, etc.) following their customs and traditions;
- The expression of rights (to self-determination, lands, resources and territories, culture); and
- Given or withheld in phases over specific periods for distinct stages or phases of the project. It is not a one-off process.

While the objective of consultation processes shall be to reach an agreement (consent) between the relevant parties, this does not mean that all FPIC processes will lead to the consent of and approval by the rights-holders in question. At the core of FPIC is the right of the people concerned to choose to engage, negotiate and decide to grant or withhold consent, as well as the acknowledgement that under certain circumstances, it must be accepted that the project will not proceed and/or that engagement must be ceased if the affected peoples decide that they do not want to commence or continue with negotiations or if they choose to withhold their consent to the project.

To determine whether FPIC is required, refer to Annex II for the screening checklist and Annex III on indigenous peoples screening.

As none of the participating countries has developed its own guideline, the project will follow UNDP's FPIC Guideline (UNDP 2022: SES Supplementary Guidance: Frequently Asked Questions on Applying FPIC) and follow the indicative steps and guidance for documenting an FPIC Process and Outcome (see Annex VIII).

6.3 Information disclosure process

UNDP's Information Disclosure Policy establishes a presumption in favor of disclosure whereby information concerning UNDP programmes and operations is made available to the public. The Policy stipulates that general project information and project documents are to be disclosed through the UNDP Transparency Portal. In line with this, the UNDP SES require that stakeholders have access to the project information. This will be ensured at the PPG phase and similarly, at the sub-project level, based on the SES Supplemental Guidance, and Guidance on Publishing Project Information. Additional information can be found in the Supplemental Guidance on Disclosure of SESPs, Assessments, Management Plans_rev_5May2022.docx (undp.org).

Where to disclose: Reports and drafts are required to be disclosed through the UNDP Transparency Portal. The Policy notes that country specific documentation is available also from the appropriate Regional and Central Bureaux, Country Office websites. Other means of dissemination may need to be considered to be appropriate to all (including marginalized and vulnerable groups), such as posting on websites, public meetings, local councils or organizations, newsprint, television and radio broadcasts/reporting, flyers, local displays, direct mail, SMS, oral presentations, etc. This is important to facilitate access to the information to those less digitalized and/or local stakeholders.

What to disclose: Specifically, the SES (SES, Policy Delivery Process, para. 21) stipulates that, among other disclosures specified by UNDP's policies and procedures, UNDP will ensure that the following information be made available:

• Information on a project's purpose, nature and scale, duration, and potential risks and impacts

• Stakeholder engagement plans and summary reports of stakeholder consultations

• Social and environmental screening reports with project documentation

• Draft social and environmental assessments, including any draft management plans (such as IPPs, RAPs and LAPs)

• Final social and environmental assessments and associated management plans (such as IPPs, RAPs and LAPs)

• Any required social and environmental monitoring reports.

ESIAs and SESAs also require that a summary report be prepared to provide an adequate, accurate and impartial evaluation and presentation of the issues and conclusions of the technical assessment. This report must be presented in an understandable format and in an appropriate language(s), including a non-technical summation that can be understood by many stakeholders to facilitate and encourage comments. This should include informing affected people and stakeholders of their options if they have concerns, e.g. through the project Grievance Redress Mechanism (GRM) (Section 6.4) and UNDP's Accountability Mechanism (Section 7).

When to disclose: To be disclosed and consulted on 60 days prior to implementation of activities that may give rise to potential adverse social and environmental impacts. Activities can only be adopted after the required time period for disclosure has elapsed. Small, local, non-governmental stakeholders may not have been an active part of the decisions yet and/or may need longer to organize themselves, and/or communication may not be that fluent.

Language of disclosure: Information needs to be in a language that is readily understandable and tailored to the target stakeholder group and locality. The information from assessments and management plans will therefore need to be translated to various languages as appropriate for each project/sub-project.

Form of disclosure: It is vital to ensure that appropriate communication forms are devised to reach appropriately marginalized and disadvantaged groups. So important considerations in devising appropriate forms of disclosure are the technical level of people, local languages and dialects, levels of literacy, persons with disabilities, roles of women and men, and local usual methods. The material may need to be presented in a contextual manner, such as:

- The presentation of options with key information and questions designed to solicit feedback
- Non-technical summary that can be understood by many stakeholders in order to facilitate and encourage comments.
- It may be more appropriate to presented by various means (e.g. written, verbal) to be adequate.

6.4 Conclusions

At this PPG phase we cannot ensure that the potential adverse impacts are limited in number, well understood, clearly circumscribed, and can be easily avoided or mitigated. Therefore, the SESP conducted at this same stage establishes the assessment/management actions needed to be sufficient as sub-projects arise. In light of that, a draft summary of this ESMF (including the SESP) will be disclosed at the national level along the consultation process. Subsequent local level E&S studies, including the local Stakeholder Engagement Plan, will be submitted following the requirements above with a focus on local engagement when sub-projects arise depending of the level of social and environmental risk associated with each sub-project as well as timing of the social and environmental assessment.

6.5 UNDP's Accountability Mechanism

Finally, UNDP's SES recognize that even with strong planning and stakeholder engagement, unanticipated issues can still arise and defines an additional grievance mechanism here. Therefore, the SES are underpinned by an Accountability Mechanism with two key components:

- A Social and Environmental Compliance Review Unit (SECU) to respond to claims that UNDP is not in compliance with applicable environmental and social policies; and
- A Stakeholder Response Mechanism (SRM) that ensures individuals, peoples, and communities affected by projects have access to appropriate grievance resolution procedures for hearing and addressing project-related complaints and disputes.

UNDP's Accountability Mechanism is available to all of UNDP's project stakeholders.

The Social and Environmental Compliance Unit (SECU) investigates concerns about non-compliance with UNDP's Social and Environmental Standards and Screening Procedure raised by project-affected stakeholders and recommends measures to address findings of non-compliance.

The Stakeholder Response Mechanism helps project-affected stakeholders, UNDP's partners (governments, NGOs, businesses) and others jointly address grievances or disputes related to the social and/or environmental impacts of UNDP-supported projects.

Further information, including how to submit a request to SECU or SRM, is found on the UNDP website at: http://www.undp.org/content/undp/en/home/operations/accountability/secu-srm/

The description of the process, assignment of roles, expected flow and relationships of the different elements composing the stakeholder engagement and disclosure process for the project is detailed in the specific Stakeholder Engagement Plan established for each sub-project. Likewise, it will be adjusted and detailed at the respective E&S studies to be conducted for each potential sub-project to be appropriate at the local level.

7 SECTION VII – Grievance redress mechanism

The mandate of the Project GRM will be to receive and seek to resolve complaints about actual or potential environmental or social harm to affected person(s) arising from Project. In its accessibility to complainants and in its responses to complaints, the GRM will be gender-responsive, culturally sensitive, non-discriminatory, and inclusive. Complaints related to sexual abuse and exploitation (SEA) will be treated in a survivor-centered manger and ensure referrals for safe and confidential survivor assistance.

The Project GRM will provide:

(i) an accessible, predictable and transparent procedure for receiving and responding to complaints

(ii) direct engagement and dialogue with Complainants to clarify issues and interests and develop mutually acceptable responses

(iii) equitable and rights-compatible resolution of complaints, including contribution to remedy for environmental or social harm demonstrably caused or contributed to by the project[17]

(iv) opportunity for learning from complaints and their resolution, in ways that contribute to improved management of environmental and social risks and ensure alignment with UNDP's Social and Environmental Standards as well as applicable laws, regulations and policies.

Therefore, in the unlikely case that stakeholders need to show their concerns on UNDP E&S compliance the Compliance Review process serves to respond to such situations. Similar to the stakeholder engagement and disclosure process, the assignment of roles, expected flow and relationships of the different elements composing the Grievance Redress Mechanism for the project will be detailed at the respective E&S studies to be conducted for each potential sub-project to be appropriate at the local level and based as a starting point on the Stakeholder Engagement Plan established at the PPG stage for the country (see Annex 9 of the ProDoc).

Each project will establish a specific Grievance Redress Mechanism (GRM) at the start of implementation. A sample of the Terms of Reference is outlined in Annex IX of this document.

Interested stakeholders may raise a grievance at any time to the Project Management Office, the Executing Agency, Implementing Agency (UNDP), or the GEF.

At a local level, due to barriers of language, access to communications, potential issues of discrimination, and perceived issues of safety where protection of the identity of complaints may be required, it is essential to provide a local point of contact for community grievances. This may be a local NGO, trusted community members in various locations, trusted person of authority, community association, or other point of contact agreed through consultations with community members, and particularly with indigenous peoples where included in project activities. It is critical that this point of contact understands the need for community complaints to be anonymous where issues of individual or group safety are perceived, and that the point of contact has direct access to the PMU staff. In the case of a complaint where anonymity is requested, the PMU and any resulting grievance process must respect this condition. Those able to access and communicate with national grievance mechanisms will establish options in the country of implementation, for example, through the Office of the Ombudsman.

The GRM also needs to consider indigenous peoples' customary laws and dispute resolution processes. Traditional dispute mechanisms of affected indigenous peoples should be utilized to the extent possible. While the project aims to use an integrated grievance redress mechanism for all people potentially affected by its interventions, there might be situations where this would result in unequal access for indigenous peoples due to conflicts, power imbalance

[17] Remedy (or contribution to remedy when the risk/impact is not solely the responsibility of the Project) may be provided through prevention, mitigation, and/or compensation, as appropriate.

and cultural and language barriers. In these cases, the project team must consider establishing a stand-alone grievance process for indigenous peoples in cases where an IPP is required. The IPPs will document the proposed structure of the GRM for those indigenous communities affected by the project and the results of consultations on this subject with the indigenous peoples, including their preferences and concerns, so that the chosen approach is appropriate and can be reviewed during monitoring and evaluation.

8 SECTION VIII – Institutional arrangements and capacity building

This section describes the institutional arrangements to implement the ESMF, from the screening of activities, the preparation of their safeguard instruments, and review and clearance of activities through to the monitoring of implementation.

8.1 Execution modality

The multiple structural options ahead define the level and form of UNDP responsibilities affecting also the SES. Below are reflected the expectations under each potential scenario:

- Project implementation under the full NIM modality: UNDP has no role in execution or direct project costs but is fully accountable for project expenditure as the GEF grant will flow through UNDP's accounts. The implementing partner directly engages any responsible parties, handles all procurement and admin support. The Project Management Unit sits within the implementing partner.
- Project implementation under assisted NIM modality: UNDP is accountable for the provision of the services required, and their quality and timeliness.

At the time of writing this document the following are the establishments for implementation of the Child Projects:

Table 8-1 – Execution modality

Country	Execution Modality
Benin	Full NIM
Madagascar	Direct Implementation Modality
Mali	Full NIM
Niger	Full NIM
STP	Supported NIM
Zambia	Full NIM

8.2 Institutional arrangements

The institutional structures involved in each project have been defined in the respective Project Document (Section VII on Governance and Management Arrangements), including their roles, responsibilities of project staff and associated agencies in implementation of project activities.

This ESMF does not cover the roles and responsibilities associated with implementation of the subsequent ESMPs and/or stand-alone management plans.

Project Management Unit:

- Supervise and manage implementation of measures defined in the ESMF;
- Assign specific responsibilities for implementation of the ESMF, including monitoring and community consultations on the draft ESIAs and ESMPs (including IPPs, RAPs or LAPs if needed) to a staff member(s) of the PMU;
- Maintain relevant records associated with management of environmental and social risks, including updated SESPs, assessments and log of grievances together with documentation of management measures implemented;
- Conduct E&S screening and classify their site into E&S risk category;
- Review and approve SES documents prepared by the minigrid developer;
- Monitor E&S performance of minigrid developer through project cycle on sample basis;
- Maintain a project-level grievance redress mechanism to address any project related feedback in a timely and meaningful manner.

- Report to the Project Board on ESMF implementation.

Project Board/Steering Committee:

- Monitor implementation of this ESMF and compliance with national and international regulations, and UNDP SES;
- Decision making for the adoption of necessary measures including full integration of management measures within project Outputs and annual work plans;
- Establish and support Grievance Redress Mechanisms (GRM) to address any grievances;
- Provide strategic guidance to implementation of the Project including oversight for safeguards and the implementation of this ESMF.

UNDP Country Offices:

- Inform all the stakeholders and right-holders involved in, or potentially impacted, positively or negatively, by the project, about the UNDP's corporate Accountability Mechanism;
- Ensure that the Compliance Review and the Stakeholder Response Mechanisms are operational during the lifetime of the project.

Regional PMU:

- Ensure that the required targeted assessments, ESIAs and ESMPs (including IPPs, RAPS or LAPs if needed) are developed, disclosed for public consultation and approved, and management measures are adopted and integrated during project implementation;
- Verify and document that all UNDP SES requirements have been addressed;
- Review and approve all SES documents developed by the national projects;
- Disclose all social and environmental documents produced by the national projects on the AMP public website;
- Contribute to the GRM by following up on complaints received;
- Provide technical guidance on implementation of the ESMF and administrative assistance in recruiting and contracting expert safeguards services (as required) and monitor adherence of each project to the ESMF and UNDP policies and procedures.

Minigrid Developer

- Prepare required assessment (targeted or ESIA) and site-specific ESMP (including IPPs, RAPS or LAPs if needed) as applicable;
- Obtain any E&S permits required by law;
- Implement all measures described in the ESMP;
- Raise awareness and provide training to all project workers on their role in implementing the ESMP;
- Conduct stakeholder engagement and establish a grievance redress mechanism; and
- Submit relevant documents to PMU and keep documents on file for verification by PMU as part of oversight and monitoring.

8.3 Capacity Building

Table 8-2 presents the capacity of the project organizational structure for each country, based on their experience identified at the preparation phase for each country.

Table 8-2 – Capacity of the project implementing partner for each country

Country	Implementer partner	Experience implementing UNDP SES
Benin	Ministry of Energy (ME)	There are no indications of experience implementing the UNDP SES for the implementing partner.

Country	Implementer partner	Experience implementing UNDP SES
Madagascar	UNDP	There are no indications of experience implementing the UNDP SES for the implementing partner.
Mali	Renewable Energy Agency / Agence des Énergies Renouvelables du Mali (AER-Mali)	The implementing partner has some familiarity with UNDP SES, since it was already implementing partner for the following project that run from 2017 to 2022: • PIMS 4903/GEF ID 5819 (GEF-5), Promoting Sustainable Electricity Generation in Malian Rural Areas through Hybrid Technologies: https://www.thegef.org/projects-operations/projects/5819 (UNDP).
Niger	ANPER	There are no indications of experience implementing the UNDP SES for the implementing partner.
STP	Ministério das Infraestruturas e Recursos Naturais (MIRN) Supported NIM (HACT/PCAT is in progress)	There are some indications of experience with UDNP SES in the country and by the implementing partner in various projects including the following: • MIRN: GEF 6 – https://www.thegef.org/projects-operations/projects/9897 (UNIDO) • Ministry of Agriculture, Fisheries and Rural Development: GEF -7: https://www.thegef.org/projects-operations/projects/10570 (UNDP) • MIRN: GEF-5: https://www.thegef.org/projects-operations/projects/5184 (UNDP)
Zambia	Rural Electrification Agency (REA)	According to the World Bank Project Appraisal Document of the Electricity Services Access Project of 2017, REA has an environmental and social unit with some experience in implementing the World Bank's safeguard policies, which are similar to UNDP SES.

To mitigate this risk, recruitment of dedicated individual independent project consultants will improve institutional capacity to implement the ESMF where it is weak and will bring relevant expertise in social and environmental safeguards to support the completion of the studies needed during the project life cycle (i.e. targeted assessment, ESIA, ESMP). Expert support in the area of social and environmental safeguards will be included in the Regional Program's offer to national projects and capacity building support will be provided to Implementing Partners/PMUs on the UNDP SES.

UNDP will provide advice to project teams as needed to support the implementation of this ESMF and the preparation, implementation and monitoring of social and environmental management plans/measures.

Prior to implementation, the project will budget sufficient funds for a suitable qualified individual/team who will support the environmental and social safeguards of project activities. Training on safeguards should include familiarization of potential environmental and social impacts, appropriate mitigation and monitoring actions and compliance requirements.

A detailed assessment for each potential implementation scenario will be conducted to establish the institutional capacity for applying safeguard instruments and complying with UNDP safeguard policies for the duration of the project. These experts will provide an induction session for the Project Management Unit and all relevant project partners, as needed, on safeguards responsibilities and approaches. Thus, training modules would be prepared as required and training would be scheduled as necessary. A capacity study will be conducted for stakeholders identified requiring additional support and formal training on safeguards aspects of the project and (AMP) program as established in the SESP. The appropriate capacity measures will be implemented (i.e. Capacity Assessment, Partner Capacity Assessment Tool, Harmonized Approach to Cash Transfer, Capacity

Management Plan…) to overcome this concern for both duty bearers and right-holders.

As part of the capacity building, stakeholders will receive information and guidance on how to communicate with the project organisation structure about concerns and grievances if they arise, including guidance on when and how to use the stakeholder engagement and grievance mechanisms. Details of this instrument are provided below for both cases.

At the preparation phase, as studied above, it has been identified in most cases that the staff at national level are not familiar with procedures for project preparation and implementation, including procurement of the UNDP safeguards Standards (and in particular, the new released version effective since 1 January 2021). Similarly, there is room for improvement on their enforcement from both, the duty-bearer and right-holder side, to ensure full and effective application of such safeguards. This is considered in the project design and budget as follows:

- Local expertise among the regulatory practitioners in regards to implementing and/or verifying the safeguards compliance to the extend needed to comply with the program requirements is limited. Escalating the knowledge of country administration and exchange of experiences seems necessary for an appropriate performance in respect to securing the safeguards. This is particularly important for implanting monitoring, evaluation and verification mechanisms, including complaints, grievances and redresses. Similarly, in respect to the social aspects specifically, as they tend to be a subset of the environmental analysis and limited to the human environment without real sociological approach, for example to vulnerable groups or gender. This scenario accentuates the need to take this capacity shortcoming into account in the project design and budget.
- Similarly, expertise among the right-holders (i.e. local stakeholders, population, private associations, NGOs…) suffer constrains to deploy resources and keep themselves educated to the level the safeguards are implemented by the project. Therefore, sensitization, education and the possibility to be included in the development of the project needs to be contemplated as part of the project design.

The project will hire one IP Expert to conduct the IP screening, guide the country programs' Safeguard Officers, support the country projects in selecting qualified consultants for the IPPs and supervise and quality assure the development and implementation of these IPP. During the development and implementation of the IPPs, the capacity of institutions at different administrative levels (local, regional, and national) that are involved in the management and monitoring of the IPP will be reviewed during IPP development and in the context of the regular project supervision missions to identify gaps against what the IPP requests from them. Additional capacity-building and technical assistance activities will be mobilised where necessary to properly implement the IPPs and monitor short- and long-term impacts.

9 SECTION IX – Monitoring and evaluation arrangements

The subsequent ESMP of each Child Project (per the procedures above) will establish the specific tailored indicators for each sub-project. The collection of data through the M&E will control the performance of the project for each risk identified in the SESP.

Monitoring should be conducted by an individual, firm, or community organization not directly affiliated with the project organization structure. These will fall into the M&E requirements established at the Project Document level. See Section X, Table 7 for further details.

Regarding co-financing activities (as defined in Section 0), once the co-financing activities start, risks will be monitored and results achieved through co-financed activities will be monitored and reported in the annual GEF Project Implementation Report (PIR), the independent mid-term review and the independent terminal evaluation.

10 SECTION X – Action Plan and Budget for ESMF implementation

The implementation of the measures established to mitigate each safeguard related risk will be in line with the pace of the activities of each project. See the respective Project Document for further details on the expected timeline

for each project.

E&S budget assessment is typically conducted and disclosed during the project design phase prior to appraisal. However, in this case it will need to be financed through the project budget (hence, during project implementation) at the time when details of the sub-projects are known.

The budget plan will tailor costing and resourcing to ensure sufficient funds and contingencies are available throughout the project on each particular option. The list may include but not limited to:

a. Undertaking an institutional safeguards capacity assessment in each project partner
b. Project staffing and administration (i.e. environmental and social safeguard officer[18] in PMU)
c. Training sessions and capacity building on safeguard issues
d. Undertaking social and environmental assessments (ESMF/ESMP/SESA/ESIA…) including baseline surveys, field visits, consultant fees, development consent fees, application fees, technical input, designing, implementing, monitoring, etc for each subproject
e. Conducting community consultation sessions and dissemination of public information (radio, newspapers, etc)
f. Technical design of subproject/s to meet specific standards
g. Environmental permits for compliance under the national/local legal framework
h. Costs of stakeholder engagement, information disclosure, managing GRM and dispute resolution

The cost of each item listed above varies from sub-project to sub-project and will be estimated by the Project Manager as they are defined along the project cycle. The accuracy of these cost estimates is important and should be reviewed by appropriate persons (Project Steering Committee), so as to avoid duplicate costs or unnecessary expenses.

A preliminary cost analysis for developing all E&S needed by an expert is outlined in the annexes of the ProDoc, and a detailed breakdown for the M&E tasks is shown below. In addition, fees payable to national/sub-national authorities for the submission and approval of the environmental and social studies will need to be taken into account too. These typically vary depending on various factors. Costs associated with the time of Project Management Unit Staff coordinating the implementation of this ESMF or UNDP support are not considered.

[18] Social and Environmental Safeguards Officer – Terms of Reference for specific tasks are established at the ProDoc Annex 8.

Table 10-1 – ESMF action plan

Monitoring Activity & Relevant Projects	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities	Cost
Track progress of ESMF implementation	M&E and reporting of ESMF implementation, with key results and issues presented to the Project Board on a regular basis	Quarterly, first year only	ESMF requirements are completed for this project	Project Manager and Social and Environment Safeguards Officer (SESO)	None
Development of assessments report(s), and management plan(s) (IPP if applicable, ESMP, ESIA…)	Carried out in a participatory manner, targeted analysis of potential impacts, as well as identification and validation of management measures, drafted in participatory manner.	In the 6 months following the Inception workshop (if possible)	Potential impacts are assessed with support of external consultants and participation of project team and stakeholders; targeted assessment report completed; an Indigenous Peoples Plan and, as determined by the targeted assessments, other management plans will be developed; management actions will be identified and incorporated into project implementation strategies.	International and national consultants (environmental and social) Project Manager and SESO with guidance from UNDP	TBD, depending on the scope and nature of the sub-project (i.e. number of pilots)
Implementation of management measures and M&E of potential impacts identified in assessments, in line with the subsequent management plans.	Permanent and participatory implementation and M&E of management measures, in accordance with findings of targeted assessments.	Annual, pre-PIR and then pre-MTR and pre-TE	Implementation of stand-alone management plans; participatory M&E; integration of management plans into project implementation strategies	Project Manager, Social and Environment Safeguards, oversight by UNDP CO, PB	TBD, based on the result of assessment
Integration of Learning	Knowledge, good practices and lessons learned regarding social and environmental risk management will be captured regularly, as well as actively sourced from other projects and partners and integrated back into the project, including updating management plans and training the PMU.	Annual	Relevant lessons are captured by the project teams and used to inform management decisions, and compared against the SESP and ESMP.	Project Manager and SESO	None
Annual project quality assurance	The quality of the project will be assessed against UNDP's quality standards to identify project	Annual	Areas of strength and weakness will be reviewed and used to inform decisions to improve project	UNDP CO, UNDP-GEF RTA, Project Manager and Project SESO	None

Monitoring Activity & Relevant Projects	Description	Frequency / Timeframe	Expected Action	Roles and Responsibilities	Cost
	strengths and weaknesses and to inform management decision making to improve the project		performance, including adjustments to management plans and activities.		
Review and make course corrections	Internal review of data and evidence from all monitoring actions to inform decision making	Annual	Performance data, risks, lessons and quality will be discussed by the project steering committee and used to make course corrections	Project and/or Program Steering Committees (considering stakeholders' opinions)	None
Annual project implementation reports	As part of progress report to be presented to the Project Steering Committee and key stakeholders, analysis, updating and recommendations for risk management will be included	Annual	Updates on progress of ESMF and/or ESMP will be reported in the project's annual PIRs. A summary of the avoidance and mitigation of potential social and environmental impacts will be included in the program annual report, sharing best practices and lessons learned across the program.	UNDP CO, UNDP-GEF RTA and Project Manager	None
Project review	The Project Steering Committee will consider updated analysis of risks and recommended risk mitigation measures at all meetings	Annual	Any risks and/ or impacts that are not adequately addressed by national mechanisms or project team will be discussed in project steering committee. Recommendations will be made, discussed and agreed upon.	Program Steering Committees, UNDP-GEF RTA, Project Manager, SESO	None

Funding for implementation of the ESMF is included in the individual project budget. The estimated costs are indicated in Table 10-2 below. Costs associated with the time of PMU Staff coordinating the implementation of this ESMF are not shown. Further details are found in the budgets of the respective Project Document.

Table 10-2: Estimated budget for ESMF implementation per country in US Dollars

Item	Benin	Madagascar	Mali	Niger	STP	Zambia	Total
Oversight activities (e.g. potential oversight missions) and monitoring							
Safeguards/Gender Specialist	USD 27,000		USD 30,000	USD 30,000	USD 32,000	USD 30,000	USD 149,000
Contracted services for scoped ESIAs, targeted assessments and site-specific ESMPs	USD 20,000		USD 50,000	USD 50,000	USD 50,000	USD 50,000	USD 220,000
Travel expenses for consultations	USD 5,000		USD 5,000	USD 5,000	USD 5,000	USD 5,000	USD 25,000
SES capacity building/training expenses	USD 10,000		USD 10,000	USD 10,000	USD 10,000	USD 10,000	USD 50,000
Community engagement	USD 26,000		USD 25,000	USD 25,000	USD 50,000	USD 25,000	USD 151,000
Total	**USD 103,000**		**USD 140,000**	**USD 140,000**	**USD 167,000**	**USD 140,000**	**USD 690,000**

11 Annex I – Project Description

11.1 Benin

Component 1. Policy and Regulation

Outcome 1: Stakeholder ownership in a national minigrid delivery model is advanced, and appropriate policies and regulations are adopted to facilitate investment in low-carbon minigrids.

The specific objective of this component is to support the completion of the regulatory framework for off-grid electrification concessions in Benin, and to enable the incumbent authorities to lead the sector and implement the envisioned minigrid delivery model. Ownership is strengthened by inviting relevant stakeholders from public and private sector and civil society to become part of a national dialogue to maximize social and economic impact. The application of UNDP's Derisking Renewable Energy Investment (DREI) framework will support policy design to promote investment in RE-based minigrids. Complementary to baseline initiatives (e.g. funded through the MCA-II Benin), the GEF Project will provide support for developing specific technical, legal, social, and environmental aspects of minigrid planning and implementation. The results of the DREI exercise in Benin will be shared with the AMP Regional Project and participating countries.

Component 2. Business Model Innovation with Private Sector

Outcome 2: Innovative business models based on cost reduction are operationalized, with strengthened private sector participation in low-carbon/renewable energy minigrid development.

Against the backdrop of a growing portfolio of private minigrid concessions aided by bilateral and multilateral investment funds , this component pursues the objective to integrate various aspects of the minigrid business model, including: (i) overall quality assurance of all stages of the concession process; (ii) adequacy of technical standards and performance benchmarks; (iii) optimized system sizing to achieve cost reductions; and (iv) community's capacity to effectively support private and publicly funded and/or owned minigrids.

Component 3. Scaled-up Financing

Outcome 3: Financial sector actors are ready to invest in a pipeline of low-carbon minigrids and concessional financial mechanisms are in place to incentivize scaled-up investment

Long-term concessions are foreseen in the Electricity Law as the framework allowing minigrid operators to generate, distribute, and commercialize electricity within a defined geographic perimeter (EL, Art. XXX). Given the low income level of most of Benin's rural population, end-user tariffs will not enable minigrid operators to fully recover operational costs. Operators applying for a concession shall propose a competitive tariff level. The GOB, through the incumbent authority, will provide a subsidy to the Concessionaire enabling full cost recovery plus a profit margin, to be calculated according to an established methodology and a positive advice by the regulator ARE (as per Electricity Law Art. XXX).

This specific objective of this component is to contribute to the development of financial mechanisms to sustain capital flows towards RE-based minigrids in Benin and foster investors' appetite in this sector. As public budgets are heavily constrained as the country largely depends on concessional funding from its development partners for investment and recurrent expenditures, there is substantial perceived risk that GOB will could default on its commitment to subsidize electricity tariffs in the medium and long term. This (counterpart) risk deters private parties from investing in minigrid infrastructure, unless additional guarantees can be offered. To this purpose, the Project will closely engage with Benin's development partners push forward this agenda ("chantier") to design and implement a long-term financial instrument to this purpose. Given the similarity of the challenge for most of the countries participating in the AMP, the Project will seek opportunities to address the finance barrier within the larger context of the minigrid market in Africa.

Component 4. Digital, Knowledge Management and Monitoring & Evaluation

Outcome 4: Digitalization and data mainstreamed, across stakeholders, into local minigrid market development. Increased knowledge, awareness and network opportunities in the minigrid market and among stakeholders, including benefitting from linkages to international good practice

The specific objective of this component is to twofold: (i) to enable the Project to monitor the minigrid pilot and share data

and lessons with the AMP Regional Project; (ii) to support the Implementing Partner in its mandate to supervise the off-grid electricity sector, through the adoption of digital systems and skills allowing effective management of sector data, monitoring of minigrid concession contracts, cost and performance benchmarking, maintaining an updated inventory of the status of public minigrid assets. The AMP Regional Project will make available specialized digital tools and solutions for the off-grid and minigrids sector in the participating countries, identify relevant cases, and assess value and social impact.

Digital technologies and solutions are fundamental to enabling off-grid electrification. The viability of minigrids relies strongly on certain digital technologies including remote control and monitoring of minigrid operations and the collection of customers' payments, including the use of digital money. Digital solutions also have offer significant cost-reduction opportunities, thus contributing to the AMP's objectives. Opportunities around digitalization also relate to the analysis of large amounts of data ("big data") from minigrid projects to surface insights enabling learning and optimization.

The AMP Regional Project will develop and implement a digital platform for the aggregation of data shared by the national child projects. This platform will use common data protocols and standardized approaches for data analysis and for monitoring of the minigrid projects.

Component 5. Monitoring and Evaluation (M&E)

Outcome 5. Ensuring compliance with all mandatory monitoring and reporting requirements of the GEF

90.91. This outcome will assist the Implementing Partner in establishing project oversight and monitoring systems, including the Project's Environmental and Social Management Framework (ESMF) and resulting Management Plans, the Gender Action Plan (GAP), the Mid-Term Review (MTR) and the GEF Terminal Evaluation (TE) of the Project. The Project's M&E Plan is built upon experiences during project preparation with a view on mitigating implementation and fiduciary risks.

11.2 Madagascar

Component 1. Policy and Regulation

Outcome 1: The Ministry of Energy and Hydrocarbons has adequate capacity to bridge the energy access gap

This component aims to ensure that Madagascar's policy and regulatory environment enable and support the shift to comprehensive solar off-grid electrification solutions. As Madagascar adopted a new legal framework for the electricity sector in which new provisions have been integrated, a central aspect of this component and the project at large is to support the dissemination of this new Decree 2021-326 (2021) to local private operators and investors, in particular the directives that contribute to the simplification of licensing and approving off-grid electrification facilities. The project will notably support ADER and project developers in general in the roll-out of the new declaration procedure. A key theme for AMP is mini-grid cost-reduction across financing costs, hardware costs, soft costs, and innovative business models. With lower costs mini-grids will be more financially viable, commercial capital flows will increase, and end-users will benefit from lower tariffs and expanded service. The Derisking Renewable Energy Investment (DREI) framework will be applied in AMP National projects to support policymakers in selecting public instruments to promote private investment in Solar PV Battery Mini-grids. In Madagascar, upon early observation DREI risks that may be explored further in during project implementation include Energy Market Risk, Financing Risk and Sovereign Risk . Overall, the project seeks to encourage a more streamlined approach to establish solar off-grid electrification ventures, thereby reducing any policy barriers and widening the possibility for more actors to provide renewable energy services and scale-up.

Component 2. Business Model Innovation with Private Sector

Outcome 2: Innovative business models based on cost reduction and value addition are implemented, with enhanced private sector participation in the progressive and integrated development of low-carbon mini-grids.

This component will target deploying of a holistic off-grid approach of several solar technologies, where the mini-grid is 100% solar-battery (greenfield) with productive uses in the southwest region of Madagascar. The pilot(s) will benefit from 2 in-depths studies conducted at project initiation (Study 1: Affordability to pay for modern electricity and Study 2: an assessment of village level for improved capacity to select sites suitable for high-value PUE intervention) in component 1. The pilots will aim at developing, implementing, operating, and monitor at least 2 projects in the region. The ESP(s) project partner(s) will be selected following ADERs established procedures and, through this pilot programme, will become project

partners to carry out the implementation of solar villages that include PV mini-grid(s) and scattered solar end-users. The pilot project seeks to engage the private sector under a scheme that is compatible with the new delivery model in Madagascar and UNDP rules.

Component 3. Scaled-up Financing

Outcome 3: Financial sector players are aware of the investment potential and financing needs of off-grid solar projects, including low-carbon mini-grids, to encourage large-scale investments.

The AMP project will closely study the business plans of the operators so that the Partnership Agreements in component 2 will have a tangible impact on the sustainability of the electricity services, the increase in access to electricity for the population, the improvement of their living conditions, the preservation of the environment and the economic development of the area. The project will provide awareness to the national financial sector on business and financing models for an off-grid holistic approach that integrates electrification services.

Component 4. Digital, Knowledge Management and Monitoring & Evaluation

Outcome 4: Digitization and data collection are encouraged among stakeholders in local mini-grid market development. Improved knowledge, awareness and networking opportunities in the off-grid solar market and among stakeholders including local communities.

A quality assurance and monitoring framework to measure, report and verify the sustainability impacts of all supported off-grid / mini-grid pilot projects, including GHG emission reductions, will be adopted and implemented based on the regional project guidelines. The performance of the mini-grids will be monitored using simplified technical, economic and business KPIs. Edge computing applications can ensure the efficient collection, process and 61nstitutional of data, in order to 61nstitut CAPEX and OPEX requirements of solar off grid service areas and facilitate the M&E of the programmes. An evaluation of the results and impacts of the project will be carried out at mid-term and at its completion. Lessons learned will be capitalized and shared with the regional project based on guidelines that will be defined by the regional project and shared at the project inception workshop. Capacity building will be provided to the Project Management Unit (PMU) staff to compile lessons learned and share knowledge effectively.

11.3 Mali

Component 1. Policy and Regulation

Outcome 1: Stakeholder ownership in a national minigrid delivery model is advanced, and appropriate policies and regulations are adopted to facilitate investment in low-carbon minigrids.

In Mali, a national minigrid delivery model has not yet been clearly determined and adopted. The need for a national delivery model with stakeholder ownership is crucial to support the market development with private sector involvement and investment in order to increase the viability and sustainability of renewable energy minigrids.

The entire electricity legal and regulatory framework is under revision in Mali with World Bank's support. This should include reallocating some roles & responsibilities at institutional level. Some reflections around the national delivery model for minigrids will be initiated but won't necessarily lead to a clear delivery model yet according to stakeholder consultations. Reflections include income generating activities to be at the very heart of the model for a viable and sustainable system. In terms of technology, hybrid (with thermal as backup power source) and 100% RE would be considered. All technologies should be accepted as soon as they are profitable and reliable.

A DREI analysis is currently ongoing and to be completed by end of September 2022. It will determine which de-risking instruments to be supported by the GoM to facilitate the uptake of green minigrids in Mali.

Component 2. Business Model Innovation with Private Sector

Outcome 2: Innovative business models based on cost reduction are operationalized, with strengthened private sector participation in low-carbon/renewable energy minigrid development.

Given Mali's electricity, and specifically minigrids' situation, policy and regulatory framework, and without a clear national delivery model, the project aims at enabling the proof of concept of green minigrids with private sector engagement in rural

areas. Thanks to innovative business models of demonstration pilots, rural communities will gain access to available, reliable, affordable and clean electricity. Lessons learned in Mali and in other countries especially LDCs, have highlighted that a minigrid can only become profitable and sustainable when applying cost-reduction levers, in particular based on productive uses of energy.

Minigrid productive customers , be it commercial (for-profit) or social (health centers, schools), are energy intensive during the day (or up to 24/7 such as telecom towers) and represent a relatively stable and significant electricity demand source. The project will support the identification of relevant energy intensive value chains in rural areas across the country.

Component 3. Scaled-up Financing

Outcome 3: Financial sector actors are ready to invest in a pipeline of low-carbon minigrids and concessional financial mechanisms are in place to incentivize scaled-up investment

Access to low-cost, commercial capital (equity and debt), for both supply and demand, ideally in local currency, is key to reducing the cost of minigrids, and the scalability and sustainability of a minigrid market. In Mali, there are only few financing schemes in place around minigrids. Thus, developing and scaling-up the GMG market in Mali requires suitable financing mechanisms both on supply and demand sides.

Component 4. Digital and Knowledge Management

Outcome 4: Digitalization and data mainstreamed, across stakeholders, into local minigrid market development. Increased knowledge, awareness and network opportunities in the minigrid market and among stakeholders, including benefitting from linkages to international good practice

Component 5. Monitoring and Evaluation (M&E)

Outcome 5. Ensuring compliance with all mandatory monitoring and reporting requirements of the GEF

11.4 Niger

Component 1. Policy and Regulation

Outcome 1: Stakeholder ownership in a national minigrid delivery model is advanced, and appropriate policies and regulations are adopted to facilitate investment in low-carbon minigrids.

As stated in the baseline, Niger is a relatively early-stage market for low-carbon minigrids. While 14 such minigrids have been installed across the country under the supervision of ANPER, a clear national minigrid delivery model has not yet been clearly determined and adopted. The PERAN decree has broadly described different financing options but missing some concrete delivery and business models attached. A variety of models are applied on the ground from ownership to tariffs, to financing, etc. The need for a national delivery model with stakeholder ownership is crucial to support the development of the market especially with private sector involvement and investment.

The existing policy and regulatory framework for electricity in general and miningrids in particular is in place but still needs to be adapted, finetuned and adopted on the ground. The SNAE and PDAE supported a relatively accurate GIS and techno-economic modelling electrification analysis across the country (including rural areas) leading to identifying the most suitable option for every locality across Niger : grid expansion (NIGELEC), minigrids or individual kits (see baseline above). The PDAE for 2021-2025 aims at enabling about 6,000 localities to have access to modern energy services out of which 300 minigrids. A DREI analysis is about to be finalized in June 2022 to determine the de-risking instruments to be supported by the GoN to facilitate the uptake of the low-carbon minigrids in Niger.

Component 2. Business Model Innovation with Private Sector

Outcome 2: Innovative business models based on cost reduction are operationalized, with strengthened private sector participation in low-carbon/renewable energy minigrid development

Given Niger's electricity, and specifically minigrids', situation, policy and regulatory framework, and being an early-stage minigrid market, the project aims at enabling the proof of concept of minigrids with private sector engagement in rural areas.

Thanks to innovative business models of demonstration pilots, rural communities will gain access to reliable, affordable and clean electricity. Lessons learned in Niger (with the support of a study conducted by Power Africa with ANPER) and in other countries have highlighted, especially in LDCs, that a minigrid can only become profitable and sustainable when based on:

- productive use
- and cost-reduction.

Such players, be it commercial (for-profit) or social (health centers, schools), are energy intensive during the day (or up to 24/7 such) where the sun is largely available and represent a relatively stable and significant electricity demand source. The project will support the identification of relevant energy intensive value chains in rural areas across the country (Output 2.2). In terms of cost-reduction efforts, 3 levers are available:

- Sector levers – related to legal requirements (e.g. legal registration, importation license, tarrif approvals, environmental impact assessment, land usage rights, village level MOU) and mainly covered in Component 1
- Supply levers - related to the site preparation costs (e.g. site visits, community engagement, transports and logistics), CAPEX (e.g. civil works, electricity generation and storage equipment, distribution infrastructure, metering and monitoring equipment, VAT and duties) and OPEX (recurring infrastructure expenses, salaries and other HR related costs, O&M costs)
- Demand levers – related to customer uptake and demand stimulation (incl. flexible tariff regimes)

Component 3. Scaled-up Financing

Outcome 3: Financial sector actors are ready to invest in a pipeline of low-carbon minigrids and concessional financial mechanisms are in place to incentivize scaled-up investment

Access to low-cost, commercial capital (equity and debt), for both supply and demand, ideally in local currency, is key to reducing the cost of minigrids, and the scalability and sustainability of a minigrid market. Being an early stage minigrid market, there are only few financing schemes in place around minigrids in Niger. Thus, developing and scaling-up the CEMG market in Niger requires suitable financing mechanisms both on supply and demand sides.

Component 4. Digital, Knowledge Management and Monitoring & Evaluation

Outcome 4: Digitalization and data mainstreamed, across stakeholders, into local minigrid market development. Increased knowledge, awareness and network opportunities in the minigrid market and among stakeholders, including benefitting from linkages to international good practice

Component 5. Monitoring and Evaluation (M&E)

Outcome 5. Ensuring compliance with all mandatory monitoring and reporting requirements of the GEF

11.5 São Tomé and Príncipe

Component 1. Policy and Regulation

Outcome 1: Stakeholder ownership in a national minigrid delivery model is advanced, and appropriate policies and regulations are adopted to facilitate investment in low-carbon minigrids.

Component 2. Business Model Innovation with Private Sector

Outcome 2: Innovative business models based on cost reduction are operationalized, with strengthened private sector participation in low-carbon/renewable energy minigrid development

Component 3. Scaled-up Financing

Outcome 3: Financial sector actors are ready to invest in a pipeline of low-carbon minigrids and concessional financial mechanisms are in place to incentivize scaled-up investment

Component 4. Digital, Knowledge Management and Monitoring & Evaluation

Outcome 4: Digitalization and data mainstreamed, across stakeholders, into local minigrid market development. Increased knowledge, awareness and network opportunities in the minigrid market and among stakeholders, including benefitting from linkages to international good practice

Component 5. Monitoring and Evaluation (M&E)

Outcome 5. Ensuring compliance with all mandatory monitoring and reporting requirements of the GEF

11.6 Zambia

Component 1. Policy and Regulation

Outcome 1: Stakeholder ownership in a national minigrid delivery model is advanced, appropriate policies and regulations are adopted to facilitate investment in low-carbon minigrids.

The outputs of this component include an inclusive national dialogue to identify minigrid delivery models is facilitated, clarifying priority interventions for an integrated approach to off-grid electrification and minigrid DREI techno-economic analyses carried out to propose most cost- effective basket of policy and financial derisking instruments.

Component 2. Component 2 Business model innovation with private sector

Outcome 2. Innovative business models based on cost reduction are operationalized, with strengthened private sector participation in low-carbon minigrid development

The second component aims to demonstrate innovative business models, based on cost reduction, that can encourage private sector participation in RE minigrid development in the country. For Zambia, the focus under this component will be on using the wealth of experience from within the country, combined with the knowledge resources available from the regional project, to enhance feasibility and business model innovation. The project will also leverage the practical experience gained by minigrid developments in the country to help streamline development processes from conceptualization to commissioning, aiming to reduce the time and costs associated with the minigrid identification, design and implementation. In this respect, pilot beneficiaries (e.g., minigrid operators) receiving support from the project will be required to share minigrid performance data with the national project.

Component 3. Scaled-up Financing

Outcome 3. Financial sector actors are ready to invest in a pipeline of low-carbon minigrids and concessional financial mechanisms are in place to incentivize scaled-up investment.

This component will study and make recommendation 64nstitutionalizing (and securing) a 'minigrid funding window' in REA/REF that would be replenishment through the REF revenue of percentage on electricity sales, the REF revenue of percentage on electricity sales, regular budget funding (from Ministry of Finance) and multilateral and bilateral source of finance. The funding would make available grant support to (private) minigrid developers (e.g., in solicited proposals in grant-support tender process, or for unsolicited proposals) for the purchase of MG equipment and selected productive use equipment. A gap analysis will be undertaken to identify the opportunities and challenges associated with different funding mechanisms. Government stakeholders (in particular REA, MoF and DoE staff) will be engaged to ascertain the appetite for

the different funding institutional setup and mechanisms proposed.

This project will also seek to enhance the capacity of local financial institutions to scale up their participation in financing models for minigrids and scale up their ability to finance productive uses or other innovative financing solutions for minigrid developers to adopt and leverage, leading to cost reductions. Local and international private sector players will be engaged to determine what they see to be the key financial barriers for and how these can be addressed by possible financing mechanisms will be proposed, while training will be provided in workshops, dialogues and conferences will be conducted with representatives from financial institutions as well as beneficiaries (MG developers, NGOs, rural businesses) to create awareness of the opportunities that exist with lending to for MG and linked PUE.

Component 4. Digital, Knowledge Management and Monitoring & Evaluation

Outcome 4. Digitalization and data mainstreamed, across stakeholders, into local minigrid market development. Increased knowledge, awareness and network opportunities in the minigrid market and among stakeholders, including benefitting from linkages to international good practice

The experience and results of the ZMG Project will feed the AMP Regional Project for onward sharing with other participating countries. There will also be opportunities for these results to be shared directly with other countries through corresponding knowledge management activities built into each child project. This will serve better integration between national projects. Integration will also be enhanced through the programmatic approach proposed for national project design around the three core thematic areas mentioned above. This fourth component has therefore been structured to link into the knowledge resource of the regional project, both to access available resources and support and to contribute to the knowledge sharing. The expectation is that lessons learned, at national and regional level, will enable scaling up of rural electrification using RE minigrids, both within the country and in the region. Towards this objective, information will be collated and shared to be available to serve as knowledge resource to both public and private sector players.

Component 5. Monitoring and Evaluation (M&E)

Outcome 5. Ensuring compliance with all mandatory monitoring and reporting requirements of the GEF

12 Annex II – Draft SES Screening Checklist for Minigrid Development

[NOTE: this checklist will be adapted based on learning through application and may be tailored to also address national/local screening requirements]

A. Project Background

1	**Name of Developer and Minigrid**	
2	**Location of Minigrid**	
3	**Objectives of the minigrid**	
4	**Brief description of minigrid (capacity, facilities, area, include photos and map)**	
5	**Minigrid beneficiaries and affected people**	

B. Environmental and Social Screening

No.	*Question / Potential Risk*	*Yes / No*	*If Yes, please fill out as indicated below*		*Description (If Yes or No, please elaborate, noting also any national or local requirements that may apply to address this risk, e.g. EIA)*
			Impact and Likelihood (1-5)	*Significance (Low, Moderate, Substantial, High)*	
	Would **construction and/or operation** of the minigrid potentially involve or lead to				
	Human Rights				
1	adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalized groups?				
2	inequitable or discriminatory impacts on affected populations, particularly people living in poverty or marginalized or excluded individuals or groups, including persons with disabilities?				
	Gender Equality and Women's Empowerment				
3	reproducing discriminations against women based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?				
	Accountability				
4	exclusion of any potentially affected stakeholders, in particular marginalized groups and excluded individuals (including persons with disabilities), from fully participating in decisions that may affect them?				
5	grievances or objections from potentially affected stakeholders?				
	Project-Level Standards				

No.	*Question / Potential Risk*	*Yes / No*	*If Yes, please fill out as indicated below*		*Description (If Yes or No, please elaborate, noting also any national or local requirements that may apply to address this risk, e.g. EIA)*
			Impact and Likelihood (1-5)	*Significance (Low, Moderate, Substantial, High)*	
6	**Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management**				
7	adverse impacts to habitats (e.g. modified, natural, and critical habitats) and/or ecosystems and ecosystem services?				
8	activities within or adjacent to critical habitats and/or environmentally sensitive areas, including (but not limited to) legally protected areas (e.g. nature reserve, national park), areas proposed for protection, or recognized as such by authoritative sources and/or indigenous peoples or local communities?				
9	changes to the use of lands and resources that may have adverse impacts on habitats, ecosystems, and/or livelihoods?				
10	risks to endangered species (e.g. reduction, encroachment on habitat)?				
11	adverse impacts on soils?				
	Standard 2: Climate Change and Disaster Risks				
12	areas subject to hazards such as earthquakes, floods, landslides, severe winds, storm surges, tsunami or volcanic eruptions?				
13	outputs sensitive or vulnerable to potential impacts of climate change or disasters?				
	Standard 3: Community Health, Safety and Security				
14	air pollution, noise, vibration, traffic, injuries, physical hazards, poor surface water quality due to runoff, erosion, sanitation?				
15	harm or losses due to failure of structural elements of the project (e.g. collapse of buildings or infrastructure)?				
16	influx of project workers to project areas?				
17	engagement of security personnel to protect facilities and property or to support project activities?				
	Standard 4: Cultural Heritage				
18	activities adjacent to or within a Cultural Heritage site?				
19	If above is Yes, could the activities lead to adverse impacts to sites, structures, or objects with historical, cultural, artistic, traditional or religious value?				
	Standard 5: Displacement and Resettlement				
20	temporary or permanent and full or partial physical displacement (including people without legally recognizable claims to land) due to land acquisition needed for the minigrid?				

No.	*Question / Potential Risk*	*Yes / No*	*If Yes, please fill out as indicated below*		*Description (If Yes or No, please elaborate, noting also any national or local requirements that may apply to address this risk, e.g. EIA)*
			Impact and Likelihood (1-5)	*Significance (Low, Moderate, Substantial, High)*	
21	economic displacement (e.g. loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation) due to land acquisition needed for the minigrid?				
22	impacts on or changes to land tenure arrangements and/or community based property rights/customary rights to land, territories and/or resources due to land acquisition needed for the minigrid?				
	Standard 6: Indigenous Peoples (refer to Annex III for guidance)				
23	activities located on lands and territories claimed by indigenous peoples?				
24	If above is yes, could these activities have impacts (positive or negative) on the human rights, lands, natural resources, territories, and livelihoods of indigenous peoples (regardless of whether indigenous peoples possess the legal titles to such areas, whether the project is located within or outside of the lands and territories inhabited by the affected peoples, or whether the indigenous peoples are recognized as indigenous peoples by the country in question)?				
25	68Could these activities lead to forced eviction or the whole or partial physical or economic displacement of indigenous peoples, including through access restrictions to lands, territories, and resources?				
26	Could the activities impact the Cultural Heritage of indigenous peoples (for example through construction and excavation activities during installation of the mingrid)?				
	Standard 7: Labour and Working Conditions				
27	working conditions that do not meet national labour laws and international commitments?				
28	working conditions that may deny freedom of association and collective bargaining?				
29	use of child labour or forced labour?				
30	discriminatory working conditions and/or lack of equal opportunity?				
31	occupational health and safety risks due to physical, chemical, biological and psychosocial hazards (including violence and harassment) throughout the project life-cycle?				
	Standard 8: Pollution Prevention and Resource Efficiency				
32	the release of pollutants to the environment (for example during construction or excavation works)?				

No.	*Question / Potential Risk*	*Yes / No*	*If Yes, please fill out as indicated below*		*Description (If Yes or No, please elaborate, noting also any national or local requirements that may apply to address this risk, e.g. EIA)*
			Impact and Likelihood (1-5)	*Significance (Low, Moderate, Substantial, High)*	
33	the generation of waste (both hazardous and non-hazardous) including batteries and solar panels during their end of life?				
34	the release and/or use of hazardous materials and/or chemicals, especially those subject to international bans or phase-outs? *For example, DDT, PCBs and other chemicals listed in international conventions such as the Montreal Protocol, Minamata Convention, Basel Convention, Rotterdam Convention, Stockholm Convention*				

Estimating the Level of Significance:

To estimate the level of **significance** of the potential social and environmental risk, screeners estimate both the potential **impact** (e.g. consequences if the risk were to occur) and **likelihood** (e.g. the chance of the risk occurring) for each identified risk. Screeners rate both impact and likelihood on a scale of 1 (low) to 5 (high) for each identified risk. See the tables below for guidance on these ratings.

Rating the 'Impact' of a Risk

Score	*Rating*	*Social and environmental impacts*
5	Extreme	Significant adverse impacts on human populations and/or environment. Adverse impacts of large-scale magnitude and/or spatial extent (e.g. large geographic area, large number of people, transboundary impacts, cumulative impacts) and duration (e.g. long-term, permanent and/or irreversible); areas adversely impacted include areas of high value and sensitivity (e.g. valuable ecosystems, critical habitats); adverse impacts to rights, lands, resources and territories of indigenous peoples; involve significant levels of displacement or resettlement; generates significant quantities of greenhouse gas emissions; impacts may give rise to significant social conflict
4	Extensive	Adverse impacts on people and/or environment of considerable magnitude, spatial extent and duration, but more limited than Extreme (e.g. more predictable, mostly temporary, reversible). *Impacts of projects that may affect the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples are to be considered at a minimum potentially Extensive*
3	Intermediate	Impacts of medium magnitude, limited in scale (site-specific) and duration (temporary), can be avoided, managed and/or mitigated with relatively uncomplicated accepted measures
2	Minor	Very minor impacts in terms of severity and magnitude (e.g. small affected area, very low number of people affected) and duration (short), may be easily avoided, managed, mitigated
1	Negligible	Negligible or no adverse impacts on communities, individuals, and/or environment

Rating the 'Likelihood' of a Risk	**Determining 'Significance' of Risk**

Score	*Rating*
5	Expected
4	Very likely
3	Moderately likely
2	Low likelihood
1	Not likely

Impact						
	5	*M*	*S*	*S*	*H*	*H*
	4	*L*	*M*	*S*	*S*	*H*
	3	*L*	*M*	*M*	*M*	*S*
	2	*L*	*L*	*L*	*M*	*M*
	1	*L*	*L*	*L*	*L*	*L*
		1	***2***	***3***	***4***	***5***
		Likelihood				
Low, Moderate, Substantial, High						

Determining the Risk Category of the Minigrid

Project categorization is determined by the highest level of significance of identified risks across all potential risk areas. For example, if some risks are identified as having "Low" or "Moderate" significance and only one as "Substantial" significance, then the overall risk categorization of the project would be "Substantial". Note that the AMP project overall is categorized as Substantial Risk so any activities that are identified to be High Risk should be excluded from the project.

13 Annex III- Guidance on Screening for Indigenous Peoples

Following the staged approach outlined above, question 23 of the Screening Checklist guide the screener to determine whether indigenous people are present or are attached to proposed intervention areas. These are key threshold questions that need to be addressed carefully by a qualified expert.

Would the intervention potentially affect:
1 an area where indigenous peoples are present (including the area of influence)?
This question highlights the importance of correctly identifying a potentially affected group as indigenous. This approach is designed to avoid, reduce or mitigate potential risks and impacts on potentially vulnerable communities, enhance opportunities for inclusiveness in project benefits and provide potentially significantly affected indigenous peoples with decision-making powers through the FPIC Process. "Area" and "area of influence" refer to geographic areas potentially affected by a proposed intervention. "Presence" in an area includes actual occupation, whether permanent or temporal and ancestral territories. The engagement of indigenous peoples experts in the initial screening is critical to understanding which group meets the characteristics commonly associated with indigenous peoples, explicit knowledge of the geography of the location and the presence of indigenous peoples in this area and an ability to identify based on an assessment of activities and potential impacts on the area of influence, including associated facilities (components not funded as part of the project but whose viability and existence depend on the project) and potential cumulative impacts (including unplanned but predictable developments or activities caused by the project). Some questions to consider are: • Are people in the subproject area of influence identifying themselves as indigenous? • Are the group and/or their rights recognized in the constitution, legislation, and laws? • What is the general situation of the group compared to the mainstream dominant society? • Do the people have distinct customs and norms (e.g. practices, language, internal laws)? • Do they have their traditional governance systems? • Does the group appear to have a distinct relationship to the lands and resources they inhabit (e.g. related to their traditional livelihoods or spiritual beliefs)? • How long have they been using or occupying those lands, and are they using or occupying them for reasons of resettlement and/or displacement? • Do group(s) that have lost access to lands, territories or resources because of forced severance, conflict, government resettlement, dispossession, natural disasters, or incorporation of lands into urban areas still maintain collective attachment to those lands, territories and/or resources, regardless of their present physical location? • Were they present on their lands before colonization? • Is the group distinctly reflected in a census or other sociological data? • Are there indications that the concerned people are unaware of the rights attached to the designation as indigenous peoples or that they may fear the implications of calling themselves indigenous peoples? At times questions may arise as to whether *other* individuals or groups are also part of an identified indigenous collective or constitute another indigenous people or collective entirely (e.g. a relocated but long-standing local farming community). These are, however, separate questions. Given the facts and circumstances, each collective must be considered on its merit. Once a collective is determined to be indigenous peoples, the extent of that collective – that is, the scope of its membership – is an internal question that the people in question can only answer. This distinction is necessary when the question arises regarding who must effectively and meaningfully participate in all project phases. The identification of indigenous peoples can be facilitated through consultations and gathering of information from, among others: project-affected people; relevant state entities; official registrations; qualified independent experts (e.g. academics, historians, anthropologists, civil society actors, sociologists); and the treatment of the same collectives by international organizations, tribunals, financial institutions, commissions and bodies.
2 activities located on lands and territories claimed by indigenous peoples?
Screeners need to examine whether the project location and area of influence encompasses lands, territories, and resources already titled, occupied, used or otherwise claimed by indigenous peoples. It is critical to recall that indigenous peoples' rights to their ancestral lands, resources and territories are a *collective right* arising from their customary laws, not from the existence of a title or other property interest recognized and issued by the State. Also, it is essential to note that delimitation on a map may not always reflect demarcations on the ground or the full extent of traditional lands and territories (and the natural resources therein) claimed by the affected peoples. Occupation, use or titling by non-indigenous peoples does not invalidate a claim by indigenous peoples. "Claim" should be interpreted to include legal

petitions before judicial or administrative bodies following the law and denunciations and requests before one or more government bodies. In addition, care needs to be taken in identifying lands and territories claimed by indigenous peoples in areas where more than one group lives, of which one is indigenous and the other not.

Identifying potential risks and impacts on indigenous peoples

When screening for potential risks and impacts to indigenous peoples (after determining that a given project might affect indigenous peoples via checklist questions 1 and 2), it is essential to recall that:

(i) **All results and activities** related to the intervention, whether originating within or outside of indigenous peoples' lands and territories, need to be screened and reviewed for potential direct and indirect impacts in the project's area of influence, and

(ii) A**ctivities** must be screened for potential social and environmental risks **before implementing planned mitigation and management measures** to form a clear picture of potential risks if mitigation measures are not implemented or fail. Risks are to be identified and quantified as if no mitigation or management measures were implemented.

Addressing the questions in the table below should involve input from the potentially affected indigenous communities and the IPP consultant. The project developers or team should verify the screening with affected communities and their representatives during early consultations to ensure that potential risks and impacts of proposed activities are well understood and recorded.

Would the intervention potentially involve or lead to:
3 impacts (positive or negative) to the human rights, lands, natural resources, territories, and livelihoods of indigenous peoples (regardless of whether indigenous peoples possess the legal titles to such areas, whether the project is located within or outside of the lands and territories inhabited by the affected peoples, or whether the indigenous peoples are recognized as indigenous peoples by the country in question)?
Note: If the answer to this screening question "yes", the intervention entails significant risks to the indigenous peoples and requires an FPIC process. Indigenous peoples' rights to their lands and territories (and the natural resources therein) arise from their customary laws and not the titling by the State. The inquiry does not stop if no title is issued. Where titles are issued, screeners also need to explore if the affected peoples have claimed rights to lands and territories that exceed the titled area. Furthermore, the rights of the affected people are collective and include the right to own, use, develop and control the lands, resources and territories that they have traditionally owned, occupied or otherwise used or acquired. Understanding the *potential* effects (both *direct* and *indirect*) of the project requires an understanding of how the affected indigenous peoples use and relate to their lands, resources and territories for their subsistence, livelihood and traditional practices and knowledge, as well as for the furtherance of their spiritual and cultural activities and beliefs. Early discussions with affected peoples – including women, young and/or poor people – will assist in making the determinations relevant to this screening question. Screeners must also consider potential effects on the human rights of indigenous peoples that may or may not be directly related to their lands, resources and territories, such as rights to traditional governance, freedom of speech, and right to health, among others.
Analysis of ownership and usage to potentially affected lands, territories, resources The screening process (and subsequent analysis) should consider the following issues when an intervention affects the lands, territories, and resources of indigenous peoples: • customary laws of the affected people related to land tenure and resource use, and management • indigenous use of the land and resources following their customary laws, values and traditions, including cultural, ceremonial or spiritual use, and seasonal or intermittent use of resources (for example, for hunting, fishing, grazing, agriculture, flora extraction of forest and woodland products, periodic cultural, ceremonial and spiritual uses • existence of any formal legal title resting with the concerned indigenous peoples to all or some of the ancestral area • identification of relevant recognitions, protections, and mechanisms for securing indigenous land tenure security under Applicable Law • extent of titling given, sometimes contrary to Applicable Law, to non-indigenous peoples within the lands and territories in question, as well as any competing claims and the squatting or intrusions that already exist within the same area • existence of land claims initiated by indigenous peoples before tribunals, relevant government offices and administrative proceedings (including their duration in the process)

- the interest and potential for indigenous contributions and/or management of project activities impacting their lands, resources and territories, and
- the potential for increased land and resource conflicts between indigenous and other communities.

6 forced eviction or the whole or partial physical or economic displacement of indigenous peoples, including through access restrictions to lands, territories, and resources?

UNDP's ESS 5 prohibits any involvement in the use of "forced eviction" (see UNDP SES 5 and the accompanying Guidance Note for more on forced eviction and "whole or partial physical or economic displacement"). This question seeks to identify "potential" eviction or displacement, not actual. The analysis also requires an assessment of whether physical displacement (temporary or permanent, full or partial) and/or economic displacement are potential risks that can be caused, for example, by interference and loss of critical assets, even where relocation is not an issue. In the case of indigenous peoples, particular attention must be paid to how they currently use, depend on, and view their surrounding environment. Screeners must examine whether project activities may displace indigenous peoples from their lands, territories, resources and livelihoods, including through alterations, contamination or limitations to access. Consideration must also be given that particular deprivations or interferences with lands, territories and resources may adversely affect indigenous peoples that non-indigenous persons may not otherwise experience. In addition, the screeners will need to go beyond registered and/or recognized land tenure and property rights and ensure that all indigenous people that have an attachment to the land, territory or resource in question, including those that might have been involuntarily displaced from this land, are included in this assessment. Any projects that involve potential displacement of indigenous peoples require FPIC processes and documented agreement of the indigenous peoples based on an IPP.

9 impacts on the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices?

"Cultural Heritage" is defined in UNDP's SES 4 and its guidelines. This screening question requires a process of evaluating the possible *direct* and *indirect* impacts, both beneficial and adverse, of all proposed activities on tangible cultural heritage, e.g. physical manifestations of the affected peoples' cultural heritage, including sites, structures, and remains of archaeological, architectural, historical, religious, spiritual, cultural, ecological or aesthetic value or significance. Commercializing or using traditional knowledge and practices (intangible cultural heritage) can come in various forms, including appropriation. It should be noted that UNDP must respect standards related to the FPIC of indigenous peoples where such utilization or commercialization is to take place and consequently requires the elaboration of an IPP.

14 Annex IV - Indicative Outline of ESIA Report

Please refer to the UNDP SES Guidance Note on Assessment and Management for additional information.

An ESIA report should include the following major elements (not necessarily in the following order):

(1) Executive summary: Concisely discusses significant findings and recommended actions.

(2) Legal and institutional framework: Summarizes the analysis of the legal and institutional framework for the project within which the social and environmental assessment is carried out, including (a) the country's applicable policy framework, national laws and regulations, and institutional capabilities (including implementation) relating to social and environmental issues; obligations of the country directly applicable to the project under relevant international treaties and agreements; (b) applicable requirements under UNDP's SES; and (c) and other relevant social and environmental standards and/or requirements, including those of any other donors and development partners. Compares the existing social and environmental framework and applicable requirements of UNDP's SES (and those of other donors/development partners) and identifies any potential gaps that will need to be addressed.

(3) Project description: Concisely describes the proposed project and its geographic, social, environmental, and temporal context, including any offsite activities that may be required (e.g., dedicated pipelines, access roads, power supply, water supply, housing, and raw material and product storage facilities), as well as the project's primary supply chain. Includes a map of sufficient detail, showing the project site and the area that may be affected by the project's direct, indirect, and cumulative impacts. (i.e. area of influence).

(4) Baseline data: Summarizes the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures; identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions; assesses the scope of the area to be studied and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences; and takes into account current and proposed development activities within the project area but not directly connected to the project.

(5) Social and environmental risks and impacts: Predicts and takes into account all relevant social and environmental risks and impacts of the project, including those related to UNDP's SES (Overarching Policy and Principles and Project-level Standards). These will include, but are not limited to, the following:

(a) Environmental risks and impacts, including: any material threat to the protection, conservation, maintenance and rehabilitation of natural habitats, biodiversity, and ecosystems; those related to climate change and other transboundary or global impacts; those related to community health and safety; those related to pollution and discharges of waste; those related to the use of living natural resources, such as fisheries and forests; and those related to other applicable standards.[19]

(b) Social risks and impacts, including: any project-related threats to human rights of affected communities and individuals; threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence; risks of gender discrimination; risks that adverse project impacts fall disproportionately on disadvantaged or marginalized groups; any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of disadvantaged or marginalized groups; negative economic and social impacts relating to physical displacement (i.e. relocation or loss of shelter) or economic displacement (i.e. loss of assets or access to assets that leads to loss of income sources or means of livelihood) as a result of project-related land or resource acquisition or restrictions on land use or access to resources; impacts on the health, safety and well-being of workers and project-affected communities; and risks to cultural heritage.

(6) Analysis of alternatives: Systematically compares feasible alternatives to the proposed project site, technology, design, and operation – including the "without project" situation – in terms of their potential social and environmental impacts; assesses the alternatives' feasibility of mitigating the adverse social and environmental impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; the institutional, training, and monitoring requirements for the alternative mitigation measures; for each of the alternatives, quantifies the social and

[19] For example, the Environmental, Health, and Safety Guidelines (EHSGs), which are technical reference documents with general and industry-specific statements of Good International Industry Practice. The EHSGs contain information on industry- specific risks and impacts and the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable cost. Available at www.ifc.org/ehsguidelines.

environmental impacts to the extent possible, and attaches economic values where feasible. Sets out the basis for selecting the particular project design.

(7) Mitigation Measures: Summary of (with Annex of full) Environmental and Social Management Plan (ESMP) (see indicative outline of ESMP below.) The ESMP identifies mitigation measures required to address identified social and environmental risks and impacts, as well as measures related to monitoring, capacity development, stakeholder engagement, and implementation action plan.

(8) Stakeholders. Summarizes and links to project Stakeholder Engagement Plan or ESMP that includes plan for consultations. Includes summary of consultations undertaken for development of ESIA (see appendices).

(9) Conclusions and Recommendations: Succinctly describes conclusion drawn from the assessment and provides recommendations. Includes recommendation regarding the project's anticipated benefits in relation to its social and environmental risks and impacts.

(10) Appendices: (i) List of the individuals or organisations that prepared or contributed to the social and environmental assessment; (ii) References – setting out the written materials both published and unpublished, that have been used; (iii) Record of meetings, consultations and surveys with stakeholders, including those with affected people and local NGOs. The record specifies the means of such stakeholder engagement that were used to obtain the views of affected groups and local NGOs, summarizes key concerns and how these concerns addressed in project design and mitigation measures; (iv) Tables presenting the relevant data referred to or summarized in the main text; (v) Annex of any other mitigation plans; (vi) List of associated reports or plans.

15 Annex V - Indicative Outline of an Environmental and Social Management Plan (ESMP)

Please refer to the UNDP SES Guidance Note on Assessment and Management for additional information.

An ESMP may be prepared as part of the Environmental and Social Impact Assessment (ESIA) report or as a stand-alone document.[20] The content of the ESMP should address the following sections:

(1) Mitigation: Identifies measures and actions in accordance with the mitigation hierarchy that avoid, or if avoidance not possible, reduce potentially significant adverse social and environmental impacts to acceptable levels. Specifically, the ESMP: (a) identifies and summarizes all anticipated significant adverse social and environmental impacts; (b) describes – with technical details – each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate; (c) estimates any potential social and environmental impacts of these measures and any residual impacts following mitigation; and (d) takes into account, and is consistent with, other required mitigation plans (e.g. for displacement, indigenous peoples).

(2) Monitoring: Identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

(3) Capacity development and training: To support timely and effective implementation of social and environmental project components and mitigation measures, the ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level. Specifically, the ESMP provides a description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g. for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training). Where support for strengthening social and environmental management capability is identified, ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

(4) Stakeholder Engagement: Summarizes and links to project Stakeholder Engagement Plan or outlines plan to engage in meaningful, effective and informed consultations with affected stakeholders. Includes information on (a) means used to inform and involve affected people in the assessment process; and (b) summary of stakeholder engagement plan for meaningful, effective consultations during project implementation, including identification of milestones for consultations, information disclosure, and periodic reporting on progress on project implementation. Require documentation of consultations (summaries including presentations, key points raised and responses provided, participation lists). Include information on project grievance mechanism (below) and on UNDP Accountability Mechanisms (SRM, SECU).

(5) Grievance redress mechanism: Describes effective processes for receiving and addressing stakeholder concerns and grievances regarding the project's social and environmental performance.

Describe mechanisms to provide stakeholders and potential affected communities avenues to provide feedback or grievances, and receive responses, with regard to the implementation of specific activities, policies, or regulations.

(6) Implementation action plan (schedule and cost estimates): For all four above aspects (mitigation, monitoring, capacity development, and stakeholder engagement), ESMP provides (a) an implementation schedule for measures that must be

[20] This may be particularly relevant where contractors are being engaged to carry out the project, or parts thereof, and the ESMP sets out the requirements to be followed by contractors. In this case the ESMP should be incorporated as part of the contract with the contractor, together with appropriate monitoring and enforcement provisions.

carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables. Each of the measures and actions to be implemented will be clearly specified and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.

16 Annex VI - Indicative Outline of an Indigenous People's Plan (or equivalent)

If the proposed project may affect the rights, lands, territories or resources of indigenous peoples as determined by the Screening conducted after selection of a minigrid site (please refer to Annexes II and III), an "Indigenous Peoples Plan" (IPP) needs to be elaborated and included in the project documentation. The IPP is to be elaborated and implemented in a manner consistent with the UNDP Social and Environmental Standards and have a level of detail proportional to the complexity of the nature and scale of the proposed project and its potential impacts on indigenous peoples and their lands, resources and territories.

With the effective and meaningful participation of the affected peoples, the IPP shall be elaborated and contain provisions addressing, at a minimum, the substantive aspects of the following outline:

1. Executive Summary: Concisely describes the critical facts, significant findings, and recommended actions
2. Description of the Project: General description of the project, the project area, and components/activities that may lead to impacts on indigenous peoples
3. Description of Indigenous Peoples: A description of affected indigenous people(s) and their locations, including:
    a. description of the community or communities constituting the affected peoples (e.g. names, ethnicities, dialects, estimated numbers, etc.);
    b. description of the lands, territories and resources to be affected and the affected peoples connections/ relationship with those lands, territories and resources; and
    c. an identification of any vulnerable groups within the affected peoples (e.g. uncontacted and voluntary isolated peoples, women and girls, persons with disabilities, elderly, others).
4. Summary of Substantive Rights and Legal Framework: A description of the substantive rights of indigenous peoples and the applicable legal framework, including:
    a. An analysis of applicable domestic and international laws affirming and protecting the rights of indigenous peoples (include general assessment of government implementation of the same);
    b. Analysis as to whether the project involves activities that are contingent on establishing legally recognized rights to lands, territories or resources that indigenous peoples have traditionally owned, occupied or otherwise used or acquired. Where such contingency exists (see Standard 6 Guidance Note, sections 5.1., 5.2), include:
        i. identification of the steps and associated timetable for achieving legal recognition of such ownership, occupation, or usage with the support of the relevant authority, including the manner in which delimitation, demarcation, and titling shall respect the customs, traditions, norms, values, land tenure systems and effective and meaningful participation of the affected peoples, with legal recognition granted to titles with the full, free prior and informed consent of the affected peoples; and
        ii. list of the activities that are prohibited until the delimitation, demarcation and titling is completed.
    c. Analysis whether the project involves activities that are contingent on the recognition of the juridical personality of the affected Indigenous Peoples. Where such contingency exists (see Standard 6 Guidance Note, section 5.2):
        i. identification of the steps and associated timetables for achieving such recognition with the support of the relevant authority, with the full and effective participation and consent of affected indigenous peoples; and
        ii. list of the activities that are prohibited until the recognition is achieved.

5. Summary of Social and Environmental Assessment and Mitigation Measures

   a. A summary of the findings and recommendations of the required prior social and environmental impact studies (e.g. targeted assessment, ESIA, SESA, as applicable) – specifically those related to indigenous peoples, their rights, lands, territories and resources. This should include the manner in which the affected indigenous peoples participated in such study and their views on the participation mechanisms, the findings and recommendations.

   b. Where potential risks and adverse impacts to indigenous peoples, their lands, territories and resources are identified, the details and associated timelines for the planned measures to avoid, minimize, mitigate, or compensate for these adverse effects. Include where relevant measures to promote and protect the rights and interests of the indigenous peoples including compliance with the affected peoples' internal norms and customs.

6. Participation, Consultation, and FPIC Processes

   a. A summary of results of the culturally appropriate consultation and, where required, FPIC processes undertaken with the affected peoples' which led to the indigenous peoples' support for the project.

   b. A description of the mechanisms to conduct iterative consultation and consent processes throughout implementation of the project. Identify particular project activities and circumstances that shall require meaningful consultation and FPIC (consistent with section 4 of the Standard 6 Guidance Note).

7. Appropriate Benefits: An identification of the measures to be taken to ensure that indigenous peoples receive equitable social and economic benefits that are culturally appropriate, including a description of the consultation and consent processes that lead to the determined benefit sharing arrangements.

8. Capacity support: Description of measures to support social, legal, technical capabilities of indigenous peoples' organizations in the project area to enable them to better represent the affected indigenous peoples more effectively. Where appropriate and requested, description of steps to support technical and legal capabilities of relevant government institutions to strengthen compliance with the country's duties and obligations under international law with respect to the rights of indigenous peoples.

9. Grievance Redress: A description of the procedures available to address grievances brought by the affected indigenous peoples arising from project implementation, including the remedies available, how the grievance mechanisms take into account indigenous peoples' customary laws and dispute resolution processes, as well as the effective capacity of indigenous peoples under national laws to denounce violations and secure remedies for the same in domestic courts and administrative processes.

10. Institutional Arrangements: Describe schedule and institutional arrangement responsibilities and mechanisms for carrying out the measures contained in the IPP, including participatory mechanisms of affected indigenous peoples. Describe role of independent, impartial experts to validate, audit, and/or conduct oversight of the project.

11. Monitoring, Reporting, Evaluation: Describe the monitoring framework for the project and key indicators for measuring progress and compliance of requirements and commitments. Include mechanisms and benchmarks appropriate to the project for transparent, participatory joint monitoring, evaluating, and reporting, including a description of how the affected indigenous peoples are involved. Indicate process for participatory review of IPP implementation and any necessary modifications or corrective actions (including where necessary consent processes).

12. Budget and Financing: Include an appropriately costed plan, with itemized budget sufficient to satisfactorily undertake the activities described.

Note: The IPP will be implemented as part of project implementation. However, in no case shall project activities that may adversely affect indigenous peoples take place before the corresponding activities in the IPP are implemented. Such activities should be clearly identified. Where other project documents already develop and address issues listed in the above sections, citation to the relevant document(s) shall suffice.

17 Annex VII - Labour Management Procedures Template

The Labour Management Procedures (LMP) facilitates planning and assists responsible parties to ensure that project implementation adheres to the requirements of SES Standard 7 on Labour and Working Conditions. The LMP (a) sets out the written labour procedures for the project, (b) identifies the main labour requirements and risks associated with the project, and (c) helps the project developer to determine the resources necessary to address project labour issues and risks and sets out an action plan.

The LMP summarizes key labour-related risks and issues and may be supplemented by more targeted analyses and plans (e.g. such as an occupational safety and health action plan, WBG EHS sector specific guidelines, ISO standards, contractor management matrices, etc.). The LMP (as with supporting analyses) should be undertaken by experts with relevant expertise.

The LMP may be prepared as a stand-alone document, or form part of other environmental and social management documents. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

In preparing and updating the LMP, project developers should refer to the requirements of national law and S7 and its Guidance Note. The content of the LMP is indicative: some issues may not be relevant to the project while some projects may have other issues that need to be captured from a planning perspective. Where national law addresses requirements of S7 this should be noted in the LMP.

Where project workers under a single project may be engaged under significantly different circumstances (e.g. different regions of a country, different employment arrangements), it may be necessary to ensure that these differences are appropriately addressed in the LMP, or separate LMPs may need to be developed.

For projects utilizing an ESMF given that specific activities and/or subprojects have yet to be defined, the development of the LMP may need to be deferred. The ESMF should address as many potential issues outlined in the LMP as is feasible during project development, and the ESMF should include procedures for undertaking a specific LMP once locations and activities are defined.

A concise and up to date LMP will enable different project-related parties, for example, staff of the project implementing unit, contractors and sub-contractors and project workers, to have a clear understanding of what is required on a specific labour issue. The level of detail contained in the LMP will depend on the type of project and information available. Where relevant information is not available, this should be noted and the LMP should be updated as soon as possible.

Below is an indicative outline of the LMP.

1. Overview of Labour Use in the Project: This section describes the following, based on available information:

a. Number of Project Workers: The total number of workers to be employed on the project, and the different types of workers: direct workers, contracted workers, temporary or seasonal workers and community workers. Where numbers are not yet firm, an estimate should be provided.

b. Characteristics of Project Workers: To the extent possible, a broad description and an indication of the likely characteristics of the project workers e.g. local workers, national or international migrants, female workers, workers between the minimum age and 18.

c. Timing of Labour Requirements: The timing and sequencing of the project's labour requirements in terms of numbers, locations, types of jobs and skills required.

d. Contracted Workers: The anticipated or known contracting structure for the project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor. If it is likely that project workers will be engaged through brokers, intermediaries or agents, this should be noted together with an estimate of the number of workers that are expected to be recruited in this way.

e. Migrant Workers: If it is likely that migrant workers (either domestic or international) are expected to work on the project, this should be noted and details provided.

2. Assessment of Key Potential Labour Risks: This section describes the following, based on available information:

a. Project activities: The type and location of the project, and the different activities the project workers will

carry out, including primary supplier(s)

b. Key Labour Risks: The key labour risks that may be associated with the project (see, for example, those identified in S7 and the GN). These could include, for example:

o the conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials

o likely incidents of child labour or forced labour, with reference to the sector or locality

o discriminatory policies or practices that deny equal opportunity

o restrictions on freedom of association and collective bargaining

o likely presence of migrants or seasonal workers

o risks of labour influx or gender based violence

o possible accidents or emergencies, with reference to the sector or locality

o general understanding and implementation of occupational health and safety requirements

3. Brief overview of labour legislation, agreements and potential gaps with Standard 7:

• Core Labour Standards: This section sets out the key aspects of national legislation implementing the ILO fundamental rights at work, i.e. prohibition of child labour/minimum working age; prohibition of forced labour, non-discrimination/equal opportunity; and freedom of association and collective bargaining. The overview should highlight any material gaps between national law and S7.9-19.

• Terms and Conditions: This section sets out the key aspects of national labour legislation with regards to term and conditions of work, and how national legislation applies to different categories of workers identified in Section 1. The overview focuses on legislation which relates to the items set out in S7, paras.5-8 (i.e. wages, deductions and benefits) and any material gaps with S7. The section should also identify the terms of any existing collective agreements that stipulate workplace terms and conditions.

• Occupational Safety and Health (OSH): This section sets out the key aspects of the national labour legislation with regards to occupational health and safety, and how national legislation applies to the different categories of workers identified in Section 1. The overview focuses on legislation that relates to the items set out in S7, paras. 20-25 and any material gaps with S7.

4. Responsible Staff: This section identifies the functions and/or individuals within the project responsible for (as relevant):

• engagement and management of project workers

• engagement and management of contractors/subcontractors

• occupational safety and health (OSH)

• training of workers

• addressing worker grievances

In some cases, this section will identify functions and/or individuals from contractors or subcontractors, particularly in projects where project workers are employed by third parties.

5. Policies and Procedures: This section sets out :

• Management systems: Relevant management systems in place to implement S7, e.g. human resources policy, anti-harassment policy, staff handbook, grievance procedure, OSH management system, etc. These can be referenced or annexed to the LMP, together with any other supporting documentation. Where relevant, it identifies applicable national legislation.

• Age of Employment: Details regarding (see S7 paras. 16-19 and GN):

o the minimum age for employment on the project

o the process that will be followed to verify the age of project workers

o the procedure that will be followed if underage workers are found working on the project

o the procedure for conducting risk assessments for workers aged between the minimum age and 18

o Where incidences of child labour are identified, describe how these will be remediated

• Forced Labour: Where the risk of forced labour has been identified, this section outlines how this risk will be mitigated, and how any instances of forced labour will be addressed (see S7 para. 14 and GN).

• Occupational safety and health: Where significant health and safety risks have been identified, summarize how these will be addressed in a manner consistent with national labour and employment regulations and the requirements of S7. (Note that a specific OSH plan may be necessary.)

• Terms and Conditions: This section sets out details regarding (see S7 paras. 5-8):

o specific wages, hours and other provisions that apply to the project

o maximum number of hours that can be worked on the project

o any collective agreements that apply to the project. When relevant, provide a list of agreements and describe key features and provisions

o other specific terms and conditions (e.g. benefits)

o "Beyond compliance" initiatives e.g. to promote local employment or the hiring of traditionally underrepresented groups

• Grievance Mechanism: This section sets out details of the grievance mechanism that will be provided for direct and contracted workers, and describes the way in which these workers will be made aware of the mechanism (S7, paras. 26-28).

• Contractor Management: This section sets out details regarding (see S7, paras. 29-31 and GN):

o the selection process for contractors/third parties

o the contractual provisions that will be put in place relating to contractors for the management of labour issues, including OSH

o the procedure for managing and monitoring the performance of contractors

• Community Workers: Where community workers will be involved in the project, this section sets out details of the terms and conditions of work, and identifies measures to check that community labour is provided on a voluntary basis. It also provides details of the type of agreements that are require and how they will be documented. This section sets out details of the grievance mechanism for community workers and the roles and responsibilities for monitoring such workers.

• Primary Supply Workers: Where a significant risk of violations of core labour standards32 or serious safety issues in relation to primary suppliers has been identified, this section sets out the procedure for monitoring and reporting on primary supply workers (S7 paras. 32-34)

7. Action Plan This section sets out details of actions required to achieve and maintain compliance with national law and S7, including responsibilities, timelines and cost/resource estimates. The Plan will also include monitoring and reporting requirements appropriate to the nature of the project and associated labour risks and impacts. The Action Plan includes the following elements:

• Summary of required measures identified in above sections of the LMP.

• Describe schedule, institutional arrangements, and responsibilities and mechanisms for carrying out the identified measures, indicating who is responsible and when actions will be undertaken.

• Describe the monitoring framework for the project and key indicators for measuring progress in implementing the identified measures.

• Budget and Financing: Include an appropriately costed plan, with itemized budget sufficient to satisfactorily undertake the identified measures.

18 Annex VIII – Indicative Steps and Guidance for Documenting FPIC Process

The table below shows how project teams can effectively document the FPIC design process, FPIC implementation and outcomes.

GUIDANCE FOR DOCUMENTING THE FPIC PROCESS (As part of an IPP or IPPF)

Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
SCOPING: RELEVANT PROJECT ACTIVTIES, RIGHTS-HOLDERS, AND THE APPLICABLE LEGAL FRAMEWORK	
Define project activities that could have impacts on indigenous peoples	▪ *A list or schedule of known and expected project activities and their details, including their timeframes, locations etc.*
Establish the project's obligation to achieve FPIC: Assessment of national and international legal obligations	▪ *A description of the national legal obligations to promote and protect Indigenous Peoples' rights.* ▪ *A description of the international legal obligations to promote and protect Indigenous Peoples' rights, including the UNDP SES requirements* ▪ *Gap analysis of national legal obligations and international legal obligations, including UNDP's SES requirements.* ▪ *Interviews, documented trainings, workshops, etc. with relevant project staff demonstrating that these obligations are understood.*
Identify the potentially affected rights- holders: Map the rights-holders who may be impacted by the project's operations, through an appropriately gender-balanced, culturally appropriate and inclusionary assessment process.	▪ *Inclusion of a rationale for any differential treatment between potentially affected Indigenous Peoples' communities and other local communities.* ▪ *Documented evidence that customary rights have been identified and acknowledged within the rights-holder map, in addition to legal rights.* ▪ *Documentation of any conflicting claims, and measures that were taken to mediate and resolve these conflicts.* ▪ *Interviews or surveys with community members that confirm there are not outstanding conflicts.* ▪ *Interviews or surveys with community members that confirm they feel they were sufficiently trained to participate in the rights-holder mapping, and that they were able to participate effectively in the process.* ▪ *Interviews or surveys with community members that confirms they were sufficiently compensated to be able to participate in the rights-holder mapping.* ▪ *Interviews or surveys of how the results of this process have been communicated and made accessible to all other community members.* ▪ *Interviews with community members that confirm the results of this process have been received and understood.*

Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
Establish the willingness of potentially affected rights-holders to consider the proposed project (or project activities): Hold an initial meeting with rights-holders who may be impacted by the proposed project, to present the project and establish whether they would be willing to consider it.	▪ *Documented evidence of a community meeting having been called.* ▪ *Documented evidence of the presentation given by the Project Developer about the proposed project that clearly shows the content of the presentation and information communicated to the meeting attendees.* ▪ *Interviews or surveys with meeting attendees clarifying that the content of the Project Developer's presentation was presented in a format and language that was understood and culturally appropriate.* ▪ *Signed meeting minutes that detail the willingness of the community to consider the proposed project.*
SOCIAL AND ENVIRONMENTAL IMPACT ASSESSMENT	
Establish and communicate how the proposed project (activities) may impact identified rights-holders: Undertake a social, cultural, environmental, and human rights impact assessment of the proposed activities that may have impacts on indigenous peoples (this could be done as part of a targeted impact assessment on IPs or an ESIA)	▪ *Documented evidence that community representatives were engaged in advance of the impact assessment and participated in the design of the assessment.* ▪ *Documented agreement on the format, scope and content of the assessment to be conducted, including who will conduct it.* ▪ *Documented evidence that impacts on customary rights have been considered within the scope of the impact assessment, in addition to legal rights.* ▪ *Documented evidence that the rights-holder map is properly considered in the impact assessment design.* ▪ *Assessment of community capacity (time, resources, skills) to participate in the impact assessment and measures taken to ensure sufficient capacity.* ▪ *Written or recorded evidence of interviews with relevant company personnel demonstrating that Indigenous Peoples' rights are understood and that they have all been considered within the design of the impact assessment.* ▪ *Documented interviews with community members that confirms they feel they were sufficiently trained and compensated to participate in the impact assessment design and implementation.* ▪ *Documentation of all potential impacts that may result from the proposed project and related activities in relevant languages and/or formats to maximise comprehension by as many community members as possible, including women, the elderly, children and other marginalised groups.* ▪ *Documented evidence of the methods used to communicate this process and its outcome to community members.*

Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
	▪ *Written or recorded evidence of interviews with relevant community representatives demonstrating that these impacts are understood.*
COMMUNITY PARTICIPATION, REPRESENTATION, GOVERNANCE AND DECISION-MAKING STRUCTURE	
Establish if the community is willing to enter into negotiation regarding the approval and implementation of the proposed project activities, based on the results of the impact assessment	▪ *Documented evidence of a community meeting(s) having been called.* ▪ *Signed meeting minutes that detail:* ▪ *The community has reached a consensus that they are willing to enter into negotiations based on the results of the impact assessment.* ▪ *Signed attendance register.* ▪ *Documented evidence of how the results of this process have been communicated to all other community members.* ▪ *Documented evidence of interviews with community members that demonstrate they are willing to enter into negotiation based on the impact assessment.*
Establish who will be representing the community throughout the FPIC process, and that they were selected by community members in a culturally acceptable manner.	▪ *Documented evidence of a community meeting having been called.* ▪ *Signed meeting minutes that detail the election of the community members or institutions who will represent the community during the FPIC process.* ▪ *Signed attendance register.* ▪ *Documented evidence of how the results of this process have been communicated to all other community members.*
Establish how women participate in local decision-making mechanisms.	▪ *Documented analysis of local gender dynamics which identifies potential obstacles to meaningful participation in consultations for female community members* ▪ *Documented evidence that community representatives maintain open communication with all community members. This may be via relevant community organisations and associations.* ▪ *Documented participation of women in consultation meetings and/or meetings conducted exclusively with women.*
Establish how marginalised or vulnerable groups, including children, the elderly, and those with disabilities, participate in local decision-making mechanisms.	▪ *Analysis of local representation dynamics which identifies potential obstacles to meaningful participation in consultations for community members who are typically marginalised.* ▪ *Documented evidence that the elected community representatives maintain open communication with all community members. This may be via relevant community organisations and associations.* ▪ *Documented evidence that where traditional or customary systems do not allow for meaningful participation of marginalised groups in formal negotiations, that best efforts have instead been made to*

Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
	integrate these groups into other community engagement processes to ensure that their voice is heard and has bearing on the consultation processes. ▪ *Documented participation of marginalized or vulnerable groups in consultation meetings* ▪ *and/or meetings conducted exclusively with these groups.*
Establish that the community has sufficient institutional and technical capacity to be able to effectively participate in an FPIC process.	▪ *Documented evidence of existing decision-making, mediation and conflict resolution mechanisms.* ▪ *Evidence that the community has the capacity to store and maintain agreements and ensure access to them for other members of the community e.g. via central archives, and also online.* ▪ *Evidence of the community having the opportunity for knowledge exchange with other communities or those who have participated in FPIC processes previously.* ▪ *Documented evidence of existing community protocols and/or "Planes de Vida" that detail:* o *The community's cosmovision and how this informs their position vis-a-vis development projects* o *How this intersects with international and national rights.* o *This should include evidence of how they were developed via an inclusionary, participatory process.* ▪ *Documented evidence of a gap analysis carried out in collaboration with community representation to identify gaps in institutional and technical capacity. Documentation of efforts made to bridge any identified gaps and to strengthen community capacity by supporting the community to identify and recruit suitable third-party experts and/or organizations to advise on e.g. the development of a Plan de Vida via an inclusive, participatory process; capacity building trainings for strengthening institutional capacity, negotiation or public speaking skills.*
SUSTAINABILITY OF THE FPIC PROCESS	
Establish a mechanism for facilitating ongoing and open, two-way dialogue between the community and project team.	▪ *Documentation of official and routine meetings both with community representatives on at least a monthly basis and with the wider community at least quarterly, detailing the number of consultation and participation activities that occur, including meetings, information dissemination, distribution of brochures/flyers and training.* ▪ *Demonstrated commitment to maintain and nurture relationships.* ▪ *Demonstrated commitment to continue consultation to maintain consent beyond its initial achievement.* ▪ *Documented evidence of consultation processes and agreements.* ▪ *Demonstrate the existence of open channels for communication, when possible e.g. phone, social media, radio, community groups etc.)*
Establish a participatory mechanism for monitoring and evaluating compliance of the FPIC process	▪ *Documented evidence of an agreement between the community and the project developer that includes:* o *What constitutes 'consent'* o *Criteria and indicators to be used for monitoring compliance with the agreed process.*

Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
against the documented agreement.	○ *Who will provide independent verification.* ▪ *Assessment of community capacity (time, resources, skills) to participate in the monitoring and evaluation of the process.* ▪ *Documented evidence taken of measures to ensure sufficient community capacity.* ▪ *Documented evidence of a positive and collaborative relationship existing between the community and the implementing partner.*
Establish a grievance redress mechanism for addressing claims in the event that the negotiated agreement is breached.	▪ *Documented evidence of an agreement regarding how the grievance redress mechanism should be designed and how it should function.* ▪ *Interviews or surveys with community members that demonstrate familiarity with the grievance mechanism, how it can be accessed and how it should be used to make claims.* ▪ *Assessment of claims made using the grievance mechanisms, including:* ○ *Types of grievances, including the FPIC process itself.* ○ *Whether they have been resolved.* ○ *Length of time they have taken to be resolved.* ▪ *Total number of people / groups to have used the grievance mechanism.*

19 Annex IX - Sample Terms of Reference: Project-level Grievance Redress Mechanism

Notes: Please complete relevant sections and annex this TOR to the Project Document and include as necessary in the relevant Social and Environmental Assessments and Management Frameworks/Plans

This section aims to support UNDP projects to meet the SES requirement that, all projects categorized as complex Moderate Risk, Substantial Risk, or High Risk, as determined by the Social and Environmental Screening Procedure (SESP), have made available an effective project-level grievance redress mechanism. The scope of the project GRM is therefore to address grievances related to the social and environmental impacts of a UNDP project (see Section III below regarding eligibility). Grievances related to other topics should be referred to the appropriate mechanisms, in accordance with their mandates[21].

I. Introduction and Overview

These ToR provide guidance on the mandate and functions of the grievance redress mechanism (GRM) for this UNDP-supported Project. The GRM provides one avenue for stakeholder engagement and the management of social and environmental risks and impacts. However, it is not a substitute for proactive outreach to stakeholders to inform them about the Project, seek their input, and respond to their suggestions and concerns regarding social and environmental benefits, risks and impacts. Proactive stakeholder engagement should begin early in project design and continue throughout the project cycle.

The Project GRM provides an additional, formal channel for project stakeholders to register complaints about project social and environmental risks and impacts. UNDP requires the establishment of project GRMs when its Social and Environmental Screening Procedure (SESP) identifies the potential for significant, adverse social and/or environmental impacts.

Project GRMs also facilitate timely identification and treatment of potential emerging Project risks, strengthening effective risk management at the Project-level, in line with UNDP's Enterprise Risk Management Policy.[22] Grievances are an ERM sub-risk category.

In the case that an existing national mechanism for grievance resolution may be appropriate for the Project, the UNDP Country Office, jointly with the Project Board, will assess the mechanism's effectiveness against a set of criteria specified in UNDP's Supplemental Guidance Note on Project GRMs and will determine who will be responsible for undertaking the GRM function as outlined in this TOR.

The UNDP corporate Accountability Mechanism (www.undp.org/secu-srm) provides an additional recourse for Complainants who are not satisfied with the response they have received from the Project GRM or who are concerned about an adverse response if they raise concerns with the Project GRM.

II. Mandate

The mandate of the Project GRM will be to receive and seek to resolve complaints about actual or potential environmental or social harm to affected person(s) arising from Project. In its accessibility to complainants and in its responses to complaints, the GRM will be gender-responsive, culturally sensitive, non-discriminatory, and inclusive. Complaints related to sexual abuse and exploitation (SEA) will be treated in a survivor-centered manger and ensure referrals for safe and confidential survivor assistance.

The Project GRM will provide:

(i) an accessible, predictable and transparent procedure for receiving and responding to complaints

[21] For example, grievances related to fraud, abuse or misconduct should be referred to the Office of Audit and Investigations (OAI).

[22] UNDP Enterprise Risk Management (ERM) Policy and Procedures.

(ii) direct engagement and dialogue with Complainants to clarify issues and interests and develop mutually acceptable responses

(iii) equitable and rights-compatible resolution of complaints, including contribution to remedy for environmental or social harm demonstrably caused or contributed to by the project[23]

(iv) opportunity for learning from complaints and their resolution, in ways that contribute to improved management of environmental and social risks and ensure alignment with UNDP's Social and Environmental Standards as well as applicable laws, regulations and policies.

III. Eligible Complaints

To be eligible for a Project GRM response, the complaint must pertain to this UNDP Project and its activities after signature of the Project Document and prior to Project closure. In addition, the complaint must:

(a) Indicate how Project activity(ies) have caused or contributed, or may cause or contribute to social or environmental harm
(b) Be made by a person or people (directly or through an authorized representative) who could plausibly be affected by the harm(s) referenced in the complaint.

If further information is needed to determine eligibility, the GRM should seek such information from the complainant before making an eligibility determination.

Complainants may request and receive confidentiality, but the GRM cannot respond to anonymous grievances. Record keeping and information sharing about SEA survivor assistance will adhere to the 'do no harm' and confidentiality principles and the survivor's personally identifiable information will remain confidential unless the victim expressly consents to it being shared.

With the complainant's agreement, the GRM will refer requests alleging non-compliance with UNDP Social and Environmental Standards, fraud, or corruption to the appropriate offices within UNDPand to the relevant national authority(ies).

IV. Functions of the GRM

The GRM will function on two levels: at the Project Management level, under the direction of the Project Manager (supported by the project management unit), and as part of UNDP's Project Assurance role in consultation with and in support of the Project Board. UNDP is responsible for the Project Assurance function, under the direction of the UNDP [Deputy] Resident Representative.

A. GRM at Project Management level:

The Project Manager will [establish a system] OR [use NAME OF EXISTING GRM[24]] for receiving and responding to complaints through direct engagement with Complainants. The GRM at Project Management level will:

(i) Establish communications channels to receive complaints and identify staff responsible for documenting and responding to complaints.

(ii) Establish procedures to engage with the complainant, seek resolution, and document all

[23] Remedy (or contribution to remedy when the risk/impact is not solely the responsibility of the Project) may be provided through prevention, mitigation, and/or compensation, as appropriate.

[24] Existing GRMs should be assessed by UNDP and the Project Board to determine whether they are sufficiently accessible and effective to be used by the Project, and whether institutional strengthening is needed prior to designation as the project GRM and how this could be provided outside the scope of this project. See the UNDP Supplemental Guidance: Grievance Redress Mechanisms for guidance on assessing and strengthening project GRMs.

complaints and responses.

(iii) Establish procedures to ensure that complaints related to sexual exploitation and abuse are treated in a survivor-centered manner and ensure referrals for safe and confidential survivor assistance[25]

(iv) When responding to complaints, engage directly with the complainant to clarify issues, identify options for resolution, and provide or support remedy for any environmental or social risks or impacts that are demonstrably associated with the project.

(v) Inform potentially affected community members and other stakeholders (e.g. workers employed in project activities) how to make a complaint about the project (including the option to bring complaints to the Project Management level of the GRM, the Project Assurance function, or the UNDP Accountability Mechanism). Where there are CSOs or NGOs that have well-established communication with affected stakeholders, seek their assistance (voluntary or contracted) to promote awareness and understanding of the GRM.

(vi) Log and track all complaints received.

(vii) Within 5 business days of receipt of a complaint, review the complaint and

a. If further information is needed to determine eligibility, seek further information from the complainant and/or project staff to make the determination;

OR

b. If it is very clear that the complaint does not meet one or more of the eligibility criteria, refer the complainant to appropriate national or local institution(s) that may be able to respond to the complaint;

OR

c. If the complaint is determined eligible, respond to the complainant through direct, good faith engagement to clarify issues, develop and seek agreement on options for resolution, and address and remedy risks and harms that the project is causing or contributing to (with the option to provide technical assistance to the complainant to support the complainant's effective engagement).

(viii) If the complaint is resolved within 60 days, document the complainant's acceptance of resolution, and continue to monitor until all project actions that were agreed to as part of the resolution have been taken.

(ix) If the complaint is unresolved 60 days after initial receipt (or if requested by the complainant at any time), offer the complainant the option of referral to the Project Board through the UNDP Project Assurance function, to the UNDP Accountability Mechanism, or to national institution(s) with a mandate to address the issues raised.

(x) Provide quarterly reports on complaints, responses, and outcomes to the Project Board through the Project Assurance function, and collaborate with Project Assurance to identify successes, challenges, trends and lessons learned in responding to complaints.

B. GRM at Project Assurance Level (in consultation with Project Board)

Complainants who are not satisfied with the Project Management GRM response, or who are concerned about an adverse response, may bring their complaint to the Project Assurance function of the Project Board which is

[25] Procedures will be aligned with the UN Protocol on Provision of Assistance to Victims of Sexual Exploitation and Abuse: https://psea.interagencystandingcommittee.org/victim-survivor-centred-assistance.

exercised by UNDP. In addition, UNDP Project Assurance will receive unresolved complaints referred from the Project Manager.

Complaints submitted to the UNDP Project Assurance function will be addressed per the procedures outlined below. UNDP will seek resolution of complaints together with national and other relevant partners (e.g. Implementing Partner, other members of the Project Board), with due consideration of confidentiality if requested by Complainants. The process for addressing complaints submitted to the UNDP Project Assurance function would typically involve the Project Manager and any necessary staff, external mediators, etc., under the direction of the UNDP Resident Representative and/or Deputy Resident Representative.

For complaints referred from the Project Manager (or project management unit), the Project Assurance function will:

(i) Log and track the complaint.

(ii) Review documentation received from the Project Manager and consult with the Project Manager on the case.

(iii) Within 5 days of receipt, engage with the complainant to review and clarify the issues raised in the case and explore options for resolution (with the option to provide technical assistance to the complainant to support the complainant's effective engagement).

(iv) As appropriate, engage with senior representatives of the Implementing Partner and other Project Board members to clarify issues and explore options for resolution.

(v) As appropriate, play a mediating role between the parties to seek resolution of the complaint (with the option to contract with an external mediator).

(vi) When risks are identified that may affect overall project governance (e.g. potential need to put project components on hold or change the design of the project), ensure that the Project Board has full information about the risks and guides project decision making on the appropriate response;

(vii) Support the Project Board to address and remedy risks and harms that the project is demonstrably causing or to which it is demonstrably contributing.

(viii) If the complaint is resolved within 60 days of receipt, document the complainant's acceptance of resolution, and continue to monitor until all project actions that were agreed to as part of the resolution have been taken.

(ix) If the complaint is unresolved 60 days after referral to the project assurance function (or if requested by the complainant at any time), offer the complainant the option of referral to the UNDP Accountability Mechanism and/or to any national institutions that have a mandate to address the issues raised.

For complaints received directly from Complainants, the Project Assurance function will first make an eligibility determination (identical to step (iv) of the operational Project Management level of the GRM outlined above) and then continue from step (ii) of the Project Board process as outlined above, except that step (ii) for complaints that are received directly by the Project Assurance function will be "Consult with the Project Manager on the case, protecting Complainant confidentiality if requested."

Additionally, the Project Assurance function will perform these tasks in support of the Project Board:

(i) Review complaints received by the GRM and their outcomes, work with the Project Manager to identify successes, lessons learned, challenges and trends, and report its assessments to the Project Board. Should an outcome to a grievance be compensation, the UNDP Project Assurance function is responsible for confirming this outcome and for working with the Project Board to determine how compensation will be achieved as necessary.

(ii) Receive quarterly reports on complaints from the Project Management level of the GRM, and collaborate with its staff to identify successes, challenges, trends and lessons learned in responding to complaints.

(iii) Provide summary reports to the PB of all complaints received (both those received by the operational level GRM and directly by the Project Assurance function) with any recommended actions.

(iv) Disclose the GRM's work (including case registry, summary reports on individual cases, reports on trends or patterns, and actions taken in response to trends and patterns) to the PB and to project stakeholders, through periodic reporting (at least semi-annual) in media/forums accessible to project stakeholders and protecting confidentiality of complainant identities where necessary;

(v) Monitor the Project Manager's efforts to inform project stakeholders about the GRM, and ensure the accessibility, predictability, transparency, legitimacy, and credibility of the GRM process;

(vi) Provide continuing education of PB members and their respective institutions regarding policies, procedures, and capacities needed to prevent risks and impacts which could lead to complaints, and to promote the constructive resolution of complaints.

V. Submitting a complaint

(i) Who can Submit a complaint?

A complaint can be submitted by any individual or group of individuals that believes it has been or will be harmed by the Project.

If a complaint is to be lodged by a different individual or organization on behalf of those said to be affected, the Complainant must identify the person/people on behalf of who the complaint is submitted and provide written confirmation by the person/people represented that they are giving the Complainant the authority to present the complaint on their behalf. The GRM will take reasonable steps to verify this authority.

(ii) How is the complaint submitted?

The GRM will maintain a flexible approach with respect to receiving complaints in light of known local constraints with respect to communications and access to resources for some stakeholders. A complaint can be transmitted to the GRM by any means available (i.e. by email, letter, phone call, meeting, SMS, etc.). The contact information is the following:

[Project Web site: complaint portal

Project Manager email, address, phone number, fax, etc.]

UNDP Project Assurance function email, address, phone number, fax, etc.(typically DRR or RR)

UNDP Accountability Mechanism Web complaint portal (www.undp.org/secu-srm), stakeholder.response@undp.org; project.concerns@undp.org; secuhotline@undp.org

(iii) What information should be included in a complaint?

The Grievance should include the following information:

(a) the name(s) of the person/people submitting the complaint ("the Complainant");

(b) a means for contacting the Complainant (email, phone, address, other);

(c) if the submission is on behalf of those alleging a potential or actual harm, the identity of those on whose behalf the complaint is made, and written confirmation by those represented of the Complainant's authority to lodge the complaint on their behalf;

(d) a description of the potential or actual harm;

(e) names of the individual(s) or institutions responsible for the risk/harm (if known), and the location(s) and date(s) of harmful activity (if Complainant states that harm has already occurred);

(f) what has been done by Complainant thus far to resolve the matter;

(g) whether the Complainant wishes for their identity to be kept confidential; and

(h) the specific response requested from the GRM.

However, Complainants are not required to provide all of the information listed above. Initially, the Complainant need only provide enough information to determine eligibility. If insufficient information is provided, the GRM has an obligation to make a substantial, good faith effort to contact the Complainant to request whatever additional information is needed to determine eligibility, and if eligible, to develop a proposed response.

Complainants may request and receive confidentiality, but the GRM cannot respond to anonymous grievances. With the Complainant's agreement, the GRM will refer requests alleging fraud or corruption to the appropriate offices within UNDP and to the relevant partner(s). For complaints regarding sexual exploitation, abuse or harassment (SEAH) the GRM will ensure complete confidentiality, and may refer the complainant to [NAME OF SPECIALIZED SEAH INVESTIGATIVE BODY] and/or [NAME OF SURVIVOR ASSISTANCE BODY].

VI. Logging, Acknowledgment, and Tracking of Complaints

The Project Manager (with the support of the project management unit) will receive grievances, assign each a tracking number, acknowledge each to the Complainant, record the main points electronically in a database that is shared with the Project Assurance function, and provide periodic updates to the Complainant as well as the GRM file. The Project Assurance function will use the same system as the Project Manager for tracking of complaints. When a complaint comes directly to the Project Assurance function, it will log the case with a new case record.

Within five (5) business days from the receipt of a grievance, the GRM will send a *written* acknowledgement to Complainant of the grievance received with the assigned tracking number.[26]

Each Grievance file will contain, at a minimum:

i. the date of the request as received;

ii. the date the written acknowledgment was sent (and oral acknowledgment if also done);

iii. the dates and nature of all other communications or meetings with the Complainant and other relevant Stakeholders;

iv. specific concerns raised by the complaint, and additional information regarding those concerns provided by the PB and any other relevant parties (if relevant);

v. the eligibility determination and rationale;

vi. any requests, offers of, or engagements of a Mediator or Facilitator;

vii. the dates of discussions between the Complainant, Project Manager and/or Project Assurance staff, and any other relevant parties related to the proposed resolution/way forward, and the main substantive points from each discussion;

viii. the Complainant's acceptance or objections to proposed resolutions, and the responses of other relevant parties to proposed resolutions;

ix. the proposed next steps if objections arose;

x. the alternative resolution if renewed dialogues were pursued;

xi. notes regarding implementation of any agreed resolution; and

xii. any conclusions and recommendations arising from monitoring and follow up.

VII. Maintaining Communication and Status Updates

Summary documentation of each complaint will be available for review by the Complainant and other

[26] Oral acknowledgments can be used for expediency (and also recorded), but must be followed by a written acknowledgment.

stakeholders involved in the complaint, or their designated representative(s). Appropriate steps will be taken to maintain the confidentiality of the Complainant if previously requested.

The GRM will provide periodic updates to the Complainant regarding the status and current actions to resolve the complaint. Not including the acknowledgment of receipt of the complaint, such updates will occur within reasonable intervals (no less frequent than every thirty (30) days).

VIII. Protection from Reprisal and Retaliation

UNDP seeks to identify, reduce and address the risk of retaliation and reprisals against people who may seek information on and participation in project activities, express concerns and/or access project-level grievance redress processes/mechanisms or UNDPs Stakeholder Response Mechanism or Social and Environmental Compliance Unit. To minimize the risk of reprisal or retaliation, the GRM will maintain confidentiality of Complainants' identities when requested, will respond to complainant concerns about reprisal or retaliation and in consultation with the Complainant bring the complaint to the Project Board and/or the UNDP Accountability Mechanism for review and action. For complaints regarding SEAH, the GRM will take additional steps as necessary to protect the confidentiality of the complainant and minimize reprisal and retaliation risks.

IX. Without Prejudice

The existence and use of this GRM is without prejudice to any existing rights under any other complaint mechanisms that an individual or group of individuals may otherwise have access to under national or international law or the rules and regulations of other institutions, agencies or commissions.