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## Annex 10: Environmental and Social Management Framework (ESMF)

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Date of last revision – March 28, 2024

For the following nine (UNDP-supported) National child projects under the GEF Africa Minigrids Program (AMP):

Country	Project Name	UNDP ID	GEF ID
Burkina Faso	National Child Project under the GEF Africa Minigrids Program – Burkina Faso	6510	10413
Comoros	National Child Project under the GEF Africa Minigrids Program – Comoros	6469	10413
Djibouti	National Child Project under the GEF Africa Minigrids Program – Djibouti	6327	10413
Eswatini	National Child Project under the GEF Africa Minigrids Program – Eswatini	6432	10413
Ethiopia	National Child Project under the GEF Africa Minigrids Program – Ethiopia	6338	10413
Malawi	National Child Project under the GEF Africa Minigrids Program – Malawi	6512	10413
Nigeria	National Child Project under the GEF Africa Minigrids Program – Nigeria	6484	10413
Somalia	National Child Project under the GEF Africa Minigrids Program – Somalia	6328	10413
Sudan	National Child Project under the GEF Africa Minigrids Program – Sudan	6321	10413

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## Acronyms

SEP:	Stakeholder Engagement Plan
SES:	Social and Environmental Standards
SESA:	Social and Environmental Strategic Assessment
SESP:	Social and Environmental Screening Procedure
A&M:	Assessment and management
AMP:	Africa Minigrids Program
PIF:	Project Identification Form
M&E:	Monitoring and evaluation
E&S:	Environmental and social
PPG:	Project preparation phase
FPIC:	Free, Prior and Informed Consent
IP:	Indigenous peoples
IPP:	Indigenous peoples plan
LMP:	Labour Management Procedures
PAI:	Project's area of influence
PV:	Photovoltaic
PFD:	GEF-7 Program Framework Document
BF:	Burkina Faso
CO:	Comoros
DJ:	Djibouti
ES:	Eswatini
ET:	Ethiopia
MW:	Malawi
NI:	Nigeria
SO:	Somalia
H:	High
S:	Substantial
M:	Moderate
L:	Low

## 1 SECTION I - Executive Summary

This Environmental and Social Management Framework (ESMF) covers nine national projects funded by the Global Environment Facility (GEF) as part of the Africa Minigrids Program (AMP). The AMP is a country-led regional technical assistance program for minigrids, active in an initial 21 African countries. It is led by the United Nations Development Programme (UNDP) with funding primarily from the GEF and implemented together with Rocky Mountain Institute (RMI) and the African Development Bank (AfDB), linking up with a wide array of minigrid stakeholders in Africa and beyond.

AMP's overall objective is to increase access to electricity by improving the financial viability and promoting scaled-up commercial investment in renewable energy minigrids. The program is focused on minigrid cost-reduction, across hardware costs, soft costs, and financing costs, and innovative business models for minigrids. With lower costs, minigrids will be more financially viable, commercial capital flows will increase, and end-users will benefit from lower tariffs and expanded service.

The AMP program has two main elements:

- An initial 21 national projects<sup>1</sup>, each with a common architecture consisting of five components: (i) policy and regulations, (ii) business model innovation with private sector, (iii) innovative finance for minigrids scale-up, and (iv) digital, knowledge management, and (v) M&E.
- A regional project acting as the knowledge, advocacy and coordinating platform for AMP. This will be achieved through a suite of knowledge tools, technical and operational expertise and support, communities of practice, and promoting innovative digital approaches for minigrid cost reduction.

This ESMF was prepared by UNDP during the design phase of the first round of national projects and covers nine out of the eleven first round projects under AMP. **The countries covered by this Framework are Burkina Faso, Comoros, Djibouti, Ethiopia, Eswatini, Malawi, Nigeria, Somalia, and Sudan.** There are two first round AMP national projects (Angola and Madagascar) that do not fall under the scope of this UNDP-developed Combined AMP ESMF.

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

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1 Participating countries are organized in 3 rounds/cohorts: Cohort 1 - Angola, Burkina Faso, Comoros, Djibouti, Ethiopia, Eswatini, Madagascar, Malawi, Nigeria, Somalia, and Sudan; Cohort 2 - Benin, Chad, Mali, Mauritania, Niger, Sao Tome and Principe, and Zambia; Cohort 3 - Burundi, DRC, and Liberia.

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<sup>2</sup> 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.

**All 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 - **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 (This executive summary).
- Section II describes the project scope and coverage, and objectives of the ESMF in relation to the project preparation phase.

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<sup>2</sup> The project document (ProDoc) for each National Project includes the SESP, which details the specific environmental and social risks associated with each project. See Annex 6 of each project document.

- 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) procedures 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 – Projects Description
- Annex II - Legal and Institutional Framework
- Annex III - Stakeholder Engagement Checklist
- Annex IV- Sample Terms of Reference: Project-level Grievance Redress Mechanism
- Annex V- Indicative Outline of ESIA Report
- Annex VI - Indicative Outline of an ESMP
- Annex VII - Indigenous Peoples Screening Questionnaire
- Annex VIII: Indicative Outline of an Indigenous People's Plan
- Annex IX - Key Stages in the SESA process
- Annex X - Labour Management Procedures Template



## 2 SECTION II - Project description and ESMF purpose

This section aims at describing the proposed project(s) and its(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 the African Development Bank (AfDB) and Rocky Mountain Institute (RMI).

Program Objective: The program’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 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.

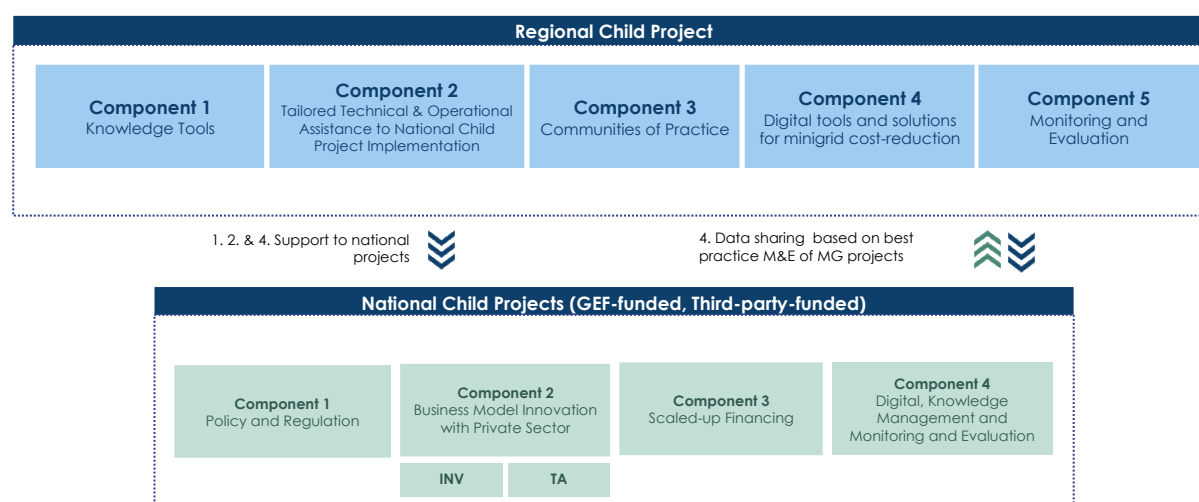
Program Design: The program architecture, as shown in Figure 1 below, has two main elements:

- A cohort of **National Projects**<sup>3</sup>, 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.

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<sup>3</sup> Participating countries are organized in 3 rounds/cohorts: Cohort 1 - Angola, Burkina Faso, Comoros, Djibouti, Ethiopia, Eswatini, Madagascar, Malawi, Nigeria, Somalia, and Sudan; Cohort 2 - Benin, Chad, Mali, Mauritania, Niger, Sao Tome and Principe, and Zambia; Cohort 3 - Burundi, DRC, and Liberia.

Figure 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, Sao Tome & Principe, 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 (DRC) 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 includes 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 first round of AMP national projects.

#### ESMF Scope by Country/Project

This ESMF covers nine UNDP-supported GEF-funded projects, out of the eleven national projects under the GEF-7 Africa Mini-grids Program (AMP) first round.

This ESMF only covers the nine national projects being supported by UNDP as GEF Agency, and which are GEF-funded. The countries included in this Framework are Burkina Faso, Comoros, Djibouti, Ethiopia, Eswatini, Malawi, Nigeria, Somalia, and Sudan. These projects, listed below, are required to adhere to the UNDP SES policy.

Table 1 - Projects covered by this ESMF

Country	Project Name	PIMS Id	GEF Id
Burkina Faso	National Child Project under the GEF Africa Minigrids Program – Burkina Faso	6510	10413
Comoros	National Child Project under the GEF Africa Minigrids Program – Comoros	6469	10413
Djibouti	National Child Project under the GEF Africa Minigrids Program – Djibouti	6327	10413
Eswatini	National Child Project under the GEF Africa Minigrids Program – Eswatini	6432	10413
Ethiopia	National Child Project under the GEF Africa Minigrids Program – Ethiopia	6338	10413
Malawi	National Child Project under the GEF Africa Minigrids Program – Malawi	6512	10413
Nigeria	National Child Project under the GEF Africa Minigrids Program – Nigeria	6484	10413
Somalia	National Child Project under the GEF Africa Minigrids Program – Somalia	6328	10413
Sudan	National Child Project under the GEF Africa Minigrids Program – Sudan	6321	10413

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

Two third-party-funded national projects in the AMP first round do not fall under the scope of this UNDP-developed ESMF (Angola and Madagascar).

- The Angola national project does not fall under the scope of this ESMF because it is not a UNDP-supported project. That is, UNDP is not the GEF Agency for the Angola AMP national project. The GEF Agency for Angola’s project (AfDB) is responsible and accountable for compliance with their own SES standards.

- For Madagascar, there are two different projects that are part of the AMP: (i) a UNDP-supported, UNDP-funded national project which is required to adhere to the UNDP SES policy; and (ii) an AfDB-supported, AfDB-funded national project which is subject to AfDB's own SES standards. A decision has been made for the UNDP-supported, UNDP-funded national project in Madagascar to have its own and independent project-specific ESMF.

#### 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 during the PPG phase. 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 other non-monetary (in-kind) contributions<sup>4</sup>.

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 (AfDB, WB, minigrid developers, etc.) which 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. UNDP's SES compliance accountability for co-financing activities

Type of co-financing activities	Description	UNDP's SES compliance accountability
<b>Co-financing activities included as project results</b> funded with resources that flow through UNDP accounts	These activities are mainly funded by <b>UNDP TRAC funds that complement the GEF grant</b> 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.

<sup>4</sup> 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. This includes expenditure made by any person or entity in cooperation, consultation or concert with, or at the request or suggestion of, the AMP.

<p><b>Co-financing activities included as project results</b> funded with resources that DO NOT flow through UNDP accounts</p>	<p>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 “<b>co-financing activities included as project results</b>”. The precise sources and amounts of these co-financing activities will only be known at implementation stage.</p>	<p>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).</p>
<p><b>Co-financing activities NOT included as project results</b></p>	<p>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.</p>	<p>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).</p>

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, a summary 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 AMP (and all 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 (e.g. Malawi, Nigeria) all projects have these four 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. Section 0 below provides more details on the project minigrid pilots.

- **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 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.

Annex I of this ESMF contains summary descriptions of each of the nine projects under this ESMF. For a complete description please refer to the respective UNDP Project Document. The table below summarizes the outputs for each country under each component.

Table 3 Summary of Outputs by Project

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
<p>National child project under the Africa Minigrids Program - <b>Burkina Faso</b></p> <p>GEF \$924,566</p> <p>UNDP \$800,000</p>	<ul style="list-style-type: none"> <li>▪ 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</li> <li>▪ Output 1.2: Formulation of rural electrification strategy/plan, incorporating transparent targets and supported by multi-tier data.</li> <li>▪ Output 1.3: Domestication of quality standards for solar mini-grid components, and institutional capacity of national stakeholders involved in setting or reinforcing standards strengthened</li> <li>▪ Output 1.4: Capacity building of public officials (regulator, ministries, agencies) and private sector to fully play their role (tariffs, design procurement/tender processes that incorporate cost-reduction levers and innovative business models etc.) vis-à-vis texts emanating from the Energy Law</li> <li>▪ Output 1.5: Operationalizing a certification scheme for installers and technicians building on ECREEE's Regional Certification Scheme.</li> <li>▪ Output 1.6: Light quantitative mini-grid DREI techno-economic analysis carried in Year 4</li> <li>▪ Output 2.1: Pilots developed, including on productive use/innovative appliances and modular hardware/system design, leading to cost-reduction in mini-grids</li> <li>▪ Output 2.2 Capacity of winning tender bidders such as new COOPELs and private sector developers from industry associations strengthened to develop and implement innovative business models and cost-reduction levers</li> <li>▪ Output 2.3 Support provided to establish and grow a national industry association for private sector developers</li> <li>▪ Output 3.1: Domestic financial sector capacity-building on business and financing models for minigrids</li> <li>▪ Output 3.2: General market intelligence study on minigrids in regions complementary to WB and AfDB investments</li> <li>▪ Output 3.3: Design support, including development of operational guidance, provided for Minigrid Funding Facility (MFF, or equivalent financial mechanism) under rural electrification agencies/funds</li> <li>▪ Output 3.4: Feasibility study support provided to minigrid developers, creating a pipeline of investible assets</li> <li>▪ Output 3.5: Capacity building provided to minigrid developers and investors on measuring and reporting on impact indicators, building credibility in impact investment as an asset class</li> <li>▪ Output 4.1 A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project</li> <li>▪ Output 4.2 - Minigrids digital platform implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction</li> <li>▪ 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</li> <li>▪ Output 4.4: M&amp;E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&amp;E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation</li> <li>▪ 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.</li> </ul>



Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	<ul style="list-style-type: none"> <li>▪ Output 4.6: Knowledge networks / Communities of Practice / industry associations / Other strengthened to promote minigrids development / rural energy access</li> <li>▪ Output 4.7: Lessons learned captured and disseminated at all levels</li> <li>▪ Output 4.8: Replication plan (including investment plan) for scaling up rural energy access developed</li> </ul>
<p>National child project under the Africa Minigrids Program -Comoros</p> <p>GEF \$1,269,863</p> <p>UNDP \$400,000</p>	<ul style="list-style-type: none"> <li>▪ 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</li> <li>▪ Output 1.2. A review of the political and regulatory frameworks on the possible minigrid delivery models and suitable incentives is proposed in close collaboration with the National Dialogue Platform members and other development partners <ul style="list-style-type: none"> <li>○ Output 1.2. / Activity 1.2.2. Adapt and enforce customs procedures and import requirements, and strengthen capacities of public officials to implement and enforce simplified import process</li> <li>○ Output 1.2. / Activity 1.4.4. Conduct an assessment of negative impact of competing fossil-fuel and main-grid utility subsidies on competitiveness of minigrids</li> </ul> </li> <li>▪ Output 1.3. Templates of tender documents and contracts for the implementation and operation of minigrids (between community and private operator) are prepared</li> <li>▪ Output 1.4. Geospatial, techno-economic modelling of least-cost off-grid renewable electricity technologies (mini-grids, grid expansion, solar home systems)</li> <li>▪ Output 1.5. Mini-grid 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</li> <li>▪ Output 1.6. Pre-feasibility studies conducted for selected mini-grid sites to enhance sector planning and decision-making on a delivery model for minigrid development</li> <li>▪ Output 1.7. Institutional capacities at technical, managerial and regulatory levels, in particular to design procurement and tendering processes incorporating cost-cutting levers and innovative business models, are strengthened</li> <li>▪ Output 1.8. Public programmes (apprenticeships, certificates, university programs) to develop competitive, skilled labor market in minigrids facilitated</li> <li>▪ Output 2.1. Opportunities to boost economic and social activities through electricity access and productive use, with focus on minigrids, are identified and innovation is promoted</li> <li>▪ Output 2.2. Pilots developed, including on productive use/innovative appliances and modular hardware/system design, leading to cost-reduction in minigrids</li> <li>▪ Output 2.3. Capacities of private minigrid developers and communities are strengthened</li> <li>▪ Output 2.4. Group of Private Sector RE Services Providers is formalized, operational and its capacities are strengthened</li> <li>▪ Output 3.1. The design and operations of a Minigrid Funding Facility under the Electricity Code is supported</li> <li>▪ Output 3.2. General market intelligence study on minigrids prepared and disseminated amongst public officials and finance community</li> <li>▪ Output 3.3. Capacities of the national financial sector (including philanthropic) in terms of business models and innovative financial solutions (including digital) in connection with minigrids are strengthened and facilitate access to financing</li> </ul>

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	<ul style="list-style-type: none"> <li>▪ Output 4.1 A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project</li> <li>▪ Output 4.2 - Minigrids digital platform implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction</li> <li>▪ 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</li> <li>▪ Output 4.4: M&amp;E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&amp;E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation</li> <li>▪ 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.</li> <li>▪ Output 4.6. A Community of Practice to promote minigrids development and rural energy access is established, in close collaboration with Communities of Practice at AMP regional level and others at SIDS, regional, continental and international levels</li> <li>▪ Output 4.7. Awareness raising campaigns, including lessons learned, are developed and disseminated at all levels nationally (incl. intervention zones) and with the regional project</li> <li>▪ Output 4.8: Replication plan (including investment plan) for scaling up rural energy access developed</li> </ul>
<p>National child project under the Africa Minigrids Program -<b>Djibouti</b></p> <p>GEF \$3,071,347</p> <p>UNDP \$50,000</p>	<ul style="list-style-type: none"> <li>▪ Output 1.1 An inclusive national dialogue to identify mini-grid delivery models is facilitated, clarifying priority interventions for an integrated approach to off-grid electrification.</li> <li>▪ Output 1.2 Mini-grid 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.</li> <li>▪ Output 1.3 Institutional set-up for rural electrification assessed to support the establishment of a focal point for mini-grid development, and institutional capacity building provided on technical, managerial, and regulatory issues.</li> <li>▪ Output 1.4 Public programmes (apprenticeships, certificates, university programs) to develop competitive, skilled labor market in the design, operation and maintenance of solar and hybrid mini-grids.</li> <li>▪ Output 1.5 Domestication of quality standards for solar mini-grid components, and institutional capacity of national authorities in-charge, i.e. standards organizations/bureau, strengthened.</li> <li>▪ Output 2.1 Pilots for low-carbon mini-grids are developed, to demonstrate business models for off-grid electricity including productive use/innovative appliances, leading to cost-reduction in mini-grids.</li> <li>▪ Output 2.2 Capacity of potential tender bidders (private sector developers) strengthened to consider innovative business models and cost-reduction levers.</li> <li>▪ Output 2.3 Support provided to establish and grow a national industry association of private sector mini-grid developers.</li> <li>▪ Output 3.1 Design support, including development of operational guidance, provided for Mini-grid Funding Facility (MFF) or equivalent financial mechanism, under rural electrification agencies/funds, such as the National Development Fund (NDF) or the Guarantee Fund (GF).</li> <li>▪ Output 3.2 Domestic financial sector capacity building on business and financing models for mini-grids.</li> </ul>

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	<ul style="list-style-type: none"> <li>▪ Output 3.3 Capacity building provided to local mini grid developers and investors on measuring and reporting on impact indicators, building credibility in impact investment as an asset class.</li> <li>▪ Output 4.1 A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project</li> <li>▪ Output 4.2 - Minigrids digital platform implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction</li> <li>▪ 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</li> <li>▪ Output 4.4: M&amp;E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&amp;E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation</li> <li>▪ 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.</li> </ul>
<p>National child project under the Africa Minigrids Program -<b>Eswatini</b></p> <p>GEF \$863,242</p> <p>UNDP \$50,000</p>	<ul style="list-style-type: none"> <li>▪ Output 1.1. Geospatial, techno-economic modelling of least-cost off-grid renewable electricity technologies (minigrids, grid expansion, solar home systems)</li> <li>▪ Output 1.2. An inclusive national dialogue to identify minigrid delivery models, a vision and roadmap is facilitated, clarifying priority interventions for an integrated approach to off-grid electrification.</li> <li>▪ Output 1.3. Capacity building provided to public officials (regulator, ministries) to identify and incorporate cost-reduction levers and innovative business models.</li> <li>▪ 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</li> <li>▪ Output 2.1. Expansion of public utility minigrid pilot to incorporate Productive Use of Energy (PUE), innovative appliances and small business development, to demonstrate opportunities for improved feasibility of minigrid systems for rural households.</li> <li>▪ Output 2.2. Greenfield pilot developed demonstrating productive uses use/innovative appliances and modular hardware/system design, leading to cost-reduction in minigrids.</li> <li>▪ Output 2.3. Strengthen capacity of potential developers and operators to consider design parameters, innovative business models and cost-reduction levers, to improve project feasibility, with practical experience drawn from both pilot projects</li> <li>▪ Output 3.2 A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project</li> <li>▪ Output 3.3. Minigrids digital platform implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction</li> <li>▪ Output 3.1. A Quality Assurance and Monitoring Framework for measuring, reporting and verification of the sustainable development impacts of MGs, including GHG emission reductions is developed and operationalized based on standardized guidance from the regional project</li> </ul>

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	<ul style="list-style-type: none"> <li>▪ Output 3.6: M&amp;E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&amp;E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation</li> <li>▪ Output 3.4. Active interface with regional project established, including, but not limited to, via (i) participating in Communities of Practice and (ii) capturing and sharing lessons learnt at national and regional level.</li> <li>▪ Output 3.5. Knowledge Network established to promote MG development / rural energy access</li> </ul>
<p>National child project under the Africa Minigrids Program -Ethiopia</p> <p>GEF \$2,890,826</p> <p>UNDP \$300,000</p>	<ul style="list-style-type: none"> <li>▪ Output 1.1. Support for national dialogue, associated capacity enhancement and arrangements for implementation of cooperative minigrid delivery model(s).</li> <li>▪ Output 1.2. Establishment of technical and contract provisions, and consultation with developers and financiers on grid arrival arrangements.</li> <li>▪ Output 1.3. Execution of the De-risking Renewable Energy Investment (DREI) analysis for solar PV minigrids.</li> <li>▪ Output 1.4. Development of decommissioning strategy and guidelines on waste management for minigrid components.</li> <li>▪ Output 1.5. Capacity-building for MoWIE and its sectoral institutions via the MoWIE Innovation Center (MIC).</li> <li>▪ Output 2.1. Implementation of pilot minigrids under cooperative delivery models.</li> <li>▪ Output 2.2. Technical assistance for productive use in association with AMP-supported minigrids.</li> <li>▪ Output 2.3. Training, higher education programs, and internships established for minigrid design, installation, operations, maintenance, and business models.</li> <li>▪ Output 3.1. Design support for financing and risk mitigation instruments, as well as development of operational guidance, provided for minigrid and productive use financing facility.</li> <li>▪ Output 3.2. Domestic financial sector capacity-building on business and financing models for minigrids.</li> <li>▪ Output 4.1: A Digital Strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project.</li> <li>▪ Output 4.2: Minigrids digital platform implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction.</li> <li>▪ 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</li> <li>▪ Output 4.4: M&amp;E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&amp;E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation</li> <li>▪ 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.</li> <li>▪ Output 4.6. A Community of Practice to promote minigrids development and rural energy access is established, in close collaboration with Communities of Practice at AMP regional level and others at SIDS, regional, continental and international levels</li> </ul>

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
<p>National child project under the Africa Minigrids Program <b>-Malawi</b></p> <p>GEF \$396,125</p> <p>UNDP \$1,000,000</p>	<ul style="list-style-type: none"> <li>▪ Output 1.1. Geospatial, techno-economic modelling of least-cost off-grid renewable electricity technologies (minigrids, grid expansion, solar home systems)</li> <li>▪ Output 1.2. Minigrid DREI techno-economic analyses carried out to propose most cost-effective basket of policy and financial derisking instruments</li> <li>▪ Output 1.3. An inclusive national dialogue to identify minigrid delivery models is facilitated, clarifying priority interventions for an integrated approach to off-grid electrification</li> <li>▪ Output 2.1. Extension of two minigrid pilots with productive use overlays to identify a business model suitable to small minigrid operations.</li> <li>▪ Output 2.2. An online 'One Stop Information Centre' established with practicable guidance to developers for navigating unfamiliar and/or evolving regulatory processes from concept to commissioning.</li> <li>▪ Output 3.2 A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project</li> <li>▪ Output 3.3. Minigrids digital platform implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction</li> <li>▪ Output 3.1. A Quality Assurance and Monitoring Framework for measuring, reporting and verification of the sustainable development impacts of MGs, including GHG emission reductions is developed and operationalized based on standardized guidance from the regional project</li> <li>▪ Output 3.6: M&amp;E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&amp;E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation</li> <li>▪ Output 3.4. Active interface with regional project established, including, but not limited to, via (i) participating in Communities of Practice and (ii) capturing and sharing lessons learnt at national and regional level.</li> <li>▪ Output 3.5. Industry association strengthened to advocate for and actively engage Government on behalf of private sector minigrid developers and operators.</li> </ul>
<p>National child project under the Africa Minigrids Program <b>-Nigeria</b></p> <p>GEF \$5,905,046</p>	<ul style="list-style-type: none"> <li>▪ Output 1.1: Pilots developed, including on productive use/innovative appliances and modular hardware/system design, leading to cost-reduction in mini-grids and sufficient growing demand for minigrid systems.</li> <li>▪ Output 1.2: Standardized online REF Calls for Proposals for enhanced transparency in developers bidding process.</li> <li>▪ Output 1.3: Capacity of potential tender bidders (private sector developers) strengthened to consider innovative business models and cost-reduction levers.</li> <li>▪ Output 1.4: Capacity of winning tender bidders (private sector developers) strengthened to develop and implement innovative business models and cost-reduction levers.</li> <li>▪ Output 1.5: Capacity building provided to public officials (regulator, ministries) specifically to design procurement/tender processes that incorporate cost-reduction levers and innovative business models.</li> <li>▪ Output 1.6: Scaled up support for upstream equipment manufacturers and suppliers.</li> <li>▪ Output 2.1: Financial advisory committee established and operational.</li> <li>▪ Output 2.2: Innovative financing solutions for minigrid development are identified and implemented through the REF.</li> </ul>

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	<ul style="list-style-type: none"> <li>▪ Output 2.3: General market intelligence study on minigrids prepared and disseminated amongst public officials and finance community.</li> <li>▪ Output 2.4: Feasibility study support provided to minigrid developers, creating a pipeline of investible assets.</li> <li>▪ Output 2.5: Capacity building provided to minigrid developers and investors on measuring and reporting on impact indicators, building credibility in impact investment as an asset class.</li> <li>▪ Output 3.1: Inception workshop.</li> <li>▪ Output 3.2: Project monitoring.</li> <li>▪ Output 3.3: Project evaluations.</li> <li>▪ Output 3.4: Lessons learned captured and disseminated at the national level.</li> <li>▪ Output 3.5: Replication plan (including investment plan) for scaling up rural energy access developed.</li> <li>▪ Output 3.6: Renewable Energy and minigrid Development Associations supported and strengthened to promote minigrid development.</li> <li>▪ Output 3.7: Project Digital Strategy developed, and Quality Assurance Framework augmented and independent verification process in place for measuring, reporting and verification of the sustainable develop impacts of minigrids, including GHG emission reductions.</li> </ul>
<p>National child project under the Africa Minigrids Program -<b>Somalia</b></p> <p>GEF \$3,276,147</p> <p>UNDP \$750,000</p>	<ul style="list-style-type: none"> <li>▪ "Output 1.1. An inclusive national dialogue to identify mini-grid delivery models is facilitated, clarifying priority interventions for an integrated approach to off-grid electrification."</li> <li>▪ "Output 1.2. Mini-grid 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. "</li> <li>▪ "Output 1.3. Mini-grid policies and regulations, including tariff model and incentives, are operationalized through digital transformation support, in collaboration with the authorities and other development partners."</li> <li>▪ "Output 1.4. Institutional setup for rural electrification assessed and supported, and institutional capacity building provided on technical, managerial, and regulatory issue."</li> <li>▪ "Output 1.5. Quality standards for solar and hybrid mini-grid components domesticated, and institutional capacity of Somali Bureau of Standards (SBS) and Somaliland Quality Control Commission (SQCC) strengthened."</li> <li>▪ "Output 2.1. Pilot(s) developed using innovative business models through calls for proposals based on lessons learned from the operationalization of the SREF under ESRES2 and the results of the geospatial mapping under SEAP. "</li> <li>▪ "Output 2.2. Public programmes (apprenticeships, certificates, university programs) to develop competitive, skilled labor market in the design, O&amp;M, and management of solar and hybrid mini-grids, including technical training on the utilization of online tools for performance monitoring, consumption tracking and billing."</li> <li>▪ "Output 2.3. Support provided to establish, grow and capacitate national industry associations for private sector developers and ESPs."</li> <li>▪ "Output 3.1. Design support, including development of operational guidance, for a complementary funding instrument through which the diaspora and small investors can participate in existing financing mechanisms that have been introduced by other development partners to facilitate finance for vetted mini-grid projects."</li> <li>▪ "Output 3.2. Domestic financial sector capacity building on business and financing models for mini-grids."</li> </ul>

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	<ul style="list-style-type: none"> <li>Output 4.1 A project digital strategy is developed and implemented, including linkages to and following guidance from the AMP Regional Project</li> <li>Output 4.2 - Minigrids digital platform implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction</li> <li>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</li> <li>Output 4.4: M&amp;E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&amp;E, (iii) Mid Term Evaluation and (iv) Terminal Evaluation</li> <li>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.</li> </ul>
<p>National child project under the Africa Minigrids Program -Sudan</p> <p>GEF \$2,637,246</p> <p>UNDP \$300,000</p>	<ul style="list-style-type: none"> <li>Output 1.1. Mini-grid delivery model(s) identified from national dialogues on minigrid delivery models</li> <li>Output 1.2. Registration process for Low Voltage minigrids in place and disseminated among stakeholders</li> <li>Output 1.3. A full minigrid regulatory framework is in place and adopted by MoEP and ERA through a series of inclusive national dialogues, with a streamlined licensing process and clear rules and requirements defined.</li> <li>Output 1.4. 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</li> <li>Output 1.5. Pre-feasibility studies for minigrid sites to enhance sector planning and decision-making on a delivery model for minigrid development, including geospatial studies</li> <li>Output 1.6. Capacitate public institutions, in particular MoEP and ERA on technical, managerial, and regulatory issues including design procurement and tender processes that incorporate cost-reduction levers and innovative business models</li> <li>Output 2.1. Pilots for an indicative two to four (2-4) existing diesel minigrids have been hybridized with solar PV and a small electrical storage. This infrastructure is successfully implemented, operational, and maintained by the private sector, involving women's vocational training and participation, leading to cost-reduction in minigrids</li> <li>Output 2.2. Capacity of potential tender bidders (private sector developers) strengthened to consider innovative business models and cost-reduction levers. This output will also benefit from Activity 3.1.2.1 (hands-on coaching on minigrid developers)</li> <li>Output 2.3. A "solar sister" (brand name) programme is in place, that supports and capacitates Sudanese women on technical, managerial, and economic aspects of solar hybrid minigrids</li> <li>Output.3.1. Design support for minigrid innovative financing mechanisms</li> <li>Output.3.2. Financing needs to support the uptake of minigrids are assessed and identified</li> <li>Output 3.3. Feasibility study support provided to minigrid developers, creating a pipeline of investible assets in unelectrified communities in Sudan"</li> <li>Output 4.1. A Project Digital Strategy is developed and implemented, including linkages to a following guidance from the regional project "</li> </ul>

Project / GEF Project Grant & UNDP TRAC (USD)	Outputs and Key Activities
	<ul style="list-style-type: none"> <li>▪ "Output 4.2. Minigrids digital platform implemented to run tenders and manage data from pilots, and to support minigrids scale-up and cost-reduction"</li> <li>▪ Output 4.3. A Quality Assurance and Monitoring Framework (QAMF) for measuring, reporting and verification of the sustainable development impacts of all minigrids pilots supported, including GHG emission reductions, is adopted an operationalized based on standardized guidance from the regional project"</li> <li>▪ Output 4.4. M&amp;E and Reporting, including (i) Conducting inception workshop and preparing report, (ii) Ongoing M&amp;E, (iii) Mid-term Review (MTR), and (iv) Terminal Evaluation (TE)"</li> <li>▪ Output 4.5. Engage with the AMP Regional Project, including, but not limited to, via (i) Participating in Communities of Practice (CoPs), and (ii) Capturing and sharing lessons learnt"</li> </ul>



### 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.**

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.

The table below shows 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 4. 3 types of minigrid pilots under AMP

Type of minigrid pilot	Description	National project	Child project
#1 Greenfield minigrids	Complete minigrid systems, including generation and distribution assets, as well as productive use equipment.	<ul style="list-style-type: none"><li>• Burkina Faso</li><li>• Comoros</li><li>• Djibouti</li><li>• Eswatini</li><li>• Ethiopia</li><li>• Nigeria</li></ul>	
#2 Hybridized diesel minigrids	Retrofitting (i.e. hybridization) of existing diesel-based minigrids increasing the renewable fraction of power generation.	<ul style="list-style-type: none"><li>• Burkina Faso</li><li>• Eswatini</li><li>• Malawi</li></ul>	
#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.	<ul style="list-style-type: none"><li>• Somalia</li><li>• Sudan</li></ul>	

Below is the analysis of the relevant aspects regarding the demonstrative minigrid pilots planned for each project:

Table 5 Key aspects of each minigrid pilot (sub-project)

Country	Final use of energy generated	Existing energy providers	Pilot sites and structure chosen
Somalia	Mini-grid to join existing diesel mini-grids, may be for residential and/or productive purposes.	Charcoal and wood sellers in the formal and informal markets, and existing private diesel mini-grids.	Sites to be allocated through public calls for proposals. Expected to be isolated mini-grids (not connected with the national grid).
Djibouti	Solar PV-battery mini-grid and solar street lighting, with consideration on business models for social housing.	Charcoal and wood sellers in the formal and informal markets, and existing off-grid private diesel mini-grids.	The locations for the pilots will also be decided at project start, using the findings of the DREI analyses and the needs assessments to be performed on the locations proposed by the Government of Djibouti. Expected to be isolated mini-grids (not connected with the national grid).
Eswatini	Pilot 1) addition of electrical productive related equipment (no batteries, no solar panels), productive sectors to be defined through further consultation.  Pilot 2) Off-grid mini-grid to be used as "energy hub" for productive, commercial and domestic use.	There are no mini-grid projects in the country. The baseline is wood and paraffin from formal and informal sellers, mainly poor woman.	1) Sigcineni area: Will join the existing pilot installation to demonstrate the contribution of productive uses of energy and efficient appliances on mini-grid capacity factor, revenue and business case. The AMP does not contemplate the supply of batteries and/or solar panels but rather other equipment needed for the productive sector when known (i.e. fridge, etc). 2) Ekubekezeleni, Bulimeni area: Creation of an 'energy hub' in a rural community that powers a hub of productive and commercial uses, for example a facility that can house various forms of agro-processing of crops for own use and resale, cold storage facilities for processed produce, business needing electricity like an internet café, etc. The AMP plans to set up the whole off-grid mini-grid (including solar panels and batteries). Another element foreseen for the pilot is making available EE cooking appliances to households. One option includes subsidizing the purchase of electric pressure cookers to displace less energy and time efficient, costly cooking fuels. Again, the exact scope and focus will be dependent on a status quo and needs assessment and consultation with the community.
Comoros	Pilot 1) Super-hybrid existing mini-grid system (diesel and hydro, biomass, solar, national grid) with different final energy uses, the AMP 4 <sup>th</sup> generation keymaker will be an additional part for a second business line, conserving and pre-processing local raw fish. Pilot 2) Mini-grid as a stand-alone container/system generating energy with multiple final uses: i.e. purifying water to make it drinkable, charging station for electronic devices (i.e. mobile phones, computers), internet access,	Kerosene, candles and wood sellers in the formal and informal markets, and existing private diesel mini-grids.	Proposed innovative technological solutions are tentative and would be confirmed during implementation based on relevant studies and analyses. Potentially: 1) Island of Mohéli, in the neighbor villages of Wallah II and Miremani (194 households in total), a coastal rural area relying mainly on fishery and tourism (before COVID-19). There, a 4th generation keymaker model will be put in place based on the fishery activity. A "Super" hybrid system with biogas (GEF/UNDP SGP), hydro (GEF/UNDP SGP), solar (AMP) and possibly national grid will be put in place by parallel projects, so the AMP will join this. 2) Island of Anjouan, remote unelectrified village, a containerized all-in-one system (solar kiosk), based on a solar minigrid with battery storage. 3) Island Grande Comore, high agricultural potential. At the farm, a

Country	Final use of energy generated	Existing energy providers	Pilot sites and structure chosen
	solar pumping for irrigation for off-season agriculture, and possibly also small solar processing equipment. Pilot 3) Island Grande Comore, aiming at developing agriculture, agribusinesses and agrivoltaics. In addition, electricity to the hospital of Dibwani.		biodigester should be implemented in 2021 based on SGP GEF financing. A project aims at attracting 100+ youth to live and work full time in Sangani. In addition to support post-COVID response and healthcare, the hospital of Imbweni close to the future minigrid will benefit from the minigrid's electricity.
Malawi	Pilot 1) Addition of electrical productive related equipment (no batteries, no solar panels), to existing solar PV mini-grid, for residential and/or productive purposes. An environmental and social management plan (ESMP) is in place. Pilot 2) An online 'One Stop Information Centre'	Existing solar PV mini-grid	The AMP does not contemplate the supply of batteries and/or solar panels but rather other equipment needed for the productive sectors and/or knowledge tools: 1) Mthembangi Village: join an existing project (EASE) with a solar-PV mini-grid. It currently provides electricity to 60 customers (41 households, 17 businesses, 1 church and 1 school). Despite the small size of the system, the available capacity is significantly underutilized with peak demand only approximately 20% of the installed capacity. The project will contribute with 1) a rice miller, 2) the Small and Medium Enterprises Development Institute, 3) making available efficient electrical appliances to households and small businesses, 4) additional monitoring requirements and data collection instruments. 2) An online 'One Stop Information Centre' established with practicable guidance to developers for navigating unfamiliar and/or evolving regulatory processes from concept to commissioning.
Nigeria	The project will support the integration of solar PV mini-grids in existing agriculture value chains (i.e. productive energy uses). The project does not consider the possibility of the following: <ul style="list-style-type: none"> <li>Hybrid mini-grids with existing fossil fuels (i.e. diesel) systems.</li> <li>Hybrid mini-grids as an addition to other existing renewable technologies (hydro, biomass...).</li> <li>Connection of mini-grids to national grid.</li> </ul>	Fuel/energy sellers in the formal and informal markets, and existing private mini-grids (i.e. based on diesel, renewable energies, etc).	Pilots for Tier 1 and Tier 2 agricultural activities. Tier 1 agricultural value chains already contain mechanized post-harvest processing using fossil fuel-powered equipment. These value chains can be electrified using solar PV mini-grid electricity immediately. Tier 2 agricultural value chains contain post-harvest activities that are not mechanized but that can be electrified in the short-to-medium term. A total of six pilots will be developed through a transparent Call for Proposals.
Burkina Faso	Pilot 1) Delivering power to health facilities. Pilot 2) Projects geared towards the food, water and energy nexus, looking to increase productivity (sectors could	Fuel/energy sellers in the formal and informal markets, and existing private minigrids (i.e. based on diesel, renewable energies, etc).	Sites to be allocated through public calls for proposals.

Country	Final use of energy generated	Existing energy providers	Pilot sites and structure chosen
	include agriculture, animal husbandry, food processing, fishing, etc...) for example through reducing post-harvest loss (processing and conservation) through solar minigrids. This will include using multi-functional platforms (MFP) as anchor load for electricity from minigrid.		
Ethiopia	Support to existing cooperative projects for productive sectors to be defined through further consultation.	Estimated over 200 existing minigrids, mostly diesel, many tiny, informal and unregulated. And, fuel/energy sellers in the formal and informal markets. The project will act on MoWIE project existing mini-grids, further details to be provided along the project cycle.	Nationwide, specific sites to be allocated during project implementation.
Sudan	Hybridization (adding renewable energy generation) to existing diesel mini-grids, may be for residential and/or productive purposes.	The baseline is the energy/fuel suppliers from the formal and informal markets. There is 3,500MW of electricity generation capacity largely from hydroelectricity under the National Electricity Corporation (NEC). Wood and charcoal are often used in homes uses, as well as for some small industries, as a cheaper alternative to gas cylinders.	Five sites in the south of the country have been identified.

## 2.4 Purpose and objectives of the ESMF

The purpose of the ESMF is to identify the likely environmental and social impacts, propose suitable mitigation measures and implementation of these measures. This ESMF is required to ensure compliance with the UNDP, the national government, and those of the participating donors and stakeholders.

Specifically, the ESMF:

- Evaluates the project's potential environmental risks and impacts in its area of influence; examines project alternatives;
- Identifies ways of improving project siting, planning, design, and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental impacts and enhancing positive impacts; and
- Includes the process of mitigating and managing adverse environmental impacts throughout project implementation.

The ESMF takes into account all relevant Programming Principles and Project-level Standards in the UNDP SES.

All the major E&S impacts along with mitigation and management measures have been compiled in the form of this ESMF. The ESMF will be applicable for the whole project implementation period, until/unless replaced by the measures in the subsequent management plans.

The study comprises the full project cycle, from initiation to closure, taking into account that the environmental and social studies to be developed will take over this ESMF along such cycle. The cycle stages are design and planning, including site selection; construction; operation and maintenance; and decommissioning.

## 2.5 Disclosure of the ESMF and Revised Draft

A draft version of this ESMF has been disclosed on the website of UNDP country offices for the various national projects. As the project has been categorized as Substantial Risk, 60 days were given to provide feedback. No comments were received during this period for all projects.

Table 6 ESMF Disclosure Dates for National Projects

Country	ESMF Disclosure Date	Comments Received
Burkina Faso	December 2021	None
Comoros	24 March 2022	None
Djibouti	Q1 2022	None
Eswatini	20 April 2022	None
Ethiopia	22 March 2023	None
Malawi	5 April 2023	None
Nigeria	Q1 2022	None
Somalia	23 December 2021	None
Sudan	15 January 2022	None

Although no comments were made on the draft ESMF, some changes were made to the disclosed draft ESMF based on lessons learned during preparation of this project and its 2<sup>nd</sup> and 3<sup>rd</sup> rounds.

These changes are reflected in this ESMF and can be summarized as follows:

- Strategic Environmental and Social Assessment requirements limited to fewer activities.
- Feasibility study activities no longer require an ESIA/ESMP.
- Exclusion list replaced by Screening Checklist to be applied after selection of each minigrid site based on SESP.
- Not necessary to conduct ESIA for pilot minigrids. Need for assessment is based on the checklist that results in requiring either an ESIA, a targeted assessment or no assessment.

### **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.

The identification of key activities that may not proceed until they are screened and assessed, and appropriate management measures are in place are identified under the exclusion and special lists for eligibility in this 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. During the project preparation phase, 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 Annex 6 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.

While the initial targeted sites/beneficiaries for the mini-grids have been identified for most countries and a menu of intentioned arrangements has been developed through the design phase of the project, the final sites and arrangements serving the purpose and the specific activities to be implemented will be committed to during project implementation when detailed information of the sites are received. 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 will continue to be budgeted and included in the design for their implementation to the whole project cycle. Note that all sub-projects with valid environmental and social safeguards will have to follow and align the requirements of this ESMF.

Below is the detailed list of expected positive and negative impacts expected from the project. An in-depth assessment is contained in Section V of this document.

#### **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).
- When 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/health 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.

### **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 7 below.

Table 7 - Summary of project Environmental and Social Risks

Risk # <sup>5</sup> /Potential Environmental and Social Risk	Relevant Identified Risks by Country (refer to SESP)								
	Burkina Faso	Comoros	Djibouti	Eswatini	Ethiopia	Malawi	Nigeria	Somalia	Sudan
RISK 1: Risk on lack of capacities (Insufficient capacity of duty-bearers and/or of rights-holders to claim their rights.	Substantial	Substantial	Moderate	Substantial	Moderate	Moderate	Moderate	Substantial	Substantial
RISK 2: Risk of project activities not being safeguards responsive during the project life cycle.	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate
RISK 3: Risk of exclusion of affected stakeholders due to their vulnerability and/or potential concerns about the project.	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate
RISK 4: Risk of exclusion of women from participatory/beneficial activities of the project.	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial
RISK 5: Risk of damage to biodiversity and natural resources due to land changes and new productive uses of electricity.	Substantial	Moderate	Substantial	Moderate	Moderate	Moderate	Substantial	Moderate	Moderate
RISK 6: Adverse transboundary environmental concerns.	Moderate	Moderate	Moderate	Moderate	Low	Moderate	Moderate	Moderate	Moderate
RISK 7: Risk due to electrical shocks/effects on fauna, flora and people.	Moderate	Moderate	Moderate	Moderate	Low	Low	Moderate	Moderate	Moderate
RISK 8: Risk of local climate change events, and weather & hydro related disasters.	Moderate	Substantial	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate

<sup>5</sup> Risk numbering is common to most projects except when explicitly indicated in the respective country column

Risk # <sup>5</sup> /Potential Environmental and Social Risk	Relevant Identified Risks by Country (refer to SESPs)								
	Burkina Faso	Comoros	Djibouti	Eswatini	Ethiopia	Malawi	Nigeria	Somalia	Sudan
RISK 9: Risk of overestimated emissions due to embedded activities.	Moderate	Moderate	Moderate	Low	Low	Low	Moderate	Moderate	Moderate
RISK 10: Risk of overestimated emissions due to aggregation to a third-party project.	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate
RISK 11: Risk on the community due to domestic connections and electricity usage, and presence of hazardous materials (mainly batteries, e-waste, chemicals for land clearance).	Substantial	Substantial	Substantial	Moderate	Low	Moderate	Substantial	Moderate	Moderate
RISK 12: Ambient perturbation on the community due to intense works locally at construction and decommissioning, and new economic activities subsequent from productive use of the energy.	Substantial	Substantial	Substantial	Moderate	Low	Moderate	Moderate	Moderate	Moderate
RISK 13: Risk on community health, safety and/or security due to the influx of people, mainly project workers and other new comers subsequent to the new economic activities resulting from the productive use of the energy.	Substantial	Moderate	Moderate	Moderate	Low	Low	Moderate	Moderate	Moderate
RISK 14: Risk on damage of cultural heritage.	Moderate	Moderate	Moderate	Moderate	Low	Moderate	Moderate	Moderate	Moderate
RISK 15: Risk of physical displacement and loss of livelihood due to eviction from land.	Substantial	Substantial	Substantial	Substantial	Moderate	Moderate	Substantial	Substantial	Substantial
RISK 16: Risk of economic displacement due to loss of income from fuel selling.	Substantial	Substantial	Substantial	Substantial	Moderate	Moderate	Substantial	Substantial	Substantial
RISK 17: Risk of economic displacement towards the payment of energy services replacing the previous options.	Substantial	Substantial	Substantial	Substantial	Low	Moderate	Low	Substantial	Substantial

Risk # <sup>5</sup> /Potential Environmental and Social Risk	Relevant Identified Risks by Country (refer to SESPs)								
	Burkina Faso	Comoros	Djibouti	Eswatini	Ethiopia	Malawi	Nigeria	Somalia	Sudan
RISK 18: Risk to indigenous peoples.	Substantial	Moderate	Moderate	Moderate	Moderate	Moderate	Substantial	Substantial	Substantial
Sub-risk under RISK 18: Risk to the safety and security of IP communities due to the identification of such groups	<i>Not applicable</i>	<i>Not applicable</i>	<i>Not applicable</i>	<i>Not applicable</i>	<i>Not applicable</i>	<i>Not applicable</i>	<i>Not applicable</i>	Substantial	<i>Not applicable</i>
RISK 19a: Risk on labour conditions.	Risk # 19: Substantial	Substantial	Substantial	Moderate	Moderate	Risk # 19: Low	Risk # 19: Substantial	Risk # 19: Substantial	Substantial
RISK 19b: Risk on labour opportunities.	Risk # 20: Moderate	Low	Low	Low	Low		Risk # 20: Moderate		Substantial
RISK 20: Risk on pollution and resource efficiency.	Risk # 21: Substantial	Substantial	Substantial	Moderate	Moderate	Low	Risk # 21: Moderate	Substantial	Substantial
RISK 21: Upstream risks due to policy or regulatory changes	Risk # 22: Substantial	Substantial	Substantial	Moderate	Substantial	Substantial	<i>Not applicable</i>	Substantial	Substantial

## 4 SECTION IV - Legal and institutional framework

This section summarizes the legal and institutional framework for the project, including the following:

- likely applicable requirements under UNDP's SES, including the Principles and Standards triggered as per the SESP;
- the country's applicable policy framework (i.e. national laws and regulations) relating to relevant social and environmental issues, including obligations of the country directly applicable to the project under relevant international treaties and agreements;
- other relevant social and environmental standards and/or requirements, including those of any other donors and development partners; and
- a gap analysis of the national social and environmental framework(s) and applicable requirements of UNDP's SES (and those of other donors/development partners).

### 4.1 UNDP safeguard policies

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.

At the time of writing this document the most advanced guidance available to comply with UNDP environmental and social requirements were the "DRAFT Guidance Note - UNDP Social and Environmental Standards (SES)" dated on 26th February 2016. However, previous to the completion of this document the new "Pre-Launch version: OPG approved in 2019" was released and became effective in January 2021 upon integration in UNDP Programme and Operations Policies and Procedures (POPP). Therefore, this ESMF has been configured on the premises of such latest

version.

According to these guidelines the UNDP classifies the proposed projects depending on the type, location, sensitivity and scale of the project and the nature and magnitude of its potential E&S impacts. In order to ensure consistency in the categorisation process all proposed projects undertook an E&S screening following the most updated (“Pre-Launch version: OPG approved in 2019”) UNDP’s Social and Environmental Screening Procedure (SESP). The resulting project level risk category –low, moderate, substantial and high – reflects the depth needed to tackle the project’s potential environmental and social risks and adverse impacts.

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 6 to the ProDoc). 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 pre-SESP during the PPG phase has led to the project risk categorization shown in Table 8 below.

Table 8 - Summary of principles and standards triggered by projects based on screening conducted during project preparation

	BF	CO	MW	NI	DJ	ES	SO	ET	MA	SU
Overarching Principle 1: Leave No One Behind	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Programming Principle 2: Human Rights	Moderate	Substantial	Moderate	Moderate	Moderate	Substantial	Substantial	Low	Substantial	Substantial
Programming Principle 3: Gender Equality and Women's Empowerment	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial
Programming Principle 4: Sustainability and Resilience <sup>2</sup>	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Programming Principle 5: Accountability	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Low	Moderate	Moderate
Project- level Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management	Moderate	Moderate	Low	Moderate	Moderate	Moderate	Moderate	Low	Moderate	Moderate
Project- level Standard 2: Climate Change and Disaster Risk	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate
Project- level Standard 3: Community Health, Safety and Security	Substantial	Substantial	Low	Substantial	Substantial	Moderate	Moderate	Low	Moderate	Substantial
Project- level Standard 4: Cultural Heritage	Moderate	Moderate	Low	Moderate	Moderate	Moderate	Moderate	Low	Moderate	Moderate
Project- level Standard 5: Displacement and Resettlement	Substantial	Substantial	Low	Substantial	Substantial	Substantial	Substantial	Low	Substantial	Substantial
Project- level Standard 6: Indigenous Peoples	Substantial	Moderate	Moderate	Substantial	Moderate	Moderate	Substantial	Moderate	Moderate	Substantial
Project- level Standard 7: Labour and Working Conditions	Substantial	Substantial	Low	Substantial	Substantial	Substantial	Substantial	Low	Substantial	Substantial
Project- level Standard 8: Pollution Prevention and Resource Efficiency	Substantial	Substantial	Low	Moderate	Substantial	Moderate	Substantial	Low	Moderate	Substantial
Number of principles/standards triggered in each category										
High	0	0	0	0	0	0	0	0	0	0
Substantial	6	6	1	5	5	4	6	1	4	7
Moderate	5	5	4	6	6	7	5	2	7	4
Low	0	0	6	0	0	0	0	8	0	0
Project Risk Level	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial	Substantial

## **4.2 International framework**

The list of international initiatives the country has actively participated and ratified are listed. See Annex I – Project Description and Legal Framework.

## **4.3 National framework**

The list of national initiatives the country has actively participated and ratified are listed and a summary of the requirements by the Authorities for the project activities is described. See Annex I of this document.

## **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.

Altogether this implies a risk to the environmental context and the peoples affected by the project. This is solved with the application of additional requirements which include measures that the project implementing entity needs to comply with in using the system created within this project. The following are the measures to satisfy:

- Establish a supervisory structure varied in stakeholders and roles to support the project implementing entity with responsibilities in respect to the E&S safeguards.
- The regulator staff responsible for monitoring, evaluating and verifying the environmental and social studies from each project concerned:
  - Clearly demonstrates into the criteria for their appointment their skills in the environmental and social issues including experience on dealing with the under-represented).
  - Ensures a 1:1 gender ratio stability of staff involved in the task/team;
- Include independent international expertise in such structure.
- Include an independent observant committee with non-governmental parties to oversee and approve the establishment of the safeguards.
- The regulator teams include at least one social expert.

## 5 SECTION V – Procedures for screening, assessing and managing social and environmental impacts

Based on the risk categorization assigned to the various national projects covered under this ESMF (listed in Table 1) 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 national project.

This section specifies the procedures for screening, assessing and managing potential social and environmental risks and impacts of specific project activities, sub-projects<sup>6</sup>/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 outputs or components), or (c) where changes in the project context might alter the project's risk profile. The project can be re-screened with the UNDP SESP when determined necessary by the respective Project Manager (after consideration of the advice from PMU staff with responsibility for safeguards), the Project Steering Committee/Project Board, or UNDP. 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

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<sup>6</sup> Any reference to sub-projects under this ESMF refers to minigrid investment pilots developed with project support.

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 a legal 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).

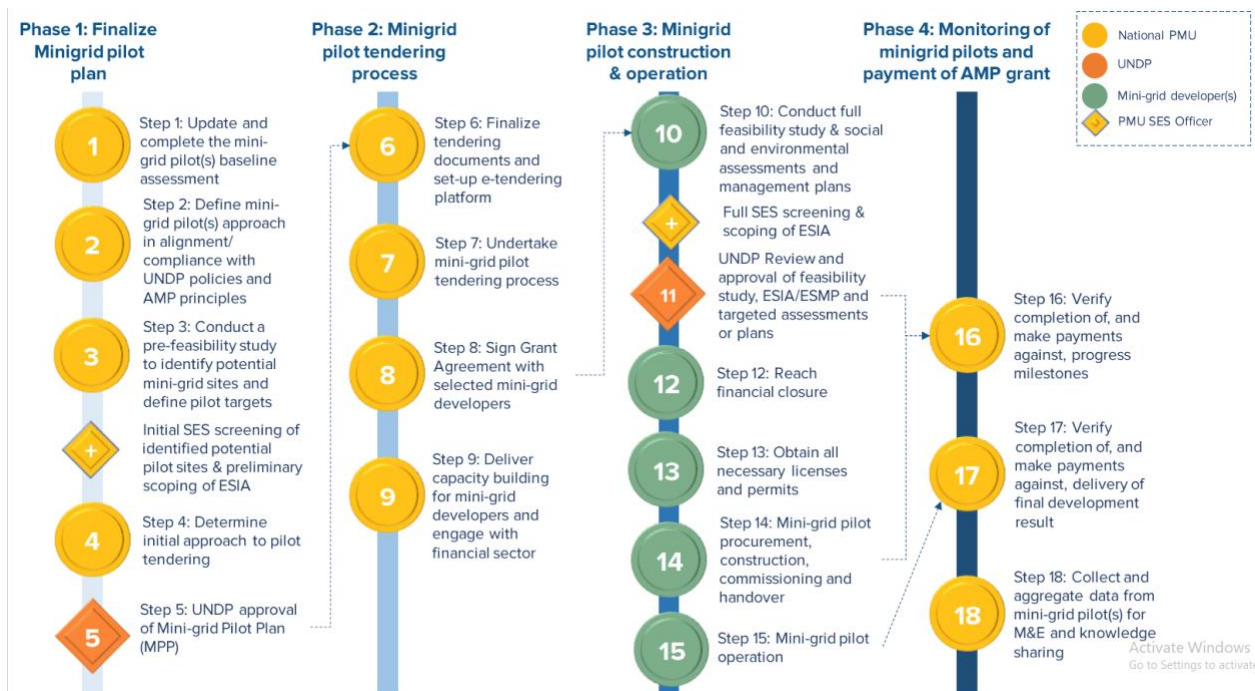


Figure 5-1: Indicative Sequencing of Pilot Minigrid Development

## 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.

## 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.

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 VII 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](#).

#### IPPF/IPP (S6 requirements)

UNDP S6 requires that, in cases where indigenous peoples are found within project sites, an Indigenous Peoples Plan (IPP) must be developed with the purpose of promoting participation of those groups in the project, mitigating risks from the project and ensuring equal and relevant benefits from the project alongside other participants. Where forthcoming but still undefined activities are anticipated to pose likely social and environmental risks and impacts to indigenous peoples, an Indigenous Peoples Planning Framework (IPPF) or its equivalent<sup>7</sup> would need to be developed during the PPG phase.

#### **S6 Applicability**

S6 was triggered during the PPG phase (risk identified on indigenous peoples as per the SESP) for a subset of 5 countries included in this ESMF (Sudan, Nigeria, Ethiopia, Burkina Faso, and Somalia). Consequently, an expert conducted the pertinent IPs studies during the PPG phase proposing specific approaches for these projects to meet S6 requirements. These studies (found in the respective Project Document) are intended as a precursor to one or more site-specific IPPs or its equivalent which would be required if the screening confirms the presence of groups that meet S6 definitions in the minigrid pilot sites (and if FPIC has been granted by those groups, as required).

Where the Standard 6 for indigenous peoples has not been confirmed during the PPG phase (Comoros, Djibouti, Eswatini, and Malawi), the applicability of S6 will be determined during project implementation based on the findings of the Screening Checklist for the Minigrids mentioned above.).

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

#### **Meeting S6 requirements**

To meet S6 requirements during the PPG Phase:

- An IPPF was completed during the PPG phase for Burkina Faso, Ethiopia, Nigeria, and Sudan (all countries where S6 was triggered, except Somalia). The IPPF highlights potential risks, identified and rated under SES criteria as ‘substantial’ in the project’s SESP, that are of particular relevance to indigenous/vulnerable/minority peoples/groups. It also makes recommendations for further assessments and management measures, and for free, prior and informed consent (FPIC) consultation procedures, monitoring, and options for grievance redress.
- Somalia follows a different approach to meet S6 requirements considering its SESP has identified a Sub-risk under RISK 18: Risk to the safety and security of IP communities due to the identification of such groups. Based on the safety and security risks identified in the SESP, stakeholder analysis conducted during the PPG phase, a decision was made that an IPPF and IPP would not be the appropriate S6 safeguards instruments in this case. As an alternative solution, the initial efforts to prepare an IPPF were instead, used to inform/strengthen the project’s Stakeholder

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<sup>7</sup> When referring to an IPPF this documents is also referring to the following equivalent documents: Vulnerable Groups Planning Framework (VGPF), or Vulnerable Peoples Planning Framework (VPPF), or Minority Groups Planning Framework (MGPF)

Engagement Plan (SEP). The project SEP describes the process for meaningfully engaging affected local communities (which includes communities that would meet UNDP's characteristics of indigenous peoples per S6) and for following the principles of FPIC to meet S6 requirements.

To meet S6 requirements during project implementation:

- **In all cases except for Somalia**, if S6 is confirmed during the ESIA at a potential minigrid pilot site, and where community consent is granted for the selection of the given site, then the IPP (or its equivalent) will be developed (at the site-level or other level, as deemed appropriate) and implemented, along with measures for FPIC, as needed for compliance with the SES. When required, the IPP (or its equivalent) would have to be developed within 6 months of minigrid site identification and before any activities commence that include indigenous/vulnerable groups. For the child projects with IPPFs, this procedure is outlined in greater detail in those documents.
- **In the case of Somalia**, its SEP includes the requirement for site-specific SEPs to be developed at each of the pilot sites to ensure meaningful consultations with affected communities, and an agreement on the most appropriate mechanisms for engagement, including FPIC procedures where required, as well as mechanisms for receiving grievances. While an IPP is not expected to be prepared during implementation, this exceptional approach should be reconfirmed/revisited in the course of developing the site-specific SEPs and ESIA/ESMPs prepared during project implementation for the pilot sites in Somalia.

Given this particular approach to meet S6 requirements as defined in the project SEP, the ESIA process for Somalia will: (i) Assess and determine the need for FPIC according to S6 definitions, with findings to be verified and decision made by the Project Steering Committee, in consultation with a UNDP SES expert. The requirements for FPIC and consultations during full implementation of project will be presented in the ESMP and site-specific SEP; (ii) Inform the development of site-specific SEPs at each pilot site to ensure agreement with affected communities on their needs and preferred arrangements for engagement, including agreed procedures for FPIC where required; and (iii) Determine the community safety and applicability of an IPPF/IPP for the project; if sufficient evidence supports a decision to prepare an IPP (e.g. at a specific site where no such risk exists), then that can be taken forward, on the decision of the Project Committee and UNDP Regional SES Experts. This procedure is outlined in the Somalia project's SEP.

#### **5.4 Other Relevant Assessments and Plans**

The findings of the SESAs and ESIA's 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 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 SESP, 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.

### **6.3 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 and the final ESMF will need to be approved 2 months ahead of the PTA Technical Clearance deadline. 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.

#### **6.4 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 manner 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<sup>8</sup>
- (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 complainants 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

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<sup>8</sup> 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.

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 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. And, 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:

Country	Execution Modality
Burkina Faso	Full NIM modality
Somalia	Direct implementation modality (DIM)
Djibouti	Assisted NIM modality
Comoros	Assisted NIM modality
Eswatini	Full NIM modality
Malawi	Full NIM modality
Ethiopia	Full NIM modality
Nigeria	Full NIM modality
Sudan	Full NIM modality

Table 9 - Execution modality

### 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.

Roles and responsibilities related to implementation of this ESMF can be found below:

**Project Management Unit (at the Implementing Partner):**

- 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 SESP, 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.

**UNDP AMP 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

Below the capacity of the project organizational structure for each country, based on their experience identified at the preparation phase for each country:

Country	Implementer partner	Experience implementing UNDP SES
Somalia	UNDP CO in Somalia	Excellent for the implementer partner. However there are no indications of experience implementing the UNDP SES among the rest of the responsible parties within the Project Organizational Structure.
Djibouti	Ministry of Urban Planning, Environment and Tourism (MUET)	One UNDP-GEF6 initiated including similar activities to the AMP but the implemented partner is Ministry of Housing, Urban and Environment (MHUE), which is not part of the Project Organisation Structure of the AMP. The project is delayed so the SES are not implemented yet. UNDP SES implemented for that project are the previous version to current applied in the AMP.
Comoros	Assisted NIM with a full UNDP Support to the implemented partner (DGEME - Direction Générale de l'Énergie, des Mines et de l'Eau, i.e., Directorate General for Energy, Mining and Water).	No UNDP similar projects to the AMP were identified applying the SES. However, a UNDP GEF regional waste project including a Child Project in Comoros have been identified but includes no solar minigrid technologies, and one UNDP-GEF6 ID (5484) geothermal project rated as high risk was implemented by the partner Vice-Presidency responsible for Energy – Comoros Geological Authority. This is a different partner to the established in this AMP. Additionally, the authority to implement this AMP has been recently established and re-structured at the Government.
Eswatini	Ministry of Natural Resources and Energy (MNRE)	There are no indications of experience implementing the UNDP SES among the responsible parties within the Project Organizational Structure.
Ethiopia	Ministry of Water, Irrigation and Energy	There are no indications of experience implementing the UNDP SES among the responsible parties within the Project Organizational Structure.
Burkina Faso	Burkina Faso Rural Electrification Agency (ABER)	There are no indications of experience implementing the UNDP SES among the responsible parties within the Project Organizational Structure.
Malawi	Department of Energy Affairs, Ministry of Energy	There are no indications of experience implementing the UNDP SES among the responsible parties within the Project Organizational Structure.
Nigeria	Rural Electrification Agency (REA)	REA plays a shared role on the ongoing implementation of the environmental and social safeguards for the Nigeria



Country	Implementer partner	Experience implementing UNDP SES
		Electrification Project (NEP). This initiative involves similar components and activities to the AMP Child Project.
Sudan	Ministry of Energy and Mining	There are no indications of experience implementing the UNDP SES among the responsible parties within the Project Organizational Structure. There may be limited experience of safeguards with other international partners.

Table 10 - capacity of the project organizational structure for each country

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. 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 existing national capacity the staff 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 constraints 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 National Project (per the procedures above) will establish the specifically 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 11 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. 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<sup>9</sup> 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 Annex 8 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.

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<sup>9</sup> Social and Environmental Safeguards Officer – Terms of Reference for specific tasks are established at the ProDoc Annex 8.

Table 11 - 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	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, Project Board	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

Monitoring Activity & Relevant Projects	Description	Frequency Timeframe	Expected Action	Roles and Responsibilities	Cost
Annual project quality assurance	The quality of the project will be assessed against UNDP's quality standards to identify project strengths and weaknesses and to inform management decision making to improve the project	Annual	Areas of strength and weakness will be reviewed and used to inform decisions to improve project performance, including adjustments to management plans and activities.	UNDP CO, UNDP-GEF RTA, Project Manager and Project SESO	None
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

The ESMF budget accounts for the particularities of each project and it takes into account all project components (this is in line with the SESP as there are risks identified across all components): number of risks to be dealt with, level of each risk, whether they will require mitigation measures, whether they are involved in setting up whole new minigrids infrastructure or just additional equipment to complement existing minigrids, economies of scale, etc. This all in order to provide an indicative tailored budget that matches its respective SESP.

Table 12: Estimated budget for ESMF implementation per country in US Dollars.

	BF	CO	MW	NI	DJ	ES	SO	ET	MA	SU	TOTAL	AVERAG E
High risks	-	-	-	-	-	-	-	-	-	-	-	-
Substantial risks	40,416	26,667	9,773	103,338	53,749	12,085	68,799	20,236	14,000	71,963	421,026	42,103
Moderate risks	16,840	11,111	19,546	62,003	32,249	10,575	28,666	20,236	12,250	20,561	234,037	23,404
Low risks	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL (\$) ESMF budget	57,256	37,778	29,319	165,341	85,998	22,660	97,465	40,472	26,250	92,523	655,062	65,506

## **11 Annex I – Project Description and Legal Framework**

### **Project Description**

#### **Somalia**

Component 1-Policy and regulations. This component aims to ensure that the policy and regulatory environment in Somalia is enabling and supportive of the shift to solar and hybrid minigrids for electricity generation. It starts with conducting DREI techno-economic analyses to propose suitable tariff structures and financial de-risking instruments, then moves to supporting digital transformation to online tools and platforms for performance monitoring, consumption tracking, tariff calculation and billing as ways of facilitating the operationalization of existing policies and regulations of relevance to clean energy and minigrid sector development. In addition, it tackles two ingredients that are crucial for the longevity of the proposed tools and instruments. The first is the need for improved institutional setup to enhance the potential for positive government-led interventions in the minigrid sector. The second is the need for quality standards for system components to enhance the efficiency of solar and hybrid minigrid operation.

Component 2. Minigrid project and Business Model innovation with private sector engagement. This component focuses on innovative ways for increasing private sector engagement in the shift from diesel minigrids to solar and hybrid minigrids. The work with developers and ESPs will come in three ways: demonstration, capacity building and representation. For demonstration purposes, pilot projects will be implemented to showcase the benefits of hybridization and digital transformation. For capacity building, the AMP in Somalia plans to institutionalize knowledge production in the minigrid sector by establishing a one-year academic programme dedicated to solar and hybrid minigrid education. As for representation, the project will support the establishment and capacitation of industry associations for minigrid developers and ESPs to ensure knowledge sharing among private sector actors and continuous engagement with the authorities in decision making processes.

Component 3. Innovative financing. The competitiveness of solar and hybrid minigrid development depends on the commercial viability of the system, but also on the funding opportunities available to the private sector players wishing to engage in hybridization or complete shift to renewable sources. The establishment of an innovative financing mechanism and instruments requires undertaking a holistic analysis of the minigrid sector, how it operates, the stakeholders involved, as well as a study of present and expected challenges potentially affecting the scaling up of investment in the minigrid sector.

Component 4. Convening, dissemination, tracking (Knowledge Management). Within the context of the AMP, knowledge sharing, learning and synthesis of experiences will be multi-directional, i.e. flowing from the Regional Program to the Somali project, and vice versa, and between the Somali project and other national child projects participating in the Program. The regional chapeau will connect countries to knowledge, resources and networks of best practice and will support the rapid deployment of expertise, solutions and tools to support on-the-ground implementation. This component defines the activities to be conducted by the AMP in Somalia to ensure knowledge production on the national-level and knowledge sharing on both the national and regional levels. The component also covers the QA and M&E aspects of the AMP in Somalia project implementation.

#### **Djibouti**

Component 1. Policy and regulations. This component aims to build upon GEF6 minigrid development project by conducting more in-depth analysis of the commercial viability of the proposed regulatory framework and tariff structure. In addition, it tackles a few ingredients which are crucial for the longevity

of any proposed delivery model, such as improving the institutional setup of the minigrid sector to enhance the capacity for managing the proposed model, developing the technical standards for system components and enhancing the government's capacity for testing, and embedding minigrid technical knowledge in the technical education and vocational training programmes in Djibouti.

**Component 2. Minigrid project and Business Model innovation with private sector engagement.** This component focuses on the promotion of innovative ways to increase private sector engagement in minigrid sector development. The goal of the activities under this component is to provide a realistic example of the selected delivery model. Therefore, pilot projects will be implemented, consisting of solar PV-battery minigrid systems, developed using the EPC+ESCO delivery model, or other - as may be recommended in the findings of the DREI analyses. The pilots will also integrate the installation of solar street lighting units, as a safety priority for off-grid areas and a most cost-efficient alternative to extending connections from the minigrid pilots for street lighting. Furthermore, capacity building will be conducted to support potential bidders with submitting their proposals for the pilot project, and an industry association will be established to ensure higher engagement and knowledge sharing on similar opportunities in the future.

**Component 3. Innovative financing for minigrids.** The sustainability of the proposed delivery model depends on its commercial viability, but also on the funding opportunities available to the private sector players wishing to engage in the Djibouti minigrid sector. The establishment of an innovative financing mechanism and instruments requires undertaking a holistic analysis of the minigrid sector, how it operates, the stakeholders involved, as well as present and expected challenges potentially affecting the implementation of the selected business model.

**Component 4. Convening, dissemination, tracking (knowledge management).** Within the context of the AMP, knowledge sharing, learning and synthesis of experiences will be multi-directional, i.e. flowing from the Regional Program to the AMP in Djibouti project, and vice versa, and between the AMP in Djibouti project and other national child projects participating in the AMP. The regional chapeau will connect countries to knowledge, resources and networks of best practice and will support the rapid deployment of expertise, solutions and tools to support on-the-ground implementation. This component defines the activities to be conducted by the AMP in Djibouti to ensure knowledge production on the national-level and knowledge sharing on both the national and regional levels. The component also covers the M&E and QA aspects of the AMP in Djibouti project implementation.

## **Comoros**

**Component 1** focuses on creating a conducive environment for private sector participation and engagement in facilitating access to renewable and reliable electricity in rural areas in Comoros. It aims at de-risking specific barriers, as depicted in II - Development Challenge and in the paragraph below on Risks, especially related to energy market, social acceptance, hardware, digital, labor, developer, end-user credit, currency and sovereign risks as defined in the DREI Minigrid Derisking Methodology developed by UNDP.

**Component 2: Project and Business Model Innovation with Private Sector Engagement.** Given Comoros' electricity, and specifically MGs', situation, policy and regulatory framework, and being a nascent MG market, the project aims at enabling the proof of concept of MGs with private sector engagement backed by communities in rural areas. Thanks to innovative business models of demonstration pilots, rural communities will gain access to and reliability of power. As lessons learned in other countries have highlighted, especially in SSA and in SIDS, a MG 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 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 across the archipelago.

Component 3: Innovative Financing. 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 is no dedicated financial scheme and funding around minigrids in the Comoros.

Component 4: Knowledge Management and Monitoring & Evaluation where data and digitalization are 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.

## **Eswatini**

Component 1. Policy and regulation. The first component seeks to address barriers to cost-effective mini-grid development within the policy and regulatory environment. With the development of a comprehensive mini-grid and off-grid regulatory framework initiated, but not yet finalised, the AMP contribution under this component will focus on establishing universally relevant resources and strengthening capacity to complement the policy and regulatory direction as it evolves. It aims to empower the key decision-makers and role-players to effectively navigate the development of this nascent market with access to good information resources and the experience available to the AMP from the regional project. It is envisaged that, under the leadership of the MNRE, these resources will support the formulation of a shared vision and roadmap to enable mini-grid development in the country.

Component 2. Project and Business Model Innovation with Private Sector Engagement. The second component aims to demonstrate innovative business models, based on cost reduction, that can encourage private sector participation in RE mini-grid development in the country. Noting again the risks that present hurdles to private sector participation in mini-grid investments, lessons from two decades of mini-grid developments in the region and the specific challenges for feasible mini-grid operations presented by the Eswatini country context, the ability to demonstrate innovative business models will be critical to open the market.

Component 4. Knowledge management and Monitoring and Evaluation. As a newcomer to mini-grids, Eswatini stands to benefit enormously from mini-grid experience gained across the continent. Harvesting both local and regional experience is key to inform future decision-making and shape policy interventions to optimize the broader contribution by mini-grids in the country and region. The regional project can help facilitate access to past and current learnings as well as best practices.

The fourth component links into the knowledge resource of the regional project to target increased awareness and network opportunities in the mini-grid market and among stakeholders. The targeted outcome for this component is stated as: Increased awareness and network opportunities in the mini-grid market and among stakeholders; Lessons learned for scaling up rural electrification using low-carbon mini-grids.

## **Burkina Faso**

Component 1: Policy and Regulation (PC1). This component aims to address policy, regulatory and institutional barriers identified in the baseline scenario preventing private sector investments for the uptake of renewable energy minigrids in Burkina Faso. This a key component, which will support the market with clear and transparent policies and regulations in order to create the enabling environment to build private sector confidence in the renewable energy minigrid sector in order to allow for low-cost

commercial capital to start flowing in Burkina Faso for off-grid electrification through solar PV minigrids with storage. For the private sector to invest, they require clear, transparent and long-term domestic policies and regulations, which are well-designed, implemented and enforced, thus contributing to de-risking the sector. Under these conditions, low-cost, commercial capital will start to flow.

Component 2 (PC2): Project and Business Model Innovation with Private Sector Engagement: Private sector (developers, supply chain, investors, financial intermediaries, etc.) involvement in minigrid cost-reduction will be central to the program's approach. A range of activities will be offered to engage and support the private sector. This component aims to promote private sector engagement and innovative business models, especially in productive uses. Additionally, the pilot project will also look to confirm deliver models for social infrastructure such as health and education facilities. Additionally, outputs 2.2 of this component will focus on building the capacity of private sector actors as well as institutions such as ABER and ARSE in procurement processes.

Component 3 (PC3): Innovative financing. Access to low-cost, commercial capital (equity and debt), ideally in local currency, is key to reducing the cost of minigrids, and ensuring the long-term commercial sustainability of minigrid markets. The project will establish partnerships with development banks and commercial financial institutions (local banks, microfinance institutions, etc.), and will support development innovation in cost-efficient financial mechanisms that leads to minigrid cost-reduction thus bringing minigrid markets to maturity. This activity will be implemented by UNCDF, as the responsible party in close collaboration with the Swedish Cooperation (SIDA), which has confirmed during the PPG phase its intention to set-up a first loss guarantee scheme to incentivize banks to lend to off-grid companies. Lessons learned from Sunref, REACT and CEADIR will inform training modules and TA. In addition to training in understanding minigrid business and financial models, commercial financial institutions (CFI) will be trained to set-up appropriate financial products for the mini-grid markets.

Component 4: Convening, dissemination, and tracking progress. This component primarily focuses on the generating, dissemination and management of knowledge products around the project and its main thematic areas such as minigrid cost-reduction. At the national level, the child project will also, emphasize awareness building and sensitization towards all key stakeholders from government, public sector and local communities about the benefits of minigrids and the negative impacts of diesel-based alternative. Dissemination of lessons learned and best practices from Burkina Faso and other countries with similar conditions will be key activities.

## **Malawi**

Component 1. Policy and regulation. The first component seeks to address barriers to cost-effective mini-grid development within the policy and regulatory environment. Despite a relatively young market, Malawi has made significant progress with mini-grids recognized and embedded in policy, regulatory and planning documentation that includes provision for import tax waivers, inclusion in a least cost rural electrification plan, provision for a subsidy, and the regulatory framework for mini-grids published in July 2020. It is expected that this support will contribute to the intended outcome of this component: an enabling environment where appropriate policies and regulations are in place that address policy, institutional, regulatory and technical barriers to cost effective RE mini-grid development and facilitate investment in RE mini-grids.

Component 2. Project and Business Model Innovation with Private Sector Engagement. The second component aims to demonstrate innovative business models, based on cost reduction, that can encourage private sector participation in RE mini-grid development in the country. Malawi has gained invaluable experience in the development and operations of mini-grids with lessons informing greater innovation in delivery models, tariff designs and productive uses, among others. Despite these learnings

and advances in the regulatory environment, a financially independent or self-sufficient mini-grid operation has not yet been achieved. The targeted outcome for this component is stated as having innovative business models based on cost reduction operationalized to support and strengthen private sector participation in solar PV-battery mini-grid development.

Component 3. Knowledge management and Monitoring and Evaluation. Significant experience has been gained with mini-grid developments in Malawi. Harvesting both local and regional experience, both past and future, can help encourage private sector interest, accelerate the adoption of clean energy mini-grids and optimize the broader developmental impact of mini-grids in the country and region. The regional project can help facilitate access to past and current learnings as well as best practices from other countries. This third component therefore links into the knowledge resource of the regional project to target increased awareness and network opportunities in the mini-grid market and among stakeholders. The targeted outcome for this component is: Increased awareness and network opportunities in the mini-grid market and among stakeholders; Lessons learned for scaling up rural electrification using low-carbon mini-grids.

## **Nigeria**

Component 1: Project and Business Model Innovation with Private Sector Engagement: Component 1 centres on providing a combination of financial support and technical assistance for embedding low-carbon minigrids into the agriculture value chain that directly supports REA's new initiative on Energizing Agriculture (Annex SA1). As per the ToC discussed in the previous section, the main focus of the project's interventions will be on increasing the commercial viability of low-carbon minigrids at scale using cost reduction levers (e.g. a derisking approach to lowering financing and hardware costs). In the proposed business delivery model, the focus is on the agriculture-energy nexus, wherein a commercially viable downstream agriculture value chain (pre- and post-harvesting value addition) becomes a cornerstone element in creating reliable and predictable energy load that creates a pull for renewable electricity demand from minigrids.

Component 2: Innovative Financing. In order to support the scaling up of low-carbon minigrids through appropriate business models that will be identified under Output 1, Component 2 will focus on transferring residual risks and barriers that cannot be fully mitigated under the first component and thus involves close collaboration and coordination with existing public and private financial actors, financing initiatives and future partners including the World Bank National Electrification Programme (NEP) and the GIZ-funded NESP II. The main focus of this component is to ensure that financing for private investors in the agriculture-energy value chains is catalyzed most efficiently and cost-effectively.

Component 3: Knowledge management and scale-up strategy. The third component addresses outreach, and capturing and dissemination of results for scaling up solar PV minigrids. It also seeks to ensure adequate monitoring and evaluation (M&E) of the project. This component is aligned with the Monitoring and Evaluation Plan given in Section VI of the ProDoc".

## **Ethiopia**

Component 1. Policy and regulations: Component 1 will strengthen the policy and regulatory enabling environment and pave the way for a successful deployment of cooperative-led renewable minigrids. Building upon the strong previous and ongoing work by other donor-funded projects (most notably the World Bank's ADELE project) on policy and regulations as well as capacity support for MoWIE, Component 1 is focused on (i) critical analysis, policy development, and capacity enhancement to address gaps needed for cost-effective deployment of cooperative minigrids, (ii) contractual, financial, and institutional arrangements for grid arrival, (iii) investment de-risking analysis for minigrids, (iv) development of a

strategy for minigrid decommissioning and associated waste management,, and (v) capacity building for MoWIE staff and its sectoral institutions via the new MoWIE Innovation Center.

**Component 2. Business model innovation with private sector:** Component 2 will enhance the technical capabilities and the cooperative-led delivery models of minigrid developers. This component builds upon MoWIE's ongoing efforts to pilot and test the viability of these alternative business models in coordination with productive use, with the ultimate goal of reducing costs, securing sustainable revenues, and documenting the business case for these models in order to attract market entrants and investors.

**Component 3. Scaled-up financing:** Minigrid financing in Ethiopia is almost exclusively reliant on donor support, with minimal commercial financing mobilized to date. The Government intends to launch new mechanisms, such as the Minimum Subsidy Tender and a debt service reserve account, to help attract private sector financing to the minigrid subsector. Component 3 will develop financing instruments to help leverage and de-risk private sector financing for renewable minigrids. Based especially on the DREI analysis (Output 1.3) AMP will assist MoWIE and REFEF in designing specific interventions to facilitate financing for private and cooperative minigrid developers as well as for productive use by off-taking entrepreneurs and cooperative members. Component 3 will also deliver technical training for commercial banks and microfinance institutions on minigrids and productive use. The outputs are as follows.

**Component 4. Digital, Knowledge Management and Monitoring and Evaluation:** The AMP provides a unique opportunity to develop a single set of metrics and guidelines for data collection, and use them to collect data from minigrid investment pilots across different national projects which the AMP regional project can then aggregate, derive insights from, and systematically disseminate knowledge with participating AMP countries and with the broader minigrids sector in Africa. At the same time, the link between the regional project and the total of eighteen (18) national child projects provides a unique 'distribution channel' opportunity across Africa for AMP to mainstream the use of digital tools and solutions for minigrids cost-reduction and scale-up.

## **Sudan**

**Component 1. Policy and Regulation:** This component will work on having the necessary policy dialogues and producing the right regulations at the right time as the mini-grid market evolves. As the minigrid market in Sudan is in its infancy, continuous dialogue through working groups and capacity building is essential under this component, as an attractive, enabling environment for mini-grids is yet to be developed in Sudan in comparison with other countries.

**Component 2. Minigrid Project and Business Model Innovation with Private Sector Engagement:** This component will target deploying solar PV mini-grid pilots in Sudan. The pilots will aim at developing, implementing, operate and maintain, and monitor at least two projects piloting the retrofitting (i.e. hybridization) of existing diesel based mini-grids (or off-grid stations as per the term used by MoEM and SEDC) in order to reduce the O&M costs of operating these power plants with fuel only. It is recommended that the implementation of these solar PV power plants and its associated infrastructure will be done by the private sector, through a Build, Own, Operate and Transfer mode over two phases, with a low solar share energy penetration in the first phase followed by more complex medium to high solar share penetration retrofitting in the second phase.

**Component 3. Innovative Financing for Minigrids:** As this child project aims at helping Sudan in transitioning from almost no experience in private sector participation into a more inclusive, multilateral rural electrification approach for other actors (private sector, states and potentially cooperatives or non for profit), innovative and adequate financing mechanisms need to be formulated and availed to support the financing needs of eventual projects. Similarly, it will be essential for this child project to identify and

help other actors in developing a list of sites that are best served by mini-grid technologies, in order to bring these sites into funding stages and support pipeline development activities.

Component 4. Convening, dissemination, tracking (knowledge management): The project will promote increased awareness and network opportunities in the sustainable energy markets and among stakeholders, and lessons learned for scaling up rural electrification using solar PV-battery minigrids.

## Legal Framework

### Somalia

#### International framework

This country is not adhered to any international initiative applying requirements to the implementation of mini-grids. Therefore, no environmental or social permits from international framework for this country are expected to be required in order to conduct any of the project activities.

A number of international agreements exist, and although binding on Somalia there has been little progress in implementation due to the chronic conflict, the lack of recognition for Somaliland and the applicability in Puntland. Such international environment agreements relate to: a) Biodiversity, b) Desertification, c) Endangered Species, d) Law of the Sea, e) Ozone Layer Protection and f) Marine Dumping.

Regarding the social safeguards, the country is signatory of a diverse range of regional (Africa) and international agreements:

- Treaty for the Establishment of the EAC (1999: Article 120(c))
- EAC's Strategic Plan for Gender, Youth, Children, Social Protection and Community Development (2010)
- EAC Social Development Policy Framework (2013)
- EAC Child Policy (2016)
- Africa Union
- Constitutive Act of the African Union [2001]
- Treaty establishing the African Economic Union [Signed 1991]
- African Charter on Human and People's Right (1981) [1985]
- African charter on the Rights and welfare of the child (1990) [Signed 1991]
- African Charter on the Rights of Women in Africa (2003) [Signed 2006]
- African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention) [Signed 2009]
- UN International Convention on the Elimination of All Forms of Racial Discrimination. (1966)(No 2) [1975]
- International Covenant on Economic, Social and Cultural Rights (1996) [1990]
- Convention on the Rights of the Child (1989) [2015]
- International Labour Organisation

#### National legal framework

This country has not yet established specific environmental and social requirements for the implementation of mini-grids. Existing requirements are embraced under the generic country framework.

In order to implement a mini-grid in Somalia an environmental permit is required from the national environmental authority. However, further refinement of activities related to the pilots will be needed to be evaluated and policy and legislation with respect to the environment is under development as the current is weak and outdated. Furthermore, the only social assessment potentially required relies within the environmental compliance currently drafted by the Government.

Pre-1991 environmental laws date back to the 1960s, 70s & 80s. Since the collapse of the state, no laws were passed, at least in the last three decades. Further, until the establishment of the Ministry of

Environment and Disaster Management in 2005, Somalia lacked any central body responsible for environmental matters. Currently, there are a number of institutions both at the Federal and state levels that would play key roles in the management of the environment. However, the existing legislative framework is at the state level, namely, Somaliland and Puntland. The said two states are the only ones in Somalia who have enacted legislations related to the environment. Nevertheless, enforcement remains weak. Therefore, adopting a national environmental policy and enacting up-to-date legislations are badly needed in order to address the environmental challenges stated earlier.

The instruments used to enforce the policies are as follows:

- Standards

The policy is to prepare and enact the following regulations:

- National Environmental Standards for Air Quality
  - National Environmental Standard for Sources of Drinking Water
  - National Environmental Standards for Telecommunication Facilities (equipments: towers, antennas etc)
  - National Environmental Standards for Marine aquaculture
  - National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health
  - National Environmental Standards for Plantation Forestry
- 
- Environmental Impact Assessment: Environmental Impact Assessment (EIA) is a systematic examination conducted to determine whether or not a programme, activity or project will have any adverse impacts on the environment. It will be the principal methodology for appraising and reviewing new projects. The policy is to require that public and private projects that are likely to have significant effects on the environment be made subject to an assessment prior to Development Consent or licence to proceed with the project.
  - Environmental Awareness, Education, and Information to enhancing environmental awareness as is essential to harmonize patterns of individual behaviour with the requirements of environmental conservation.
  - Partnerships and Stakeholder Involvement: Conservation of the environment requires the participation of multiple stakeholders, who may bring to bear their respective resources, competencies, and perspectives, so that the outcomes of partnerships are superior to those of each acting alone.
  - Capacity Building: The multi-stakeholder character of environmental issues and continuous developments in the field of environment, make it necessary to have a continuing focus on capacity building in all concerned institutions: public, private, voluntary, academic, research, and the media.

The implementation of the policy is:

- To prepare and enact environmental legislations at Federal and State levels;
- To review existing environmental legislations;
- The legislations that shall be enacted include but not limited to:
  - National Environmental Management Act
  - Forestry and Wildlife Act

- Land Management Act
- Mineral and Petroleum Act
- Marine Conservation Act
- Waste (solid & liquid) Management Act

In Puntland an Environmental Policy was produced in 2014 and framework documents for EIA guidelines and regulations put in place.

In Somaliland the National Environment Policy (NEP) provides a framework for the sustainable management of the territory's environment and natural resources. The policy seeks to ensure that the territory's natural resource assets retain their integrity to support the needs of the current and future generations. This policy, developed in 2015 by the Ministry of Environment and Rural Development, addresses the nexus between poverty alleviation, food security and national development objectives. The policy emphasises on the need to establish new prospects for the improvement to the standard of living, which enable people to become self-sufficient and realize their own potential without damaging the environment. The policy seeks to catalyse the implementation of sustainable environmental, social and economic development initiatives for equitable benefits sharing. The policy advocates for community participation, information dissemination, environmental education and awareness raising and gender equality in order to fully harness the Somaliland's "latent capacity" in this regard.

For all Somali territories the institutions at National, Regional and District Levels are responsible for the implementation and monitoring compliance of both national and international agreements as shown below and include:

- 1.The Minister, in consultation with the Parliamentary Environment committee and civil society organizations working in the environment shall establish Environmental Watch Councils at National level (NEWC).
- 2.The MNR (Min. for Natural Resources), the MoERD (Min. for Environment and Rural Development) in Somaliland and the MoEWT (Min. for Environment, Wildlife and Tourism) in Puntland with consultation with Regional Authorities, in consultation with civil society, at the Regional level, and communities shall establish the Regional Watch Councils (REWC).
- 3.The MNR, MoERD and MOEWT in consultation with the Local Government Councils/ District Governor, local CSO/CBOs and the community shall establish the District Environment and Environment Watch Council (DEWC).

In the absence of national regulatory framework for sustainable environment, and other than the pieces of legislation available in some states as discussed above, Somalia has a constitution that contains a number of parameters relevant for various operational activities in the country.

## **Eswatini**

### International framework

This country is not adhered to any international initiative applying requirements to the implementation of mini-grids. Therefore, no environmental or social permits from international framework for this country are expected to be required in order to conduct any of the project activities.

Regarding the social safeguards, the country is signatory of a diverse range of regional (Africa) and international agreements:



- UN International Convention on the Elimination of All Forms of Racial Discrimination. (1966)(No 2) [1969]
- International Covenant on Economic, Social and Cultural Rights (1996) [2004]
- Convention on the Elimination of All Forms of Discrimination Against Women (1966) [2004]
- Convention on the Rights of the Child (1989) [1995]
- Convention on the Rights of Persons with Disabilities (2006) [2012]
- International Labour Organisation
- Protocol on Employment and Labour
- Code on Social Security
- Constitutive Act of the African Union [2001]
- Treaty establishing the African Economic Union [2001]
- African Charter on Human and People's Right (1981) [1995]
- African charter on the Rights and welfare of the child (1990) [2012]
- African Charter on the Rights of Women in Africa (2003) [2012]
- African Youth Charter (2006) [2012]
- African Union Convention for the Protection and Assistance of Internally Displaces Persons in Africa (Kampala Convention) [2012]

The country is also currently a party to the following international environmental conventions:

- Biodiversity: Convention on Biological Diversity (CBD), 1992
- Hazardous Wastes: Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, 1989
- Hazardous Wastes in Africa: Bamako Convention on the Ban of Import of Hazardous Wastes into Africa
- Ozone: Montreal Protocol on Substances that Deplete the Ozone Layer
- Desertification: Convention to Combat Desertification
- Game Protection: Convention on the International Trade on Endangered Species CITES)
- Capacity Building and Institutional Strengthening: PADELIA

### National legal framework

This country has not yet established specific environmental and social requirements for the implementation of mini-grids. Existing requirements are embraced under the generic country framework.

In order to implement a mini-grid in Eswatini an environmental permit is required from the national environmental authority. This may be expected for the project activities related to the pilot 3 only though further refinement of activities related to pilot 1 and 2 will be needed to be evaluated. In order to obtain an Environmental Permit, an EIA is required.

A project developer should present a project brief to the environmental authorities and this will be classified into one of the following categories:

- (a) as a category 1 project if the authorising agency considers that the proposed project is unlikely to have any significant adverse environmental impacts
- (b) as a category 2 project if the authorising agency considers that the proposed project is likely to have some significant adverse environmental impacts but that the impacts are relatively well-known and easy to predict and the measures which can be taken to prevent or mitigate these impacts are well-know;

- (c) as a category 3 project if the authorising agency considers that the proposed project is likely to have significant adverse environmental impacts and that in-depth study is required to determine the scale, extent and significance of the impacts and to identify appropriate mitigation measures.

Where a project is classified under category 1, no further requirements are applicable to continue the project.

Where a project is classified under category 2, the proponent shall prepare an IEE report and a CMP.

Where a project is classified under category 3, before preparing an EIA report and CMP (comprehensive mitigation plan), effect a consultation process to involve or include concerned or affected Government agencies local authorities, non-governmental organizations and any other interested and affected persons to help determine the scope and effect of the project or work to be carried out.

According to the preliminary assessment discussed with the authorities during the stakeholder interviews, the type of activities included in the project could be leading to categorisation 2.

There is acknowledgement by the authorities stakeholders of the value and desire to ensure implementation of social safeguards and gender mainstreaming in project implementation, however they are generally not explicitly defined in existing frameworks. Therefore, no other specific social requirements beyond the those potentially applicable under the environmental safeguards have been identified.

The institutional arrangements relevant to the compliance of such requirements are as follows:

This Constitution established in 2005 is the supreme law of The state of Eswatini (formerly Swaziland) and is the only absolute monarchy left in Africa. The king also appoints the prime minister.

The Ministry of Natural Resources and Energy has the following departments, Energy, Valuation, Land Administration, Surveyor General's Department, Department of Water Affairs (DWA), Geological Survey Conveyancing, Deeds, and Mining Department.

The Ministry of Tourism & Environmental Affairs have the following departments, Department of Tourism, Department of Forestry, and Department of Meteorology. They also have the following parastatals, Swaziland Tourism Authority, Swaziland Environment Authority, Swaziland National Trust Commission and Piggs Peak Hotel and Casino.

The main legal requirement to comply with is the Environmental Management Act (EMA, 2002), which acts as a guide to the environmental issues in the country.

According to the Environmental Audit Assessment and Review Regulations (EAARR) of 2000 promulgated under the Environmental Management Act (EMA) of 2002 and the interviews conducted to the national authority, the implementation of mini-grids for energy use may have an impact on the environment. Thus, an Environmental and Social Impact Assessment must be conducted prior to the issuing of the Environmental Compliance Certificate (ECC) by Eswatini Environment Authority (EEA) for project implementation. Section 32 of the Environmental Management Act, 2002 emphasizes that no person shall undertake any project that may have a detrimental effect on the environment without the written approval of the EEA.

## **Djibouti**

### International framework

This country is not adhered to any international initiative applying requirements to the implementation of mini-grids. Therefore, no environmental or social permits from international framework for this country

are expected to be required in order to conduct any of the project activities.

Regarding the social safeguards, the country is signatory of a diverse range of regional (Africa) and international agreements:

- UN International Convention on the Elimination of All Forms of Racial Discrimination. (1966)(No 2) [2011]
- International Covenant on Economic, Social and Cultural Rights (1996) [2002]
- Convention on the Elimination of All Forms of Discrimination Against Women (1966) [1998]
- Convention on the Rights of the Child (1989) [1980]
- Convention on the Rights of Persons with Disabilities (2006) [2012]
- International Labour Org
- Treaty for the Establishment of the EAC (1999: Article 120(c))
- EAC's Strategic Plan for Gender, Youth, Children, Social Protection and Community Development (2010)
- EAC Social Development Policy Framework (2013)
- EAC Child Policy (2016)
- Africa Union
- Constitutive Act of the African Union [2000]
- Treaty establishing the African Economic Union [Signed 1991]
- African Charter on Human and People's Right (1981) [1991]
- African charter on the Rights and welfare of the child (1990) [2011]
- African Charter on the Rights of Women in Africa (2003) [2005]
- African Youth Charter (2006) [2008]
- African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention) {Signed 2015}

The international environmental initiatives where this country could not be identified at this stage.

#### National legal framework

This country has not yet established specific environmental and social requirements for the implementation of mini-grids. Existing requirements are embraced under the generic country framework.

In order to implement a mini-grid in Djibouti an environmental permit is required from the national environmental authority. However, further refinement of activities related to the pilots will be needed to be evaluated.

### **Comoros**

#### International framework

This country is not adhered to any international initiative applying requirements to the implementation of mini-grids. Therefore, no environmental or social permits from international framework for this country are expected to be required in order to conduct any of the project activities.

Regarding the social safeguards, the country is signatory of a diverse range of regional (Africa) and international agreements:

- UN International Convention on the Elimination of All Forms of Racial Discrimination. (1966)(No 2) [2004]
- International Covenant on Economic, Social and Cultural Rights (1996) [Signed 2008]

- Convention on the Elimination of All Forms of Discrimination Against Women (1966) [1994]
- Convention on the Rights of the Child (1989) [1993]
- International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families, Articles. (1990)(no 13) [Signed 2000]
- Convention on the Rights of Persons with Disabilities (2006) [2016]
- International Labour Org
- Treaty for the Establishment of the EAC (1999: Article 120(c))
- EAC's Strategic Plan for Gender, Youth, Children, Social Protection and Community Development (2010)
- EAC Social Development Policy Framework (2013)
- EAC Child Policy (2016)
- Constitutive Act of the African Union [2001]
- Treaty establishing the African Economic Union [1994]
- African Charter on Human and People's Right (1981) [1986]
- African charter on the Rights and welfare of the child (1990) [2004]
- African Charter on the Rights of Women in Africa (2003) [2004]
- African Youth Charter (2006) {Signed 2010}
- African Union Convention for the Protection and Assistance of Internally Displaces Persons in Africa (Kampala Convention) {Signed 2010}

In the environmental scope three main international conventions directly concerned with the conservation of biological diversity have been ratified, namely the Convention on Biological Diversity (5 June 1992), the Convention on Climate Change (4 June 1992) and the Convention to Combat Desertification.

#### National legal framework

This country has not yet established specific environmental and social requirements for the implementation of mini-grids. Existing requirements are embraced under the generic country framework.

In order to implement a mini-grid in Comoros an Environmental Permit is required from the national environmental authority. This may be expected for the project activities related to the pilot 1 and potentially pilot 2 and pilot 3 but further refinement of these last two activities will be needed to be evaluated. In order to obtain an Environmental Permit, an EIA is required.

In accordance with Article 12 the EIA must contain a description of the current state of the environment, an evaluation of the potential effects of the proposed works on the environment and a description of the mitigation measures proposed to minimise the potential effects.

In addition, legislation has been passed which provides for the protection of species or flora and fauna in the country.

The Comoros regained relative political stability after the adoption of the Fomboni Agreement in 2001 (which led to four consecutive democratic transitions), although sociopolitical tensions remain. A referendum held on July 30, 2018, endorsed a constitutional change to the presidential rotation system following a controversial national conference. Presidential elections were held in the Comoros on March 24, 2019, and President Azali Assoumani was reelected in the first round of voting. However, political uncertainties about the new government's ambitions and intra-governmental dynamics and changes in current times are a risk to the success of the project, for example, lack of inter-ministerial coordination and greater focus on investment projects than on the institutional/policy aspects that would make those investments sustainable.

The National Environmental Policy of the Union of the Comoros was prepared and adopted in 1993 by Decree No. 93-214/PR, based on the document entitled "Diagnosis of the State of the Environment in the Comoros". The country's 2001 Constitution, in its Preamble, proclaims "the right to a healthy environment and the duty of all to safeguard that environment". Adopted in 1994, its Environmental Code declares that environmental protection is in "the public interest" and recalls the right to a healthy environment and the obligation to safeguard it. Article 18 of the Environmental Code also stipulates that the State must ensure the protection of the soil and subsoil, water resources and the marine environment, the atmosphere and biological diversity.

Between 1993 and 2001, the Union of the Comoros adopted a policy framework that resulted in the preparation and adoption of a National Environmental Policy, an Environmental Action Plan and a National Strategy and Action Plan for the Conservation and Sustainable Management of Biodiversity. A legislative and regulatory framework was put in place with the adoption and promulgation of the framework law on the environment and some implementing regulations relating to the creation of the Mohéli Marine Park, species protection and an Environmental Impact Assessment (EIA) in October 1994 (Decree No. 94/100/PR). The framework law takes into account sustainable development, impact assessments, biological diversity, protection of the terrestrial and marine environment, and protected areas.

In summary, the current national legislation relevant for the safeguards of the projects is as follows:

#### National legislation

- Environment Framework Law N°094 -018 of 22 June 1994;
- Law No. 88-006 on the legal regime for reforestation, reforestation and forest management
- Decree N°01/31/MPE/CAB on the protection of species of wild fauna and flora of the Comoros
- Decree of 4 February 1911 on the reorganization of land ownership
- Decree of 06 January 1935 regulating expropriation on grounds of public utility
- Law No. 88-015/AF on general measures to prevent occupational hazards and improve working conditions
- Labour Code N°84 -108: Health and Hygiene
- Decree of 03 May 1903 concerning the quarrying
- Law No. 94-022 of 27 June 1994 on the protection of the Comorian cultural heritage

#### Policy Frameworks:

- Accelerated Sustainable Development Growth Strategy (SCA2D)
- National Energy Strategy
- National Environmental Policy
- National Equity, Equality and Gender Policy
- National Health Policy

## Malawi

#### International framework

This country is not adhered to any international initiative applying requirements to the implementation of mini-grids. Therefore, no environmental or social permits from international framework for this country are expected to be required in order to conduct any of the project activities.

Regarding the social safeguards, the country is signatory of a diverse range of regional (Africa) and

international agreements:

- UN International Convention on the Elimination of All Forms of Racial Discrimination. (1966)(No 2) [1996]
- International Covenant on Economic, Social and Cultural Rights (1996) [1993]
- Convention on the Elimination of All Forms of Discrimination Against Women (1966) [1987]
- Convention on the Rights of the Child (1989) [1991]
- Convention on the Rights of Persons with Disabilities (2006) [2009]
- International Labour Org
- Protocol on Employment and Labour
- Code on Social Security
- Constitutive Act of the African Union [2001]
- Treaty establishing the African Economic Union [1993]
- African Charter on Human and People's Right (1981) [1989]
- African charter on the Rights and welfare of the child (1990) [1999]
- African Charter on the Rights of Women in Africa (2003) [2005]
- African Youth Charter (2006) [2010]
- African Union Convention for the Protection and Assistance of Internally Displaces Persons in Africa (Kampala Convention) [2013]

The key international environmental conventions include; Convention of Nature and Natural Resources; African Convention on Conservation of Nature and Natural Resources, Convention on Biological Diversity; international Plant Protection; Convention on Fishing and Conservation of Fishing resources of the High Seas; Convention on International Trade in Endangered Species(CITES); Convention on the conservation of Migratory Species of wild Animals (Bonn Convention);UN Convention to Combat Desertification; Kyoto protocol; and Vienna Convention & Montreal Protocol(Ozone Layer).

#### National legal framework

This country has not yet established specific environmental and social requirements for the implementation of mini-grids. Existing requirements are embraced under the generic country framework.

No environmental or social permits from the national framework in this country are expected to be required in order to conduct any of the project activities.

A thorough environmental and social analysis has been conducted recently by the third-party project to which this project will be supporting for pilot 1. The ESMP available contains the details of the study. No changes have been identified since and they all constitute the legal framework relevant to this project.

In summary the following are environmental policies and legislation available in the country relevant for mini-grids: the Constitution of the Republic of Malawi of 1995, the Roads Authority policy statements, the National Environmental Policy (NEP) of 2004, the Environment Management Act (EMA) of 1996, the National Forestry Policy of 1996, the National Forestry Act of 1997, the National Land Policy of 2002, the Land Act of 2016, the Customary Land Act of 2016, the Land Acquisition Act of 1971, the National Land Resources Management Policy and Strategy of 1998, The Land Acquisition Act of 1971, The Malawi Forestry Act of 1997 the Water Resources Management Policy and Strategy of 1994, the Water Resources Act of 1969, The National Local Government Act, 1998, the Gender Equality Act , 2013, the Monuments and Relics Act , 1990,the Physical Planning Act, the Malawi Disaster Management Policy, 2015, the Physical Planning Act , 2016, the Occupational Health and Welfare Act, 1997, the Public

roads Act(Cap.69:02) the Bank's Environmental Policy, THE Bank's Involuntary Resettlement Policy and the Environmental and Social Assessment Procedures (ESAP).

Within the country system, the Environment Management Act, 1996 of Malawi provides that the project requires an Impact Assessment based on its description. In this context, the Environmental Affairs Department (EAD) exercises the primary responsibility of enforcing and regulating environmental protection requirements.

## **Nigeria**

### International framework

This country is not adhered to any international initiative applying requirements to the implementation of mini-grids. Therefore, no environmental or social permits from international framework for this country are expected to be required in order to conduct any of the project activities.

Regarding the social safeguards, the country is signatory of a diverse range of regional (Africa) and international agreements:

- Constitutive Act of the African Union [2001]
- Treaty establishing the African Economic Union [1991]
- African Charter on Human and People's Right (1981) [1983]
- African charter on the Rights and welfare of the child (1990) [2001]
- African Charter on the Rights of Women in Africa (2003) [2004]
- African Youth Charter (2006) [2009]
- African Union Convention for the Protection and Assistance of Internally Displaces Persons in Africa (Kampala Convention) [2012]
- UN International Convention on the Elimination of All Forms of Racial Discrimination. (1966)(No 2) [1967]
- International Covenant on Economic, Social and Cultural Rights (1996) [1993]
- Convention on the Elimination of All Forms of Discrimination Against Women (1966) [1985]
- Convention on the Rights of the Child (1989) [1991]
- International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families, Articles. (1990)(no 13) [2009]
- Convention on the Rights of Persons with Disabilities (2006) [2010]

This country is signatory to most of the international and regional agreements on environmental protections, the most important of which are: (i) the UNESCO Paris Agreement concerning the Protection of the World Cultural and Natural Heritage; (ii) the CITES Convention, the United Nations Rio Convention on Biological Diversity(CBD); (iii) United Nations Framework Convention on Climate Change(UNFCCC); (iv) Rotterdam Convention on PIC and the Stockholm Convention on POPs(v) Geneva Tropical Timber Agreement; (vi) Maputo African Convention on the Conservation of Nature and Natural Resources to ensure the sustainable development of African economies.

### National legal framework

This country has not yet established specific environmental and social requirements for the implementation of mini-grids. Existing requirements are embraced under the generic country framework.

In order to implement a mini-grid in Nigeria an Environmental and Social Impact Assessment Certificate is required by the Federal Ministry of Environment (FME). This is expected for the project activities related to the pilots under activity Activity 1.1.1. - Output 1.2. Pilot sites will be assigned based on calls for proposals therefore further refinement of this requirement will be evaluated in detail when more information is known about the chosen site/s.

The requirements of Nigerian legislation in force mainly concern: (i) Environmental Impact Assessment (EIA) Act No. 86 of 1992, which restricts public or private development projects without prior consideration of the environmental impact; (ii) National Environmental Standards and Regulations Enforcement Agency Law of 2007, which empowers the Agency to enforce all national environmental laws and regulations (except those related to the oil and gas sector) and international treaties or conventions to which Nigeria is signatory. The Agency has issued 24 environmental regulations which prescribe pollution abatement measures, limits and other safeguards for various industries and for noise, surface and ground water discharges among others. These mainly concern: (i) national environmental regulations concerning the protection of wetlands, river banks and lake shores (2009) and (ii) National Environmental (Protection of Watershed, Mountainous, Hilly and Catchment Areas) Regulations, 2009 with a direct impact on the proposed project; (iii) National Electric Power Sector Reform Act (2005), which established the National Electricity Power Authority (NEPA) and requires all entities intending to generate, transmit and or distribute power to include an EIA Approval Certificate, or Proof of submission and acceptance for processing of the EIA report to the Ministry of Environment in their applications; (iv) National Policy on the Environment, with the goal of achieving sustainable development for the country and emphasis on (a) securing for all Nigerians a quality environment adequate for their health and well-being; (b) conserving and using the environment and natural resources for the benefit of present and future generations; and (c) restoring, maintaining and enhancing ecosystems and ecological processes essential for the functioning of the biosphere and for the preservation of biological diversity and to adopt the principle of optimum sustainable yield in the use of natural resources and ecosystems; and (v) the Land Use Act (1978), which recognizes the rights of all Nigerians to use and enjoy land and the natural fruits thereof in sufficient quality to enable them to provide for the sustenance of themselves and their families.

The implementer partner has acceptable Legal and Institutional Frameworks in the country to ensure compliance on environmental issues. When it comes to social issues there is no single point ministry dealing with social impacts and risk management in Nigeria. The provisions of the new World Bank Environmental and Social Framework (ESF) that relate to social aspects such as labor, protection of vulnerable groups, social inclusion, community health & safety and land and livelihoods are under the purview of different ministries or department and agencies such as Ministry of Women Affairs & Social Development, Department of Lands, Ministry of Labor etc. Typically, these Ministries/Departments do not have policies and regulatory provisions that address the safeguards requirements holistically.

## **Burkina Faso**

### International framework

This country is not adhered to any international initiative applying requirements to the implementation of mini-grids. Therefore, no environmental or social permits from international framework for this country are expected to be required in order to conduct any of the project activities.

Regarding the social safeguards, the country is signatory of a diverse range of regional (Africa) and international agreements:



- Constitutive Act of the African Union [2001]
- Treaty establishing the African Economic Union [1992]
- African Charter on Human and People's Right (1981)[1984]
- African charter on the Rights and welfare of the child (1990)[1992]
- African Charter on the Rights of Women in Africa (2003)[2006]
- African Youth Charter (2006)[2008]
- African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention)[2012]
- UN International Convention on the Elimination of All Forms of Racial Discrimination. (1966)(No 2) [1974]
- International Covenant on Economic, Social and Cultural Rights (1996) [1999]
- Optional protocol to the Economic, Cultural & Social Rights (2008) (no 3)(a) (Signed 2012)
- Convention on the Elimination of All Forms of Discrimination Against Women (1966) [1987]
- Convention on the Rights of the Child (1989) [1990]
- International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families, Articles. (1990)(no 13) [2003]
- Convention on the Rights of Persons with Disabilities (2006) [2009]
- Maternity Protection Convention, 2000, (No. 183) [2013]

This country is signatory to most of the international and regional agreements on environmental protections, the most important of which are: (i) the UNESCO Paris Agreement concerning the Protection of the World Cultural and Natural Heritage; (ii) the CITES Convention, the United Nations Rio Convention on Biological Diversity(CBD); (iii) United Nations Framework Convention on Climate Change(UNFCCC); (iv) Rotterdam Convention on PIC and the Stockholm Convention on POPs(v) Geneva Tropical Timber Agreement; (vi) Maputo African Convention on the Conservation of Nature and Natural Resources to ensure the sustainable development of African economies.

#### National legal framework

This country has not yet established specific environmental and social requirements for the implementation of mini-grids. Existing requirements are embraced under the generic country framework.

It is expected that the implementation of mini-grids will be subjected to Environmental Impact study Notice. This is based on the environmental studies required by national government the Code of Environment, 2004 and its associated decree of October 22, 2015 on procedural requirements for Environmental assessment studies when the subproject category is "A," and in some cases, projects appearing in category "B". Also, for small-scale projects among those in category "B," and Environmental Impact Study Notice may be a requirement.

The country requires to submit an environmental impact study or an environmental impacts notice request the prior opinion of the Minister in charge of environmental protection before the activity starts.

The main national legal framework is summarised below:

- The law No.006-2013/AN of April 02, 2013 bearing the code of the environment in Burkina Faso
- The law No.003-2011/AN of April 2011 concerning the forest code in Burkina Faso
- The Law No.034-2012/AN concerning agrarian and land reorganization in Burkina Faso,
- The law of No.002-2001/AN of February 8,2001 on the Framework Law relating to Water Management promulgated by Decree 2001-126/PRES of 3 April 2001.
- The decree No.2015 2015-

1187/PRESTRANS/PM/MERH/MATD/MMME/MS/MARHASA.MRA/MICA/MHU/MIDT/MCT of October 22, 2015, laying down the conditions and procedures for carrying out and validating the strategic Environmental Assessment, the Environmental and social Impact Assessment study and Notice; and

- The Decree No.2001-409/PRES/PM/MECVMARHRH/MID/MATD of July 03, 2007 laying down modalities for carrying out the Environmental Audit.
- The National Policy of land security in rural areas (PNSFMR)
- The National Population Policy (PNP)
- The National Planning Policy (PNAT)
- The National Gender Policy (PNG)
- The National Public Health Policy (PNHP)
- The National Plan for the adoption of Climate Change (NAP)

The Ministry of Environment, Green Economy and Climate Change (MEEVCC) is responsible for the implementation of the Government's policy on environment and sustainable development, Ratachee at MEEVCC, the National Bureau of Environment Assessments (BUNEE) is the technical body for monitoring the implementation of the ESIA's in Burkina Faso.

## **Ethiopia**

### International framework

This country is not adhered to any international initiative applying requirements to the implementation of mini-grids. Therefore, no environmental or social permits from international framework for this country are expected to be required in order to conduct any of the project activities.

The country is signatory of the following international conventions and protocols on the environmental and social scopes:

- International Labour Organisation (ILO) Forced Labour Convention, 1930 (No. 29);
- ILO Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
- ILO Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- ILO Equal Remuneration Convention, 1951 (No. 100);
- ILO Abolition of Forced Labour Convention, 1957 (No. 105);
- ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111);
- ILO Minimum Age Convention, 1973 (No. 138);
- ILO Worst Forms of Child Labour Convention, 1999 (No. 182);
- ILO Right of Association (Agriculture) Convention, 1921 (No. 11);
- ILO Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144);
- The United Nations Convention on the Rights of the Child, 1990;
- The Stockholm Convention on Persistent Organic Pollutants;
- Convention on Biological Diversity;
- The United Nations Framework Convention on Climate Change, 1992;
- The United Nations Convention to Combat Desertification in those Countries Experiencing Serious Drought and/or Desertification, Particularly in Africa;
- The United Nations Convention for the Safeguarding of the Intangible Cultural Heritage;
- The United Nations Convention on the Protection and Promotion of the Diversity of Cultural

- Expressions;
- The United Nations Convention Concerning the Protection of World Cultural and National Heritage;
- The Vienna Convention for the Protection of the Ozone Layer;
- Montreal Protocol on Substances that Deplete the Ozone Layer;
- The Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and
- Pesticides in International Trade;
- Libreville Declaration on Health and Environment in Africa;
- The United Nations Convention on International Trade in Endangered Species (CITES) of Wild Fauna and Flora, 1973;
- The United Nations Convention on Biological Diversity (Rio Convention), 1992.

### National legal framework

This country has not yet established specific environmental and social requirements for the implementation of mini-grids. Existing requirements are embraced under the generic country framework.

A thorough environmental and social analysis is being conducted recently by the World Bank for the ADELE project (P171742), which aims at supporting common goals using similar strategies. This analysis is publicly available and therefore it constitutes the legal framework relevant to this project too.

## **Sudan**

### International framework

International conventions and processes that Sudan is a signatory to that may be relevant to the project include:

- African Commission on Human and Peoples' Rights (ACHPR): Sudan is member and previously reported to the commission up to 2012.
- Universal Periodic Review (UPR): Sudan continues its engagement with UPR processes and did report in November 2021.<sup>10</sup>
- ICCPR - International Covenant on Civil and Political Rights
- CEDAW - Convention on the Elimination of All Forms of Discrimination against Women
- ICERD - International Convention on the Elimination of All Forms of Racial Discrimination
- ICESCR - International Covenant on Economic, Social and Cultural Rights
- CRC - Convention on the Rights of the Child
- CRPD - Convention on the Rights of Persons with Disabilities
- ILO C111 - Discrimination (Employment and Occupation) Convention
- ILO C138 - Minimum Age Convention (*Minimum age specified: 14 years*)
- ILO C182 - Worst Forms of Child Labour Convention
- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)

There have been some efforts to strengthen systems, monitoring and administration around applying

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<sup>10</sup> <https://www.ohchr.org/en/hrbodies/upr/pages/sdindex.aspx>

international treaties in Sudan. However, it is unclear, especially with ongoing instability, to what degree international law is implemented.

#### National legal framework

Due to the 2019 coup in Sudan, the state currently utilised an Interim Constitutional Declaration of August 2019, in place of the 2005 Interim National Constitution of the Republic of the Sudan. This replaced the 2005 Interim National Constitution of the Republic of the Sudan, which in turn replaces the 1998 Constitution. A constitution for the transition from military to democratic sure is under development. As such, the legal institutional framework of Sudan faces instability.

Given the political situation around the drafting of the Interim Constitutional Declaration, as expected it focuses on defining roles and powers of governance in Sudan. Of relevance to this project, the Interim Constitutional Declaration does declare that the State must “perform an active role in social welfare and achieve social development by striving to provide healthcare, education, housing and social security, and work on maintaining a clean natural environment and biodiversity in the country and protecting and developing it in a manner that guarantees the future of generations” (Article 7). A bill on the national human rights commission is under consideration.

It also realises women’s rights as follows (Article 48):

“(1) The state shall protect women’s rights as set forth in international and regional agreements ratified by Sudan.

(2) The state shall guarantee to both men and women the equal right to enjoy all civil, political, social, cultural, and economic rights, including the right to equal pay for equal work, and other professional benefits.

(3) The state shall guarantee women’s rights in all fields through positive discrimination.

(4) The state shall work to combat harmful customs and traditions that reduce the dignity and status of women.

(5) The state shall provide free healthcare for motherhood, childhood and pregnant women.”

The **2001 Electricity Act** remains in force and does not address environmental or social concerns, although a new, 2019, Electricity Act has been drafted and is in the approval stages.

A **1986 Land Appropriation Act** defines the right of the government to sell and rent government land, as well as to allocate it for specific uses and to grant licenses to investors.

The **1999 Investment Encouragement Act** provides some guidelines regarding feasibility studies, land allocation for investment purposes and referral to the Minister of Environment, but provides limited specific measures and processes.

The **2001 Environment Protection Act** replaced the Higher Council for Environment and Natural Resources Act of 1991 and defines environmental protection at federal and state levels, as well as duties

of the Higher Council for Environment and Natural Resources. The Higher Council has the mandate to coordinate the work of the State Environmental Councils, form committees to coordinate environmental work and is the national focal point for international and regional environmental conventions and treaties. This includes “determining development and rationalising the means of use, management and protection, from deterioration thereof, in an integrated and balanced form” and Environmental Impact Assessment (EIA) processes.

The **2003 Local Government Act** replaces the 1998 Local Government Act and promotes devolution of power to locality levels.

## 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 <b>construction and/or operation</b> of the minigrid potentially involve or lead to				
	<b>Human Rights</b>				
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?				
	<b>Gender Equality and Women's Empowerment</b>				
3	reproducing discriminations against women based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?				
	<b>Accountability</b>				
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				

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)	
	stakeholders?				
	<b>Project-Level Standards</b>				
6	<b>Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management</b>				
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?				
	<b>Standard 2: Climate Change and Disaster Risks</b>				
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?				
	<b>Standard 3: Community Health, Safety and Security</b>				
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?				
	<b>Standard 4: Cultural Heritage</b>				
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?				
	<b>Standard 5: Displacement and Resettlement</b>				
20	temporary or permanent and full or partial physical displacement (including people without legally				

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)	
	recognizable claims to land) due to land acquisition needed for the minigrid?				
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?				
	<b>Standard 6: Indigenous Peoples</b> (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	88Could 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 minigrid)?				
	<b>Standard 7: Labour and Working Conditions</b>				
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?				
	<b>Standard 8: Pollution Prevention and Resource Efficiency</b>				



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)	
32	the release of pollutants to the environment (for example during construction or excavation works)?				
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 <a href="#">Montreal Protocol</a> , <a href="#">Minamata Convention</a> , <a href="#">Basel Convention</a> , <a href="#">Rotterdam Convention</a> , <a href="#">Stockholm Convention</a>				

### 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). <i>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</i>
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

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Rating the 'Likelihood' of a Risk

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

Determining 'Significance' of Risk

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) **Activities** 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.<sup>11</sup>

*(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 environmental impacts to the extent possible, and attaches economic values where feasible. Sets out the basis for selecting

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<sup>11</sup> For example, the Environmental, Health, and Safety Guidelines (EHSs), which are technical reference documents with general and industry-specific statements of Good International Industry Practice. The EHSs 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](http://www.ifc.org/ehsguidelines).

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.<sup>12</sup> 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 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

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<sup>12</sup> 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.



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 required 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 standards<sup>32</sup> 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 ACTIVITIES, RIGHTS-HOLDERS, AND THE APPLICABLE LEGAL FRAMEWORK	
Define project activities that could have impacts on indigenous peoples	<ul style="list-style-type: none"> <li>▪ <i>A list or schedule of known and expected project activities and their details, including their timeframes, locations etc.</i></li> </ul>
Establish the project's obligation to achieve FPIC: Assessment of national and international legal obligations	<ul style="list-style-type: none"> <li>▪ <i>A description of the national legal obligations to promote and protect Indigenous Peoples' rights.</i></li> <li>▪ <i>A description of the international legal obligations to promote and protect Indigenous Peoples' rights, including the UNDP SES requirements</i></li> <li>▪ <i>Gap analysis of national legal obligations and international legal obligations, including UNDP's SES requirements.</i></li> <li>▪ <i>Interviews, documented trainings, workshops, etc. with relevant project staff demonstrating that these obligations are understood.</i></li> </ul>
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.	<ul style="list-style-type: none"> <li>▪ <i>Inclusion of a rationale for any differential treatment between potentially affected Indigenous Peoples' communities and other local communities.</i></li> <li>▪ <i>Documented evidence that customary rights have been identified and acknowledged within the rights-holder map, in addition to legal rights.</i></li> <li>▪ <i>Documentation of any conflicting claims, and measures that were taken to mediate and resolve these conflicts.</i></li> <li>▪ <i>Interviews or surveys with community members that confirm there are not outstanding conflicts.</i></li> <li>▪ <i>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.</i></li> <li>▪ <i>Interviews or surveys with community members that confirms they were sufficiently compensated to be able to participate in the rights-holder mapping.</i></li> <li>▪ <i>Interviews or surveys of how the results of this process have been communicated and made accessible to all other community members.</i></li> <li>▪ <i>Interviews with community members that confirm the results of this process have been received and understood.</i></li> </ul>

Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
<p>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.</p>	<ul style="list-style-type: none"> <li>▪ <i>Documented evidence of a community meeting having been called.</i></li> <li>▪ <i>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.</i></li> <li>▪ <i>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.</i></li> <li>▪ <i>Signed meeting minutes that detail the willingness of the community to consider the proposed project.</i></li> </ul>
SOCIAL AND ENVIRONMENTAL IMPACT ASSESSMENT	
<p>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)</p>	<ul style="list-style-type: none"> <li>▪ <i>Documented evidence that community representatives were engaged in advance of the impact assessment and participated in the design of the assessment.</i></li> <li>▪ <i>Documented agreement on the format, scope and content of the assessment to be conducted, including who will conduct it.</i></li> <li>▪ <i>Documented evidence that impacts on customary rights have been considered within the scope of the impact assessment, in addition to legal rights.</i></li> <li>▪ <i>Documented evidence that the rights-holder map is properly considered in the impact assessment design.</i></li> <li>▪ <i>Assessment of community capacity (time, resources, skills) to participate in the impact assessment and measures taken to ensure sufficient capacity.</i></li> <li>▪ <i>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.</i></li> <li>▪ <i>Documented interviews with community members that confirms they feel they were sufficiently trained and compensated to participate in the impact assessment design and implementation.</i></li> <li>▪ <i>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.</i></li> <li>▪ <i>Documented evidence of the methods used to communicate this process and its outcome to community members.</i></li> </ul>



Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
	<ul style="list-style-type: none"> <li>▪ <i>Written or recorded evidence of interviews with relevant community representatives demonstrating that these impacts are understood.</i></li> </ul>
<b>COMMUNITY PARTICIPATION, REPRESENTATION, GOVERNANCE AND DECISION-MAKING STRUCTURE</b>	
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	<ul style="list-style-type: none"> <li>▪ <i>Documented evidence of a community meeting(s) having been called.</i></li> <li>▪ <i>Signed meeting minutes that detail:</i></li> <li>▪ <i>The community has reached a consensus that they are willing to enter into negotiations based on the results of the impact assessment.</i></li> <li>▪ <i>Signed attendance register.</i></li> <li>▪ <i>Documented evidence of how the results of this process have been communicated to all other community members.</i></li> <li>▪ <i>Documented evidence of interviews with community members that demonstrate they are willing to enter into negotiation based on the impact assessment.</i></li> </ul>
Establish who will be representing the community throughout the FPIC process, and that they were selected by community members in a culturally acceptable manner.	<ul style="list-style-type: none"> <li>▪ <i>Documented evidence of a community meeting having been called.</i></li> <li>▪ <i>Signed meeting minutes that detail the election of the community members or institutions who will represent the community during the FPIC process.</i></li> <li>▪ <i>Signed attendance register.</i></li> <li>▪ <i>Documented evidence of how the results of this process have been communicated to all other community members.</i></li> </ul>
Establish how women participate in local decision-making mechanisms.	<ul style="list-style-type: none"> <li>▪ <i>Documented analysis of local gender dynamics which identifies potential obstacles to meaningful participation in consultations for female community members</i></li> <li>▪ <i>Documented evidence that community representatives maintain open communication with all community members. This may be via relevant community organisations and associations.</i></li> <li>▪ <i>Documented participation of women in consultation meetings and/or meetings conducted exclusively with women.</i></li> </ul>
Establish how marginalised or vulnerable groups, including children, the elderly, and those with disabilities, participate in local decision-making mechanisms.	<ul style="list-style-type: none"> <li>▪ <i>Analysis of local representation dynamics which identifies potential obstacles to meaningful participation in consultations for community members who are typically marginalised.</i></li> <li>▪ <i>Documented evidence that the elected community representatives maintain open communication with all community members. This may be via relevant community organisations and associations.</i></li> <li>▪ <i>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</i></li> </ul>

Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
	<p><i>integrate these groups into other community engagement processes to ensure that their voice is heard and has bearing on the consultation processes.</i></p> <ul style="list-style-type: none"> <li>▪ <i>Documented participation of marginalized or vulnerable groups in consultation meetings</i></li> <li>▪ <i>and/or meetings conducted exclusively with these groups.</i></li> </ul>
<p>Establish that the community has sufficient institutional and technical capacity to be able to effectively participate in an FPIC process.</p>	<ul style="list-style-type: none"> <li>▪ <i>Documented evidence of existing decision-making, mediation and conflict resolution mechanisms.</i></li> <li>▪ <i>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.</i></li> <li>▪ <i>Evidence of the community having the opportunity for knowledge exchange with other communities or those who have participated in FPIC processes previously.</i></li> <li>▪ <i>Documented evidence of existing community protocols and/or “Planes de Vida” that detail:</i> <ul style="list-style-type: none"> <li>○ <i>The community’s cosmovision and how this informs their position vis-a-vis development projects</i></li> <li>○ <i>How this intersects with international and national rights.</i></li> <li>○ <i>This should include evidence of how they were developed via an inclusionary, participatory process.</i></li> </ul> </li> <li>▪ <i>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.</i></li> </ul>
SUSTAINABILITY OF THE FPIC PROCESS	
<p>Establish a mechanism for facilitating ongoing and open, two-way dialogue between the community and project team.</p>	<ul style="list-style-type: none"> <li>▪ <i>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.</i></li> <li>▪ <i>Demonstrated commitment to maintain and nurture relationships.</i></li> <li>▪ <i>Demonstrated commitment to continue consultation to maintain consent beyond its initial achievement.</i></li> <li>▪ <i>Documented evidence of consultation processes and agreements.</i></li> <li>▪ <i>Demonstrate the existence of open channels for communication, when possible e.g. phone, social media, radio, community groups etc.)</i></li> </ul>
<p>Establish a participatory mechanism for monitoring and evaluating compliance of the FPIC process</p>	<ul style="list-style-type: none"> <li>▪ <i>Documented evidence of an agreement between the community and the project developer that includes:</i> <ul style="list-style-type: none"> <li>○ <i>What constitutes ‘consent’</i></li> <li>○ <i>Criteria and indicators to be used for monitoring compliance with the agreed process.</i></li> </ul> </li> </ul>

Indicative Steps in an FPIC Process (to be further clarified in IPP)	Examples of Documentation
against the documented agreement.	<ul style="list-style-type: none"> <li>○ <i>Who will provide independent verification.</i></li> <li>▪ <i>Assessment of community capacity (time, resources, skills) to participate in the monitoring and evaluation of the process.</i></li> <li>▪ <i>Documented evidence taken of measures to ensure sufficient community capacity.</i></li> <li>▪ <i>Documented evidence of a positive and collaborative relationship existing between the community and the implementing partner.</i></li> </ul>
Establish a grievance redress mechanism for addressing claims in the event that the negotiated agreement is breached.	<ul style="list-style-type: none"> <li>▪ <i>Documented evidence of an agreement regarding how the grievance redress mechanism should be designed and how it should function.</i></li> <li>▪ <i>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.</i></li> <li>▪ <i>Assessment of claims made using the grievance mechanisms, including:</i> <ul style="list-style-type: none"> <li>○ <i>Types of grievances, including the FPIC process itself.</i></li> <li>○ <i>Whether they have been resolved.</i></li> <li>○ <i>Length of time they have taken to be resolved.</i></li> </ul> </li> <li>▪ <i>Total number of people / groups to have used the grievance mechanism.</i></li> </ul>

## 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<sup>13</sup>.

### 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.<sup>14</sup> 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](http://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 manner 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

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<sup>13</sup> For example, grievances related to fraud, abuse or misconduct should be referred to the Office of Audit and Investigations (OAI).

<sup>14</sup> [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<sup>15</sup>
- (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 UNDP and 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<sup>16</sup>] 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 complaints and responses.
- (iii) Establish procedures to ensure that complaints related to sexual exploitation and abuse are treated

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<sup>15</sup> 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.

<sup>16</sup> 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.

in a survivor-centered manner and ensure referrals for safe and confidential survivor assistance<sup>17</sup>

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

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<sup>17</sup> 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>.

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](http://www.undp.org/secu-srm)), [stakeholder.response@undp.org](mailto:stakeholder.response@undp.org); [project.concerns@undp.org](mailto:project.concerns@undp.org); [secuhotline@undp.org](mailto: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.<sup>18</sup>

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 stakeholders involved in the complaint, or their designated representative(s). Appropriate steps will be taken to

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<sup>18</sup> Oral acknowledgments can be used for expediency (and also recorded), but must be followed by a written acknowledgment.

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.