



# Global EbA Fund

## Environmental and Social Management System



Supported by:



Federal Ministry  
for the Environment, Nature Conservation,  
Nuclear Safety and Consumer Protection



based on a decision of  
the German Bundestag



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## Acronyms and Abbreviations

BMU	Federal Ministry for the Environment, Nature Conservation and Nuclear Safety
CBD	Convention on Biological Diversity
CfP	Call for Proposals
EbA	Ecosystem-based Adaptation (aka Nature-based Solutions for Adaptation)
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESMP	Environmental and Social Management Plan
FEBA	Friends of EbA
FPIC	Free, Prior and Informed Consent
Fund (The)	Global EbA Fund
GAN	Global Adaptation Network
GCA	Global Commission on Adaptation
GCF	Green Climate Fund
GEBAF	Global EbA Fund
GEF	Global Environment Facility
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH
ODA	Official Development Assistance
IUCN	International Union for Conservation of Nature
IKI	International Climate Initiative
MEL	Monitoring, Evaluation and Learning
NAPs	National Adaptation Plans
NDCs	Nationally Determined Contributions
NbS	Nature-based Solutions
SC	Steering Committee
SDGs	Sustainable Development Goals
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change

# 1. Introduction to the Global EbA Fund's ESMS

## 1.1 Objectives and Purpose

Implemented by IUCN and UNEP with funding from the International Climate Initiative (IKI) of the German Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV), the **Global EbA Fund** is a catalytic funding mechanism for supporting innovative approaches to EbA to create enabling environment for its mainstreaming and scaling up.

By supporting catalytic climate change adaptation initiatives, the Fund will help overcome barriers to upscaling EbA, address knowledge gaps, pilot innovative EbA approaches, engage in strategic EbA policy mainstreaming, and incentivise innovative finance mechanisms and private sector EbA investment.

While the Global EbA Fund aims to achieve positive conservation and social outcomes, IUCN and UNEP are aware of the potential risk for unwanted negative environmental and social impacts from project implementation. To reduce these risks, the Global EbA Fund has put in place a Fund-level Environmental and Social Management System (ESMS). The ESMS provides a systematic procedure to screen EbA initiatives (in the following referred to as “grantee projects”) for potential adverse environmental and social impacts to ensure that negative impacts are avoided or minimised while positive impacts are stimulated. The ESMS also ensures that the implementation and effectiveness of mitigation measures are monitored and that any impacts arising during execution of grantee projects are addressed.

As a grant-making Fund implemented by IUCN, the Global EbA Fund is required to adhere to the Environmental and Social Management Standards of IUCN. The Fund's ESMS is aligned to the overarching institutional-level ESMS of IUCN (in the following referred to as “IUCN's ESMS”), including its ESMS standards and ESMS principles, and follows the general procedure outlined in the IUCN ESMS Manual. Given that IUCN is a GEF and GCF accredited entity, its institutional ESMS (and therefore this ESMS for the Global EbA Fund) is in full compliance with the safeguard requirements of GEF and the interim safeguard system/requirements applied by GCF. While the Global EbA Fund ESMS is aligned to, and underpinned by IUCN's ESMS, the procedures required by the Fund's ESMS considers the geographic context, objectives, and the likely activities of future grants. The ESMS applies the principle of proportionality to the proposed assessment studies and management/mitigation plans that would be required of grantee projects. Successful implementation of this ESMS will therefore facilitate sound E&S management in line with good international practice.

This ESMS defines procedures, tools and responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with projects supported by the Global EbA Fund throughout the entire project lifecycle, in line with national requirements. The ESMS is applicable to all projects that receive funding from the Global EbA Fund.

## 1.2 ESMS Implementation Responsibilities

### **Global EbA Fund**

By implementing the measures outlined in this ESMS, the Fund will be able to provide evidence that best efforts are being made to address E&S topics to the extent possible given the

project/stakeholder setup, the nature of the projects, and the context of implementation. The Fund, as established by this ESMS, is responsible for: (i) establishing a set of environmental and social standards and procedures that the grantees must adhere to when they apply for funds, and during the execution of their projects; (ii) raising awareness of grantees on E&S topics through training based on real cases encountered in projects; (iii) integrating E&S elements in the project/grantee selection criteria; (iv) reviewing the extent to which E&S risks have been correctly assessed and screened by grantees in the proposal stage, and then categorising, and requesting applicable assessments/studies/management plans, as appropriate; and, (v) monitoring E&S performance (including implementation of mitigation and management plans) during the implementation of grant activities.

**Grantees**

Grantees are responsible for the screening and assessment of potential E&S risks/impacts. They are also responsible for carrying out the requisite studies, assessments, mitigation and management plans that may be required for a given project. The ESMS responsibilities of the Grantees also include: (i) ensuring compliance with the Fund’s ESMS and its requirements at all times; (ii) ensuring proper stakeholder engagement (including where relevant, direct and indirect stakeholders and beneficiaries); (iii) ensuring compliance with national E&S legislation and mitigation/management measures that may be stipulated in an Environmental and Social Management Plan (ESMP) or equivalent; and, (iv) reporting to the Fund on any grievances and complaints received.

**1.3 ESMS within the Fund-cycle**



- Applicant responsible for completing ESMS screening questionnaire
- Global EbA Fund responsible for reviewing, categorising, and requesting applicable assessments/ studies/ management plans (ESMP or if standards are triggered)



- Grantee responsible for maintaining compliance to ESMS requirements, monitoring safeguards compliance, and reporting back to Fund's Secretariat on issues pertaining to safeguards/ESMS compliance and performance

## 2. E&S Standards and Requirements

### 2.1 The Relationship between the Fund ESMS and IUCN's ESMS

This ESMS conforms to the environmental and social safeguard requirements of the IUCN institution-level ESMS. While the fund's ESMS adheres to the requirements and principles of IUCN's ESMS, it needs to be pointed out that not all requirements are pertinent for applicant grantees given the types of projects funded under the EbA Fund and the expected lower level of risks. The requirements relevant for grantee projects includes

- adherence to the eight principles guiding ESMS application<sup>1</sup>:
  - Principle on Taking a Rights-based Approach;
  - Principle on Protecting the Needs of Vulnerable Groups;
  - Principle on Gender Equality and Women Empowerment;
  - Principle on Stakeholder Engagement (and respective [Stakeholder Engagement Guidance Note](#));
  - Principle on Free, Prior and Informed Consent;
  - Principle on Accountability (with the grievance requirements established in the [Grievance Mechanism Guidance Note](#));
  - Principle on the Precautionary Principle; and,
  - Principle on Precedence of the Most Stringent Standards.
- adherence to [the four ESMS standards](#) (i.e. Involuntary Resettlement and Access Restrictions; Indigenous Peoples; Cultural Heritage and Biodiversity and Sustainable use of Natural Resources); the standards are published as stand-alone documents describing the standard's underlying policies and objectives and specific requirements on how to assess and manage associated risks<sup>2</sup> and
- ensuring coverage of the following environmental and social risks areas:
  - Adverse gender-related impacts (including gender-based violence)
  - Risks of affecting vulnerable groups
  - Community health, safety and security risks
  - Labour and working conditions
  - Resource efficiency, pollution, wastes, chemicals and GHG emissions

Guidance for risk identification and management in these five areas is outlined in Section 6 of the ESMS Guidance Note Risk Assessment and Management<sup>3</sup>. Where applicable, the fund's secretariat/ESMS reviewer may guide applicant grantees to specific IUCN ESMS Guidance Notes for further consideration.

In addition to adhering to the safeguard requirements of this ESMS, all project activities financed and supported by the Fund need to be compliant with provisions of the legal frameworks of host countries. The grantees must commit to achieving and demonstrating compliance with the safeguard requirements of this ESMS and with national legislation and other obligations (e.g. environment, health, safety & labour laws, construction and operation permits etc.) by signing an Implementing Agreement between the Fund and the grantee.

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<sup>1</sup> Further outlined in Section 2 of the ESMS Manual: [iucn-esms-manual\\_0.pdf](#)

<sup>2</sup> The ESMS Standards are available at: [www.iucn.org/esms](http://www.iucn.org/esms)

<sup>3</sup> The Guidance Note is available at: [iucn\\_esms\\_gn-risk-management-clean-22.pdf](#)



## 2.2 The Fund's Operational Environmental and Social Requirements

The Global EbA Fund has established the following set of operational E&S requirements, as part of this ESMS:

- Screen all projects for negative E&S impacts and benefits prior to any funding;
- Define adequate management measures to avoid or mitigate potential negative environmental and/or social impacts;
- Comply with applicable national and international environment, social, health and safety regulations;
- Plan, implement and document stakeholder engagement activities as an ongoing process for all projects; and,
- Implement a formalised grievance redress process to capture and manage project-related complaints from communities, workers and other stakeholders.

## 2.3 Exemptions

Projects that consist solely of any of the following functions or activities will be exempt from the screening requirements of this ESMS (as outlined and further detailed in Section 4.1):

- Preparation and dissemination of knowledge products and communication materials;
- Organisation of capacity building activities, such as workshops and trainings;
- Strengthening capacities of partners to participate in national and international policy processes;
- Partnership coordination and management of networks; and/or,
- Global/regional/national activities (e.g. activities such as knowledge management, inter-governmental processes) with no field-level activities.

The exemption criteria only apply when they make up the entire scope of the project. During the screening, it shall be determined if a grantee applicant project is exempt from the full ESMS screening requirements as outlined in [ESMS screening questionnaire](#)

## 3. Excluded Activities

The Fund will not support projects that intentionally degrade the natural environment, or involve the production of, or trade in, any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans.

In addition, the Fund will not support any activities, which are included in the International Finance Corporation's excluded activities list. These are:

- Production or trade in weapons and munitions;
- Production or trade in alcoholic beverages (excluding beer and wine), and/or production or trade in tobacco;
- Trade in wildlife or wildlife products regulated under CITES;
- Production or trade in radioactive materials;
- Production or trade in or use of unbonded asbestos fibres;
- Purchase of logging equipment for use in primary tropical moist forest;

- Production or trade in pharmaceuticals subject to international phase outs or bans;
- Production or trade in pesticides/herbicides subject to international phase outs or bans;
- Drift net fishing in the marine environment;
- Physical displacement of people (relocation or loss of shelter), neither involuntary (where people may not be able to refuse) nor forced;
- Contact with indigenous peoples living in voluntary isolation;
- Use and/or procurement of pesticides and hazardous materials that are unlawful under national or international laws, the generation of wastes and effluents, and emissions of short- and long-lived climate pollutants;
- Removal, alteration or disturbance of any non-replicable or critical cultural heritage, or the use of any intangible cultural heritage without the Free, Prior and Informed Consent of the communities who it belongs to; or,
- Introduction of species outside their natural range (non-indigenous) that can potentially develop invasive characteristics and become harmful to the environment.

## 4. Risk Screening, Assessment and Management within the Fund's ESMS

### 4.1 Screening

While the Global EbA Fund aims to achieve positive conservation and social outcomes, IUCN and UNEP are aware of the potential risk for unwanted negative environmental and social impacts from project implementation. As part of the grant application process to the Fund, all prospective grantee projects must undertake a project ESMS Screening in order to determine their respective risk categories. To undertake ESMS screening applicants must complete [ESMS Screening questionnaire](#).

Once completed by the applicant grantee, the Fund will determine the overall risk category of the proposed activities, which will be based on the approach/methodology prescribed by IUCN's ESMS manual. Grantee projects will be assigned one of three potential risk categories:

- **High risk projects (Category A):** Projects with the potential to cause significant adverse environmental and/or social impacts. These impacts may influence an area broader than the project site, may be related to sensitive receptors – human populations or environmentally important areas, may severely affect the health and quality of life of the receptor, may be of long duration, and may be irreversible and very likely to occur. *\*Category A projects are excluded from receiving funding from the Global EbA Fund\**
- **Moderate-risk projects (Category B):** Projects with potential environmental and social impacts that are less adverse and fewer in number than those of high-risk projects. Typically, these impacts are site-specific, their extent can be determined with a reasonable degree of certainty, few if any of them are irreversible, and mitigation measures could be readily designed and implemented to successfully address these concerns.
- **Low-risk projects (Category C):** Projects that are likely to have minimal or no environmental or social impacts, and/or when mitigation measures have already been devised as part of the project's activities that appropriately address the risks. No further assessment is required for low-risk projects.

Based on the self-identified environmental and social impacts/risks of the project, the Fund will define any safeguard requirements/studies as necessary. The grantee is responsible for implementation and monitoring of any required safeguard instrument or other required measures to address the applicable safeguard requirement. Depending on the nature and scale of the risk identified, the applicant may be requested by the Fund to conduct further risk assessment (see Section 4.2.2).

## 4.2 Assessment

### 4.2.1 Potential Fund-wide E&S risks and Impacts

Based on an initial ESMS review (as part of the funding application to the IKI), a small selection of E&S risks was identified that could occur within the portfolio of the Fund. These potential risks/impacts are as follows and are overall considered of minor magnitude:

#### **Environmental and social risks**

*Vulnerable groups and gender-based violence:* The screening process includes an assessment of the differentiated risk that could be posed to vulnerable groups and individuals. Depending on the context of a given project, vulnerable groups could be landless or elderly people, children, ethnic minorities, displaced people, people living in poverty, marginalised or discriminated individuals or groups, amongst others. Particular emphasis will be given to risks falling on people with disabilities (which are often overlooked). Projects will also be screened for their potential to aggravate risks based on gender or of gender-based violence (including sexual harassment, sexual exploitation or sexual abuse). Any project which is deemed to have adverse gender-based violence related risks will be rejected.

*Labour and Working Conditions:* The Global EbA Fund will cooperate with different individual and institutional partners to support them in the application of EbA, including work in vulnerable communities. The nature of this work often involves the agricultural sector. Farmers, especially small-scale farmers and migrant workers, may work in an environment without consideration of labour rights and concern for occupational health and safety (OHS). Given the nature of the Fund's potential portfolio, labour/OHS conditions is an area that could result in certain risks/impacts. As such, the applicant grantee may be required complete additional assessments.

*Community Health, Safety and Security:* Programme activities are not expected to include risks to community health, as the introduction of EbA will not depend, for example, on toxic substances or does not involve major infrastructure construction. However, safety and security at the community level must be evaluated on a case-by-case or region-by-region level as part of the screening process for projects receiving support through the EbA Fund portfolio.

*Resource Efficiency and Pollution Prevention:* The Global EbA Fund follow's IUCN's requirements under this risk area<sup>4</sup>, i.e. the strict avoidance of any activities that would involve promoting the trade in or use of any substances listed under the Stockholm Convention on Persistent Organic Pollutants, or other chemicals or hazardous materials subject to international bans, restrictions or phase-outs due to high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential depletion of the ozone layer, consistent with relevant international treaties and agreements. Chemical fertilisers and pesticides may be used in agricultural practices in order to improve production levels. Chemical degradation of soil may result from insufficient or

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<sup>4</sup> See IUCN ESMS Guidance Note Risk Management, p 42 ff  
[https://www.iucn.org/sites/dev/files/iucn\\_esms\\_gn\\_risk\\_management.pdf](https://www.iucn.org/sites/dev/files/iucn_esms_gn_risk_management.pdf)

inappropriate use of mineral fertilisers, failure to recycle nutrients contained in crop residues, and failure to correct changes in soil pH that result from long-term use of nitrogen fertilisers and excessive use of poor-quality water, resulting in salinisation. As such, the Global EbA fund will follow Good Industry International Practice<sup>5</sup> with regards to fertiliser use. IUCN encourages the use of ecologically sound pest management practices, following Integrated Pest Management (IPM)<sup>6</sup> principles. The over-riding principle is that the choice of the pest management technique should be based on effectiveness at managing the pest while minimising risks to health and the environment, including non-target or ecological damage. The IUCN ESMS Guidance Note on Pest Management Planning<sup>7</sup> applies for any project that involves the use of biocides or other pest management techniques and projects that include activities related to biocide handling (e.g. procurement and transportation of biocides, storage, disposal of biocides or of biocide contaminated materials, etc.).

### **Potential impacts relating to ESMS Standards**

*Involuntary resettlement/Access restrictions:* The Global EbA fund requires that there be no physical displacement of people (relocation or loss of shelter), neither involuntary (where people may not be able to refuse) nor forced displacement for any project receiving support from the Fund. This issue will be included in screening during the selection process for all projects receiving support. In instances where a project's conservation objective might require putting in place restrictions to the use or access restrictions of natural resources to which communities have legitimate rights, a [Process Framework](#) will be established.

*Indigenous Peoples:* At a policy level, indigenous communities often struggle to be respected and engaged, including with regard to their specific resource-related knowledge connected to EbA. Without recognising them as owners of the knowledge, the project can contribute unintentionally to their further exclusion. Through screening grantee projects will be analysed to see if they have the potential to cause and/or exacerbate risks/impacts to indigenous peoples. If it is determined that a project may positively or negatively impact indigenous peoples (including their lands, territories and/or waters), then a process of Free Prior Informed Consent must be undertaken. Using FPIC as a modality for meaningful participation and consultation, a project will then be able to determine, through engagement with the respective indigenous peoples, whether the project poses the potential for any adverse impacts. If adverse impacts are not foreseen, then no further assessment is required. If, through consultation and FPIC, potential negative/adverse impacts are foreseen, then the applicable social assessment/IPP will be required to be undertaken by applicant grantees (see the indicative template as outlined [here](#)).

*Cultural Heritage:* Natural areas considered as sacred can have a fundamental role in the culture and religion of communities, and especially of indigenous peoples. Projects receiving support as part of the EbA Fund's portfolio will need to demonstrate that there will not be adverse impacts on cultural heritage, including on tangible or intangible, movable or immovable cultural resources or natural features of historical, cultural, spiritual or symbolic value.

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<sup>5</sup> Such as IFC's EHS Guidelines for Annual Crop Production. See [Annual+Crop+Production+EHS+Guidelines\\_2016+FINAL.pdf \(ifc.org\)](#)

<sup>6</sup> FAO defines Integrated Pest Management (IPM) as "an ecosystem approach to crop production and protection that combines different management strategies and practices to grow healthy crops and minimise the use of pesticides" <http://www.fao.org/agriculture/crops/thematic-sitemap/theme/pests/ipm/en/>

<sup>7</sup> Available at: [esms-pest-management-planning-guidance-note\\_0.pdf \(iucn.org\)](#)

*Biodiversity Conservation and sustainable use of living natural resources:* No project receiving support from the EbA Fund will have any negative impacts on biodiversity or lead to degradation or conversion of habitats. No invasive species will be introduced.

#### 4.2.2 Risk assessment requirements for applicant projects<sup>8</sup>

The Fund, and through it the grantee projects, will follow the principles of the mitigation hierarchy, and shall as a first priority seek to avoid most impacts/risks. Impacts can be avoided through careful project design and diligent E&S screening.

**Category C:** If, during the E&S screening and subsequent review/QA by the Fund, a grantee's project is identified to be of Low risk (i.e. Category C), there will generally not be a need for further studies/assessments to be undertaken. In certain circumstances, where there may be small scale construction associated with a project, the grantee may be required to develop an abbreviated Environmental and Social Management Plan. Typical activities that could require the production of such plans include construction of small facilities, use of agricultural equipment, and/or the limited use of agricultural chemicals. A template for an abbreviated ESMP is included [here](#).

**Category B:** If a project supported by the Fund is determined to be of a Moderate risk level (i.e. Category B), then certain risk assessment studies/frameworks may be required. The need for such risk/impact assessments will be established in the ESMS screening questionnaire and subsequent review by relevant members of the Fund's Secretariat. For such projects, the screening will identify initial risks that will need to be further explored through appropriate assessment studies. The level of assessment shall be proportionate to the level of risk identified during screening. Given that the Fund's main aim is to achieve positive environmental and social outcomes, and that individual grant activities will be limited in their size due to grant limits, the expected E&S risks for Category B projects are expected to be limited and temporary, and as such a full scale Environmental and Social Impact Assessment will not likely be required.

For Category B projects, a targeted E&S assessment is to be completed (if deemed necessary by the Fund upon review of the ESMS screening). A template is outlined [here](#). While unlikely (given the expected portfolio of the Fund), for any project that is screened as having potential to result in access restrictions, a Process Framework will be required (as outlined [here](#)). The purpose of the Process Framework is to establish a process by which members of potentially affected communities can participate in the design of project components, and in the determination of measures necessary to achieve the objectives of IUCN's ESMS Standard on Involuntary Resettlement and Access Restrictions. Guidance and an indicative template for a Process Framework are outlined [here](#).

A full ESIA may occasionally be required when triggered under national legislation. In such instances, the grantee must comply with the law and produce a full ESIA.

An outcome of a targeted E&S assessment or full ESIA may be a requirement to modify project design to avoid potential risks/impacts. In theory, this could include re-siting of the intervention. After the conduct of E&S assessment, the project may also be required to develop and implement an Environmental and Social Management Plan (ESMP), which will be used to manage, monitor and respond to E&S mitigation measures. The requirements for an ESMP are outlined in Section 4.3.

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<sup>8</sup> As indicated in Section 4.1, projects categorised as "A" (high risk) are excluded from receiving funding from the Global EbA Fund.

The table below summarises the actions to be taken as determined by the Global EbA Fund ESMS reviewer.

Standard triggered/ thematic risk identified	Assessment/safeguard tool/action to be taken that may be required
Access restrictions and resettlement	<a href="#">Process Framework</a> <i>*any projects that involve involuntary resettlement/forced displacement are to be rejected</i>
Indigenous Peoples	Conduct FPIC with Indigenous Peoples affected by the project (positively or negatively). Through FPIC/meaningful participation of indigenous peoples, determine whether the project poses a potential for adverse impacts to indigenous peoples (including their lands, waters, territories and cultural heritage) or solely positive impacts. If it is determined that the project poses the potential for negative impacts, undertake a Social Assessment or IPP/IPPF <sup>9</sup> ( <a href="#">here</a> ).
Cultural Heritage	<i>*reject any project that includes the removal or alteration of cultural resources. If the proposed project has other merits, work with the applicant to remove the component(s) that trigger the safeguard standard.</i>
Biodiversity Conservation & Sustainable Management of Natural Resources	Targeted <a href="#">E&amp;S assessment/management plan</a> <i>*any projects that would cause degradation to natural habitats are to be rejected</i>
Vulnerable Peoples and Gender	Dependent on type on type of risks/project type and size: - Abbreviated <a href="#">E&amp;S assessment/management plan</a> <i>*reject any project with adverse Gender Based Violence -related risks/impacts</i>
Labour and Working Conditions	Dependent on type on type of risks/project type and size: - Abbreviated <a href="#">E&amp;S assessment/management plan</a>
Community Health, Safety and Security	Dependent on type of risks/project type and size: - Abbreviated <a href="#">E&amp;S assessment/management plan</a> - <a href="#">Social impact assessment</a>
Pollution prevention and resource efficiency	<i>*reject any project which would include the use of banned substances (see exclusionary criteria), or result in the release of high volumes of effluents/emission of climate pollutants</i>

### 4.3 Management

In cases where a project is required to undertake an E&S assessment, or where deemed necessary for a Category C project (see section 4.2.2), environmental and social management measures will need to be undertaken to mitigate and manage any potential adverse risks. The

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<sup>9</sup> Projects working in areas where the local population is fully or predominantly composed of Indigenous Peoples do not need to prepare a separate Social Assessment, if they are already preparing a Process Framework under the Involuntary Resettlement standard. Also, if they are required to prepare an [Indigenous Peoples Plan](#), the elements of the plan should be included in the overall project design and a separate document is not necessary.



instrument that will be required of grantees to demonstrate that they have the required management plans in place is an ESMP. An ESMP can either be a stand-alone document or can be incorporated into the overall E&S assessment report. The ESMP should include proposed mitigation and management measures, with responsible parties attributed to each specified measure, along with a monitoring and reporting process outlined. Further guidance/an indicative template for an ESMP is presented [here](#).

#### 4.4 Grievance Redress

As part of this ESMS, the Global EbA Fund (and through it, its funded grantee projects) shall institute a Grievance Redress Mechanism (GRM). The Fund will use the IUCN Project Complaints Management System (PCMS) as its main mechanism for providing Grievance Redress to potentially affected communities and people. The PCMS is an institution-wide GRM, and for the function of the Fund's GRM it shall be used as the primary GRM for stakeholders.

The PCMS (which will include a small tailoring/inclusion of the Secretariat of the Fund within its architecture for the purposes of operationalising it for the Fund) states that resolution of complaints should be sought at the lowest possible level following a three-stage process, as outlined below:

- (a) First, complainants should bring up the issue with the project management/applicable authority within the grantee agency to work at resolving the issue together;
- (b) If this is not effective, the concern should be escalated to the Secretariat of the Fund, which should act as a neutral party mediating the situation;
- (c) If both of these avenues are not successful at remedying the situation, a formal complaint should be escalated to the IUCN PCMS.

If the concern is highly sensitive or if the complainant would like to seek confidentiality, the first two stages can be skipped with the complainant submitting a grievance directly to the [IUCN PCMS](#).

Following the guidance provided for the IUCN institutional ESMS on GRM<sup>10</sup>, complainants can submit a grievance directly to the PCMS by post, email or telephone.

For the grievance mechanism to be effective and accessible, the grantees must inform all relevant project stakeholders of the existence of the mechanism. This should ideally be done during the project design phase, but no later than within the first quarter of project implementation. Stakeholders need to know when issues eligible to be dealt with using the grievance mechanism, the three-stage process, contact information and the mechanism for complaint submission. The information should be delivered in a culturally appropriate form assuring that all relevant groups are reached, including women, indigenous peoples and vulnerable groups. It can be communicated verbally (in consultation meetings or through media) and in writing. Evidence of having provided adequate information to all relevant stakeholders about the existence of the Grievance Mechanism needs to be included in the first progress report.

#### 4.5 Monitoring

The primary responsibility for E&S monitoring within the ESMS of the Fund lies with the grantee. The grantee is responsible for the day-to-day monitoring of the implementation of the E&S requirements and stakeholder engagement in their respective projects. In instances where an

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<sup>10</sup> [iucn-esms-grievance-mechanism-guidance-note.pdf](#)

ESMP has been developed, monitoring and reporting of the proposed mitigation measures will be done through the [ESMP template](#).

It is the grantee's responsibility to agree with its contractors or project implementers on how the monitoring will be conducted. Contractors will immediately report on arising emergency situations to the grantee. In instances where the grantee is the sole implementing entity, it is responsible for conducting its own monitoring and reporting (including instances of emergency situations), and informing the fund's secretariat of E&S performance. "Emergency situations" include: encountering unforeseen environmental/social impacts of a high magnitude; unforeseen accidents; unacceptable working conditions (including instances of GBV/SEAH, child labour, forced labour); and non-compliance with national legislation. In such circumstance the grantee shall complete a [Serious Incident Report](#), and submit it to the fund's Secretariat.

The grantee is required to document those issues and report them to the Fund as soon as possible. The grantee has to provide information on the progress of the relevant safeguard related implementation as part of the half-yearly and annual grant reporting documents to the Fund.