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# Environmental and Social Management Framework

Sudan SOMOUD Enhancing Community Resilience  
Project – Component 2 (P181490)

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## Acronyms

AAP	Accountability to Affected Populations
CBO	Community Based Organization
CCs	Consumer Cooperatives
CFP	Chance Finds Procedure
CP	Cooperating Partner
ESCP	Environmental and Social Commitment Plan
ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework
ESRS	Environmental and Social Review Summary
ESS	Environmental and Social Standards
FOs	Farmers Organizations
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
ID	National Identity
IDP	Internally Displaced Person
KII	Key informant interview
LNGO	Local Non-Governmental Organization
MC	Mercy Corps
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PIM	Project Implementation Manual
PSEA	Prevention of Sexual Exploitation and Abuse
SA/SDP	Social Assessment and Social Development Plan
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender-Based Violence
SH	Sexual Harassment
SHF	Smallholder Farmers
SME	Small and Medium sized Enterprises
SRA/SMP	Security Risk Assessment and Security Management Plan
ToT	Training of Trainers
WB	World Bank
WFP	World Food Programme

## 1. Introduction

The World Bank's Appraisal Environmental and Social Review Summary (A-ESRS) classified the SOMOUD project as high risk (social risks) due to the FCV context of the country and on-going conflict in Sudan. Other social risks identified in the A-ESRS include (i) exclusion of indigenous people and vulnerable groups from project benefits and decision-making structures; (ii) security risks and illegal activities, such as violence, extortion, theft, armed assault, looting, and vandalism of project materials and properties; (iii) Gender Based Violence (GBV), including sexual exploitation, harassment, and abuse; (iv) weak community participation and engagement during implementation; (v) social tensions or conflict between the Internally Displaced Persons (IDPs) and host communities over project benefits and rejection of targeting criteria; and (vi) a possible increase in IDP mobility to the project areas to benefit from the project. The ESRS also noted the volatility of project implementation areas, in particular between hosts and the significant numbers of IDPs, among other issues.

The Environmental and Social Management Framework (ESMF) is a disbursement requirement within the Environmental and Social Commitment Plan (ESCP), under ESS1: Assessment and Management of Environmental and Social Risks and Impacts. The ESCP states that an ESMF must be adopted and implemented, and that Environmental and Social Management Plans (ESMPs) must be developed and implemented for any community infrastructure works of the project based on the determination of subproject screening.

The objective of this ESMF is to synthesise the commitments made across other instruments<sup>1</sup> into one coherent plan, covering:

1. Environmental and Social Commitment Plan
2. Stakeholder Engagement Plan
3. Social Assessment and Social Development Plan
4. Labor Management Procedures
5. GBV/SEA/SH Action Plan (PSEA Action Plan)
6. Integrated Pest Management Plan
7. Chance Finds Procedure
8. General provisions of SRA/SMP.

This EMSF sets out the relevant national legal frameworks not already covered in other SOMOUD instruments. It compiles all risks, mitigation and monitoring measures set out across other SOMOUD instruments and adds some additional environmental and social risks and mitigation measures that are relevant to subprojects and not covered in other documents. The ESMF also sets out the handling of subprojects – determining which interventions are defined as subprojects' and how they will be

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<sup>1</sup> Note: Security Risk Assessment and Security Management Plan (SRA/SMP) are not integrated here in detail for security reasons.

screened, assessed, and mitigation measures identified and monitored. A range of tools and templates support this, captured in annexes 1-9. The ESMF also sets out the implementation arrangements, the capacity building required, and provides an indicative budget for implementation of all Environmental and Social Standards (ESSs). The ESMF was developed from the existing rich details provided in all existing instruments.

## 2. National legal framework

This section lists the relevant Sudanese laws, policies, institutions and international conventions that govern environmental management in Sudan. It draws extensively on UNEP (2020) State of the Environment. Please see the Social Impact Assessment (section 4) for discussion of legal frameworks relating to ethnic and cultural groups, marginalized groups and women. The current war context undermines the ability of the Government of Sudan to function and apply laws, policies and conventions, and for the relevant institutions to operate.

### 2.1 Constitutional provisions

The Interim National Constitution (2005, updated 2015-18) included a right to a clean and diverse environment, and the promotion of biodiversity.

Signed on 17 August 2019, the Draft Constitutional Charter for the 2019 Transitional Period (the 2019 Constitutional Declaration) established a Sovereignty Council, a Transitional Cabinet and a Legislative Council. It also included a federal system of regional / provincial government, with the detail of these structures to be developed. Article 7 (14) commits the state to *“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.”*

Although the Interim Constitution (which had an extensive body of law and established institutions relating to the environment) was repealed with the implementation of the 2019 Constitutional Declaration, laws from the Interim Constitution remain in force unless they are repealed or amended.

The Juba Peace Agreement 2020 led to adaptations to the Constitution, including expansion of the Sovereignty Council to incorporate the three signatory armed groups: the Sudan Revolutionary Front, the Sudan People’s Liberation Movement (SPLM) faction led by al-Tahir Hajar, and the SPLM-North led by Malik Agar.

In Oct 2021 the military arrested Prime Minister Hamdok and suspended the 2019 Constitutional Declaration. Soon after Prime Minister Hamdok was reappointed by the military and signed a new 2021 Political Framework but soon after resigned, dissolving the government and the political framework. The status of the 2019 Constitutional Declaration remains unclear.

In December 2022 a new framework agreement was signed for the transition to a civilian government, with a ‘final agreement’ to be signed on 6 April 2023. Many difficult topics were expected to be resolved as part of that final agreement, and yet intense negotiations in the run up to the ‘final agreement’ did not succeed, with the process collapsing in April 2023 with RSF attacks starting the current war. Many

argue that the process towards the final agreement, in particular how the two armed forces would be integrated and who would lead them, was a key trigger for the war.

During the Transitional Period (Aug 2019-Oct 2021) The National Council for the Environment was established, replacing the Ministry for Environment, Natural Resources and Physical Development. A Higher Council for Environment and Natural Resources was also endorsed to be established.

Environmental management was divided between federal and state level under the previous Interim Constitution (2005 and later updated):

**Federal level:** natural resources, minerals, underground wealth, transboundary waters

**State level:** regulations on land, forest, agriculture, livestock, wildlife, but subject to federal planning and control. State level Ministry of Agriculture, Irrigation and Natural Resources handle environmental issues.

## 2.2 Federal and state level law

There is a complex range of laws at the **federal level** covering environmental protection and natural resource use, with over 150 relevant laws and regulations. Key federal laws are listed in table 1 below. There is a lack of knowledge about these laws, and limited enforcement.

*Table 1 Relevant National Laws relevant to the Environment and SOMOUD*

Legislation	Legal Provisions
Investment Promotion Act (2021)	Reinforces that land without title is 'government land', reinforcing a lack of recognition of customary claims to land
Regulation of Range and Pasture Resources (2015)	Recognises public grazing land, private 'hema' (where grazing is restricted), community-held 'hema' and privately cultivated rangeland. Passageways are defined and protected – livestock routes cannot be closed.
Forests and Renewable Natural Resources Act (2002)	These Acts empower provincial governments to prohibit the clearing of forest for cultivation, grazing, hunting, removing forest produce, quarrying and felling, logging and topping down of trees, branches in reserved or protected areas. Penalties for breach of regulation and payment of cash compensation are provided in these Acts.
Water Resources Act (1995)	This Act consists of 23 articles divided in 6 Chapters and aims at reforming the organization of the Nile and Non-Nilotic surface waters as well as the groundwater, hence superseding the Law of 1939 that was limited to the Nile waters only. The Law establishes the National Council for Water Resources (NCWR) to design and rationalize the management and use of water resources to mitigate the effects of natural disasters resulting from drought and floods.
Wildlife Protection and National Parks Act (1986)	This Act was issued to provide protection, preservation, conservation, and management of wildlife and setting up of a National Park. This Act is applicable to all areas for protection, conservation and preservation and management of wildlife.

Legislation	Legal Provisions
Civil Transaction Act (1984)	Key water legislation including the inseparability of rights to develop / access water from rights over land, that constructed water resources are recognised as private property.
The Environmental Health Act of 1975 and the Public Health Act (1975)	Provide regulations and restrictions for industries regarding water and air pollutions (standards). According to these Acts, protection obligations extend to cover animal and plant life. Specifically, the Acts cover issues related to collection, treatment, and disposal of waste. Also, they prohibit water pollution by addition of any solid or liquid wastes, chemicals, sewage, and remains of animals on water resources such as rivers, hafirs, and wetlands.
Civil Transaction Act (1984)	Repealed the 1970 Unregistered Land Act, recognising usufruct rights.
Unregistered Land Act (1970)	A de facto nationalise of all unregistered land, denying any customary claims to land, allowing the government to use force to 'safeguard' its land
Land Settlement and Registration Ordinance (1925)	All forest and unoccupied land were deemed government land unless otherwise proven. Still in force today.

**State level law:** There are also laws covering water, rangelands and forests at the state level. With variation between different states these are not captured here.

### 2.3 Customary law on Land

The historical system of land rights and natural resource access, based on a tribal homeland, which provides collective rights to land for a tribe, with individual rights to use land which could be inherited but could not be sold outside the tribe. The system became institutionalized through Native Administration and the concept of 'Dar' (tribal homeland), with the allocation of land held by the village sheikh. Women have restricted land rights compared to men.

For pastoralists access to rangelands was similarly legitimized through membership of a tribal structure, and while there are no specific rights to land, they can access water and other resources through their relationship with farmers. The graze-and-go system allowed nomads to utilize farmland for 3 consecutive years before moving on in particularly dry periods, but the expansion of agriculture onto rangelands and livestock routes, and conflicts resulting from cattle trespass, has severely undermined these customs.

There is a confusion between customary and statutory rights – with a significant divergency between legality and legitimacy/reality.<sup>2</sup> Borders established for 'government land' are often not recognized by communities, leading to conflict between state and communities. Peace agreements, in particular the Juba Peace Agreement in 2020, included specific provisions for harmonization of land laws.

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<sup>2</sup> Egemi



Land law is discussed in the Social Assessment Section 4: Legal and institutional framework and current application relevant to inclusion and empowerment of ethnic minorities, indigenous people / Sub-Saharan African Historically Underserved Traditional Local Communities, vulnerable and disadvantaged groups. See in particular Box 1: A summary of land law affecting smallholder farmers.

## 2.4 Key policy agendas relevant to the environment and SOMOUD

Promotion of farming over herding: A state policy to prioritize the rights of cultivators over herders, established in 1944, has continued until the present day. This was based on an assumption that farmers yield greater return per unit of area over herders.<sup>3</sup> The policy has led to an expansion of agricultural areas at the expense of herding areas and has underpinned much farmer-herder conflict as farms expand into pastureland and herds subsequently trample crops. This is relevant to the project since caution is needed in actions which bring ‘unused’ land into agricultural production, to ensure this is not land used by nomadic herders.

Nomad settlement: Encouraging nomads to be settled has been an objective of national governments since independence, with a number of government-sponsored nomad settlement schemes in the 1970s. However, these schemes have all failed.<sup>4</sup>

Demarcation of livestock routes: A priority for government and donors since early 2000s, with the aim of minimising conflict between farmers and herders rather than securing pastoralist livelihoods, with low success due to dealing with corridors in isolation from the continuously changing environment.<sup>5</sup> For instance the pastoralist routes in Gederef do not inter-connect, meaning herders cannot switch between migratory routes when conditions are poor on a selected route.

## 2.5 International Agreements and Treaties signed by the Government of Sudan

The GoS has joined regional and international initiatives and treaties relevant to environmental management.

At the regional level the key initiative is the **Nile Basin Initiative** – for the sustainable and equitable use of the Nile Basin water resources. At the international level, key agreements and treaties relevant to SOMOUD are:

- United Nation Framework Convention on Climate Change, Rio de Janeiro (1992) (*Ratified 1993*).
- International Convention on Biodiversity CBD, Rio de Janeiro 1992 (*Ratified 1995*).
- International Convention to Combat Desertification in countries experiencing serious drought and/or desertification particularly in Africa, Paris (*Ratified 1995*).
- Minamata Convention on Mercury, entered into force on 16 August 2017 (*Ratified 2021*).
- Kyoto protocol, Kyoto – Japan, 1997 (*Ratified 2005*) and Paris Agreement (*Ratified 2017*).
- Internationally legally binding instrument for the application of prior informed consent procedure for certain hazardous chemical and pesticides in international trade, Rotterdam, 1998 (*Ratified 2004*).

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<sup>3</sup> Egemi, citing *Eltayeb, Galal Eldin, 1985. The Gedarif Study Area, Institute of Environmental Studies, Khartoum University, Khartoum*

<sup>4</sup> Egemi

<sup>5</sup> Egemi

- Cartagena Protocol on Biosafety to the Convention on Biological Diversity Montreal, 2002 (*Ratified 2005*).
- Stockholm Convention on Persistent Organic Pollutants (*Ratified 2001*).

## 2.6 World Bank and WFP Environmental and Social Standards

The Environmental and Social Commitment Plan (ESCP) was structured based on the World Bank’s Environmental and Social Framework (ESF) and stipulates the development of instruments as per the Environmental and Social Standards (ESSs) relevant to the project. Due to lack of a proper gap analysis, WFP’s ESS approach is largely not acknowledged in the ESCP, and thus the WB ESSs are applied. Since the WFP ESS framework is not being utilised, it is not presented here.

The ESCP, finalized in March 2024, defines the range of ESs relevant for the project, formalized as environmental and social risk management instruments and required as conditions of disbursement. These include:

### 1 Instruments

- Labor Management Procedures (LMP)
- Integrated Pest Management Plan (IPMP)
- Prevention of GBV/SEA/SH Action Plan (PSEA Action Plan)
- Security Risk Assessment and Security Management Plan (SRA/SMP)
- Social Assessment and Social Development Plan (SIA/SDP)
- Chance Finds Procedure (CFP)
- Stakeholder Engagement Plan (SEP)
- An Environmental and Social Management Framework (ESMF) with detail on handling of ‘subprojects’ and associated Environmental and Social Management Plans (ESMPs). This to include any required measures relating to:
  - Resource efficiency, pollution prevention and management;
  - Traffic and road safety; and
  - Community health and safety.

### 2 Processes and Structures

- Project Implementation Unit with ESS capacity, and ESS capacity at field level;
- Integration of ESS commitments into contracts with contractors;
- Establishment of Grievance Redress Mechanism (GRM);
- Capacity building to deliver all of the above;
- Bi-annual ESS reports, commencing from effectiveness; and
- Incident / accident reporting process.

Each of the instruments has been developed as a standalone document, and collectively will be annexed to the ESMF.

### 3. Compiled environmental and social risks, mitigation and monitoring measures

These tables compile all risks and mitigation measures already outlined in the Labor Management Plan, Prevention of GBV/SEA/SH Action Plan (PSEA Action Plan), the Social Impact Assessment / Social Development Plan, and the Integrated Pest Management Plan. It also adds additional environmental risks and mitigation measures not documented in the above instruments. The risks and their associated mitigation and monitoring mechanisms are re-structured here, organised by E&S standards (rather than by instrument) and linked to specific activities that could generate the risk. However, other than environmental risks which did not feature in other instruments, all other risks are not new content but sourced from these other instruments. Risks and mitigation measures from the Security Risk Assessment / Security Management Plan are not presented/disclosed in detail for security reasons.

Table 2: Compiled environmental and social risks, mitigation and monitoring measures

Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
<b>ESS2 – Labor and Working Conditions</b>					
Enhanced agricultural production among project-supported Farmers Organizations (FOs)	Women are forced to work on husband's fields	Agricultural work that is considered 'men's work' is often done by women, and women's contribution is not recognized. Increased crop production may result in increased exploitation of women	<p>Awareness raising sessions on women's rights, economic violence, the positive outcomes for the community of women's economic empowerment</p> <p>Key messages developed and communicated to communities and key opinion formers</p> <p>SA phase 2 – include research to understand 'men's work', women's contribution and household decision making on this</p> <p>Farms supported by project to clarify in planning who works on these fields and how they are remunerated</p>	<p>Regular consultation with women engaging in agricultural labor through the project</p> <p>Grievance Redress Mechanism (GRM) – any incidents reported</p> <p>Regular project activities monitoring</p>	PSEA Action Plan



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
Enhanced agricultural production among project-supported FOs	Children recruited to work in the fields	Boys and girls may be forcefully recruited to work in the fields and exploited, mistreated, abused	<p>Partner assessment, onboarding and monitoring mechanisms to include specific checks on child safeguarding, highlighting prohibition of child labor</p> <p>Grant agreements to include specific provisions that prohibit child abuse</p> <p>Staff and partner to receive training sessions on child safeguarding, with specific content on child labor</p> <p>GRM, information on available reporting channels to be included in grant agreements</p>	Partnership monitoring GRM – any incidents reported	PSEA Action Plan
Enhanced agricultural production among project-supported FOs	Men take control of women’s pay / women’s enhanced agricultural produce	<p>Even for crops grown exclusively by women, it is men who take the crops to market, and they then control the income generated by sales.</p> <p>Enhanced production through women’s farmer organizations may also be sold by men, who retain the proceeds.</p>	<p>SA phase 2 – include research to understand women’s ability to retain control over income received, and relative bargaining power in house on household spending</p> <p>Ensure women’s production is sold through Consumer Cooperatives, and develop payment mechanisms that go directly to the women</p> <p>Explore the use of collective sales of women’s agricultural produce, such that income generated is a business collective, making it harder for</p>	<p>Existence and functioning of payment mechanisms for women’s crops through the agricultural co-operatives going direct to women farmers</p> <p>Regular consultation with women engaging in agricultural labor through the project, with a particular focus on monitoring women’s income and control over that money</p>	PSEA Action Plan



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
			any individual husband to demand control over the income  Awareness raising sessions on women’s rights, economic violence, the positive outcomes for the community of women’s economic empowerment		
Labor hired for expansion of grant -supported SME	Sexual and Gender Based Violence at work or travelling to / from work	Risk of violence against particularly women working as manual labor within SMEs supported by the project	Awareness raising activities with SMEs management and staff concerning sexual and gender-based violence (SGBV)  Grant agreement for SMEs to include Code of Conduct with safeguard commitments, and provision that any cases of SGBV will lead to investigation and possible exclusion  Support SMEs that provide home based work for women	GRM – any incidents reported  Regular consultation with women engaging in food processing labor through the project	PSEA Action Plan
Labor hired for expansion of grant -supported SME	Risk of engaging child labor	Internally Displaced Persons (IDPs) that fled Khartoum and now also Wad Medani may have lost their national identity (ID) cards, contributing to further vulnerability. This makes it hard to verify age.	Where people hold national ID cards these can be used to verify age. Where age cannot be verified, individuals will be asked their age / date of birth.  In all cases, name / date of birth / gender is to be recorded by SMEs, and this information to be shared with project team.	Records of community workers, including age / date of birth, engaged in the project  Spot checks will include checking on age, and if child labor if found this will result in suspension.	LMP



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
Labor hired for expansion of grant -supported SME	Risk of injury or death to manual laborers		<p>To prevent accidents in the SME agricultural product processing facilities, health and safety at the facilities will be assessed through a site check of selected SMEs.</p> <p>Health and safety briefings will be given to grant-supported SMEs</p>	<p>Monitoring visits to grant supported SMEs during project implementation by MC and WFP field teams to confirm application of occupational health and safety (OHS) measures.</p> <p>Completed SME site visit checklists covering OHS issues</p> <p>OHS complaints received through GRM, and case investigation, follow up and closure.</p>	LMP
Selection of SMEs	Project fails to support women working in food processing SMEs	<p>Women-led food processing SMEs are likely to be harder to reach, as they may be smaller, home based, and not recognized among larger, male-led food processing SMEs. They may be harder to identify, and may require additional support to enable their growth</p>	<p>Specific measures to identify and encourage women-led food processing SMEs to bid for project support</p> <p>Selection criteria for food processing SMEs to take affirmative action for women-led SMEs and include a minimum %women-led SMEs</p> <p>Undertake research to understand additional support needed for success for women-led SMEs – including ensuring marketing of produce is not exploitative or exposes women to stigma / violence</p> <p>Lesson learned events throughout the project enable</p>	<p>Selection criteria for food processing SMEs show affirmative action</p> <p>Outreach actions to identify women-led food processing SMEs are completed</p> <p>Minimum % of women-led food processing SMEs is achieved</p> <p>Lessons learned events completed</p> <p>Specific learning questions will be integrated into the monitoring and evaluation system to capture lessons learned in what works in challenging cultural</p>	PSEA Action Plan



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
			reflection on successes and weaknesses and refinement of approach	constraints on women’s economic empowerment	
Grant support to SMEs	Risk of creating a backlash against women through challenging limitations on women’s roles in value chains	Challenging cultural norms on women’s work may create a backlash against vanguard women / businesses	<p>Phase 2 SA will research constraints on women’s roles in value chains and women’s aspirations, as well as women’s views on possible risks associated with challenging existing controls, and best means to mitigate those risks</p> <p>Awareness raising sessions will be convened to challenge cultural norms, specifically targeting opinion formers and men more broadly in the community</p>	<p>The monitoring system will monitor for unintended consequences, with a specific focus on possible backlash</p> <p>The GRM will be established, and awareness raising activities will promote it to community members</p> <p>Awareness raising sessions completed and documented in E&amp;S reporting</p>	LMP
Labor hired for expansion of grant -supported SME	Discrimination and exploitation of women and other vulnerable groups	<p>Risk of exclusion of women from labor force, or of unequal pay for women compared to men</p> <p>Risk of exclusion of marginalized groups from the workforce</p>	<p>Phase 2 Social Assessment (SA) will identify processes of discrimination and exploitation of women and other vulnerable groups in accessing work opportunities. Where risks are identified, affirmative action will be integrated into processes for labor selection.</p> <p>SME eligibility includes commitment to pay women equal to men and non-discrimination in recruitment.</p>	<p>Phase 2 SA research completed with specific section on women in the workforce.</p> <p>Spot checks will be undertaken across grant-supported SMEs to identify possible acts of discrimination and exploitation</p>	LMP



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
			<p>Payments to staff will be costed elements of financial proposals.</p> <p>The grant evaluation criteria will provide additional points awarded for SMEs with women in the workforce</p>		
Any activity	Risk of sexual harassment against staff in the workplace	Risk of harassment among staff members	<p>Induction, orientation and regular training on the Code of conduct and safeguarding policies</p> <p>CP and WFP disciplinary action for staff for SH</p>	Disciplinary actions for staff, CPs	PSEA Action Plan
<b>ESS3 – Resource Efficiency and Pollution Prevention and Management</b>					
Support to Farmers Organizations (FOs)	Infrastructure subprojects may have downstream environmental risks	<p>Rehabilitation / upgrading of irrigation infrastructure may lead to increased water abstraction impacting downstream users.</p> <p>Solar batteries that are out use contain components that are hazardous</p>	<p>If support to FOs includes irrigation systems, including solar pumps, standardised risk mitigation measures to be applied</p> <p>Needs assessment for all selected FOs to include identification of possible conflict over water with nearby communities with additional mitigation measures identified as needed within ESMP</p>	<p>Completion of ESS assessments integrated into needs assessments with FOs</p> <p>Completion of ESMPs for support to FOs where selected support involves irrigation systems or solar pumps</p> <p>Implementation of mitigation measures</p>	ESMP
Support to FOs	Risk of leakage / emissions of heavy metals affecting health	Heavy metals like lead and mercury, used in solar panel batteries, are carcinogenic could get into the food chain with the potential for causing cancer	Identify suppliers that have incorporated extended producer responsibility in the supply chain	Awareness raising sessions completed and documented in E&S reporting	





Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
			<p>Users to be sensitized about the dangers of lead acid in the batteries</p> <p>The suppliers collect the batteries after end of life and recycle them into other products</p> <p>Lead-acid battery handling should be managed through best-practiced instruments/ tools</p>		
Support to SMEs	Risk that improper disposal of hazardous wastes affect community health and the environment	<p>Poor disposal of hazardous waste has potential for water pollution</p> <p>Communities could pick up the hazardous waste for use and this could impact on their health</p>	<p>Put in place facilities for collection, transportation and safe disposal of hazardous waste</p> <p>Awareness raising on potential impacts of hazardous wastes to human health and environment</p>	<p>Facilities put in place for collection, transportation and disposal of wastes</p> <p>Awareness raising sessions completed and documented in E&amp;S reporting</p>	ESMP
Support to SMEs	Indiscriminate disposal of solid and liquid wastes including packages, plastic material etc.	<p>There is potential for water pollution</p> <p>The plastic materials especially the single use carrier could affect the soils affecting agriculture</p> <p>The plastic waste may be ingested by cattle which may lead to death</p> <p>Communities could use the contaminated waste as raw materials for domestic needs but this could impact health</p>	<p>Reuse and recycling of waste should be encouraged as far as possible and practical</p> <p>Put in place facilities for collect and proper disposal of solid waste</p> <p>Awareness raising on sorting, storage and disposal of wastes not disposing of wastes into any drinking water source, cultivation fields or critical habitat.</p>	<p>Awareness raising sessions completed and documented in E&amp;S reporting</p> <p>Monitoring visits to SMEs during project implementation by MC and WFP visibly observe waste handling including use of waste facilities</p>	ESMP



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
			Ensure that waste effluents will not be discharged into irrigation channels		
Support to smallholder farmers (SHF)	Weakness or lack of a plan to management of pests	Use of pesticides procured outside the project affecting non-target plants Spraying food crops pre-harvest with pesticides has an impact on food safety	Pesticide purchase prohibited with project funds Develop an Integrated Pest Management Plan (IPMP)	Existence of finalized IPMP	IPMP
Support to SHF	Risk of agrochemicals causing health and environmental impacts	Misuse of agrochemicals have the potential to pollute water, air and soils Application of the wrong agrochemicals or incorrect quantities can affect harvests Agrochemicals can affect human health if misused or applied without personal protective equipment (PPE)	Provide information and training on acceptable and unacceptable pesticides to farmers Encourage farmers to comply with WFP policy and international standards of pesticide use, storage and disposal Encourage the use organic fertilizers Put in place facilities for the storage of agrochemicals Carry out training and awareness raising on the proper application of agrochemicals	Awareness raising sessions completed and documented in E&S reporting Facilities for storage of agrochemicals put in place Monitoring visits to FOs during project implementation by MC and WFP visibly observe handling of agrochemicals	IPMP
Any activity	Small scale waste	Support to FOs, SMEs or Consumer Cooperatives may generate small amounts of waste	Determined within ESMPs		ESMP
<b>ESS4 – Community Health and Safety</b>					

Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
Support to FOs	Smallholder farmers (SHF) expand production into land that is contested between them and neighbouring SHF	Conflicts over land occur particularly over boundaries between neighbouring plots. If land that has been unused for some time is being brought into production, there may be some boundary issues	In the early stages of engaging with FOs the farmers will be required to identify the unused land they will bring into production, and collectively to determine and assure there are no conflicts over land claims including boundaries	Completion of planning stage with FOs to include collective statement from member farmers that plot boundaries are clear and uncontested	SDP
Support to FOs	Powerful men in co-operatives take control of new resources of project	There are experiences of powerful farmers taking control of assets provided to a co-operative and charging other farmers to use them. This has been particularly due to farmers being unaware of the rules and entitlements relating to these assets	Ensure all SHF are provided with information concerning their entitlements to use of asset  Any farmers found trying to capture assets in this way will be excluded from the project	Completion of awareness raising events in planning stage with FOs  GRM to capture any issues arising, and triggering spot checks and investigations if this problem is reported	SDP
Enhanced agricultural production among project-supported SHFs  Labor hired for expansion of grant -supported SMEs	Domestic violence in household	If women challenge men’s economic controls, they may face violent backlash in the household	SA phase 2 – include research to understand women’s ability to retain control over income received, and relative bargaining power in house on household spending, and effective mechanisms to avoid backlash  Awareness raising sessions on women’s rights, economic violence, the positive outcomes for the community	Regular consultation with women FOs or working in SMEs through the project, with a particular focus on monitoring women’s income and control over that money  GRM – any incidents reported  Regular project monitoring exercises	PSEA Action Plan



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
			of women’s economic empowerment  Key messages developed and communicated to communities (men and women) and key opinion formers		
Grant support to SMEs	New value chain addition processes developed for women prove profitable and are subsequently taken over by men		Awareness raising sessions on women’s rights, economic violence, the positive outcomes for the community of women’s economic empowerment  Lesson learned events throughout the project enable reflection on successes and weaknesses and refinement of approach	Regular consultation with women working in SMEs through the project	PSEA Action Plan
Support to SMEs and Consumer Cooperatives	Backlash by middlemen or transporters who loose market control or loose income streams from provision of loans	Middlemen are strongly influencing prices and controlling markets. They will lose profit and control and may act as spoilers try to retain their extraordinary profits	Value chain assessments in start-up period will identify middlemen and others who may lose out from enhanced value chains, who may act as spoilers.  Specific outreach will be undertaken to explain the project.  Where possible, non-exploitative positions in the value chain will be highlighted		SDP



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
			for their involvement, but without preferential treatment		
Any activity	Sexual Exploitation of beneficiaries	Risk of sexual exploitation by WFP staff or partners or by powerful community members asserting themselves as gatekeepers to access project resources	<p>All project staff (direct, contracted) to sign Code of Conduct with specific provisions on SEA/SH</p> <p>All project staff: WFP, Cooperating Partners (CP) Community Based Organizations (CBOs) trained on PSEA/SH including ability to spot and refer protection issues</p> <p>Sensitization for FOs / SMEs / Consumer Cooperatives (CCs) on prohibited practices and grievance mechanisms and public information campaign</p> <p>CP capacity on PSEA is assessed, with remedial actions identified and implemented</p> <p>CP and WFP disciplinary action for staff for SEA (as set out in organizational policies above)</p>	<p>Disciplinary actions for staff, CPs or primary suppliers</p> <p>GRM – any incidents reported</p> <p>Regular consultation with women engaging in agricultural and food processing labor through the project</p>	PSEA Action Plan
Not activity linked	War spreads into programme operational area creating physical safety and security risks for staff,	While the programme states have been chosen in locations of relative calm, there is a risk that the war between RSF and SAF expands into these areas. This would put everyone at risk of violence.	WFP has prepared a Security Risk Assessment and Security Management Plan (SRA/SMP) in compliance with the relevant ESS2 and ESS4 requirements. This is not a	UNDSS threat monitoring Security Community of Practice convened for this project provide ongoing monitoring through bi-weekly meetings	LMP

Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
	contractors, and everyone		public document for security reasons.		
<b>ESS5 – Land Acquisition, Restrictions of Land Use and Involuntary Resettlement</b>					
N/A					
<b>ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>					
Support to SMEs	Destruction of biodiversity and natural resources during construction of community subprojects	Risk that rare species of ecological and medical importance could be destroyed, important pollinators lost or habitats for some species could be destroyed	Subprojects screening will identify and exclude any activities causing destruction of biodiversity and natural resources	Completion of ESS screening for all subprojects	ESMP
<b>ESS7 – Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities</b>					
Support to SHFs	Project contributes to tensions between farmers and herders	Project support to SHFs on agricultural land that has expanded into a livestock migratory route / pastureland or blocks access to water	Screening of potential FOs for possible conflict over livestock routes / pasture / water access as part of selection process to avoid supporting contested land	Completed screening	SDP
Support to SHFs	Investment in land may trigger old claims to land	Irrigation schemes were undertaken on land considered ‘tribal lands’ by one group, and the newly irrigated land was then given to other tribal groups (in particular Kassala). While there is acceptance of the temporary use of this land by others, investments in the land can trigger land competition	The nature of support to SHF will be temporary (inputs such as seeds / labor) or small scale Screening of potential FOs for possible conflicting tribal claims for land as part of selection process to avoid supporting contested land		SDP
Cumulative effect of all activities	Project resources perceived to benefit one	The selection of location or beneficiaries could disproportionately direct resources to certain groups inadvertently. This	Phase 2 social assessment to include tribal mapping in selected locations	Social assessment phase 2 reports include tribal mapping	SDP



Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
	tribe over another	becomes more likely and obvious when: - populations live in largely segregated communities - tribes traditionally engage in specific livelihoods - some tribes cannot fulfil key project entry points (e.g., no land, unable to join agricultural co-operatives)	Selection of locations will consider tribal balance (geographical mapping of tribes) and adjust to ensure no groups are disproportionately benefitting / excluded Selection of FOs will consider inclusivity and whether minority tribes are excluded from the FO, and how this relates to land access	Reporting on selected locations / FOs to include commentary on tribal balance  Monitoring mechanisms will track if land conflict is increasing, and if discrimination towards landless ‘settlers’ are worsening, utilising the following approaches: 1) Post distribution monitoring 2) Systematically reviewing field team insights 3) Include these topics as specific flags in GRM	
Support to SHFs	Project contributes to cumulative problems of support to farmers rather than herders	The Government of Sudan has held a policy position to support farming over herding for decades, creating and enabling space for farming to encroach on pastoralist resources. Aid programming has similarly largely supported agricultural production and been blind to pastoralism	The first two years are a quick impact project, to promote food production to prevent possible famine. The second phase of the project should expand to support pastoralist livelihoods, and this message to be communicated		SDP
<b>ESS8 – Cultural Heritage</b>					
Support to FOs or SMEs	Destruction of cultural heritage through	Construction of subprojects may inadvertently unearth archaeological remains	Implement Chance Finds Procedure (CFP)		CFP

Activity that may generate risk	Risk title	Risk description	Mitigation Measures	Monitoring	Relevant instrument
	accidental damage				
<b>ESS10 – Stakeholder Engagement and Information Disclosure</b>					
	Controls on community engagement	In some locations the Sudanese security services have prevented community engagement / GRM processes, including forced removal of GRM boxes, or prevention of community meetings on the basis of emergency security situation preventing mass gatherings. Information banners may be censored.	Where usual mass communications mechanisms are not feasible, project will switch to providing information through community leaders to disseminate locally		SEP



## 4. Subprojects, screening, assessment and implementation

**Subprojects:** The project will provide support to Farmers Organizations (FOs), Small and Medium Sized Enterprises (SMEs) and Consumer Cooperatives (CCs). When this support involves developing / enhancing *community infrastructure*<sup>6</sup>, it is defined as a ‘subproject’ and a mini E&S assessment is required, to be documented in a site-specific Environmental and Social Management Plan (ESMP). Not all support to FOs and CCs involve community infrastructure, and thus not all support to FOs or CCs require specific E&S assessment/ESMP. Any support to SMEs is defined as community infrastructure and thus require E&S assessment and an ESMP.

**Screening:** The selection of FOs, SMEs and CCs involves a range of requirements, including a small number of ESS exclusion criteria. These ESS screening questions are to be embedded in the selection process, which will exclude any that raise red flags.

**Assessment:** Once beneficiaries (FOs / SMEs / CCs) are selected, they undergo a deeper needs assessment process. ESS assessment questions will be integrated into the needs assessment, probing for context-specific risks, and triggering context-specific mitigation measures where required. These will be documented in ESMPs.

### 4.1 Farmers Organisations

#### 4.1.1 Screening of Farmers Organisations

Farmers Organisations will be mapped through engagement with Ministry of Agriculture, relevant state agriculture authorities, HAC, a community sensitization campaign on the project and how to be involved, and a public Call for Expression of Interest. Specific ESS considerations will inform the initial screening of the FOs, in particular to identify locations with on-going land conflict or with problems related to corruption, which will be ineligible. A screening tool for ESS risks for FOs is included at Annex 1 and will be a scored component within selection processes. The screening questions will be embedded within the application form that FOs will be required to submit, and the list of selected FOs will be shared with local leaders, HAC and relevant others, to also screen and verify the FOs as part of the finalisation of the selection process.

#### 4.1.2 Assessment of selected FOs for possible ESS risks and mitigation measures

Once the FO selection is completed, the support to be provided through the project will be determined through a needs assessment for each selected FO. The FO will have a range of options for support from which they can select. These options are:

1. Provision of inputs: seeds and fertilizer
2. Land preparation
3. Small scale rehabilitation of irrigation systems or pumps
4. Installing solar pumps

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<sup>6</sup> The project ESCP commits WFP to “Prepare, adopt and implement corresponding Environmental and Social Management Plans (ESMPs) for any **community infrastructure** works of the Project, consistent with the relevant ESSs and as stipulated in the ESMF.”

From among these options, only items # 3. Small scale rehabilitation of irrigation system or pumps, and 4. Installing solar pumps, are considered as ‘community infrastructure’ and so would be subject to subproject screening.

The possible E&S risks for these two ‘subprojects’ can be sub-divided into those which are fairly predictable, and those that are unique to the context.

For the **predictable risks**, standardized mitigation measures can be established. The predictable E&S risks related to each small scale infrastructure are set out at Table 3 below, along with a standardized set of mitigation measures, and thus all FOs that select 3. Small scale rehabilitation of irrigation system or pumps, and 4. Installing solar pumps will be expected to implement these pre-determined mitigation measures.

*Table 3: Standardised risks and mitigation measures for Farmers Organisations*

Option for support	Likely risk	Standard mitigation measure
Small scale rehabilitation of irrigation systems or pumps	Increased abstraction of water that may lead to reduced access by downstream users	Identify who might be affected upstream / downstream and how, drawing on local knowledge of hydrological water flow and patterns Inform potentially affected community, and gather feedback on proposed intervention, and adjust design if needed Establish / enhance existing water governance or management systems involving project community and other affected communities
	Limited construction waste may be generated	Identify a disposal site for construction waste, and determine expected scale of waste to be generated Discuss with community proposed waste site and identify any possible unintended effects of disposing this waste at this site (such as contamination of water sources)
Installing solar pumps	Some packaging waste may be generated	The waste should be collected and disposed of appropriately

However, there may be specific contextual factors which may create context-specific risks and affect the engagement with FOs irrespective of which option is selected. The identification of these possible risks will be integrated into the needs assessment process undertaken with each FOs and is set out at Annex 2. This assessment tool identifies the specific contextual risks of concern, a series of questions to determine whether the risk is relevant or not, and specific mitigation measures to apply where the risk is identified as relevant.

Both standardised, and context-specific mitigation measures will be captured in a site-specific ESMP. The FO ESMP template is captured at Annex 7. These ESMPs will be reviewed by Mercy Corps (MC) and WFP together and reported to the WB in regular ESS reporting.

The process for the needs assessment and its integrated ESS risk assessment component will be dependent on access and levels of conflict, and thus four different scenarios are set out below:

*Table 4: Scenarios for needs assessments for farmers organisations*

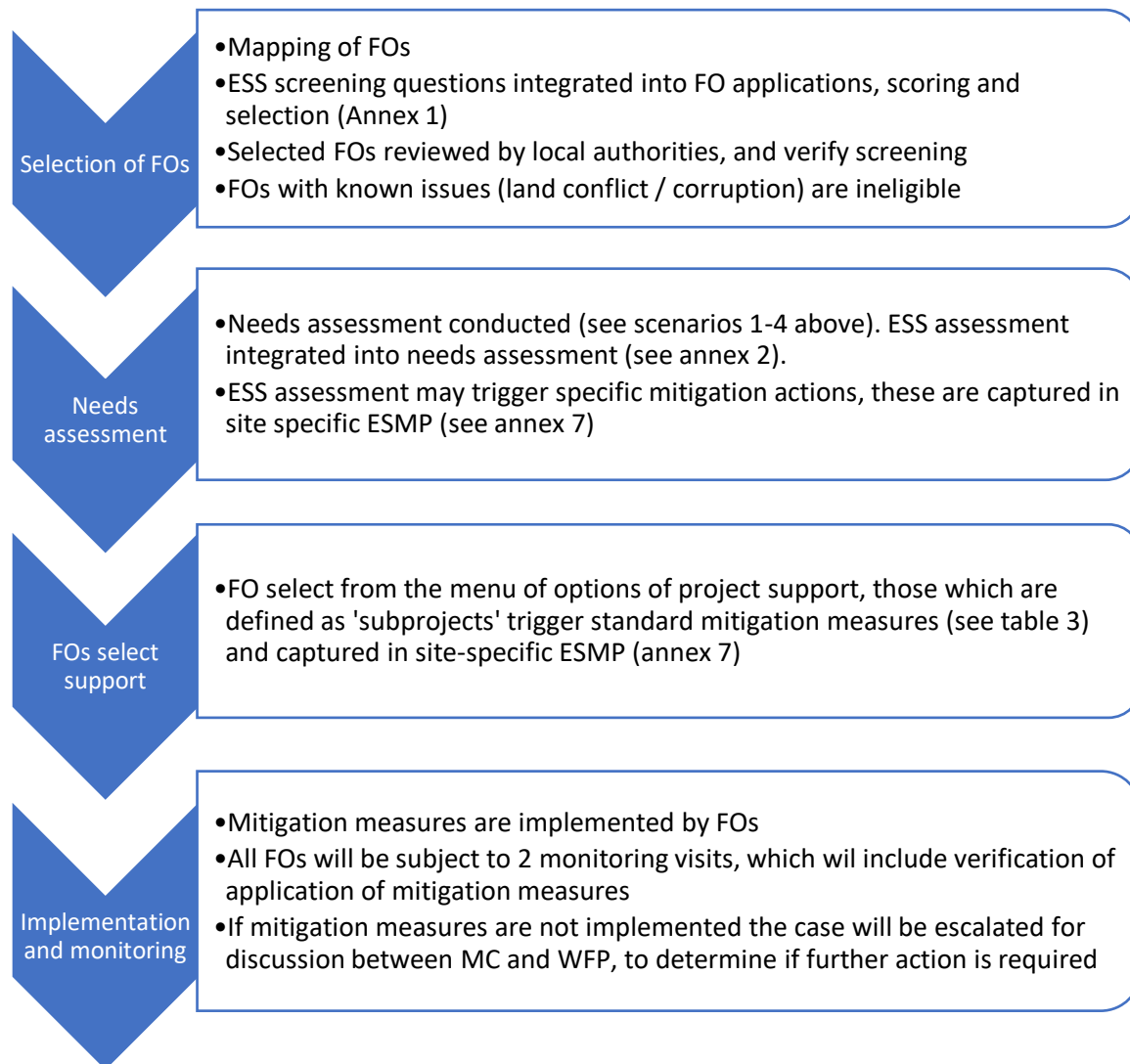
<b>Scenario 1:</b> No active conflict in project area, permissions for research and travel are provided
<i>MC locally recruits enumerators to conduct survey at project site. Enumerators are accompanied by MC, with MC conducting key informant interviews (KIIs) and focus group discussions (FGDs) with a sample of people from the community</i>
<b>Scenario 2:</b> No active conflict in project area, permission for research received but not for travel
<i>MC locally recruits enumerators to conduct survey at project site. MC conducts KIIs remotely by phone</i>
<b>Scenario 3:</b> Period of violence, followed by calm
<i>Needs assessment is paused until situation is calm. MC locally recruits enumerators to conduct survey at project site.</i>
<b>Scenario 4:</b> Phone network is out, MC cannot travel to site (conflict or permissions not granted), no existing local contacts
<i>Use secondary data</i>

During implementation the FOs will be responsible for implementing the mitigation measures within the ESMP. In addition to the field visit during the needs assessment, there will be one visit during the growing season, and one visit at the end of the growing season (access / conflict dependent). These monitoring visits will include review of implementation of mitigation measures. WFP to accompany monitoring visits for FOs with significant mitigation measures. These monitoring visits to be reported to the WB in regular ESS reporting.

The ESS process for FOs is set out in the diagram below, involving:

- screening of FOs during selection process (see Annex 1)
- application of standardised mitigation measures for project support defined as a ‘subproject’ (see Table 3 above)
- assessment of contextual risks and triggering of relevant mitigation measures (see Annex 2)
- implementation and monitoring actions for implementation of mitigation measures

Diagram 1: Environmental and social risk management process for FOs



Given there are approximately 160 FOs to be targeted in a wide geographical spread covering 3 states, the needs assessment process (and integrated ESS screening) will be phased, with the aim of approximately one month per state to complete the process.

The needs assessment will not go to the level of each individual farmer within a FO, but instead meet with key members of the FO and a sample of farmers within it as well as other community members.

## 4.2 Small and Medium sized Enterprises

### 4.2.1 Screening of grant-supported Small and Medium sized Enterprises

Food processing SMEs will be provided grants. The grants provided to SMEs are treated as subprojects and thus all are subject to screening. Each grant is expected to be unique, and thus more individualized mitigation measures are likely (no standardised approaches are proposed).

These SMEs will initially be mapped through engagement with the Ministry of Agriculture, relevant state agriculture authorities, HAC, a multi-pronged approach to reach the private sector including a public Call for Expression of Interest (similar to FOs above). Interested SMEs will submit an initial application, which will be reviewed according to the selection criteria laid out in the Project Implementation Manual (PIM) and specific ESS considerations will inform this screening, in particular to identify any SMEs which are commonly known to be aligned to any conflict party or have been involved in significant pollution events or have a publicly known history of labor disputes. A screening tool for SMEs is included at Annex 3, and the PIM also sets out exclusion criteria. The screening questions will be embedded within the initial application form that SMEs will be required to submit, and the list of selected SMEs will be shared with local leaders, HAC and relevant others, to also screen the SMEs as part of the finalisation of the selection process (similar to the FOs). Some SMEs may have already worked with MC and thus have already been approved through previous screening processes.

#### 4.2.2 Assessment of selected SMEs for possible ESS risks and mitigation measures

Approximately 80 possible SME recipients will be selected. These SMEs will undergo a business capacity assessment to understand current capacities and opportunities for scale up. ESS considerations will be included in the assessment, set out in Annex 4. Similar to the context-specific risks for the FOs, this assessment tool identifies the specific contextual risks of concern using a series of questions to determine whether the risk is relevant or not, and specific mitigation measures to apply where the risk is identified as relevant. Mitigation measures will be captured in a SME-specific ESMP (see Annex 8). These ESMPs will be reviewed by MC and WFP together and reported to the WB in regular ESS reporting.

MC will engage with support and accompany the SMEs throughout the business capacity assessment and integrated ESS assessment, feeding into the drafting of the SME's bid for grant support, as well as the ESMP. The nature of that engagement will be determined by context, and three scenarios are set out below.

*Table 5: Scenarios for business capacity assessments for SMEs*

<b>Scenario 1:</b> The SME can be physically reached (within the state or at Port Sudan)
<i>MC visits SME on more than one occasion during business capacity assessment and development of the SME bid</i>
<b>Scenario 2:</b> SME is not present in target states, but is present in another state MC has offices
<i>MC visits SME once during business capacity assessment and bid development, where distance to SME is less than 50km km from MC office</i>
<b>Scenario 3:</b> SME is not present in any states that CM has offices
<i>Business capacity assessment is conducted remotely</i>

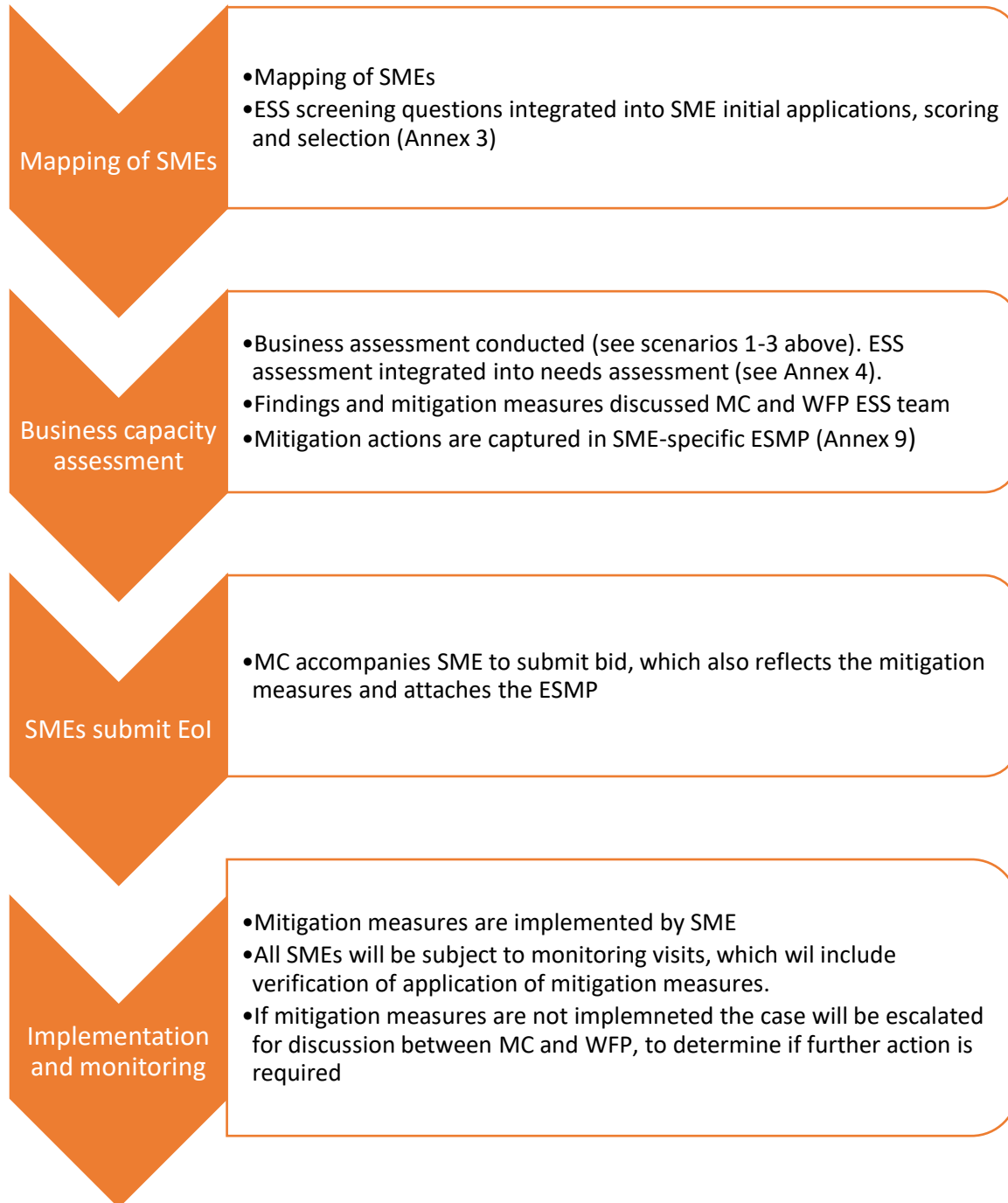
During implementation, the SMEs will be responsible for implementing the mitigation measures within the ESMP, and these will be reviewed during monitoring visits. In addition to the field visit during the needs assessment, the frequency of further monitoring visits will be determined by geographical spread. At least one monitoring will be made during project implementation, with multiple visits made for those within 50 km from MC offices and where travel permits can be obtained. It is expected there will be a cluster of SMEs within Port Sudan, which should be easily reachable. WFP will conduct some monitoring visits – possibly to accompany MC, or if WFP has greater ease of access, then to visit SMEs that MC

cannot reach. Those with significant mitigation needs/measures will be prioritised. These monitoring visits to reported to the WB in regular ESS reporting.

The ESS process for SMEs is set out in the diagram below, involving:

- screening of SMEs during selection process (see Annex 3)
- assessment of specific risks, triggering relevant mitigation measures (see Annex 4)
- implementation and monitoring actions for implementation of mitigation measures

Diagram 2: Environmental and social risk management process for SMEs



### 4.3 Consumer Cooperatives

#### 4.3.1 Roll down of ESS into local partnership for Consumer Cooperatives component

Support to Consumer Cooperatives will be implemented by a local organization (CBO or LNGO). MC will put out a Call for Expression of Interest for a sub-award or procurement tender to deliver this

component. The Call for Expression of Interest / procurement tender will include the ESS commitments and the grant agreement with the selected partner(s) will also include these commitments.

#### 4.3.2 Screening Consumer Cooperatives

The Selected LNGO(s) /CBO(s) will map and screen the possible Consumer Cooperatives within the project area. The screening questions are included at Annex 5. The screening process will be undertaken by the local organisation leading on this component and will comprise of a series of questions the Consumer Cooperatives will complete as part of their application to participate in the project.

#### 4.3.2 Assessment of selected Consumer Cooperatives for possible ESS risks and mitigation measures

The support to the selected Consumer Cooperatives will also follow a menu of options approach, similar to the FOs. These options will be:

1. Enhanced logistics capacity
2. Enhanced storage capacity
3. Enhanced processing capacity through equipment or training
4. Enhanced cooperative participant enrolment
5. Business development services to help ensure Consumer Cooperatives are sustainable

Of these interventions, only #1. Enhanced logistics capacity, 2. Enhanced storage capacity and 3. Enhanced processing capacity through equipment (not training) are considered as ‘community infrastructures’ and thus to be treated as subprojects with screening.

Similarly to the FOs, the possible E&S risks, and related mitigation measures, can be subdivided into those that are predictable, and those that are unique to context.

For the **predictable** risks, standardized mitigation measures can be established. The predictable E&S risks related to each infrastructure are set out at Table 6, along with a standardized set of mitigation measures, and thus all Consumer Cooperatives that select a specific option will be expected to implement the pre-determined mitigation measure.

*Table 6: Standardised risks and mitigation measures for Consumer Cooperatives*

Option for support	Likely risk	Standard mitigation measure
Enhanced logistics capacity	<p>Potential limited air pollution from food processing impacting neighbours</p> <p>Waste may be generated which may impact the aesthetics of the area and could lead to pollution of water sources</p>	<p>Use equipment in good mechanical condition with low emissions</p> <p>Equipment to be regularly maintained</p> <p>Waste generated to be collected and appropriately disposed of</p>
Enhanced storage capacity	There is potential for infestation	Storage facility to be fumigated appropriately before the increased storage and regularly thereafter



	Shelf life of food may expire and become unsuitable for human consumption Food could be contaminated through water leakages	Establish stock management including regular verification on the status of the shelf life Ensure that any leakages are repaired in a timely manner and appropriately
Enhanced processing capacity through installation of equipment	Potential for increased air emissions and generation of solid waste	Carry out regular maintenance of equipment to reduce air emissions The waste generated should be collected and appropriately disposed of The waste generated could be reused in other processes as a source of energy

There are likely to be specific contextual factors which create context-specific risks, and affect the engagement with Consumer Cooperatives, irrespective of which option is chosen. In particular it is anticipated that the existing Consumer Cooperatives may have issues with

**Inclusivity** within the co-operative, in particular: women, tribal minorities, IDPs, youth, people living with disabilities;

**Governance** of the co-operative, in particular: representation of women, tribal minorities, IDPs, youth and people living with disabilities within the governance structure.

A willingness to improve in these areas will be checked in screening, while the ESS assessment (within the needs assessment) will determine the details of the actual gaps. These identified gaps will be used to set targets for improvement on these specific social risk management issues over the course of the project lifetime. ESS questions to be integrated into the needs assessment of selected Consumer Cooperatives are included at Annex 6. This assessment tool focuses on risks of lack of inclusivity or poor governance, questions to assess if the risk exists, and specific mitigation measures to apply in terms of targets to improve inclusivity / governance.

Both standardized, and context-specific mitigation measures will be captured in a site-specific ESMP. The Consumer Cooperative ESMP template is captured at Annex 9. These ESMPs will be reviewed by MC and WFP together and reported to the WB in regular ESS reporting.

The process for the ESS assessment will be dependent on contextual factors, and thus two different scenarios are set out below:

*Table 7: Scenarios for needs assessments for Consumer Cooperatives*

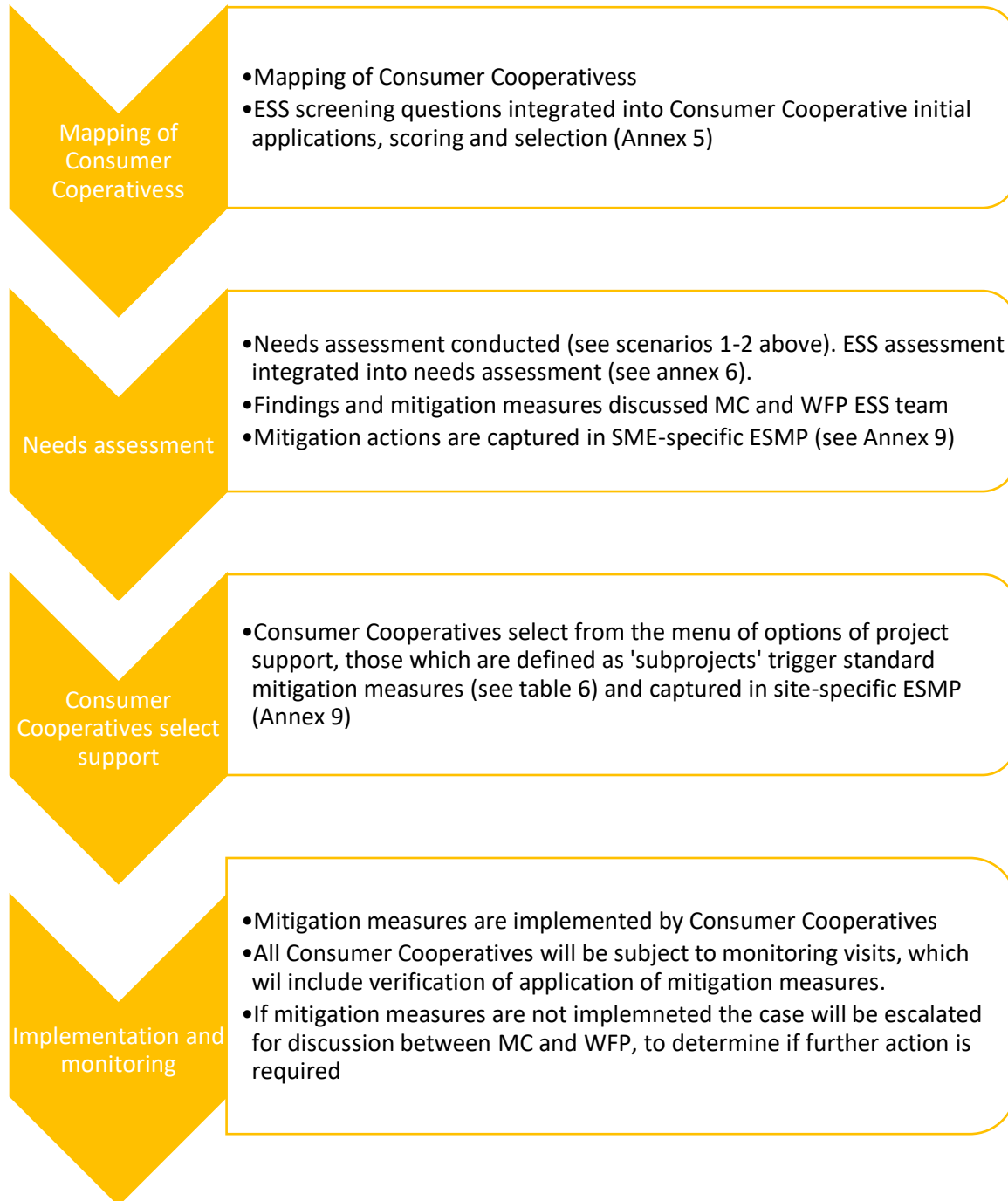
<b>Scenario 1:</b> MC and its partner are able to physically reach the Consumer Cooperative <i>MC accompanies LNGO/ CBO during needs assessment process</i>
<b>Scenario 2:</b> The Consumer Cooperative is inaccessible due remoteness or lack of permission to travel <i>LNGO / CBO conducts needs assessment</i>

During implementation the Consumer Cooperatives will be responsible for implementing the mitigation measures within the ESMP, and these will be reviewed during monitoring visits. In addition to the field visit during the needs assessment, the frequency of further monitoring visits will be determined by geographical spread and ability to gain travel permits. At least one monitoring will be made during project implementation by MC if feasible, while the local partner will undertake 3 monitoring visits. WFP will conduct some monitoring visits – possibly to accompany MC &/or the local partner, or if WFP has greater ease of access, then to visit Consumer Cooperatives that MC cannot reach. Those with significant mitigation measures will be prioritised. These monitoring visits to reported to the WB in regular ESS reporting.

The ESS process for Consumer Cooperatives is set out in the diagram below, involving:

- screening of Consumer Cooperatives during selection process (see Annex 5)
- application of standardised mitigation measures for project support defined as a ‘subproject’ (see Table 6 above)
- assessment of contextual risks and triggering of relevant mitigation measures (see Annex 6)
- implementation and monitoring actions for implementation of mitigation measures

Diagram 3: Environmental and social risk management process for Consumer Cooperatives



#### 4.4 Exclusion criteria

The selection criteria for different sets of grantees are set out in the PIM. Embedded within these are several ESS eligibility criteria, some of which are universal across all types of grantees, some of which are unique to the different grantee types.

<p>Exclusion criteria relevant to all grantees:</p> <ul style="list-style-type: none"> <li>• Activities on disputed land</li> <li>• Known corruption problems</li> <li>• Reasonable concerns of involvement in illegal activities</li> <li>• Use of forced and child labor<sup>7</sup>, in compliance with the ESF. If cases of child or forced labour are identified, appropriate steps will be taken to remedy them. The SOMOUD LMP defines the minimum age of employment being 14 and sets restrictions on anyone aged 14-16 carrying heavy weights or maintaining machinery. Anyone aged 14-18 may be employed in connection with SOMOUD only under the specific conditions established in the LMP<sup>8</sup>.</li> </ul>
<p>Exclusion criteria relevant to Farmers Organisations: No further exclusions beyond the above.</p>
<p>Exclusion criteria relevant to SMEs:</p> <ul style="list-style-type: none"> <li>• News/reports indicating the SME is linked to any armed group</li> <li>• News/reports indicating the SME has caused significant pollution events</li> <li>• News/reports indicating the SME is unfairly treating labor</li> <li>• Any SME in which the production operations cause permanent or temporary physical or economic displacement of people (ESS5)</li> <li>• Any SME in which the production operations cause negative impacts on biodiversity, forests and natural habitats (ESS6). In case any subproject deemed important to reach the project objectives would imply unavoidable biodiversity/natural habitat impacts, ESS6 will become relevant and a subproject-specific ESMP will identify potential impacts and the necessary mitigation and management measures to minimize such impacts</li> </ul>
<p>Exclusion criteria relevant to Consumer's Co-operatives</p> <ul style="list-style-type: none"> <li>• Lack of willingness to enrol new members and be inclusive</li> </ul>

<sup>7</sup> It is generally understood that children often contribute and support family members on family farms. The specific concern is employment of children.

<sup>8</sup> (i) The work is not hazardous, interfere with the child's education, or be harmful to the child (physical/mental health, spiritually, moral or social development); (ii) A risk assessment is conducted prior to the child starting work; and (iii) Regular monitoring is made of health, working conditions, hours of work, and wider environmental and social safeguarding.

## 5. Implementation arrangements for the ESMF

### 5.1 WFP

WFP will establish and maintain a Project Implementation Unit (PIU) in its Country Office to implement Component 2 of the Project. The PIU will include one Environmental Specialist and one Social Specialist within the WFP Country Office, who will work closely with one field officer covering both E&S risks and mitigation measures, based in one of the three states supported by this project. The E&S Specialists in the PIU will be responsible for overall implementation of all E&S instruments, supervision and monitoring. They will undertake field monitoring missions, review documents, and engage in planning and implementation decision making with the wider PIU and the CP. They will lead in training design, and research design and analysis specific to ESS, and provide technical input to key processes (such as integration of ESS into needs / capacity assessment processes across all three groups of FOs, SMEs and Consumer Cooperatives). They will lead in reporting to the WB.

The E&S field officer will engage in regular field engagement, in conjunction with the CP. This will include training delivery, site visits to assess E&S risks across a sample of FOs, SMEs and Consumer Cooperatives. They will engage in stakeholder consultation and review the functioning of risk mitigation measures and GRM processes.

Other CO specialist support will also be drawn on by the PIU, including Security, Accountability to Affected Populations (AAP), Protection, and PSEA:

- The Security Advisor will engage substantially in the delivery of the SMP, including active participation in the security community of practice and overall security risk assessments and security risk management;
- The AAP Advisor will engage substantially in the delivery of the SEP, including development of information, education and communication materials, oversight of stakeholder engagement plans and their implementation, review and synthesis of stakeholder input, integration of these findings into (sub)project design and reporting to the WB. The Advisor also leads establishing and managing the GRM, including set up and oversight of all channels, management of staff receiving feedback within WFP and engagement with UNICEF and MC, and management of complaint handling and resolution within WFP.
- The Protection Advisor will periodically review the gender, GBV, protection and conflict sensitivity risks and mitigations set out in Table 2 above (compiled risks and mitigation measures) and provide expert advice to support mitigation and monitoring.
- The PSEA Advisor will engage substantially in the delivery of the PSEA Action Plan, including reviewing the SEA/SH risks and mitigation measures and developments within the project, and provide expert advice to minimize SEA/SH risks and impacts.

The E&S Specialists will receive monthly reports from the CP on E&S activities and compliance and will prepare the E&S inputs for the Project Biannual Progress Report to the World Bank. The Specialists will flag any performance concerns or non-compliance with the PIU leadership.

## 5.2 Mercy Corps

Mercy Corps has recruited a Safeguarding Specialist to work on SOMOUD. MC will recruit three Monitoring and Evaluation (M&E)/Community Accountability Reporting Mechanism (CARM) Officers for SOMOUD, one in each of the three states of Kassala, River Nile and Northern, to oversee monitoring and evaluation (M&E) and all social and environmental risk management related issues.

WFP will provide significant up front capacity building to the MC team. This will include hands-on in-field accompaniment support to initial needs assessment processes across all three subcomponents (FOs, SMEs and Consumer Cooperatives) including on-the-job coaching and support to the MC team.

MC also has in-house environmental compliance and safeguard tools, developed in 2023, drawing from the World Bank and UNDP Environmental and Social (Safeguards) Frameworks, with an accompanying training manual that cascades to all levels from staff to subcontractors. In 2022, Mercy Corps became the first international non-governmental organization to monitor, track, and measure its global emissions using a centralized tracking system published in [Greening Mercy Corps Report 2022](#), with a further sustainability report published in 2023 and another underway. Corporately MC has an Environmental Sustainability Team which works to secure humanitarian and development outcomes by increasing the agency’s ability to implement effective programs that support climate adaptation, natural resource management, and access to clean energy.

## 5.3 Grantees

The grantees can be Farmers Organisations, grant-supported SMEs, or Consumer Cooperatives. Various mitigation measures relating to grantees have been stipulated in different tables of risks and mitigation measures, of which a number are to be reflected in grant agreements. Those to be reflected in the grant agreements are summarized in Table 8.

*Table 8: ESS provisions within grant agreements*

<p>Grant agreement for all grantees (Farmers Organisations, Grant-supported SMEs, Consumer Cooperatives) to include:</p> <ul style="list-style-type: none"> <li>• Provision that any cases of SGBV will be investigated and may result in exclusion;</li> <li>• Provision that any cases of child or forced labor will be investigated and may result in exclusion</li> <li>• Willingness to address inclusivity and governance issues, and targets to deliver this practically</li> <li>• Inclusion of a GRM</li> </ul>
<p>Grant agreement for Farmers Organisations to also include:</p> <ul style="list-style-type: none"> <li>• Provision that any farmers trying to capture project-provided assets and charging other farmers to use them will be investigated and may be excluded from the project, that any machinery provided to FO is available to all equally</li> </ul>
<p>Grant agreement for SMEs to also include:</p> <ul style="list-style-type: none"> <li>• Commitment to provide equal pay for men and women for the same role</li> <li>• Commitment to non-discrimination (gender / tribe / status) in recruitment</li> <li>• Code of Conduct with relevant ESS commitments</li> </ul>

Annexes 10-12 compile the mitigation measures according to the different beneficiary groups, for ease of management during implementation. All mitigation measures described therein are drawn from the

existing ESS instruments and summarized in Table 2 in section 3: compiled environmental and social risks, mitigation and monitoring measures:

Annex 10 – Compiled mitigation measures - Farmer’s Organisations

Annex 11 – Compiled mitigation measures - SMEs

Annex 12 – Compiled mitigation measures - Consumer’s Cooperatives

## 6. Capacity building to ensure delivery of the ESMF

Capacity building will be needed to ensure the implementation of the mitigation measures set out in the various instruments and summarized here in the ESMF. The expected capacity building is set out in the table below:

*Table 9: Capacity building activities for ESS implementation*

Target group	Capacity building objective	Delivered by	Time frame
PIU staff All WFP engaged on project All CP staff engaged on project	Induction into all commitments / mitigation measures established under all instruments, code of conduct, child labor, PSEA obligations and referral mechanisms	E&S Specialists in WFP	Completed in July, 2024
CP staff involved in key processes (eg conducting needs assessments), ESS focal points, state-level project managers	On-the-job accompaniment for deeper capacity support to key CP staff on ESS commitments / mitigation measures	E&S Specialists in WFP	Within 2 months of the start of implementation
Farmers Organisations (if assets provided, e.g. tractor)	Access to / management of assets, operation and maintenance of asset	Asset provider	At point of asset distribution
Farmers organisations (200 FOs)	ESS commitments in SOMOUD relevant to FOs, prohibited practices (child / forced labor), GRM mechanisms, women's rights and economic empowerment	Initial Training of trainers (ToT) designed & delivered by E&S Specialists in WFP, then rolled out by CP state level project managers	There will be one ToT for CP staff, and one training event at each location for grantees (FOs / SMEs / Consumer Cooperatives) integrated into project start-up activities on site. A rolling process, starting with Kassala, and being completed within 6 months of project launch
SMEs (100)	ESS commitments in SOMOUD relevant to SMEs. Prohibited practices (child / forced labor), GRM mechanisms, Occupational Health and Safety, women's rights and economic empowerment		
Consumer Cooperatives	ESS commitments in SOMOUD relevant to Consumer Cooperatives, prohibited practices (child / forced labor), GRM mechanisms, women's rights and economic empowerment		



## 7. Monitoring and Reporting

In addition to monitoring outcomes and activities as part of the usual performance monitoring, WFP and MC will monitor performance according to the WB ESSs. This involves:

- Ensuring mitigation measures are implemented as intended;
- Assessing the effectiveness of mitigation measures, any adaptations needed, and whether new risks are arising.

### 7.1 Roles and responsibilities

The WFP PIU E&S Specialists will assess implementation of the instruments (ESCP, SEP, SMP, LMP, SA/SDP, PSEA Action Plan, IPMP, CFP) and report progress / obstacles to the Project Manager. The WFP E&S Specialists will compile all relevant ESS reporting data and be responsible for submission to the WB. They will also conduct field missions to quality assure ESS processes and ground truth findings.

Mercy Corps will monitor implementation of the ESS commitments of grantees and will escalate issues to WFP PIU. Spot checks will be conducted by Mercy Corps and WFP to ensure compliance.

### 7.2 Reporting framework

MC will provide brief monthly reporting to WFP on ESS implementation. The MC E&S focal points and WFP E&S Specialists shall meet monthly to discuss progress, adaptations, issues arising, and planning. Additional ad hoc meetings will be convened to discuss findings from screening and need assessments.

The PIU will provide biannual project progress reports to the World Bank on Component 2 implementation. These will include reporting on E&S risks, impacts, mitigation measures undertaken, and corrective actions discussed. E&S reports will cover environmental, social, health and safety performance of the project. The reports will also track complaints and provide summary statistics on complaint handling. Reports will be submitted no later than 45 days after the end of the reporting period.

During the last six months of the project implementation period, the PIU will undertake an assessment of the success of the ESMF implementation and that of all the other E&S risk management instruments and include relevant information in the Implementation Completion Report (ICR) that is due before project closure. This ICR will be followed by the World Bank's own ICR due within six months after the project closure. If the PIU assessment, stakeholder grievances/claims, or WB observations reveal that any key objectives of the ESMF/other E&S risk management instruments were not achieved, an action plan will be agreed to close the gaps before the project closure, aimed at avoiding a need for a Post-Closure Action Plan (PCAP) to ensure ESS compliance.

### 7.3 Incident reporting

WFP will follow its protocol in order to comply with the ESSs and reporting obligations under the Grant Agreement, including when allegations are reported to its Office of Inspections and Investigations.

As noted in the ESCP, WFP will notify the WB within 48 hours of any incident or accident related to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, or security breach.



WFP will provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. A detailed report of the incident shall be provided within thirty (30) days subsequent to the initial report of the incident or accident, unless a different timeline is agreed with the Association. WFP will use the WB's ESIRT standard incident reporting templates for this reporting.

For discussion on Grievance Redress Mechanism please see the Stakeholder Engagement Plan, which includes significant detail on the process.

## 8. Budget for ESMF

*Indicative budget only – all costs are included within existing budget lines of staffing and activities of overall project agreed budget*

	Required Resources	USD
1.	Human Resources: WFP PIU risk management team, CP and CBO risk management capacity	420,000
2.	Logistics / Travel for research, monitoring and supervision	60,000
3.	Outreach materials	150,000
4.	Outreach events	2,700
5.	Media and communications	20,000
6.	Training and capacity building	54,000
7.	Risk Mitigation Measures*	173,000
	<b>TOTAL</b>	<b>879,700</b>

\* The ESMP costs will be covered through the subproject budgets.

## Annex 1 – Screening tool for selecting Farmers Organizations

For each FO identified in the mapping, screening considers publicly known concerns for the FO:

Are there conflicts between tribes over claims to land in the farming area included in this FO?	Y/N	If yes, the FO is ineligible
Have there been conflicts with pastoralists over access to water / pasture / corridors in the last 10 years in the farming area covered in this FO?	Y/N	
Have there been concerns raised about powerful individuals in the FO taking control of large, shared assets (in the past) and excluding members from using them / charging others to use them?	Y/N	
Are there reasonable concerns of corruption or involvement in illegal activities?	Y/N	
Have there been concerns raised about use of forced labor?	Y/N	
Is the FO employing child labor of children below 14 years or child labor that does not comply with the other restrictions set out in the SOMOUD LMP (acknowledging that children may work on family farms)?	Y/N	

## Annex 2 – ESS assessment integrated within needs assessment of selected FOs

The following ESS questions to be integrated into the needs assessment processes for selected FOs.

Key risk to probe		
How to assess	Action to take	
<b>1</b>	<b>Are there tribes that might be excluded from the FO?</b>	
Ask community leadership and local government for tribal mapping and distinguish between tribes with / without land access (KII)	If there are minority tribes in the area with land but not represented in the FO, develop measures with FO to ensure meaningful integration of minorities in FO Monitor the integration	
Ask FO members to list all tribes living in the area, and identify which tribes have access to land, and which tribes are included in the FO (KII and FGD)		
Ask community members to identify if there are landless people who usually work as agricultural labor (FGD)		
Visit landless tribe members for KII to verify list of tribes, those with land access, and those included in FO (min 2 KIIs)		
<b>2</b>	<b>Are women able to access the project resources, and are they at risk of exploitation in doing so?</b>	
Ask women if they participate in the applying FO, if they have their own FO, or if they do not participate in any FO, why not (FGD)	If women farmers are not participating in the supported FO, explore either integrating them or supporting them via a women-led FO	



	Ask women if they face the risk of violence or harassment travelling to/from farms, or at farms, and/or if there is social stigma for work on farms (FGD)	If women face risks travelling to/from fields, encourage women to travel in groups. Where distance is significant, provide transport for women. If women face risks at farm, then specific mitigation measures needed
	Ask women what is their labor contribution to family farms (FGD)	
	Ask women how crops they produce are sold, their ability to retain control over the income generated, and their relative bargaining power in household spending (FGD)	If women’s agricultural production is being sold by men, who retain some / all of the revenue, then link women’s production directly to the Consumer Cooperatives or explore the use of collective sales of women’s product
<b>3</b>	<b>Is the FO governed fairly or do individuals within it take control of resources provided to the group?</b>	
	Ask a sample of FO members to describe who governs the FO, and if they are satisfied with the existing governance. If not, what are they unhappy about (survey or FGD or KII)	If there is a history of powerful men taking control of shared resources, and these men remain in powerful positions in the FO, exclude the FO from project
	Ask FO members if there have been issues with powerful people controlling FO resources / assets / decision making	
<b>4</b>	<b>Are there risks of conflict over water with nearby communities?</b>	
	Ask community leadership and FO members if there has been previous conflict over water supply with other nearby community(ies)	If there is existing or recent conflict over water usage, any irrigation support must be informed by analysis of upstream/downstream water users, who must be informed about the intervention and have the opportunity to give feedback on the proposed irrigation support

## Annex 3 – Screening tool for selecting SMEs

For each SME identified in the mapping, screening considers publicly known concerns for the SME:

Has this SME been associated with any armed group in Sudan?	Y/N	If yes, the SME is ineligible
Has this SME been accused of causing significant pollution events?	Y/N	
Has this SME been accused of unfairly treating labor or using forced labor?	Y/N	
Is the SME using child labor of children below 14 years or child labor that does not comply with the other restrictions set out in the SOMOUD LMP?	Y/N	
Are there reasonable concerns that this SME is involved in illegal or corrupt activities?	Y/N	
Is the SME operating on disputed land?	Y/N	

## Annex 4 – ESS assessment integrated within business capacity assessment for selected SMEs

The following ESS questions to be integrated into business capacity assessment processes for selected SMEs. All conversations with SME staff should be in confidence, without management present, and led by a team member of the same gender.

Key risk to probe		
	How to assess	Action to take
1	<b>Are there children (below 14) working at this site? (ESS2)</b>	
	Ask all visibly young SME employees for their date of birth and if they have any ID document that can verify this. If visibly young people do not have an ID document, do they have a valid reason for this (e.g. ID document lost during displacement)	If children under 14 years are working at the site, the SME is excluded from grant support If 14-16 year olds are working at the site, they should not be carrying heavy weights, maintain machinery, or do other tasks that imply risk of physical or any other type of injury/damage
	Ask visibly young SME employees if there are other young people who normally work at this site but who are not present today	
2	<b>Are women working at this site receiving less pay as men for the same / equivalent work? (ESS2)</b>	
	Ask management to explain worker roles, and which roles are filled by men and which by women	If women receive less pay for equivalent work, SME is commit to pay women equal to men and apply non-discrimination in recruitment. Follow up visit to be agreed to verify measures in place before grant provided.
	Ask management to describe and justify any difference between roles for men / women	
	Ask management to describe salary and benefits for a sample of these roles, include similar roles occupied by men and women	

	Verify salary / benefits through records check, and through questions to workers (ensure confidential space)	Spot checks to be applied during grant period.
<b>3</b>	<b>Are there significant health or safety risks for staff working at this site which are not being adequately managed? (ESS2)</b>	
	Ask management about possible risks and health and safety measures in place	If significant risks are not being adequately managed, grant is conditional on OHS measures being demonstrably introduced.
	Ask management to show records of accidents at work and actions taken	
	Randomly select staff to ask in confidence about any accidents occurring at work, actions taken, and concerns they have about health and safety at work	Follow up visit to be agreed to verify measures in place before grant provided.
	Visible assessment of site: are there obvious hazards for workers?	Spot checks to be applied during grant period.
<b>4</b>	<b>Are there significant risks of violence, sexual harassment or SGBV at the SME or travelling to/from work? (ESS4)</b>	
	Ask female staff about attitudes towards women working in this locality, and if there is social stigma for being employed outside the home	If there is social stigma then awareness raising session on women's rights, economic violence and the positive outcomes for the community of women's economic empowerment to be organized for the wider community.  If there is violence against women travelling to/from work, then specific mitigation measures need to be established.  If there is violence or sexual harassment against women in the workplace, the SME is ineligible.
	Ask female staff if there have been incidents of violence against women	
	Visible observation of site: how are women staff treated by male staff?	
<b>5</b>	<b>Is this SME causing significant pollution? (ESS3)</b>	
	Is there visible air, water or soil pollution	If there is pollution, what measures is the SME proposing to put in place. If it's not known, provide guidance on what is required to prevent and mitigate the pollution, as applicable
	Ask management if they have any records of monitoring and also ask staff involved in the production processes whether they have any knowledge of any sources of pollution	Provide training to staff and management on cleaner production approaches Carry out spot checks and unannounced inspections
<b>6</b>	<b>Is this SME causing physical or economic displacement of people? (ESS5)</b>	
	If the grant support is intended to expand the footprint of the SME, ask manager to identify the actual locations for physical expansion and affected areas.	If the expansion will cause any involuntary resettlement, the SME is ineligible
<b>7</b>	<b>Is this SME affecting biodiversity, forest, or natural habitats? (ESS6)</b>	
	Ask management to describe raw materials used in production, and where they are sourced from	If there is evidence that raw materials are being extracted from sensitive habitats, that must be stopped before the SME is eligible for project support. In such cases, the SME is advised to



		look for alternative sources and guided to correct the situation before approval of project funding.
	Verify whether the SME was constructed on/is operating causing degradation of a fragile ecosystem/natural habitat	The SME is ineligible

### Annex 5 – Screening tool for selection of Consumer Cooperatives

For each Consumer Cooperative identified in the mapping, screening considers publicly known concerns for the Consumer Cooperative:

Is this Consumer Cooperative willing to enroll new members?	Y/N	If not, the cooperative is ineligible If yes, the cooperative is ineligible
Is the Consumer Cooperative operating on disputed land?	Y/N	
Are there reasonable concerns that this consumer co-operative is involved in illegal or corrupt activities?	Y/N	
Have there been concerns raised about use of forced labor?	Y/N	
Is the Consumer Cooperative using child labor of children below 14 years or child labor that does not comply with the other restrictions set out in the SOMOUD LMP?	Y/N	
Is this Consumer Cooperative inclusive of all different tribes, women, youth, and people living with disabilities? If not currently inclusive, is it willing to become inclusive?	Y/N	If the cooperative is not inclusive and not willing to become inclusive, then the cooperative is ineligible
Is the governance of this co-operative inclusive of women, tribal minorities, IDPs, and people living with disabilities? If not currently inclusive, is it willing to become inclusive?	Y/N	

### Annex 6 – ESS assessment integrated within needs assessment of selected Consumer Cooperatives

The following ESS questions to be integrated into the needs assessment processes for selected Consumer Cooperatives:

	Key risk to probe	
	How to assess	Action to take
1	<b>Is this Consumer Cooperative inclusive (women / tribal minorities / youth / people living with disabilities)?</b>	
	Ask local government / community leaders to identify tribes in the project area, and to identify if there are specific quarters / streets / blocks these tribes live in	Discuss with Consumer Cooperative leadership possible barriers to membership for women / tribal minorities / youth / people living with disabilities, and identify measure to overcome these barriers Establish targets and monitor progress
	Ask Consumer Cooperative leadership to identify proportion of: <ul style="list-style-type: none"> <li>• Women members</li> <li>• People from different tribes (may be an estimate)</li> </ul>	





	<ul style="list-style-type: none"> <li>Youth members</li> <li>Members who are people living with disabilities</li> </ul>	
2	<b>Is the governance structure of the Consumer Cooperative inclusive (women / tribal minorities / youth / people living with disabilities)?</b>	
	Review leadership structure of Consumer Cooperative to identify proportion of: <ul style="list-style-type: none"> <li>Women members</li> <li>People from different tribes (may be an estimate)</li> <li>Youth members</li> <li>Members who are people living with disabilities</li> </ul>	Discuss with Consumer Cooperative leadership possible barriers to leadership roles for women / tribal minorities / youth / people living with disabilities, and identify measure to overcome these barriers  Establish targets and monitor progress

## Annex 7 ESMP template – Farmers Organizations

SECTION 1 – BASIC DATA		
Farmer’s Organization		
Locality / State		
Date of ESS review		
Assessment conducted by		
Selection option(s) for support under SOMOUD	1. Provision of inputs: seeds and fertilizer 2. Land preparation 3. Small scale rehabilitation of irrigation systems or pumps 4. Installing solar pumps	
SECTION 2 – STANDARDISED RISKS AND MITIGATION MEASURES		
If the following options are selected:	Take these mitigation measures	Document here the actions taken (include dates) and any measures established
Small scale rehabilitation of irrigation systems or pumps	Identify who might be affected upstream / downstream and how, drawing on local knowledge of hydrological water flow and patterns  Inform potentially affected community, and gather their feedback on proposed intervention, and adjust design if needed	



	<p>Establish / enhance existing water governance or management systems involving project community and other affected communities</p> <p>Identify a disposal site for construction waste, and determine expected scale of waste to be generated</p> <p>Discuss with community proposed waste site and identify any possible unintended effects of disposing this waste at this site (such as contamination of water sources)</p>	
Installing solar pumps	The waste should be collected and disposed of appropriately	
<b>SECTION 3 – ASSESSMENT OF CONTEXT-SPECIFIC RISKS AND MITIGATION MEASURES</b>		
<b>Specific risks to probe</b>	<b>Findings from assessment</b>	<b>Mitigation measures to be implemented</b>
Are there tribes that might be excluded from the FO?		
Are women able to access the project resources, and are they at risk of exploitation in doing so?		
Is the FO governed fairly or do individuals within it take control of resources provided to the group?		
Are there risks of conflict over water with nearby communities?		
Any other observations?		



## Annex 8 ESMP template – SMEs

SECTION 1 – BASIC DATA		
Business name		
Locality / State		
Date of ESS review		
Assessment conducted by		
Describe business supported being funded by SOMOUD		
SECTION 2 – ASSESSMENT OF CONTEXT-SPECIFIC RISKS AND MITIGATION MEASURES		
Specific risks to probe	Findings from assessment	Mitigation measures to be implemented
Are there children below 14 working at this site?		
Are there children between 14 and 16 years working at this site?		
Are women working at this site receiving less pay as men for the same / equivalent work?		
Are there significant health or safety risks for staff working at this site which are not being adequately managed?		
Are there significant risks of violence, sexual harassment or SGBV at the		



SME or travelling to/from work?		
Is this SME causing significant pollution?		
Is this SME affecting biodiversity, forest, or natural habitats?		
Any other observations?		

## Annex 9 ESMP template – Consumer Cooperatives

SECTION 1 – BASIC DATA		
Consumer’s Organization		
Locality / State		
Date of ESS review		
Assessment conducted by		
Selection option(s) for support under SOMOUD	<ol style="list-style-type: none"> <li>1. Enhanced logistics capacity</li> <li>2. Enhanced storage capacity</li> <li>3. Enhanced processing capacity through equipment or training</li> <li>4. Enhanced cooperative participant enrolment</li> <li>5. Business development services to help ensure Consumer Cooperatives are sustainable</li> </ol>	
SECTION 2 – STANDARDISED RISKS AND MITIGATION MEASURES		
If the following options are selected:	Take these mitigation measures	Document here the actions taken (include dates) and any measures established
Enhanced logistics capacity	Ensure equipment in good mechanical condition with low emissions Equipment to be regularly maintained Waste generated to be collected and appropriately disposed of	
Enhanced storage capacity	The storage facility to be fumigated appropriately before the increased storage and regularly thereafter Establish stock management including regular verification on the status of the shelf life Ensure that any leakages are repaired in a timely manner and appropriately	
Enhanced processing capacity through equipment	Carry out regular maintenance of equipment to reduce air emissions The waste generated should be collected and appropriately disposed of	



	The waste generated could be reused in other processes as a source of energy	
<b>SECTION 3 – ASSESSMENT OF CONTEXT-SPECIFIC RISKS AND MITIGATION MEASURES</b>		
Specific risks to probe	Findings from assessment	Mitigation measures to be implemented
Are there children (below 14) working at this site?		
Are there children between 14 and 16 years working at this site?		
Are women working at this site receiving less pay as men for the same / equivalent work?		
Are there significant health or safety risks for staff working at this site which are not being adequately managed?		
Are there significant risks of violence, sexual harassment or SGBV at the SME or travelling to/from work?		
Is this SME causing significant pollution?		
Is this SME affecting biodiversity, forest, or natural habitats?		
Any other observations?		



## Annex 10 - Compiled ESS commitments for Farmers Organizations

<p>Selection and eligibility</p>	<ul style="list-style-type: none"> <li>• Consider land conflict (tribal claims or farmer / herder) - screening</li> <li>• Consider if significant governance concerns exist in the FOs – screening</li> <li>• Consider if concerns over corruption / involvement in illegal activities / forced / not acceptable child labor, as defined in the SOMOUD LMP - screening</li> <li>• Pro-actively seek communities relocated to unviable relocation sites in previous dam constructions where feasible (Al Makabrab and Kehila in River Nile State)</li> <li>• Consider tribal balance (through tribal mapping) and ensure no tribes are disproportionately benefitting / excluded</li> </ul>
<p>ESS in needs assessment</p>	<ul style="list-style-type: none"> <li>• Consider inclusivity of FOs towards minority tribes and access of minority tribes to land</li> <li>• Consider if women can access project resources, and if they are at risk in doing so</li> <li>• Supported farms to clarify during planning sessions who works on the fields and how they are remunerated (including women / children)</li> <li>• FOs to identify the unused land that will be brought into production and collectively assure there are no conflicts over land claims including boundaries</li> <li>• Mapping of livestock routes / pasture / water access as part of village selection to avoid supporting agricultural expansion onto contested land</li> <li>• Consider if the FO is governed fairly or if individuals within it take control of resources provided to the group?</li> <li>• Consider if there are risks of conflict over water with nearby communities</li> </ul>
<p>Standard mitigation measures</p>	<p>Apply standard mitigation measures to the following support options:</p> <ul style="list-style-type: none"> <li>• Small scale rehabilitation of irrigation systems or pumps</li> <li>• Installing solar pumps</li> </ul>
<p>Grant agreements with FOs</p>	<ul style="list-style-type: none"> <li>• Provision that reported cases of SGBV will be investigated and may result in the exclusion of the specific farm from the project</li> <li>• Prohibition on use of child and forced labor and child abuse, child labor as per provisions of the SOMOUD LMP</li> <li>• Inclusion of GRM and reporting channels</li> </ul> <p>IF ASSETS PROVIDED:</p> <ul style="list-style-type: none"> <li>• Provision that assets will be well maintained by FOs and only operated by those trained to do so</li> <li>• Provision that assets provided are available to all FO members and any farmers trying to capture assets will be excluded from project</li> </ul>
<p>Within activities</p>	<ul style="list-style-type: none"> <li>• Ensure any project-linked agrochemicals are appropriately stored</li> </ul> <p>IF WOMEN FARMER’S CO-OPERATIVE:</p> <ul style="list-style-type: none"> <li>• Link FO to Consumer Cooperatives for direct sales and develop payment mechanisms that go direct to the women farmers, or</li> </ul>





	<ul style="list-style-type: none"> <li>• Identify options for collective sales of produce, with income generated pooled as women FO’s business collective, to protect women’s ability to control income generated</li> </ul>
Capacity building	<p>Training for 200 FOs, integrated into on-site project start-up activities, covering:</p> <ul style="list-style-type: none"> <li>• ESS commitments in SOMOUD relevant to FOs,</li> <li>• prohibited practices (child / forced labor),</li> <li>• GRM mechanisms,</li> <li>• women’s rights and economic empowerment</li> </ul> <p>IF ASSETS PROVIDED:</p> <ul style="list-style-type: none"> <li>• Access to / management of assets</li> <li>• operation and maintenance of asset</li> </ul>
Outreach	<ul style="list-style-type: none"> <li>• Opinion formers to explain project, women’s rights and economic empowerment</li> </ul>

## Annex 11 - Compiled ESS commitments for SMEs

<p>Selection and eligibility</p>	<ul style="list-style-type: none"> <li>• Consider possible links to war economy or illegal activities – screening</li> <li>• Consider if SME has been accused of significant pollution or unfair treatment of labor – screening</li> <li>• Consider if concerns over corruption / forced labor / not acceptable child labor, as defined in the SOMOUD LMP - screening</li> <li>• Consider if operating on disputed land - screening</li> <li>• Grant evaluation criteria to award additional points for SMEs with women in workforce</li> <li>• Affirmative action to support women’s led SMEs make applications for grant support (for instance working with smaller SMEs or adding skills building components)</li> <li>• with a minimum number of grant awards to go to women-led SMEs (number to be established)</li> <li>• Site visit to review OHS measures in place</li> </ul>
<p>ESS in business capacity assessment</p>	<ul style="list-style-type: none"> <li>• Consider if children under 14 or between 14 and 16 years are working at site</li> <li>• Consider if women working on site are receiving less pay than men for same / equivalent work</li> <li>• Consider if there are significant health and safety risks at site which are not being adequately managed</li> <li>• Consider if there is a significant risk of violence, sexual harassment or SGBV at the SME or travelling to / from it</li> <li>• Consider if SME is causing significant pollution</li> <li>• Consider if the SME is causing physical or economic displacement of people</li> <li>• Consider if the SME is affecting biodiversity, forests, or natural habitat</li> </ul>
<p>Grant agreements with SMEs</p>	<ul style="list-style-type: none"> <li>• Provision that any reported cases of SGBV will be investigated and may result in exclusion of this SME from the project</li> <li>• Prohibition on use of child labor as per provisions of the SOMOUD LMP</li> <li>• Inclusion of GRM and reporting channels</li> <li>• Commitments on OHS measures</li> <li>• Provision that women are paid the same as men for equal work, and non-discrimination in recruitment</li> <li>• Additional funded measures to enable women within the workforce or workplace (eg separate washroom facilities for women or enabling home based work for women)</li> </ul>
<p>Within activities</p>	<ul style="list-style-type: none"> <li>• Ensure facilities for collection, transportation and safe disposal of hazardous waste</li> <li>• Ensure facilities for collect and proper disposal of solid waste</li> </ul>
<p>Capacity building</p>	<p>Training for 100 SMEs, integrated into on-site project start-up activities, covering:</p> <ul style="list-style-type: none"> <li>• ESS commitments in SOMOUD relevant to SMEs</li> <li>• Prohibited practices (child / forced labor)</li> <li>• GRM mechanisms</li> <li>• OHS</li> <li>• women’s rights and economic empowerment</li> </ul>



	<ul style="list-style-type: none"> <li>• Prevention of SGBV</li> </ul>
Outreach	<ul style="list-style-type: none"> <li>• Engage with middlemen who lose control and profit to explain project and seek to prevent backlash</li> <li>• Opinion formers to explain project, women’s rights and economic empowerment</li> </ul>
Learning	<ul style="list-style-type: none"> <li>• Seek successful existing women-led SMEs, document their experiences and provide a platform to share these</li> <li>• Lesson learned events to reflect on successes and weaknesses and refinement of approach to supporting women’s led SMEs</li> </ul>



## Annex 12 - Compiled ESS commitments for Consumer Cooperatives

Targeting and selection	<ul style="list-style-type: none"> <li>• Consider if SME is willing to enroll new members – screening</li> <li>• Consider if SME is inclusive of different tribes, women, youth, and people living with disabilities? And if not currently, if it is willing to become inclusive - screening</li> <li>• Consider the governance of this cooperative inclusive of women, tribal minorities, IDPs, and people living with disabilities? If not currently, if it is willing to become inclusive – screening</li> <li>• Consider if concerns over corruption / involvement in illegal activities/ forced labor / not acceptable child labor, as defined in the SOMOUD LMP - screening</li> <li>• Consider if operating on disputed land – screening</li> <li>• Consider if concerns raised about use of forced or child labor - screening</li> </ul>
ESSs in needs assessment	<ul style="list-style-type: none"> <li>• Is the Consumer Cooperative inclusive of different tribes, women, youth, and people living with disabilities?</li> <li>• Is the governance of this co-operative inclusive of women, tribal minorities, IDPs, and people living with disabilities?</li> </ul>
Grant agreements with Consumer Cooperatives	<ul style="list-style-type: none"> <li>• Provision to include inclusivity (women, tribal minorities, IDPs, youth, people living with disabilities)</li> <li>• Provision to enhance governance, in particular the representation of women, tribal minorities, IDPs, youth and people living with disabilities within the governance structure</li> <li>• Prohibition on use of child labor as per provisions of the SOMOUD LMP</li> </ul>
Standard mitigation measures	<p>Apply standard mitigation measures to the following support options:</p> <ul style="list-style-type: none"> <li>• Enhanced logistics capacity</li> <li>• Enhanced storage capacity</li> <li>• Enhanced processing capacity through equipment</li> </ul>
Within activities	<ul style="list-style-type: none"> <li>• Ensure facilities for collect and proper disposal of solid waste</li> </ul>
Capacity building	<p>Training for 20 Consumer Cooperatives, integrated into on-site project start-up activities, covering:</p> <ul style="list-style-type: none"> <li>• ESS commitments in SOMOUD relevant to Consumer Cooperatives</li> <li>• Prohibited practices (child / forced labor)</li> <li>• GRM mechanisms</li> <li>• Women’s rights and economic empowerment</li> </ul>
Outreach	<ul style="list-style-type: none"> <li>• Opinion formers to explain project, women’s rights and economic empowerment</li> </ul>