



**WFP EVALUATION**

# Evaluation of WFP's Environmental Policy

Centralized evaluation report

OEV/2023/017

**November 2024**



SAVING  
LIVES  
CHANGING  
LIVES

# Acknowledgements

This report was written by an evaluation team coordinated by IOD PARC. The evaluation was conducted under the technical guidance and oversight of the World Food Programme (WFP) Office of Evaluation.

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# Executive summary

## Introduction

### Evaluation features

1. The evaluation of WFP's environmental policy, approved in 2017, assessed the quality of the policy, the results achieved and the reasons why the policy's expected results have, or have not, been achieved. The goal of the evaluation is to uphold accountability to stakeholders and inform WFP's future policy on environmental and social sustainability.
2. The evaluation is global in scope and covers the period from 2017 to mid-2024. A theory-based approach was used, with data collection and analysis organized into two core components: policy architecture and the implementation and results of the policy and its associated tools; and WFP's wider approaches to environmental and social sustainability. The design, conduct, analysis and reporting of the evaluation ensured that policy results and processes were assessed in terms of gender, equality, disability and social inclusion and the extent to which those concerns were addressed in the design and implementation of activities.
3. The evaluation faced several limitations, including uncertainty and pressure on staff created by an ongoing restructuring process, but this did not compromise data quality. A comprehensive cost efficiency analysis was hindered by data limitations and variation in WFP's approach to sustainability. The recent implementation of policy tools further complicated the assessment of results, and data were uneven for the analysis of gender, equality, disability and social inclusion. Despite these challenges, valuable insights were gained and the overall findings are reliable.

#### **Box 1: Evaluation data collection and analysis**

Primary and secondary data collection and analysis took place between December 2023 and July 2024 at the headquarters, regional and country levels and included the following:

- Retrospective participative construction of the theory of change underpinning the policy
- Systematic document and literature review
- Field missions to Egypt, Ghana, Kenya, Kyrgyzstan, Namibia and Nicaragua
- "Desk review plus"<sup>1</sup> undertaken in Afghanistan, Guatemala, Madagascar, Mali and Yemen
- Key informant interviews and focus group discussions with WFP staff at headquarters, regional bureaux and country offices; cooperating partners; government departments; and other United Nations, multilateral and donor entities
- Review of external entities covering the International Committee of the Red Cross, the Office of the United Nations High Commissioner for Refugees, the United Nations Children's Fund and Cargill Incorporated (a corporation with a supply chain similar in size to that of WFP)
- In-depth analysis drawing on data collection and follow-up interviews

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<sup>1</sup> "Desk review plus" refers to document review and selected key informant interviews.

## Context

4. Several external and internal factors have driven WFP's approach to environmental sustainability and the development of the 2017 policy:
  - Growing evidence on the environmental impact of humanitarian and development activities on natural resources and how those activities affect the security, livelihoods and well-being of the people who depend on those resources.
  - The progressive mainstreaming of environmental sustainability in development and humanitarian activities, driven largely by international agreements<sup>2</sup> and increasing global consensus on how to manage environmental risks.
  - Increasing recognition of the tension between addressing immediate emergency needs and achieving long-term environmental and social sustainability.
  - The growing prominence of environmental sustainability at WFP, including a shift towards environmental and social sustainability as reflected in its strategic plans.<sup>3</sup>
  - Funding gaps, with rising needs and food costs increasing pressure on resources.<sup>4</sup>
  - The restructuring of WFP, with changes in the responsibilities and position of some of the units tasked with implementing the environmental policy.

## Subject of the evaluation

5. WFP's 2017 environmental policy has five objectives and seven principles, as listed in table 1.

**Table 1: Environmental policy objectives and guiding principles**

| Policy objectives  |   |
|--------------------|---|
| 1                  | Enhancing the environmental sustainability of activities and operations   |
| 2                  | Managing risks and maximizing the environmental opportunities of activities and operations  |
| 3                  | Minimizing the carbon footprint and increasing the resource-efficiency of activities and operations   |
| 4                  | Aligning WFP's approach with global standards and international practice  |
| 5                  | Strengthening the understanding and capacities of partners and WFP stakeholders   |
| Guiding principles |   |
| 1                  | Systematic consideration of correlations between healthy local ecosystems and livelihoods   |
| 2                  | Alignment with local regulatory contexts as well as global standards and United Nations requirements  |
| 3                  | Minimization and mitigation of adverse environmental impacts of WFP activities and operations   |
| 4                  | Engagement with local communities on protection and sustainable use of natural resources  |
| 5                  | Precautionary approach to prevent potential negative impacts on the environment   |
| 6                  | Consideration of the full life cycle of activities and operations, from acquisition to final disposal   |
| 7                  | Continual identification of opportunities to improve environmental performance and resource efficiency and design actions that are scalable over time |

Source: Adapted from WFP/EB.1/2017/4-B/Rev.1.

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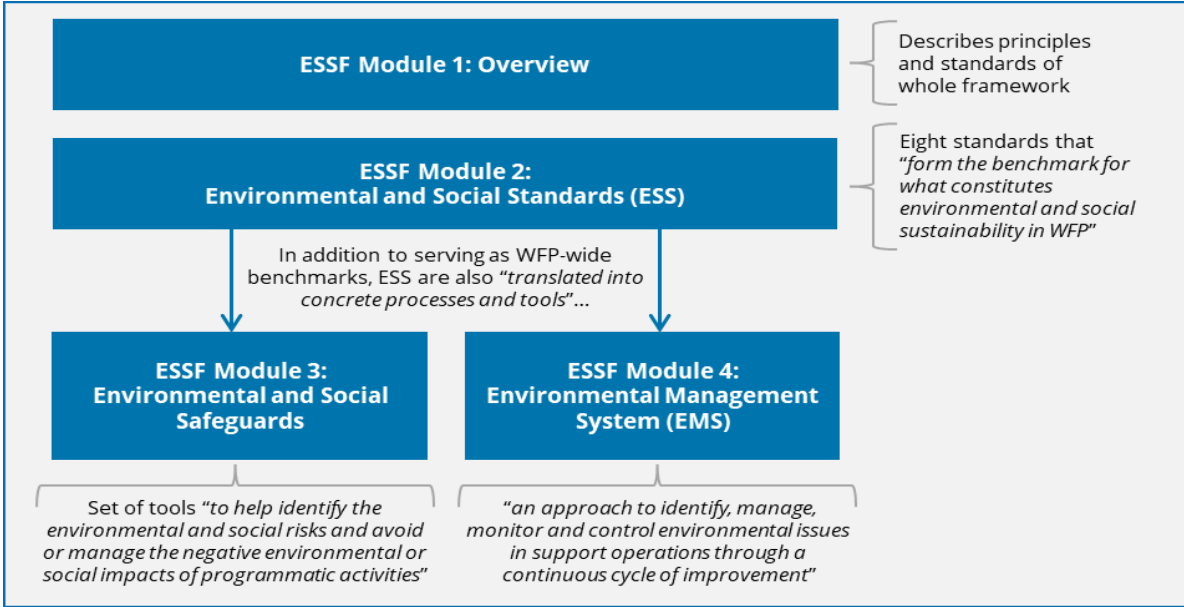
<sup>2</sup> United Nations. 2012. [A Framework for Advancing Environmental and Social Sustainability in the United Nations System](#); United Nations. 2015. [Resolution adopted by the General Assembly on 25 September 2015 \(A/RES/70/1\) – Transforming our world: the 2030 Agenda for Sustainable Development](#); United Nations. [Strategy for Sustainability Management in the United Nations System 2020-2030](#), phases I (2019) and II (2021).

<sup>3</sup> WFP's [strategic plan for 2022–2025](#) at page 34 commits WFP to enhancing the environmental and social sustainability of its operations.

<sup>4</sup> As noted in its [annual performance report for 2023](#), in 2023 WFP received USD 8.3 billion against a needs-based plan of USD 22.8 billion, resulting in its highest recorded funding shortfall.

6. Three tools were established to implement the policy and ensure consistency with the United Nations 2012 environmental and social sustainability framework:<sup>5</sup> environmental standards; environmental risk screening and categorization (referred to, along with other measures, as “safeguards”); and the environmental management system (EMS). These tools were formally adopted by WFP in its 2021 environmental and social sustainability framework (ESSF),<sup>6</sup> which became WFP’s principal framework for increasing the environmental and social sustainability of its programme activities, supporting its operations and guiding its interactions with partners (figure 1).<sup>7</sup>

**FIGURE 1: OVERVIEW OF THE ESSF**



Source: Environmental and social sustainability framework.

- 7. The ESSF divides institutional ownership of the policy and related tools between the Climate and Resilience Service,<sup>8</sup> which leads on the development of standards and safeguards, and the Management Services Division – Infrastructure and Facilities Management Branch (MSDI), which leads on the EMS.
- 8. More recently, MSDI has also been leading the development of WFP’s environmental plan of action 2030 (EPACT), which will compile commitments relating to environmental sustainability from divisions and operations across WFP.
- 9. Neither the environmental policy nor the ESSF included a costed implementation plan. Table 2 presents expenditures related to the policy between 2018 and 2024, including staffing and travel costs. These figures give an indication of the level of resources allocated to MSDI and the Environmental and Social Safeguards Unit of the Climate and Resilience Service.

<sup>5</sup> United Nations. 2012. [A Framework for Advancing Environmental and Social Sustainability in the United Nations System](#).  
<sup>6</sup> See Executive Director’s Circular OED2021/018, “[Establishment of the WFP environmental and social sustainability framework](#)”, which announces the adoption of the framework and provides hyperlinks to its various modules.  
<sup>7</sup> For information on environmental management systems see Executive Director’s circular OED2021/018, “Establishment of the WFP environmental and social sustainability framework”, [module 4](#).  
<sup>8</sup> Formerly the Programme – Humanitarian and Development Division, Climate and Disaster Risk Reduction Unit.



**Table 2: Expenditure for MSDI and the Environmental and Social Safeguards Unit, 2018–2024 (USD)**

|   | 2018    | 2019    | 2020    | 2021    | 2022                 | 2023    | 2024*   |
|---|---------|---------|---------|---------|----------------------|---------|---------|
| <b>MSDI</b>                                     | 169 410 | 271 706 | 419 839 | 773 366 | 988 442              | 935 778 | 593 551 |
| <b>Environmental and Social Safeguards Unit</b> | 59 922  | 434 340 | 318 196 | 457 717 | 140 779 <sup>9</sup> | 824 081 | 555 724 |

\* To end June 2024.

Source: WFP internal data from the Infrastructure and Facilities Management Branch and the Climate and Resilience Service.

**Evaluation conclusions and supporting findings**

10. The following section presents the five main conclusions of the evaluation and the findings that support them.

**Conclusion 1: Rationale and approach to environmental and social sustainability**

The policy sets out a clear rationale for taking a systematic approach to environmental and social sustainability. At the same time, WFP is laying strong foundations to better understand its environmental performance and inform decision making. However, WFP’s focus on applying the safeguards and EMS has detracted from the policy’s broader vision, objectives and principles, undermining the extent to which environmental and social sustainability is being addressed systematically across WFP.

- 11. **Policy consultation, vision and alignment with external and internal norms.** The design and implementation were and continue to be informed by consultations across WFP. The policy provides a clear, high-level vision of how to integrate environmental sustainability into the design and implementation of WFP operations. It contains a set of principles and objectives as a foundation for the organization’s efforts to improve environmental sustainability.
- 12. The policy reflects external factors such as United Nations system-wide commitments, the increasing priority given to environmental sustainability by national governments and pressure from donors to apply environmental standards.<sup>10</sup>
- 13. However, while the logic of the policy is generally clear, it has not been supported by a detailed theory of change or results framework setting out what the policy aims to achieve. The absence of these elements has meant that there is little detail regarding the operationalization of the policy’s vision and the achievement of results.
- 14. **WFP policy coherence.** The environmental policy is coherent with and refers to other relevant WFP policies; its own visibility in other WFP policies, however, is limited, despite the existence of commonalities and operational links. While supply chains are only mentioned briefly in the policy, the document catalysed efforts to understand the environmental footprint of WFP’s supply chain operations, which is now reflected in WFP’s 2024 supply chain environmental strategy.

<sup>9</sup> No information was available to explain the low expenditure of the Environmental and Social Safeguards Unit in 2022.

<sup>10</sup> For example, International Bank for Reconstruction and Development/World Bank. 2017. [The World Bank Environmental and Social Framework](#).

15. **Focus of policy implementation.** The tools selected to support policy implementation were relatively limited in scope and focus on quite specific aspects of environmental sustainability. For example, although safeguards and standards are applicable to “all [WFP] activities and operations,”<sup>11</sup> they are sharply focused on risk management rather than broader environmental sustainability considerations. Moreover, while the EMS is a high-level approach featuring principles for analysing and addressing environmental sustainability, its application has been narrow, restricted to in-house operations (WFP facilities management) rather than WFP operations such as logistics or food procurement, which often have a larger footprint.
16. The focus on and allocation of resources to safeguards and the EMS have led to these tools becoming synonymous with the policy. The divided institutional ownership of the policy has only strengthened that perception: the Climate and Resilience Service leads exclusively on safeguards, while MSDI leads exclusively on the EMS. Policy-related collaboration between MSDI and the supply chain function has been based on good interpersonal relationships, but there is no formal connection between them. The absence of a high-level lead or champion for the environmental policy may have undermined WFP's efforts to address environmental and social sustainability, and thus achieve the vision and objectives of the policy. Notwithstanding this, recent work on developing EPACK, led by MSDI, is helping to deepen the involvement of more operational areas (e.g. supply chain) in the implementation of the environmental policy.

**Conclusion 2: Integration of the social dimensions of sustainability**

The social dimensions of sustainability have not been adequately incorporated into policy implementation.

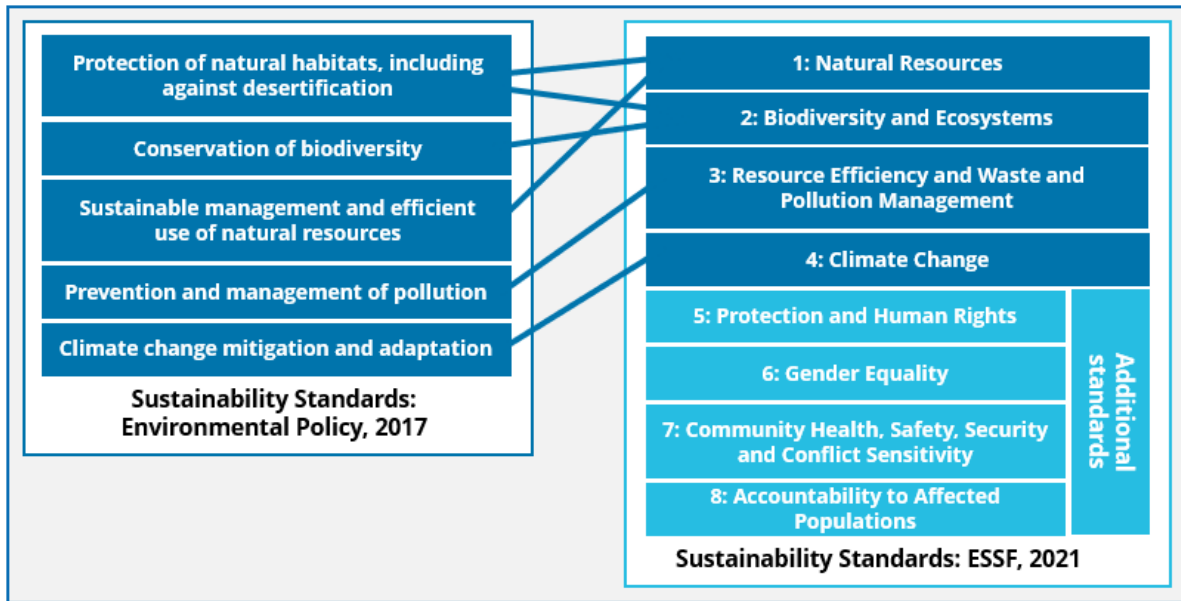
17. **Social sustainability standards.** The original policy did not adequately consider social sustainability or include analysis of gender, equality, disability or social inclusion considerations related to environmental sustainability, placing it at odds with the framework for advancing environmental and social sustainability in the United Nations system.<sup>12</sup> However, this was partly resolved through the ESSF, which introduced four social sustainability standards as part of its broader sustainability framework (see figure 2). This brought WFP's environmental and social sustainability and safeguards process into much tighter alignment with the standards and safeguards applied by other United Nations and multilateral bodies.
18. Beyond the introduction of safeguards, no strategic or practical direction was provided on how social sustainability should be incorporated into environmental policy responses and thus into the operationalization of the policy.

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<sup>11</sup> See paragraphs 37, 41 and 52, “[WFP environmental policy](#)” (WFP/EB.1/2017/4-B/Rev.1).

<sup>12</sup> United Nations Environment Programme. 2011. [A Framework for Advancing Environmental and Social Sustainability in the UN System](#).

**Figure 2: Comparison of standards identified in the 2017 Environmental Policy with standards adopted in the 2021 ESSF**



Source: Evaluation team analysis of the 2017 environmental policy and the environmental and social sustainability framework.

19. The absence of substantive guidance on environmental and social sustainability continues in the forthcoming EPACT. This limits the extent to which social sustainability is being addressed alongside environmental sustainability within WFP and risks WFP not making crucial connections between environmental management and its potential effects (positive and negative) on the people it serves. Thus, the policy's objective of ensuring that WFP is avoiding harm, in terms of environmental and social sustainability, through its interventions is in question. In addition, lack of attention to environmental and social sustainability could result in missed opportunities to maximize benefits and avoid or mitigate risks to affected people.

**Conclusion 3: Staffing and capacity for policy implementation**

The presence of policy-focused teams at headquarters, regional bureaux and country offices, including focal points, has been essential to achieving progress in implementing the policy. However, challenges with temporary staffing and limited resourcing have compromised the sustainability of the policy and its results.

20. **Resources, complementarity and accountability.** While the policy does not detail the institutional, human and financial resources required for implementation, the ESSF specifies the tools, processes, resources and institutional ownership needed to operationalize the policy. Important gaps remain, however, particularly with regard to funding sources; how the policy works alongside existing functions (e.g. supply chain, gender, protection and inclusion), tools (e.g. gender analyses, conflict-sensitivity principles) and accountability mechanisms for safeguards; and how non-compliance with safeguards would be addressed.

21. **Structures for implementation.** WFP has established structures for implementing both the safeguards and the EMS at the headquarters, regional bureau and country office levels. This institutional support, however, has been largely reliant upon consultants rather than staff. The recent organizational restructuring has reduced the number of regional advisers for both safeguards and the EMS by approximately 50 percent across the regional bureaux. Country offices identify focal points for safeguards and the EMS but the incumbents do not consistently have the required expertise, and they must take on these responsibilities alongside their other core tasks.

- 22. **Support to country offices.** For both safeguards and the EMS, a strong positive correlation was found between the extent of policy implementation by country offices and the level of support they received from headquarters and the regional bureaux. The inverse also tends to be true: where there has been limited headquarters and regional bureau support there has been limited policy implementation. Implementation is also dependent on country offices being able to identify sufficient new or existing resources. This has been challenging for country offices that are operating in increasingly resource-constrained environments.
- 23. **National government and cooperating partner capacity.** Government partners and NGO cooperating partners face the same resource, capacity and expertise limitations as WFP. Training has been undertaken with partners, but it has mostly been focused on safeguards and associated screening processes. Stakeholders reported that training and support provided by WFP has been helpful, but a lack of in-country capacity, specifically the absence of firms or consultants with the requisite technical experience, remains a constraint. Limited resources and capacity and the steep learning curve required to integrate environmental sustainability hinder the systematic implementation of safeguards. However, the vast majority of governments and cooperating partners appreciate the value of safeguards and support WFP's efforts to establish a safeguards system that aligns with their own principles and accountability requirements.

**Conclusion 4: Achievement of policy results**

While efforts to meet the five environmental policy objectives are still at an early stage, some progress has been made towards each objective. The evaluation identified challenges to the achievement of results such as inconsistent application of safeguards and the limited scope of the EMS. Existing policy monitoring, however, does not provide an adequate basis for fully assessing WFP's progress against the policy's objectives.

- 24. An overview of progress towards the five objectives of the environmental policy is presented in table 3. Further details are set out in conclusions 4a and 4b.

**Table 3: Summary assessment of progress against environmental policy objectives**

| Policy objective   | Summary assessment of progress against objective  |
|--|---|
| 1: Progressively enhancing the environmental sustainability of activities and operations, improving efficiency and outcomes over time  | The EMS approach has helped to enhance the environmental sustainability of WFP facilities. However, it has not been applied beyond facilities to cover more substantial aspects of WFP operations such as logistics or food procurement.  |
| 2: Protecting the environment and preventing pollution by managing risks and maximizing the environmental opportunities of all activities and operations                             | A safeguards system has been established to support risk management, but it is not being applied consistently or systematically, nor is it being applied to all WFP activities.   |
| 3: Minimizing the carbon footprint and increasing the resource-efficiency of operations and facilities management, particularly the management of materials, water, energy and waste | While the EMS is resulting in reduced carbon intensity and increased resource efficiency of WFP facilities, it has not been applied to operations to address the greenhouse gas emissions of WFP's broader work. The Supply Chain and Delivery Division is working on better understanding WFP's operational carbon footprint and resource usage. |

**Table 3: Summary assessment of progress against environmental policy objectives**

| Policy objective  | Summary assessment of progress against objective  |
|---|---|
| <p><b>4:</b> Aligning WFP’s approach to environmental sustainability with global standards and good international practice, including in donors’ policies and expectations</p>  | <p>Both the safeguards and the EMS are reasonably well aligned with relevant global standards and practices. However, there are some gaps in the standards applied by safeguards system, and donors have raised concerns about the inconsistent application of safeguards across WFP.</p> |
| <p><b>5:</b> Strengthening the understanding and capacities of national governments, cooperating partners, suppliers and, particularly, beneficiary communities in planning and implementing sound activities for food security and nutrition</p> | <p>Although WFP has trained partners on safeguards, there has been no systematic, externally focused capacity development or awareness raising about environmental or social sustainability as they relate to WFP operations.</p>   |

**Conclusion 4a: Application of safeguards**

It is too early to determine the extent to which WFP’s safeguards have enhanced the environmental and social sustainability of its programming. WFP has designed a safeguards model that is generally consistent with models applied by other entities. However, its implementation has been limited and unsystematic, which, given the need to comply with donor requirements, could limit WFP’s ability to maintain existing – and access new – funding streams.

25. **Adoption of the international financial institutions model.** WFP’s use of safeguards as part of its approach to environmental sustainability is aligned with the model used by international finance institutions (IFIs) and climate funds and therefore constitutes an advanced framework for considering environmental sustainability aspects of programmes. However, the IFI safeguards model is designed for development activities rather than the humanitarian and emergency responses that comprise the majority of WFP’s work. This suggests that the IFI model may not fit the full range of WFP’s programming.
26. WFP is distinct from other United Nations agencies in not adopting standalone standards for labour, land acquisition, displacement and resettlement and cultural heritage. This may impede WFP’s ability to manage social and environmental risks and could pose funding and reputational risks for WFP.
27. **Environmental and social sustainability results.** It is too early to assess the results or influence of the safeguards process on the environmental and social sustainability of WFP activities. Currently the extent of implementation varies across and within countries. However, the evaluation found that WFP activities are yielding results relevant to environmental and social sustainability aligned with (rather than driven by) the vision of the policy; these are often by-products of the activities. Examples of positive environmental and social sustainability results related to the policy at the country office level are presented in box 2.

**Box 2: Examples of environmental and social sustainability related results**

- Water conservation in the implementation of resilience programming (Ghana)
- Emissions reductions due to more efficient supply chains and a shift to single annual procurements (Namibia)
- Use of agricultural waste in biogas production (Egypt)
- Reduced packaging waste through reverse logistics supply chains (Kenya)
- Promotion of solar energy and fuel-efficient cooking technologies in school meal programming (Guatemala)

28. Country offices applying safeguards reported that the requirement to apply a structured screening process pushed them to consider sustainability risk in a deliberate, systematic manner, thereby improving the environmental and social risk management of their activities.
29. **Implementation challenges in applying safeguards to the full spectrum of WFP interventions.** Country strategic plans (CSPs) provide an entry point for environmental and social sustainability risk assessment. While post-2021 CSPs respond consistently to the ESSF on paper, the practical application of safeguards during CSP implementation varies considerably.
30. The evaluation found that only 3 of the 11 country offices analysed were making substantive progress towards a systematic, CSP-wide approach to applying safeguards as envisaged by the ESSF. For example, the Yemen country office appointed two safeguard focal points for environmental and social standards, respectively. Other country offices had started taking a similar approach to mainstreaming environmental and social sustainability risk assessment, but this work was still at a preliminary stage during the evaluation period.
31. Even where the evaluation found a more consistent approach to mainstreaming the safeguards, there were gaps in coverage. In the country offices that are more advanced in this work, safeguards are largely applied to long-term development activities (such as community asset building and smallholder agricultural development) rather than the emergency responses that constitute the majority of their work.
32. This includes country offices where there are active emergency responses. Indeed, WFP's emergency activation protocol,<sup>13</sup> which guides the organization's emergency responses, does not refer to the ESSF or safeguards. Insufficient direction and guidance on where and how safeguards should be incorporated into WFP's activity design and implementation processes creates a particularly consequential gap for emergency operations; the perception that the process is disproportionate or inappropriate for some contexts is widespread.
33. The challenge of integrating safeguards is common to other organizations, in particular those institutions working in emergency settings. Some described the application of safeguards in humanitarian and emergency situations or in fragile contexts as challenging. Others were taking a voluntary approach to safeguard implementation.
34. **Management prioritization.** Staff report that there has been little pressure from senior management to apply safeguards. The limited convening power of the Environmental and Social Safeguards Unit and its position within WFP's organizational structure have also sometimes been interpreted as a signal that safeguards are not a programmatic priority. The reported low priority given to safeguards by senior management is linked to the absence of accountability mechanisms to support or encourage compliance with the safeguard requirements. There are no internal consequences for the failure to apply safeguards.
35. **Donor requirements for safeguards.** The implementation of safeguards has helped to meet donor requirements and supported risk management. Indeed, meeting donor safeguard

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<sup>13</sup> Executive Director's circular on WFP's emergency activation protocol (OED2023/003).

requirements has been a prerequisite for some funding agreements, such as that with the German Development Bank, which in 2023 provided almost USD 100 million, and with the World Bank for activities (within the evaluation country sample) in Afghanistan, Madagascar and Yemen. Since donor requirements to apply safeguards are increasing and becoming more stringent,<sup>14</sup> access to many funding streams will be increasingly dependent on the existence of a safeguards system capable of meeting donor requirements.

#### **Conclusion 4b: Implementation of environmental management systems**

WFP's approach to its EMS is well-structured, generally aligns with global best practices and is yielding early positive results. However, the approach does not consider social sustainability and the work has only covered a small part of WFP's overall environmental footprint. There are opportunities for WFP to further engage with partners and governments to leverage WFP's work on environmental management systems.

36. **EMS implementation and results.** WFP has taken an incremental approach to its EMS, but human and financial capacity has meant that progress has been uneven, as has the degree to which regional bureaux and country offices have prioritized and implemented EMS.
37. The EMS approach has nevertheless helped to enhance the environmental sustainability of WFP facilities, improving things such as waste management and energy efficiency at the office level. Examples of positive environmental and social sustainability results linked to country office implementation of the EMS are shown in box 3.

#### **Box 3: Examples of country office results of EMS implementation**

- **Emissions reductions and cost savings** in Mali due to the ongoing solarization of facilities
- **Energy and cost savings** in Nicaragua due to the switch from fluorescent to LED lighting
- **Reduced waste generation** in Kyrgyzstan due to recycling and promotion of changes in staff behaviour
- **Reduced water usage** in Kenya due to wastewater recycling and rainwater harvesting
- **70 percent reduction in plastic bottle use** in Yemen through the use of water dispensers
- **Paper use reduction** in Namibia through staff engagement and behaviour change promotion

38. Reporting through the United Nations "Greening the Blue" initiative, while covering only a small portion of WFP's environmental footprint,<sup>15</sup> demonstrates a positive trajectory for WFP's environmental performance. Although total CO<sub>2</sub> emissions increased between 2017 and 2022,<sup>16</sup> emissions per staff member are trending slightly downward, while waste generation has decreased by 70 percent as a result of improved waste management in accordance with the environmental policy and the EMS tools and resources established under the policy.
39. **Missed opportunities.** The evaluation identified several missed opportunities to achieve results through the EMS:

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<sup>14</sup> For example, new requirements from the World Bank require the integration of components such as land acquisition and cultural heritage risks.

<sup>15</sup> Greening the Blue applies the [Greenhouse Gas Protocol](#) for emissions tracking, including what the protocol terms [Scope 1 and Scope 2 emissions, plus Scope 3 business travel emissions](#). Scope 3 emissions include indirect emissions from activities upstream and downstream of an organization (e.g. emissions from suppliers, transportation of goods and use of the organization's products).

<sup>16</sup> From 80,036 to 108,014 metric tons of carbon dioxide equivalent. United Nations Environment Programme. [Greening the Blue – WFP data page](#).

- Currently the application of the EMS excludes large-scale operational activities such as supply chain operations, food procurement and logistics. These areas are substantial sources of emissions, and expanding the EMS to include them would align with the policy's goal of minimizing environmental impact.
  - The focus on internal operations has led WFP to miss opportunities to engage with external partners and governments for collaborative efforts in relation to sustainability that could significantly reduce its environmental footprint (e.g. through partner-operated facilities such as warehouses).
  - Moreover, the EMS does not address or consider social sustainability as part of environmental management, although some country offices have identified EMS measures that successfully address both environmental and social sustainability, such as combining gender considerations with staff well-being and occupational health in the design of and access to sanitary facilities in Kenya. However, these efforts have been undertaken independently, in the absence of any high-level corporate guidance.
40. **Comparative performance on EMS.** The evaluation found WFP to be a positive outlier in its approach to its EMS compared to its peer organizations. The environmental policy and the ESSF give the organization's approach more structure, standardization and rigour than was evident in other organizations. It was particularly notable that WFP is the only organization identified that is seeking to comply with International Standards Organization standard 14001. This represents good progress against the policy commitment of having an EMS consistent with this international benchmark.

**Conclusion 5: Policy monitoring and reporting framework**

Policy monitoring processes are inadequate. They do not measure progress effectively and are not capable of supporting policy related decision making. However, other mechanisms – most notably, “Greening the Blue” and the forthcoming EPACT – provide a sound basis upon which to build future monitoring.

41. **ESSF monitoring and reporting.** Some processes have been established within the ESSF to contribute to corporate monitoring and reporting, assess compliance and maintain regular monitoring and oversight. This includes a new requirement for WFP annual country reports to incorporate an environment section describing environmental and social sustainability outcomes. However, these broader results are not reported against a consistent structure or shared metrics and therefore cannot be aggregated. Moreover, reported results are invariably positive examples, with challenges or gaps rarely identified. The EMS is reported on in more detail than are safeguards.
42. **Corporate indicators.** The ESSF sets out two cross-cutting indicators and three management key performance indicators (KPIs) for environmental reporting (table 4), which focus exclusively on the implementation of safeguards and the EMS.

**Table 4: Corporate Results Framework cross-cutting indicators and management KPIs identified in ESSF**

|                        |                   |  |
|------------------------|-------------------|--|
| <b>Cross-cutting</b>   | <b>Safeguards</b> | Proportion of field-level agreements, memorandums of understanding and construction contracts for CSP activities screened for environmental and social risks |
|                        | <b>EMS</b>        | Percentage of WFP operations implementing the EMS  |
| <b>Management KPIs</b> |                   | Percentage of countries reporting on greenhouse gas emissions  |
|                        |                   | Percentage of countries reporting on waste management  |
|                        |                   | Percentage of countries reporting on water management  |

*Source:* Environmental and social sustainability framework.



43. The two indicators provide limited information for understanding policy-related contributions and results, since they track activities and outputs relating to safeguards and the EMS rather than providing a basis for measuring broader progress against the policy's objectives. The impact of the policy on the environmental sustainability of WFP's work is therefore not being effectively monitored or reported.
44. **Wider monitoring and reporting.** The EPACT under development has the potential to improve policy monitoring because it has key elements of a results framework, such as activities, milestones, targets and impacts. The EPACT also encompasses work on environmental sustainability being undertaken by WFP and its partners beyond the areas currently covered through the safeguards and EMS tools.
45. WFP's input into "Greening the Blue" also provides a stronger basis for tracking and understanding some aspects of progress made in implementing environmental policy, although it gathers no substantive data on social sustainability.

## Recommendations

| # | Recommendation  | Rationale   | Responsibility  | Deadline            |
|---|---|---|---|---------------------|
| 1 | <b>Recommendation 1: WFP should establish a stronger approach and governance structure to ensure that environmental and social sustainability are systematically addressed across the organization.</b>   | Safeguards and the EMS are essential components of a comprehensive approach to environmental and social sustainability. However, these two tools have dominated policy implementation: the broader policy intent and the policy's applicability to other aspects of WFP operations have been somewhat lost. At the same time, work on supply chain sustainability being carried out by the Supply Chain and Delivery Division (SCD) has the potential to demonstrate the relevance of the policy to WFP's broader operations and to offer tools for improving decision making regarding environmental sustainability. While collaboration between the current policy owners and SCD has been strong (particularly on the development of the environmental plan of action), it has been based on good interpersonal relationships, and there is no formal connection between the SCD Sustainability Unit, the EMS function and the broader policy implementation process. The informality of this relationship risks undermining the policy. | Lead: Deputy Executive Director<br>Support: Management Services Division (MSD), Programme Policy and Guidance Division (PPG), SCD | Fourth quarter 2025 |
|   | <b>Sub-recommendation 1.1:</b> Complementing existing WFP policies, the environmental policy should be revised to reflect the updated framing, structures and conceptual approaches for environmental and social sustainability.  | At the country office level, the quality and extent of safeguard and EMS implementation are strongly correlated with the level of resources and technical support that the country office receives. Where resources and technical support are not available, there tends to be little or no progress on implementing safeguards and EMS.  | Lead: PPG<br>Support: MSD, SCD, Gender, Protection and Inclusion Service (PPGG)   | Fourth quarter 2026 |
|   | <b>Sub-recommendation 1.2:</b> WFP should establish a sustainability unit responsible for – at a minimum – safeguards and environmental management system (EMS), along with the sustainability functions performed by the Supply Chain and Delivery Division (SCD). Guided by a high-level champion (at the level of Deputy Executive Director or Assistant Executive Director), the unit should take the organizational lead on ensuring the operationalization of the environmental policy (including subsequent revisions) and the mainstreaming of sustainability across WFP. | Consistent with broader moves across the United Nations system, the ESSF extended the scope of the policy to encompass both environmental and social  | Lead: Programme Operations Department (PO)<br>Support: MSD, PPG, SCD  | Fourth quarter 2025 |
|   | <b>Sub-recommendation 1.3:</b> WFP should make it a priority to identify stable resourcing models for the sustainability unit. This should include – but not be restricted to – a “lift and shift” model, whereby existing resources for safeguards, EMS and the SCD sustainability unit are  |   | Lead: PO<br>Support: MSD, PPG, SCD  | Fourth quarter 2025 |

| # | Recommendation   | Rationale  | Responsibility   | Deadline            |
|---|--|--|--|---------------------|
|   | retained and redeployed to the newly formed sustainability unit.   | sustainability. However, this was not accompanied by the substantive involvement of relevant offices at WFP and – in practice – social sustainability has only been addressed to a very limited extent.  |  |                     |
|   | <p><b>Sub-recommendation 1.4:</b> The ESSF should be reviewed and revised as needed to support WFP's efforts to address environmental and social sustainability by providing practical guidance for all operations. This should include the following, as required:</p> <ul style="list-style-type: none"> <li>➤ References and guidance for applying tools and analyses developed by SCD, PPGG and other relevant units.</li> <li>➤ Guidance on incorporating environmental and social sustainability considerations into country strategic plans and activity design and implementation</li> </ul> |  | Lead: PO<br>Support: MSD, PPG, SCD, PPGG                                 | Fourth quarter 2025 |
|   | <p><b>Sub-recommendation 1.5:</b> WFP's forthcoming strategic plan should reflect the organization's strengthened approach to environmental and social sustainability by including social dimensions in its framing of environmental sustainability as a cross-cutting priority.</p>   |  | Lead: PO<br>Support: PPG, SCD, PPGG                                      | Third quarter 2025  |
| 2 | <b>Recommendation 2: WFP leadership should ensure that safeguards are applied across all country strategic plan activities.</b>  | Although WFP has tools in place to support the safeguard system, the inconsistent and unsystematic rollout of safeguards is a function of multiple shortcomings, including limited leadership and messaging, the limited convening power of the Environmental and Social Safeguards Unit, weak accountability mechanisms and gaps in activity-specific guidance and technical expertise. | Lead: PO   | Second quarter 2026 |
|   | <p><b>Sub-recommendation 2.1:</b> WFP's safeguards system should be strengthened through the following measures:</p> <ul style="list-style-type: none"> <li>• Establish an accountability mechanism that incentivizes and ensures the application of safeguards across all country strategic plan activities with a view to mitigating reputational risk and establishing access to new funding streams.</li> </ul>  |  | Lead: PPG<br>Support: Programme Cycle and Quality Unit (POCQ), HRM, PPGG | Second quarter 2026 |

| # | Recommendation  | Rationale   | Responsibility   | Deadline            |
|---|---|---|--|---------------------|
|   | <ul style="list-style-type: none"> <li>Develop a process that requires activity managers to ensure adherence to relevant safeguards before interventions are approved.</li> <li>Clarify where and how other WFP expertise (e.g. gender analysis) could be used or must be used during safeguard screening processes.</li> </ul>   |   |  |                     |
|   | <p><b>Sub-recommendation 2.2:</b> WFP should develop mechanisms that give greater priority to and tailor the safeguards system so that it is better aligned with WFP's mandate and operating model. In particular, WFP should:</p> <ul style="list-style-type: none"> <li>Explore whether, how and in what contexts tailored safeguards processes could be applied: this should include clearly defined thresholds for applying any streamlined processes.</li> <li>Develop a road map for analysing and identifying where safeguards would be feasible in WFP's emergency operations. This should include establishing whether – and if so, what – thresholds should be applied. WFP should consider undertaking this research in coordination with other humanitarian actors that are facing similar challenges. Consideration should be given to involving donors in this research, with a view to improving their understanding of the barriers to applying safeguards during emergency responses.</li> </ul> |   | Lead: PPG<br>Support: PPGE, Emergency Coordination Service | Second quarter 2026 |
| 3 | <b>Recommendation 3: Improve the extent to which environmental and social sustainability is addressed by the EMS and broaden the application of the EMS.</b>  | The EMS is well-structured, reflects best practice and is delivering results. These early achievements could be built on by broadening the scope of the EMS so that | Lead: MSD<br>Support: SCD, PPG                             | Fourth quarter 2026 |

| # | Recommendation  | Rationale  | Responsibility   | Deadline           |
|---|---|--|--|--------------------|
|   | <b>Sub-recommendation 3.1:</b> EMS documentation and guidance (including the environmental and social sustainability framework) should be screened to identify opportunities for incorporating social sustainability considerations into the design of the EMS and into the ESSF itself.  | both environmental and social sustainability are formally addressed. There are opportunities for WFP to further engage with partners and governments to leverage WFP’s work on environmental management systems in line with WFP strategic outcome 5 (Humanitarian and development actors are more efficient and effective). | Lead: MSD<br>Support: PPGG   | Fourth quarter2025 |
|   | <b>Sub-recommendation 3.2:</b> WFP should develop protocols and guidance for engaging and supporting partners (including the landlords of facilities leased by WFP, vendors, governments and cooperating partners) in the application of the EMS.   |  | Lead: MSD<br>Support: SCD, PPGG  | Fourth quarter2025 |
| 4 | <b>Recommendation 4: Strengthen the monitoring of environmental and social sustainability across WFP.</b>   | Policy monitoring processes have not allowed WFP to measure progress and do not generate the depth of evidence needed to support policy related decision making.   | Lead: PPG  | Third quarter2025  |
|   | <b>Sub-recommendation 4.1:</b> The CRF indicator, “proportion of FLAs/MOUs/CCs that have been screened for environmental and social sustainability risks”, should be reformulated to capture all activity management agreements (including those activities directly managed by WFP). Complementary qualitative indicators/processes should also be developed to track the rollout of safeguards. The EMS would also benefit from additional reporting focused on qualitative progress. |  | Lead: PPG<br>Support: MSD, Analysis, Planning and Performance Division (APP) | Third quarter2025  |
|   | <b>Sub-recommendation 4.2:</b> WFP should develop a monitoring framework capable of measuring WFP’s work on environmental and social sustainability, including the results achieved.  |  | Lead: MSD<br>Support: PPG, SCD, PPGG, APP                                    | Third quarter 2025 |

**Acronyms**

|       |   |
|-------|---|
| CSP   | country strategic plan                            |
| EMS   | environmental management system                   |
| EPACT | environmental plan of action 2030                 |
| ESSF  | environmental and social sustainability framework |
| IFI   | international finance institution                 |
| KPI   | key performance indicator                         |
| MSDI  | Infrastructure and Facilities Management Branch   |

# 1. Introduction

1. The following report documents the independent evaluation of the World Food Programme's (WFP) (2017) Environmental Policy.<sup>17</sup> The evaluation was commissioned by the Office of Evaluation (OEV) in November 2023, and has been produced by an external evaluation team.

## 1.1 EVALUATION FEATURES

2. In line with other WFP policy evaluations, the evaluation of WFP's Environmental Policy worked towards two overarching objectives:
  - **Accountability:** The evaluation assessed the quality of the policy and the results achieved. This included the consideration of guidance and activities that were rolled out to support the policy's implementation.
  - **Learning:** The evaluation identified reasons why the policy's expected changes have or have not occurred, drew lessons from the policy's implementation to date, and considered its continued relevance in today's context. It also identified good practices and learning, from both within and outside of WFP, in order to inform WFP's approaches to environmental and social sustainability.
3. To address these objectives, the evaluation applied the following three headline evaluation questions (EQs), all of which are standard for WFP policy evaluations:
  - **EQ1:** How good is the Environmental Policy?
  - **EQ2:** What are the results of the Environmental Policy on WFP's programme activities and management operations?
  - **EQ3:** What factors have enabled or hindered the implementation and achievement of the policy objectives?
4. The evaluation's design, conduct, analysis and reporting also ensured that results and processes related to the environmental policy were assessed through the lens of gender equality and women's empowerment (GEWE). For the purposes of this evaluation, this approach was widened to consider gender, equality,<sup>18</sup> disability and social inclusion (GEDSI) issues.
5. Building on the evaluation's terms of reference (TOR) and with the support of OEV, the evaluation's design was developed by the evaluation team during an inception phase, which ran from December 2023 to February 2024. The main data collection phase then took place between May and July 2024.
6. The evaluation aims to inform the work of key groups of internal and external WFP stakeholders. It will be especially relevant to the WFP operational units that have been closely involved in the implementation of the Environmental Policy. These units include the following:
  - the Climate and Resilience Service (PPGR; previously the Climate and Disaster Risk Reduction Programmes Unit (PROC)), which is within the Programme Policy and Guidance Division (PPG; previously the Programme Humanitarian and Development Division (PRO));
  - the Infrastructure and Facilities Management Branch (MSDI) of the Management Service Division (MSD).<sup>19</sup>
7. The evaluation is equally relevant to the many staff members based in the country offices and regional bureaux who have taken on roles relating to two of the most visible policy-driven tools: the

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<sup>17</sup> "Environmental Policy" (WFP/EB.1/2017/4-B/Rev.1\*).

<sup>18</sup> Recognizing the importance of promoting equity as a means to achieve gender equality, the evaluation adopted an equity lens throughout.

<sup>19</sup> At the time of the policy's adoption in 2017, MSD's equivalent was RMM (MSDI's equivalent was RMMI), and PPG was OSZ (PPGR's equivalent was OSZIR).

Environmental Management System (EMS) and the Environmental and Social Safeguards (herein referred to as Safeguards). The evaluation also aims to be useful to the Supply Chain and Delivery Division (SCD; previously Supply Chain Operations Division), given the recent extensive work on environmental sustainability undertaken by the Sustainable Supply Chain team within the Strategic Engagement Branch. The evaluation's results may also be of interest to external stakeholders, especially the donors, governments and external cooperating partners that WFP works with on environmental and social standards and sustainability.

## 1.2 CONTEXT

8. The Environmental Policy identified a number of external and internal contextual factors that have driven WFP's approach to environmental sustainability and the development of the policy itself:
  - an increasing recognition of the interdependencies between food and nutrition security, land productivity, healthy ecosystems and the sustainable use of natural resources;
  - a growing evidence base on the environmental impacts (positive and negative) that humanitarian and development activities can have on natural resources and, in turn, on the security, livelihoods and wellbeing of the people that depend on those natural resources;
  - the progressive mainstreaming of environmental sustainability within development and humanitarian activities, driven largely by international agreements – from the 1972 United Nations Conference on the Human Environment to the 2030 Agenda for Sustainable Development and its associated Sustainable Development Goals (SDGs);
  - the tensions between addressing immediate emergency needs and long-term environmental and social sustainability considerations; and
  - the guidance and requirements placed on WFP by United Nations-wide strategies and normative frameworks, such as the *Framework for Advancing Environmental and Social Sustainability in the United Nations System*<sup>20</sup> and the *Strategy for Sustainability Management in the United Nations System*.<sup>21</sup>
9. All of the above contextual factors were central to the policy's evolution. However, the evaluative process has revealed nuances in some of the above factors and a number of additional contextual considerations that have been important in the evaluation.

### **External context**

10. The policy's development and its ongoing roll-out were – and continue to be – substantially influenced by international standards and normative frameworks. In particular, there has been an increasing degree of alignment between donor, development and United Nations agency approaches to environmental risk management. These developments have included the World Bank's early work on Safeguards in the late 1990s, which drove the development of the International Finance Corporation's (IFC's) 2006 Performance Standards. This, in turn, provided a standard model that many other donors and agencies adopted and applied to their own work. The World Bank's most recent update to their approach towards Safeguards (as codified

#### **Box 1: What are Safeguards?**

A Safeguards system is a set of principles, standards, processes and tools that help to identify, avoid and/or mitigate the environmental and social risks associated with an intervention. Their application helps to limit any potentially negative impacts that an intervention may have on people, communities and/or the natural environment. They can also help to identify opportunities for enhancing positive impacts, but can also reveal trade-offs that need to be considered.

<sup>20</sup> UNEMG. 2012. *A Framework for Advancing Environmental and Social Sustainability in the United Nations System*.

<sup>21</sup> CEB. 2019. *Strategy for Sustainability Management in the UN System 2020-2030 Phase I*. CEB. 2021. *Strategy for Sustainability Management in the UN System 2020-2030 Phase II*.



in their 2017 *Environmental and Social Framework*,<sup>22</sup> updated in 2022 and 2023) has become the new model for others to replicate. A central development during all this work has been the evolution of safeguard standards and processes that fully incorporate both environmental and social considerations into sustainability risk management. In this regard, the *Common Approach to Environmental and Social Standards in UN Programming*<sup>23</sup> has been particularly influential for WFP.

11. External frameworks have similarly influenced WFP's approach to resource efficiency and EMS. The standard ISO 14001: 2015 from the International Standards Organization (ISO) represents a global benchmark for EMS,<sup>24</sup> and WFP's Environmental Policy indicates that its approach will be consistent with this standard.<sup>25</sup> However, other external frameworks also have an influence on – or are relevant to – WFP's EMS-focused work. The most notable of these are: the guidance from the Directorate General for European Civil Protection and Humanitarian Aid Operations (DG ECHO) on the minimum environmental requirements and recommendations for EU-funded humanitarian aid operations;<sup>26</sup> and the Sphere standards and guidelines.<sup>27</sup>

#### Box 2: What is an EMS?

An environmental management system (EMS) is an approach used to identify, manage, monitor and control the environmental performance of an organization's facilities and operations. It is also used to identify specific measures that can generate positive environmental benefits: for example, improved waste management approaches, processes to reduce water consumption, or opportunities to reduce fossil fuel usage. The tool arose from the British Standards Institute in the early 1990s and was primarily aimed at corporate (manufacturing and service) organizations, but since then has been adopted more widely.

12. Another central influence on WFP's work on environmental sustainability has been the broader United Nations system's approach and requirements, most notably through the 2007 *Strategy for a Climate-Neutral United Nations*,<sup>28</sup> following which WFP started calculating and reporting its emissions. The subsequent *Strategy for Sustainability Management in the United Nations System 2020–2030*<sup>29</sup> set several objectives and targets for the United Nations system, concerning issues such as reductions in greenhouse gas (GHG) emissions, sustainable waste management and wastewater reduction. In order to manage and understand their performance against these objectives, United Nations agencies are also required to develop the requisite monitoring systems for each objective. The strategy and its requirements have been a central driver for WFP's work on environmental sustainability, including the extensive work undertaken to develop a GHG emissions baseline for WFP, to calculate the organization's carbon footprint, and – alongside other United Nations agencies – to publicly disclose WFP's environmental metrics through the annual *Greening the Blue Report*.<sup>30</sup> The 2020 United Nations Joint Inspection Unit's *Review of Mainstreaming Environmental Sustainability across Organizations of the United Nations system*<sup>31</sup> has placed further pressure on WFP (and indeed other United Nations agencies) to strengthen their approach to environmental sustainability. Other standards that have been influential on aspects of WFP's sustainability-focused work have included the International Civil

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<sup>22</sup> World Bank. 2017. *The World Bank Environmental and Social Framework*. Updates in 2022 and 2023 provided further focus on strengthening national management systems and grievance mechanisms.

<sup>23</sup> UNEMG. 2019. *Moving towards a Common Approach to Environmental and Social Standards for UN Programming*.

<sup>24</sup> ISO. 2015. [ISO 14001:2015](#).

<sup>25</sup> "Environmental Policy" (WFP/EB.1/2017/4-B/Rev.1\*), page 19, para 43.

<sup>26</sup> DG ECHO. 2022. 'Guidance on the operation of the minimum environmental requirements and recommendations for EU-funded humanitarian aid operations'.

<sup>27</sup> Sphere, 2018. *The Sphere Handbook – Humanitarian Charter and Minimum Standards in Humanitarian Response*.

<sup>28</sup> UNEMG. 2007. *Strategy for a Climate-neutral UN*.

<sup>29</sup> CEB. 2019. *Strategy for Sustainability Management in the United Nations System 2020-2030*.

<sup>30</sup> UNEP. 2022. *Greening the Blue Report 2022*. UNEP. 2023. *Greening the Blue Report 2023*.

<sup>31</sup> Joint Inspection Unit. 2020. *Review of Mainstreaming Environmental Sustainability across Organizations of the United Nations system*.

Aviation Organization's (ICAO's) environmental protection standards<sup>32</sup> and the International Maritime Organization's (IMO's) standards and regulations.<sup>33</sup>

### **Internal context**

13. WFP's internal context also needs to be taken into account when considering the policy and its implementation. Approved in 2017, WFP's Environmental Policy superseded its 1998 policy entitled *WFP and the Environment*.<sup>34</sup> In line with the external context described above, the 2017 policy stated that a central justification for the renewal was that "global and internal developments since [1998] make it necessary to revisit this approach [to environmental sustainability] and align it with WFP's Strategic Plan ... and current international and United Nations standards".<sup>35</sup> The 2017 policy also acknowledged that the framework established by the 1998 document "was under-resourced and inconsistently applied".<sup>36</sup> While the 1998 policy was never formally evaluated by WFP, these justifications for a renewed policy appear logical, and, by 2017, some aspects of the 1998 policy were noticeably dated – for example, it contained no reference to climate change or GEDSI.
14. However, there is a degree of continuity between the successive policies, with some shared principles, analyses and themes. Both documents were motivated by a recognition of the interdependency between food security, environmental health and people's livelihoods, and both acknowledged that a focus on environmental sustainability is valid for both development and humanitarian-focused operations. The earlier policy also advocated for the use of certain processes and tools, which were in their infancy in 1998 but which, by 2017, had evolved to become well-established, widely applied approaches, underpinned by international frameworks. Notably, the 1998 policy identified an emerging trend of donors requiring "routine screening of proposed development projects to estimate the probable type and magnitude of potential adverse impacts and to ensure that people's coping mechanisms are safeguarded". It went on to advise that WFP place "greater attention to incorporating systematic review procedures into activity identification and programme design".<sup>37</sup> Separately, the policy also recommended that WFP "promote environmental stewardship within its operations at headquarters and in the field by adopting environmentally-responsible procurement and recycling".<sup>38</sup> The 2017 policy necessarily updated the earlier analysis and guidance to reflect the trends, processes and normative frameworks that were pre-eminent at that time. However, many of the 2017 policy's elements were usefully prefigured by the 1998 document.
15. The increasing weight that WFP has placed on environmental sustainability – including a shift towards environmental and social sustainability – is reflected in the progression of WFP's strategic plans. The 2014–2017 Strategic Plan<sup>39</sup> only contained a limited discussion on environmental sustainability. For example, Strategic Goal 2 referenced "sustainable livelihoods",<sup>40</sup> but not explicitly in the context of environmental sustainability. However, it became a more prominent theme within the 2017–2021 Strategic Plan.<sup>41</sup> This plan both confirmed the intention to present a policy on "environmental impact"<sup>42</sup> within the strategic period and linked environmental and social sustainability within WFP's core values, principles and standards. Most significantly, however, the 2022–2025 Strategic Plan then

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<sup>32</sup> ICAO. Environmental Protection. <https://www.icao.int/environmental-protection/Pages/default.aspx> (accessed on 9 December 2024).

<sup>33</sup> IMO. Marine Environment. <https://www.imo.org/en/OurWork/Environment/Pages/Default.aspx> (accessed on 9 December 2024).

<sup>34</sup> "WFP and the Environment" (WFP/EB.3/98/3).

<sup>35</sup> "Environmental Policy" (WFP/EB.1/2017/4-B/Rev.1\*), page 3, para 2.

<sup>36</sup> Ibid., page 7, para 27.

<sup>37</sup> "WFP and the Environment" (WFP/EB.3/98/3), page 5, para 11.

<sup>38</sup> Ibid., page 12, para 26.

<sup>39</sup> "WFP Strategic Plan (2014–2017)" (WFP/EB.A/2013/5-A/1).

<sup>40</sup> Ibid., page 14, para 32.

<sup>41</sup> "WFP Strategic Plan (2017–2021)" (WFP/EB.2/2016/4-A/1/Rev.2\*).

<sup>42</sup> Ibid., page 18, para 31.

established “environmental sustainability”<sup>43</sup> as one of just four cross-cutting priorities, which “represent commitments that WFP has made to maximize programme effectiveness”.<sup>44</sup>

16. A central influence on all of WFP’s current work and decision making is the funding environment. When the Environmental Policy was approved in 2017, it was funded largely through non-core funding sources. When environmental sustainability became a cross-cutting priority for WFP in 2022, core funding was allocated through management services but not through all divisions tasked with implementing the policy.<sup>45</sup> As noted during WFP’s 2023 Partnership Consultation, increasing numbers of vulnerable people, rising food costs and reduced funding have all contributed to “WFP [facing] the largest funding gap recorded in [its] 6-decade history”, with only 36 percent of funding requirements secured for 2023, compared with 66 percent for 2022, compounding a pre-existing funding shortfall.<sup>46</sup> The consequent increased pressure on resources inevitably influences strategies, priorities and decisions, including on the extent to which new policy tools and guidance can be operationalized. Of particular relevance to this evaluation is that, at the time of writing, no funding beyond 2024 had been secured for the Headquarters Safeguards Unit.
17. Another critical internal consideration is WFP’s related and ongoing restructuring process. Initiated in 2023, this has included changes to the responsibilities and institutional locations of some key evaluation stakeholders. The relevant changes to date have included the relocation of supply chain operations to the Programme Operations Department and the expansion of the Gender Equality Office to include the Gender, Protection and Inclusion Service, as well as restructuring at the regional bureau level.
18. One further relevant internal development is that a revision process was being undertaken for both WFP’s Climate Change Policy and Resilience Policy at the same time as this evaluation. While the Environmental Policy has linkages to multiple other WFP policies, the linkages with the climate change and resilience policies are particularly close. Fortunately, the revision process was at a sufficiently developed stage to enable this evaluation to analyse the extent to which the Environmental Policy is aligned with the two (draft) policy revisions.

### Key definitions

19. Some key terms and concepts of direct relevance to the evaluation are not formally defined within WFP documentation. For the purposes of this evaluation – and based on the evaluation’s document review – the following definitions have been applied:

**Table 1: Key definitions**

|  |  |
|--|--|
| <b>Environmental benefit</b>                   | A measurable, positive effect (outcome or impact) on the environment, climate, ecosystems, biodiversity and/or natural resources. Benefits can be intended or unintended, and can be local, national, regional or global in scale. |
| <b>Environmental and social sustainability</b> | A state in which the demands placed on the environment can be met without reducing its capacity to allow all people to live well, now and in the future. <sup>47</sup>   |

<sup>43</sup> “WFP Strategic Plan (2022–2025)” (WFP/EB.2/2021/4-A/1/Rev.2), page 34.

<sup>44</sup> Ibid., page 31, para 89.

<sup>45</sup> Key informant interviews.

<sup>46</sup> WFP. 2023. *Strategic Roundtable on Looming Food Crises, Annual Partnership Consultation 2023*. “Annual Performance Report 2023” (WFP/EB.A/2024/4-A/Rev.1).

<sup>47</sup> For the purposes of the evaluation, environmental and social sustainability are conceptualized together. The idea that environmental and social sustainability are interrelated aspects of sustainability is affirmed in the *Strategy for Sustainability Management in the United Nations System 2020–2030*. The Strategy responds to the United Nations Chief Executive Board’s request to develop a “comprehensive sustainability strategy” that encompasses a “fuller picture of environmental and social sustainability in United Nations system policies, programming and support functions”. See: CEB. 2019. *Strategy for Sustainability Management in the United Nations System 2020–2030*, page 5, para 19 and page 22, para 60(b).

|                             |   |
|-----------------------------|---|
| <b>Do no harm</b>           | A principle that policies and interventions should not cause adverse (negative) effects on the environments in which they operate or the populations they aim to assist.                |
| <b>GEDSI considerations</b> | The extent to which an intervention analyses how gender, equality, disability and social inclusion can be taken into account and addressed during the intervention design and delivery. |

Source: Elaborated by the evaluation team.

### 1.3 SUBJECT BEING EVALUATED

20. WFP's 2017 Environmental Policy established five objectives and seven guiding principles that aim to support WFP's consideration and integration of environmental sustainability across all its operations (Tables 2 and 3).

**Table 2: Environmental policy objectives**

| The policy aims to support WFP and its partners in: |  |
|---|--|
| <b>1</b>  | Progressively enhancing the environmental sustainability of activities and operations, thus improving efficiency and outcomes over time  |
| <b>2</b>  | Protecting the environment and preventing pollution by managing risks and maximizing the environmental opportunities of all activities and operations  |
| <b>3</b>  | Minimizing the carbon footprint and increasing the resource-efficiency of operations and facilities management, particularly the management of materials, water, energy and waste  |
| <b>4</b>  | Aligning WFP's approach to environmental sustainability with global standards and good international practice, including in donors' policies and expectations  |
| <b>5</b>  | Strengthening the understanding and capacities of national governments, cooperating partners, suppliers and, particularly, beneficiary communities in planning and implementing sound activities for food security and nutrition |

Source: "Environmental Policy" (WFP/EB.1/2017/4-B/Rev.1\*).

**Table 3: Environmental policy guiding principles**

|  |   |
|--|---|
| <b>Systematic consideration of the environment</b> | Systematically seek to understand correlations between healthy local ecosystems and livelihoods   |
| <b>Global requirements</b>                         | Take into account local regulatory context as well as relevant international treaties, global standards and United Nations requirements                                     |
| <b>Mitigation hierarchy</b>                        | Avoid, minimize, mitigate and remediate adverse environmental impacts of food assistance activities and in-house operations   |
| <b>Sustainable consumption</b>                     | Engage local communities in protection and sustainable use of natural resources, increasing awareness of the linkages between healthy ecosystems and food security          |
| <b>Precautionary approach</b>                      | Take measures to prevent potential impacts, even when some cause-and-effect relationships are not fully established   |
| <b>Life-cycle thinking</b>                         | Take into account the full life-cycle of an activity or operation, from acquisition or generation of raw materials to delivery, use, repair, maintenance and final disposal |
| <b>Continual improvement</b>                       | Identify opportunities to improve environmental performance and resource efficiency, and design actions that are scalable over time   |

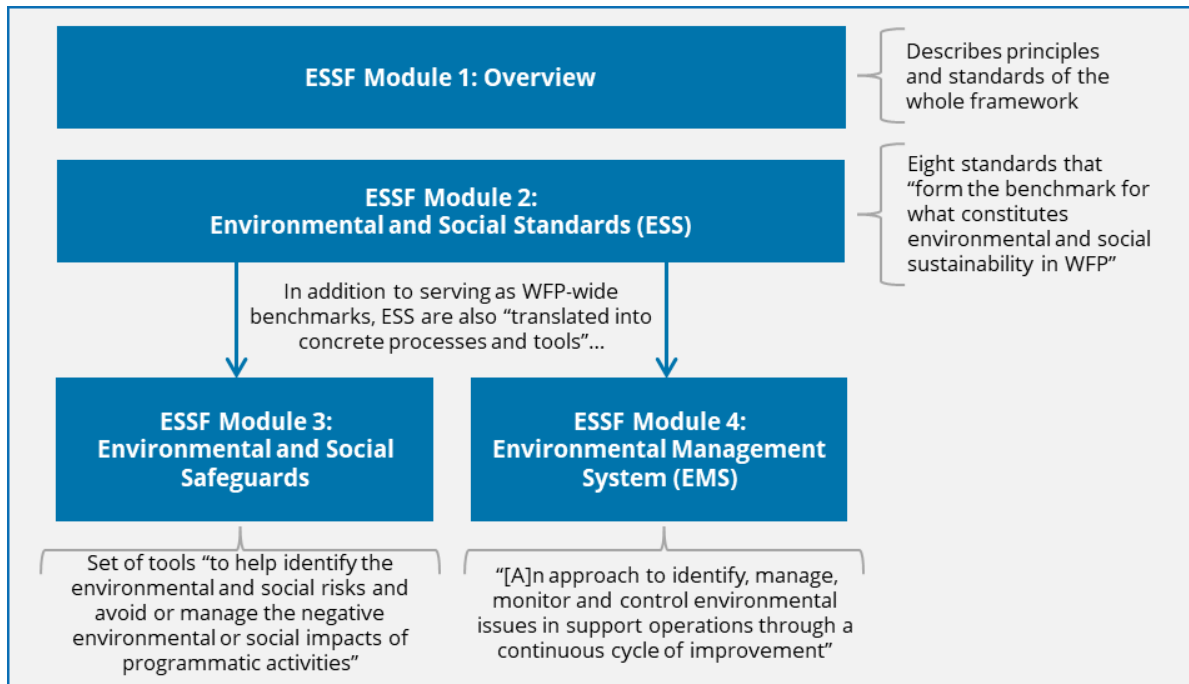
Source: Adapted by evaluation team from "Environmental Policy" (WFP/EB.1/2017/4-B/Rev.1\*).

21. These overarching objectives and principles are intended to guide all WFP operations. However, the policy also establishes a set of tools to directly support the operationalization of the policy and to explicitly align the policy with the *United Nations Framework for Environmental and Social Sustainability*. In the 2017 policy, these tools were identified as: (1) **environmental standards**; (2) **environmental risk screening and categorization**; and (3) **the EMS**. The tools' nomenclature and scope have evolved

since the policy's approval. The policy also describes the piloting and roll-out phases for these tools, including the testing and development of processes, guidance and training.

22. Following a series of pilot processes, the tools anticipated by the policy were formalized and fully specified within the 2021 **Environmental and Social Sustainability Framework (ESSF)**. Through the Executive Director's Circular OED2021/018, the ESSF was confirmed as: "WFP's principal framework to increase the environmental and social sustainability of its programme activities, support operations,<sup>48</sup> and interactions with partners as an integral part of WFP's normative framework."<sup>49</sup> The ESSF comprised an overview module and three operational modules, which correspond to the three tools identified within the 2017 policy.<sup>50</sup>

**Figure 1: Overview of the ESSF**



Source: WFP's ESSF 2021 Module 1-4.

23. The ESSF establishes the following components for the Safeguards system:
- There is the need for a strategic assessment of the environmental and social risks in countries where CSPs are being developed.
  - The screening of programme activities for environmental and social risk is needed, to systematically assess the risks during the activity design and prior to approving agreements with implementing partners – specifically field level agreements (FLAs), memorandums of understanding (MOUs) or construction contracts (CCs). If a programme activity is not implemented through these modalities, it needs to be screened at the level of the implementation plan. The screening determines whether the intervention is low risk, medium risk or high risk.

<sup>48</sup> The policy refers to in-house operations, with subsequent documents often referring to support operations. In this report, the term 'in-house operations' is predominantly used unless direct reference is made to a document that uses a different term.

<sup>49</sup> WFP. 2021. *Executive Director's Circular – Establishment of the WFP Environmental and Social Sustainability Framework* (OED2021/018), page 1, para 4.

<sup>50</sup> WFP. 2021. *Environmental and Social Sustainability Framework Module 1*. WFP. 2021. *Environmental and Social Sustainability Framework Module 2*. WFP. 2021. *Environmental and Social Sustainability Framework Module 3*. WFP. 2021. *Environmental and Social Sustainability Framework Module 4*.

- In the case of a medium-risk intervention, an environmental and social management plan (ESMP) needs to be prepared. In the case of a high-risk intervention, an environmental and social impact assessment is needed prior to the preparation of an ESMP.
  - An ESMP should set out the necessary management and mitigation measures and how they will be implemented.
24. Module 4 on the EMS defines the scope of the EMS, its objectives, roles and responsibilities, and provides guidance for country-level implementation, corporate reporting mechanisms, awareness-raising and training, a communications strategy and a review cycle.
  25. Aside from detailing the 2017 policy's three tools, the ESSF also confirmed institutional ownership, with the Executive Director's circular noting that the MSDI and the Climate and Disaster Risk Reduction Service (PROC; now PPGR) take responsibility for maintaining and updating the ESSF. In practice, the PPGR has led the development of the environmental and social standards (ESS) and Safeguards streams, and continues to oversee them, while MSDI fulfils the same role for the EMS stream. The ESSF also allocated WFP-wide roles and responsibilities for policy implementation, including new advisers based in the regional bureaux for both Safeguards and EMS.
  26. Since the Environmental Policy's approval in 2017, a critical development has been the explicit incorporation of social dimensions within the ESSF. The policy acknowledges the broader trend of humanitarian and development actors adopting environmental and social safeguards, particularly in the context of the *Framework for Advancing Environmental and Social Sustainability in the United Nations System*. However, the policy also states that it "focuses on environmental sustainability, **complementing** existing WFP policies and practices related to social sustainability"<sup>51</sup> (emphasis added), and the policy only indicates the development of "environmental standards" and strategies for managing "environmental risk", so environmental and social standards or risks are never explicitly referenced.
  27. The 2021 Executive Director's circular that operationalized the ESSF confirmed that, "in line with UN-wide practice, the scope of the standards and tools envisaged by the 2017 Environmental Policy has been expanded to cover also social sustainability,"<sup>52</sup> and that the ESSF and its underlying standards are now "WFP's principal framework to increase the environmental and social sustainability of its programme activities, support operations, and interactions with partners as an integral part of WFP's normative framework".<sup>53</sup> The incorporation of social dimensions is further explained in an Environmental Policy implementation update submitted to the Executive Board in 2022: "Early in [the policy tool testing] phase, WFP management decided to develop and adopt environmental and social standards (rather than environmental standards only) ... this aligned WFP with common practices in other United Nations entities' agencies and with the requirements of WFP's multilateral donors."<sup>54</sup> This shift is exemplified by comparing the sustainability standards that were envisaged in the 2017 policy with the standards adopted throughout the 2021 ESSF (Figure 2).

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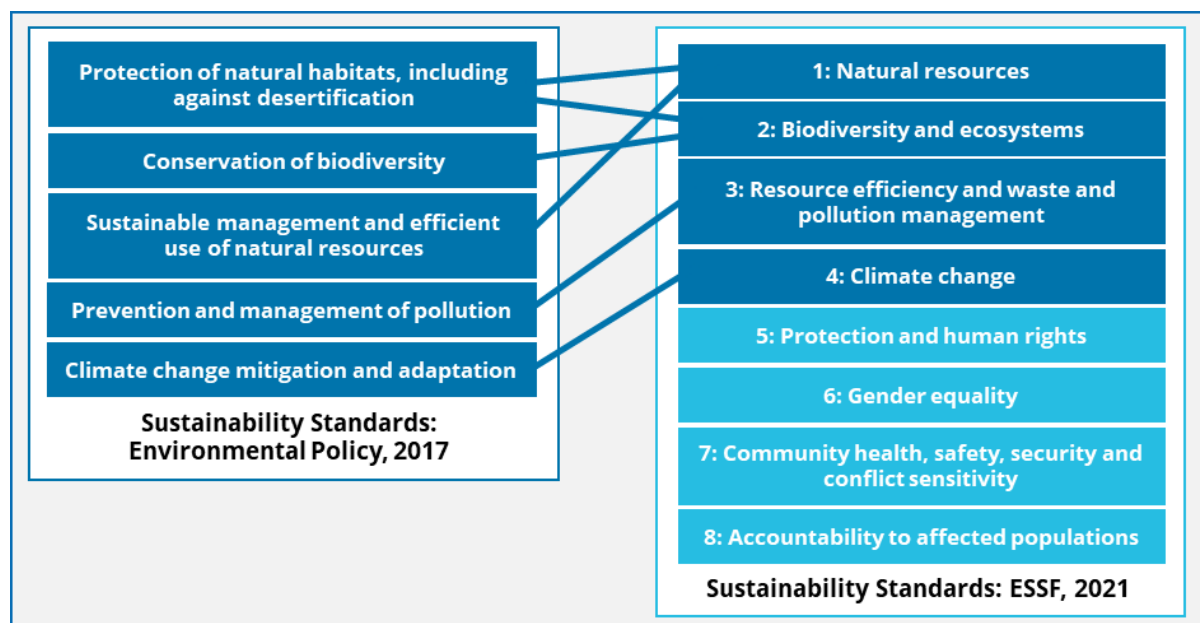
<sup>51</sup> "Environmental Policy" (WFP/EB.1/2017/4-B/Rev.1\*), page 9, para 4.

<sup>52</sup> WFP. 2021. *Executive Director's Circular – Establishment of the WFP Environmental and Social Sustainability Framework* (OED2021/018), page 1, para 2.

<sup>53</sup> *Ibid.*, page 1, para 4.

<sup>54</sup> WFP. 2022. *Update on the Implementation of the 2017 Environmental Policy: Background paper*, page 3, para 7.

**Figure 2: Comparison of standards identified in the 2017 policy with standards adopted in the 2021 ESSF**



Source: Elaborated by the evaluation team based on: WFP. 2017. "Environmental Policy" (WFP/EB.1/2017/4-B/Rev.1\*). WFP. 2021. Environmental and Social Sustainability Framework. Environmental Policy

28. The 2017 policy and the ESSF contain passing references to supply chain activities, but the potential role or contribution of supply chain activities to policy implementation is not developed in detail. However, a notable development in WFP's 2022–2025 Strategic Plan is that, alongside the policy's tools of Safeguards and EMS, the environmental sustainability cross-cutting priority "also includes supply-chain-related actions, such as shortening supply chains, adopting innovations in transport modalities, using sustainable packaging, organizing systems for collecting packaging waste and reducing material consumption at source".<sup>55</sup> The strategic plan's emphasis on this third strand of work focused on environmental sustainability work is aligned with operational realities. The SCD has allocated resources (finance and personnel) to establish a team directly tasked with measuring and improving supply chain sustainability, including the development of a supply chain environmental strategy,<sup>56</sup> and a strategic approach to the environmental and social governance (ESG) of supply chain operations.<sup>57</sup> WFP also participates in the Logistics Cluster WREC<sup>58</sup> Coalition project, which seeks to increase sustainability in humanitarian supply chains (the evaluation had limited engagement with this team and area of work).
29. More recently, MSDI has been leading the development of the WFP's Environmental Plan of Action 2030 (EPACT), which "builds on the principles, standards and tools described in [the ESSF] and the Supply Chain [ESG] Strategy".<sup>59</sup> Although awaiting final approval, the draft document compiles multiple commitments relating to environmental sustainability from divisions and operations across WFP. The plan identifies targeted impacts, milestones and actions to be taken, along with lead responsibilities for those actions. It serves as a valuable reference point for the current and planned sustainability-focused work being undertaken by WFP operations, beyond just MSDI, PPGR and SCD.

<sup>55</sup> "WFP Strategic Plan (2022–2025)" (WFP/EB.2/2021/4-A/1/Rev.2), page 34, para 102.

<sup>56</sup> WFP. 2024. *WFP Supply Chain Environmental Strategy*.

<sup>57</sup> WFP & Accenture. 2023. *Supply Chain ESG Strategy and Roadmap*.

<sup>58</sup> Waste Management Measuring, Reverse Logistics, Environmentally Sustainable Procurement and Transport, and Circular Economy.

<sup>59</sup> WFP. forthcoming. *WFP Environmental Plan of Action 2030*, draft report.

30. In terms of resources, Module 1 of the ESSF provides a detailed outline of the roles and responsibilities required to deliver the ESSF; this includes the roles that will be fulfilled by MSDI and PPGR staff, and the identification of new roles such as advisers based in regional bureaux for both Safeguards and EMS. Country office focal points are also being identified for both Safeguards and EMS, whereby an existing staff member will take on the Safeguards/EMS role alongside their existing responsibilities. By July 2024, out of 85 countries with a WFP country office, 57 country offices had identified Safeguards focal points and 56 country offices had identified EMS focal points.
31. Neither the policy nor the ESSF included a costed implementation plan; however, since 2017 funding for policy and ESSF implementation has been secured through sources such as the Programme Support and Administrative Budget, the Strategic Resource Allocation Committee and the Critical Corporate Initiative for the mainstreaming of cross-cutting priorities into WFP operations. Table 4 presents the 2018–2024 expenditures for MSDI and the ESS Unit within PPGR (previously PROC). These figures include staffing and travel costs, so represent good proxies for the volume of resources allocated at headquarters for the implementation of the two main policy tools: EMS (managed by MSDI) and Safeguards (managed by PPGR).

**Table 4: 2018–2024 expenditure for MSDI and ESS Unit within PPGR**

|          | 2018      | 2019      | 2020      | 2021      | 2022        | 2023      | 2024*     |
|----------|-----------|-----------|-----------|-----------|-------------|-----------|-----------|
| MSDI     | \$169,410 | \$271,706 | \$419,839 | \$773,366 | \$988,442   | \$935,778 | \$593,551 |
| ESS Unit | \$59,922  | \$434,340 | \$318,196 | \$457,717 | \$140,779** | \$824,081 | \$555,724 |

\* To the end of June 2024.

\*\* No information was available to explain the ESS Unit's low expenditure in 2022

Note: \$ refers to USD.

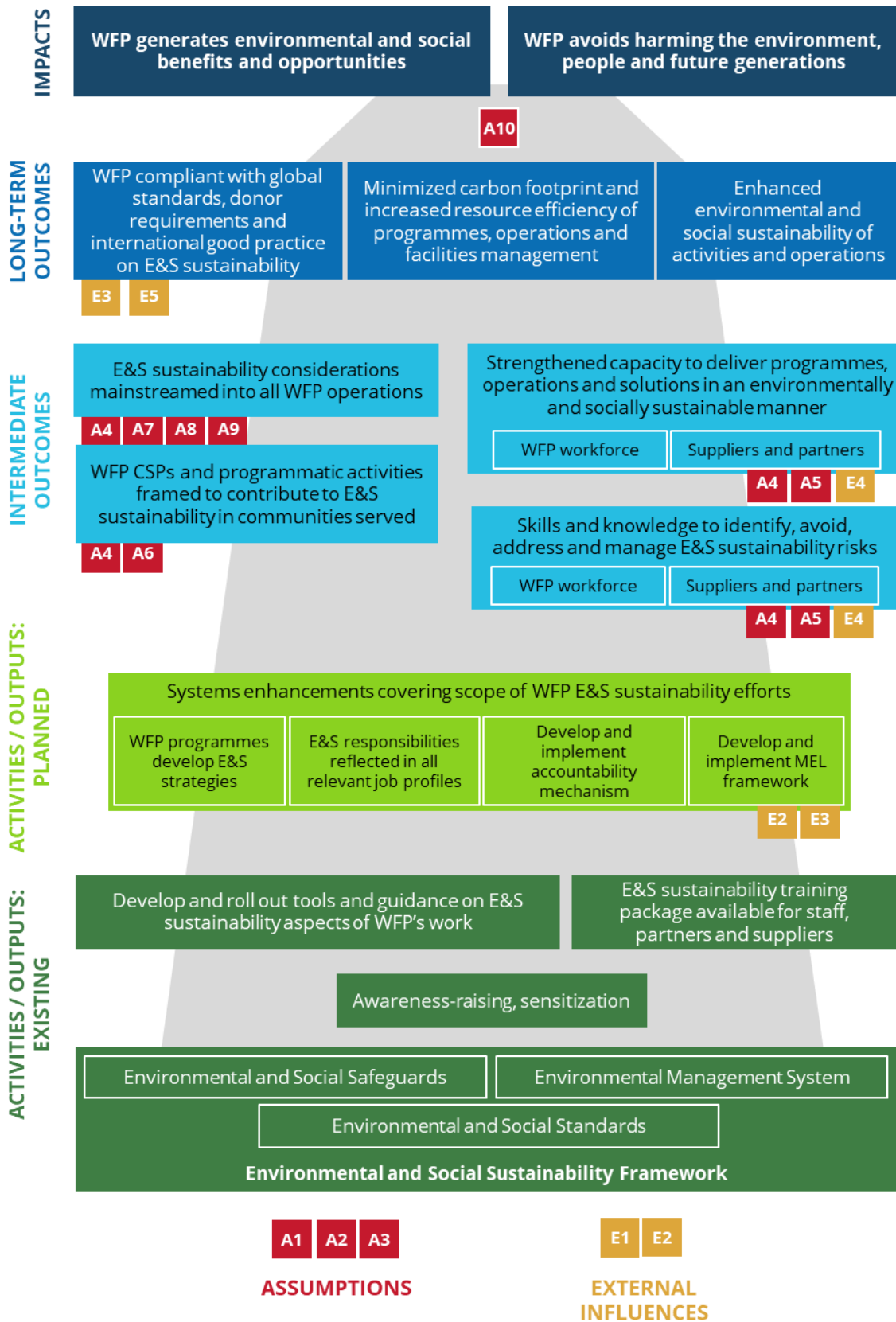
Source: WFP internal data from MSDI and PPGR.

### **Theory of change**

32. A theory of change (TOC) was not developed for the original Environmental Policy. However, for the purposes of this evaluation, a TOC was developed through a participative process involving many of the policy's key stakeholders. Crucially, the TOC reflects relevant current and proposed activity, rather than the policy as it stood in 2017. It represents WFP's efforts to become more sustainable now and in the near future, and acts as a TOC for more than the Environmental Policy itself. The TOC comprises a main diagram (Figure 3), which expresses the policy's results chain from activities through to intended impact. Tables 5 and 6 then list the TOC's underlying assumptions and the main external influences on the TOC. The evaluation used these various elements to build a granular understanding of the Environmental Policy's progress and results, and of the influence of external factors and stakeholders on the policy and the policy's interaction with them. An assessment of progress against the TOC is presented in Annex IV.



Figure 3: WFP Environmental Policy TOC



Source: Elaborated by the evaluation team

**Table 5: WFP Environmental Policy TOC – assumptions**

| ASSUMPTIONS |   |
|-------------|---|
| A1          | Support is available to enable policy implementation (for example, communications and leadership/management support).   |
| A2          | Resources are available to support policy implementation.   |
| A3          | The social component of environmental sustainability is acknowledged and integrated across WFP (for example, within strategic plans, CSPs, annual performance reports (APRs)).  |
| A4          | WFP can engage with external stakeholders on approaches to environmental and social sustainability (for example, governments, partners and suppliers).  |
| A5          | External stakeholders have the authority, resources, capacity and political will to implement environmental and social sustainability standards and principles in their systems and programmes.   |
| A6          | Policy guidance, tools and templates are integrated in all WFP programme areas.   |
| A7          | WFP programmes, activities and in-house operations adopt the policy's environmental and social principles and standards.  |
| A8          | CSPs reflect the policy's requirements.   |
| A9          | The Environmental Policy is fully aligned with – and supports the delivery of – relevant objectives within other related WFP policies (e.g. climate change policy, gender policy, resilience policy).                                       |
| A10         | Work focused on environmental sustainability is also being undertaken and results are being delivered through programmes and operations that are aligned with the policy, but which may not have been explicitly spelled out in the policy. |

Source: Elaborated by the evaluation team based on the TORs.

**Table 6: WFP Environmental Policy TOC – external influences**

| EXTERNAL INFLUENCES |  |
|---------------------|--|
| E1                  | Governments/donors: policies, politics and interests                   |
| E2                  | Funding entities: standards and requirements                           |
| E3                  | United Nations policies and reporting frameworks; normative frameworks |
| E4                  | Partners and suppliers: capacity and capabilities                      |
| E5                  | International standard-setting bodies                                  |

Source: Elaborated by the evaluation team based on the TORs.

## 1.4 METHODOLOGY, LIMITATIONS AND ETHICAL CONSIDERATIONS

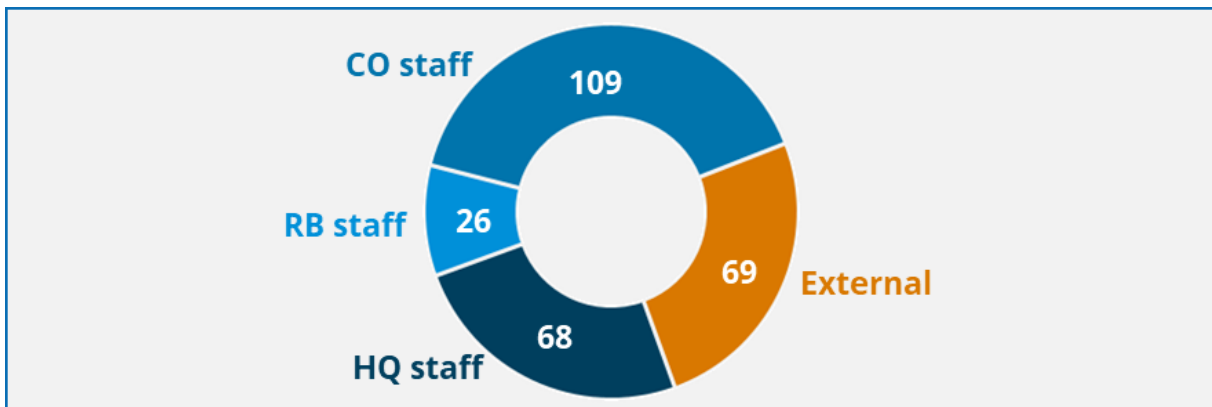
33. The evaluation was designed and undertaken to address a series of evaluation questions and sub-questions; an evaluation matrix (Annex V) identifies how each question was addressed, including data sources and analysis tools.
34. To address the questions, the evaluation used a **theory-based approach** as its overarching framework. Theory-based evaluations are particularly appropriate for assessing complex situations, such as policy implementation, where there are multiple pathways, multiple incentives, and multiple internal and external interactions and influences.
35. Within the overarching framework of a theory-based approach, data collection and analysis were organized through two core components. First, a **policy architecture and implementation** component, focused on gathering and analysing data relating to the approach, results and progress of the two primary policy tools (EMS and Safeguards). Second, a component which looked at **wider approaches to environmental and social sustainability**, gathering data on WFP operations that are beyond the immediate policy tools of EMS and Safeguards, but which still have relevance to the Environmental Policy and its aims. The data collection and analysis were strengthened by three

supporting components: external lessons, cost efficiency and GEDSI support (Annex III presents further detail on the evaluation methodology).

### Data collection tools

36. The primary data collection tools were country studies, a documentation review, semi-structured interviews and focus group discussions.
- Much of the data were gathered through 11 **country studies**, which comprised 6 country visits (Egypt, Ghana, Kenya, the Kyrgyz Republic, Namibia and Nicaragua) and 5 'desk review plus' studies (Afghanistan, Guatemala, Madagascar, Mali and Yemen). The studies were based on a purposive sample of country offices, as is standard practice for most WFP policy evaluations. The sample was developed to comprise a balance of regions, contexts and operational factors, as well as the maturity of the Environmental Policy's roll-out.
  - An extensive **document review** was undertaken over the course of the evaluation. This included documentation from the headquarters, regional bureau and country office level, along with relevant external literature. The evaluation's external lessons component also reviewed relevant strategies, policies and evaluations across other United Nations and multilateral agencies. The evaluation's bibliography is presented in Annex XVI.
  - In total, 272 individuals were **interviewed** during the evaluation, including WFP staff at the headquarters, regional bureau and country office level, and individuals from 36 external institutions, including cooperating partners, government departments and other United Nations, multilateral and donor agencies. A breakdown of the interviewee groups is presented in Figure 4, with a more detailed categorization of the interviewees presented in Annex XV. A further 56 individuals – primarily those assisted by WFP interventions – were involved in 6 **focus group discussions**.

Figure 4: Breakdown of evaluation interviewees



Source: Elaborated by the evaluation team.

37. The triangulation of the data and findings was assured through periodic analysis sessions, whereby the evaluation team collectively identified common themes arising across the various evaluation components and tools. Equally, these sessions helped to identify evidence and data gaps, which supported the development of new lines of enquiry for the evaluation. At the end of the data collection phase, the evaluation team also facilitated two emerging findings briefings with WFP staff. These briefings provided an opportunity to validate and refine the evaluation's emerging findings, and to identify remaining gaps in the evidence base.

## **Scope**

38. The scope of the evaluation was global. While most of the focus was on assessing the implementation and results of the policy, the ESSF and its associated tools (EMS and Safeguards), the evaluation also looked beyond the direct implementation of the tools established in the policy and the ESSF, in order to understand the breadth of work being undertaken across WFP on environmental and social sustainability. This helped the evaluation to build an understanding of the extent of the influence of the policy, but also of what other drivers or barriers have influenced WFP's approach to environmental and social sustainability.
39. The Environmental Policy – and particularly the ESS – focuses on several themes that are covered by other WFP policies, such as climate change, gender, and accountability to affected populations (AAP). This evaluation did not assess any other WFP policies, but it did assess the coherence of the Environmental Policy in relation to other policies, including the interaction between the Environmental Policy's processes and tools and any processes and tools applied through other policies.
40. The evaluation covered the period from February 2017 (when the policy was approved) to mid-2024 (when the evaluation's data collection concluded).

## **Limitations and mitigations**

41. The evaluation was set against a backdrop of reducing resources for WFP as well as an ongoing organizational restructuring process. This has been a challenging time for WFP and its staff, with several key evaluation stakeholders being directly affected by the restructuring. Despite these uncertainties and the corresponding pressures on WFP teams and staff, the evaluation team was consistently impressed by the depth and objectivity of engagement from all WFP interviewees: ultimately, the ongoing organizational and personal challenges did not compromise the quality of the data collection.
42. The evaluation's inception report noted that a comprehensive cost-efficiency analysis of the policy would be challenging, given data limitations and the considerable diversity in WFP approaches to environmental and social sustainability. Instead, an evaluation supporting component was designed to undertake a limited cost-efficiency analysis within only one country, with the aim being to identify lessons for other WFP countries, rather than generalizable findings for the evaluation. However, limitations in the consistency, depth and availability of relevant data meant that a comprehensive cost-efficiency analysis was not possible. Nevertheless, the process of attempting the cost-efficiency analysis has still yielded valuable insights and helped to triangulate some of the evidence and findings developed through other evaluation components.
43. Due to data limitations and the relatively recent operationalization of the tools (2021), results from the implementation of the policy on the ground are only just emerging and have therefore been challenging to evaluate. This was particularly the case for assessing the policy objectives relating to Safeguards, and to capacity development. The lack of data is consequentially a central finding of the evaluation.
44. Data on gender and other groups of people that WFP work with (e.g. disabled, indigenous people) were uneven, and the GEDSI analysis drew predominantly from gender data. However, while data were not evenly representative of all groups, this has not affected the overall findings of the report.

## **Ethical considerations**

45. The evaluation conformed to the United Nations Evaluation Group's (UNEG) 2020 ethical guidelines. During the evaluation, this included: ensuring informed consent; protecting the privacy, confidentiality and anonymity of stakeholders; ensuring cultural sensitivity; respecting the autonomy of participants; ensuring the fair recruitment of participants (including women and socially excluded groups); and ensuring that the evaluation did no harm to the participants or their communities.

## 2. Evaluation findings

### 2.1 EQ1: HOW GOOD IS THE ENVIRONMENTAL POLICY?

#### SUMMARY OF FINDINGS

WFP's Environmental Policy (2017) provides a good guiding intention, set of principles and objectives as a foundation for the organization's efforts to improve environmental sustainability. The subsequent and supporting ESSF provides some well-developed key tools for policy implementation (Safeguards and EMS), but this has skewed focus and effort towards these tools and away from some of the key organizational environmental impact areas (e.g. supply chain) and wider aims and intentions of the policy (e.g. ensuring do no harm across all activities). This supporting framework also came four years after the policy and this affected progress on policy implementation. The policy's design involved a broad consultation across WFP (although wider consultation with social cadres, particularly for the ESSF, would have been beneficial), and practical testing of the Safeguards and EMS tools.

Environmental and social sustainability are intrinsically linked, especially in the humanitarian contexts in which WFP works. For example, people in vulnerable situations are often highly dependent on scarce natural resources in humanitarian settings, and WFP and its partners, and those they assist, have a direct interaction and impact on the local environment through operations and daily access. The Environmental Policy is weak in terms of making this connection between environmental and social sustainability. The ESSF brought this much more to the fore, with the elaboration of environmental and social standards, but this was then poorly 'cascaded' down to the implementation elements (e.g. the EMS). This weakness means that WFP risks not making crucial connections between environmental management and its potential effects (positive or negative) on target populations. As a result, the policy's objective of ensuring that WFP is avoiding harm, in terms of environmental and social sustainability, through its interventions is in question. In addition, a lack of attention to environmental and social sustainability could result in missed opportunities to maximize benefits (e.g. income generation and health benefits from more abundant and thriving natural resources).

In terms of implementation, the policy lacked a sufficient summary of key 'asks' or minimum requirements for staff, and particularly leadership – leaving too much to selection and interpretation. There were also gaps in the identification of sufficient funding sources and specifying links to existing functions and activities/tools (e.g. social accountability tools). Both the policy and the ESSF have lacked sufficient follow-up and advocacy from senior leadership in particular, resulting in varied impressions of the policy's relevance and import. This has been compounded by flawed and insufficient monitoring measures and a lack of enforced accountability mechanisms.

In terms of practice elsewhere, many multilateral organizations are following a more holistic 'sustainability policy' now, which integrates social and institutional aspects much more robustly, and usually incorporates the environment and climate change. Often such policies are separate from the Safeguards process. Other organizations have less well articulated operational environmental management arrangements (relative to WFP's EMS).

46. Prior to considering the findings on policy quality in detail, Table 7 presents a headline assessment of the policy and the ESSF against WFP policy quality criteria.<sup>60</sup> For each criterion, the 2017 Environmental

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<sup>60</sup> Criteria based on: "WFP Policy Formulation" (WFP/EB.A/2011/5-B). WFP. 2018. *Evaluation Top 10 Lessons*. WFP. 2020. *Synthesis of Evidence and Lessons from WFP's Policy Evaluations 2011–2019*.

Policy was first assessed on its own. A second assessment then considered both the policy and the 2021 ESSF in combination, taking into account the additional substance and direction that the ESSF introduced. The full assessment is presented in Annex XIV.

**Table 7: Assessment of the policy and ESSF against standards for policy quality<sup>61</sup>**

| Criteria for policy quality   | Policy   | Policy and ESSF |
|---|----------|-----------------|
| 1. Presence of a clear conceptual framework   | Met      | Met             |
| 2. Presence of a context analysis to ensure timeliness and relevance                            | Met      | Met             |
| 3. Based on reliable evidence   | Met      | Met             |
| 4. Ensures internal and strategic coherence   | Partial  | Partial         |
| 5. Ensures external coherence   | Moderate | Met             |
| 6. Develops a vision and a TOC  | Partial  | Partial         |
| 7. Defines its scope of activities and priorities   | Partial  | Met             |
| 8. Integrated gender equality, disability and social inclusion considerations                   | Not met  | Partial         |
| 9. Policy development is based on internal consultations  | Moderate | Moderate        |
| 10. Outlines clear institutional arrangements and defines accountabilities and responsibilities | Not met  | Moderate        |
| 11. Identifies the financial and human resources required for its implementation                | Not met  | Partial         |
| 12. Presence of a robust results framework (e.g. targets and milestones)                        | Not met  | Not met         |
| 13. External dissemination took place   | Moderate | Moderate        |

Extent to which criteria met:

Not met

Partial

Moderate

Met

Source: Elaborated by the evaluation team.

### 2.1.1 EQ1.1: How good is the policy's content?

#### Finding 1 | Policy vision, objectives and principles are clear and well aligned with external context but only partly addressed by selected tools

The policy provides a clear, high-level vision for WFP's approach to environmental sustainability, with the aim of the policy further elaborated through a set of tangible objectives and principles. The policy and its vision, objectives and principles are – and continue to be – responsive to and well aligned with external contexts, frameworks, drivers and strategies. However, the tools selected to support policy implementation are relatively limited in scope and focus on quite specific aspects of environmental sustainability.

47. The original 2017 policy document establishes the context and rationale for the policy, identifies how previous lessons have informed its design, and describes the external frameworks and standards that have influenced the policy. The links between those external frameworks and the policy are clear. The

<sup>61</sup> These standards were identified by WFP as components of policy quality in: "WFP Policy Formulation" (WFP/EB.A/2011/5-B). They have been assessed in OEV policy evaluations conducted from 2011 to present.

relevance of environmental sustainability to WFP's work – and to humanitarian interventions more broadly – is clearly articulated.

48. Based on the contextual analysis, five overarching objectives are defined, which are further supported by seven guiding principles. The policy is clear that these objectives and principles are applicable to – and should be considered during – the design and implementation of all WFP operations. This is supported by possible practical applications of the policy, demonstrated using real-world examples of WFP activities that – at the time of the policy's development – were already aligned with the objectives and principles. The policy then defines the three tools that will be established to support implementation; namely, as described in section 1.3, environmental standards, environmental risk screening and the EMS). It is clear that the selection of these tools was driven by United Nations-wide guidance, specifically the *Framework for Advancing Environmental and Social Sustainability in the United Nations System*. Moreover, the tools clearly respond to the policy objectives and principles.
49. However, beyond the link with the United Nations framework, there is no discussion around why these specific tools are selected (e.g. why the ESSF is aligned with a development-focused international financial institution (IFI) Safeguards model), or why they are particularly appropriate for strengthening the environmental sustainability of WFP's operations. The tools address important **aspects** of environmental sustainability, but their **scope and/or application** appears to be quite constrained, and their relevance for WFP's core business in crisis response is not fully demonstrated. While the first two tools (Safeguards standards and screening) are identified as being applicable to “all [WFP] activities and operations”, they are tightly focused on **risk management** rather than broader environmental sustainability considerations. On paper, the scope of the EMS tool was broad, framed as a high-level method and set of principles for analysing and addressing environmental sustainability. However, its application has been narrow, restricted to in-house operations (WFP facilities management) rather than – for example – more substantial aspects of WFP operations, such as logistics or food procurement.
50. Following the launch of the policy, the ESSF then honed in on the three tools, specifying their application in considerable detail, including allocation of resources and responsibilities. As explored more in section 2.2.2 and 2.3.1, this heavy emphasis on policy tools ultimately drew focus away from the broader policy vision, objectives and principles. So, although the need for WFP to address environmental sustainability is clearly articulated within the policy, the selection and emphasis on a set of very specific tools was not fully rationalized.
51. The policy and ESSF would have benefited from a clearer and more comprehensive set of definitions for key terminology. The ESSF does this, to an extent, but could have gone further, and overarching agreed definitions regarding – for example – environmental sustainability and social sustainability would have been useful.

## Finding 2 | Generally coherent with other policies, although this is mostly one way

The policy is generally coherent with other WFP policies, at least in identifying other relevant policies and processes. However, other policies do not tend to reference the Environmental Policy, introducing a risk that environmental sustainability may not be fully taken into account across WFP operations.

52. At a high level, the Environmental Policy is generally coherent with other WFP policies. It identifies which other policies are relevant and why; for example, noting that the disaster risk reduction and management policy, the building resilience for food security and nutrition policy, and the climate change policy provide the “foundations for WFP's programmatic contribution to environmental sustainability”.<sup>62</sup> Discussing these other policies also helps the Environmental Policy to identify gaps in

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<sup>62</sup> “Environmental Policy” (WFP/EB.1/2017/4-B/Rev.1\*), page 2, para 21.

WFP's approach, which strengthens the justification for – and positioning of – the Environmental Policy itself.

53. The ESSF similarly identifies relevant WFP policies but in more granular detail, outlining linkages between other policies and the EMS and Safeguards. For example, the ESSF explicitly identifies which WFP policies and guidelines are relevant to each sustainability standard and describes how the EMS relates to WFP's risk management policy and processes. The ESSF also details its alignment with the three lines of defence model, providing the basis for risk control measures within the programme cycle (first line), in monitoring (second line) and finally through the independent oversight functions (third line).
54. However, the visibility of the Environmental Policy within other WFP policies is limited. For example, the 2020 protection and accountability policy, the 2022 gender policy and the 2022 capacity development policy make no explicit reference to the Environmental Policy, despite clear commonalities and operational linkages. This potentially introduces risks that environmental sustainability is not being sufficiently taken into account during the implementation of other policies, and therefore more broadly across WFP operations.
55. While not WFP policies, the 2024 Supply Chain Environmental Strategy and the 2023 Supply Chain ESG Strategy and Roadmap are both strongly aligned with the Environmental Policy, its objectives and its principles. Indeed, the supply chain environmental strategy explicitly references the Environmental Policy as the driver of WFP's work to integrate environmental considerations. Therefore, while the Environmental Policy only makes passing references to supply chains and does not directly associate supply chain operations with the two main policy tools, it is clear that the guiding documents for supply chain sustainability take their cue directly from the Environmental Policy.

### Finding 3

#### **Policy does not substantively address GEDSI or social sustainability dimensions related to environmental sustainability, but this is partly resolved through the ESSF**

The policy does not include any GEDSI-relevant analyses or considerations relating to environmental sustainability. It is also squarely focused on environmental sustainability, placing it at odds with important external drivers that emphasize the importance of both environmental and social sustainability. For the policy's operationalization, the ESSF partly resolved this, particularly through the inclusion of four social sustainability standards. These standards and the ESSF's Safeguards modules necessarily address GEDSI considerations. The Safeguards screening tool integrates most GEDSI dimensions relatively well, although disability considerations are absent. However, the EMS module in the ESSF does not integrate GEDSI or social sustainability considerations at all.

56. Beyond a single reference to WFP's gender policy, the original policy document contains no GEDSI-relevant context, analyses or considerations. Some interviewees assessed the policy as being 'gender-blind'.
57. It is also notable that the policy's exclusive focus on environmental sustainability is not completely aligned with one of the policy's central drivers: the *Framework for Advancing Environmental and Social Sustainability in the United Nations System*. As the title suggests, this framework is entirely built on – and pushes the United Nations system to adopt – the conceptual model of environmental and social sustainability, particularly where agencies are developing Safeguards.
58. This gap in alignment is largely addressed through the ESSF, which – as discussed in section 1.3 – essentially extends the scope of the policy to cover environmental and social sustainability, thereby bringing WFP's approach into greater alignment with the external drivers that initially influenced the policy. Importantly, the context and rationale for this incorporation of social sustainability are both clearly articulated in the ESSF, where sustainability is linked to enhancing human well-being. The incorporation of social sustainability is particularly important for strengthening the external coherence of the policy's Safeguards tool. Originally, the policy only defined five sustainability standards, all of which were environmentally focused. The ESSF extended this to eight standards – four environmental



standards and four social standards (Figure 2). As confirmed by the evaluation’s external lessons review, this move brings WFP’s ESS and Safeguards process into much tighter alignment with the standards and Safeguards applied by other United Nations and multilateral agencies.

59. The adoption of the four social sustainability standards also means that the Safeguards modules in the ESSF necessarily integrate GEDSI considerations. The supporting Safeguards screening tool incorporates GEDSI dimensions relatively well, providing clear guidance on the application of the tool against these four standards. The screening tool’s guidance includes reference to existing policies, including the gender policy and the protection and accountability policy. However, neither the standards nor the screening tool include any reference to people affected by a disability.
60. The EMS Module of the ESSF does not integrate or even reference GEDSI or social considerations at all. This is broadly in line with the approach taken by two key influences on the EMS, namely the United Nations Environment Management Group (UNEMG) and the Greening the Blue initiative, both of which also place little emphasis on GEDSI. At the same time, the *UN EMS Toolkit* from Greening the Blue<sup>63</sup> does include a section on gender, which highlights opportunities for strengthening gender empowerment throughout an EMS. Some alignment between WFP’s EMS and that guidance would be beneficial.
61. A complete GEDSI analysis of the Environmental Policy is presented in Annex XIII, but the summary assessment of the policy and the two main policy tools is presented in Table 8.

**Table 8: Summary assessment of policy components against GEDSI continuum**

| Policy component     | Assessment                                     | Rationale   |
|----------------------|--|---|
| Environmental Policy | GEDSI-blind                                    | The policy lacks any consideration or acknowledgement of GEDSI.   |
| Safeguards           | GESI-sensitive, but disability inclusion-blind | The Safeguards system design integrates the needs of women and girls, affected populations and indigenous communities in risk assessments, as well as the integration of a human rights approach. However, there is a lack of disability inclusion. |
| EMS                  | GEDSI-blind                                    | The EMS was assessed as GEDSI-blind for both design and implementation, based on the above review and analysis of the country office sample.  |

Source: Elaborated by the evaluation team.

## 2.1.2 EQ1.2: How good is the policy design process?

| Finding 4  | Pilots, consultations and the EPACT have helped to strengthen policy design |
|--|---|
| The design of the policy and the ESSF have benefited from the practical testing of the EMS and Safeguards processes. The policy’s design and implementation has been, and continues to be, informed by consultations across WFP, with the recent process of developing the EPACT helping to deepen the involvement of more operational areas in the Environmental Policy’s delivery. |   |

62. The original policy document is informed by the early testing of EMS and Safeguards approaches, with that process in itself being part of United Nations system-wide pilots associated with the *Framework for Advancing Environmental and Social Sustainability in the United Nations System*. Following WFP’s adoption of the Environmental Policy, a broader piloting process for the EMS and Safeguards subsequently informed the detailed design of the implementation-focused ESSF. These processes engaged stakeholders at the headquarters, regional bureau and country office level, although headquarters-level evaluation interviews indicated that the extent of engagement with WFP functions specializing in ESS themes, such as gender, AAP and protection, was limited.

<sup>63</sup> Greening the Blue. n.d. *UN Environmental Management System Tool: A Quick Start Guide*.

63. The policy's roll-out has been further supported by the development of the EPACT. Although not formally adopted at the time of writing (mid-2024), the draft EPACT compiles multiple commitments, results and actions to reduce WFP's environmental footprint. While these are identified for EMS and Safeguards, significantly, the EPACT goes beyond those tools, identifying environmental sustainability results and actions for multiple other WFP functions. The development of this document has necessarily engaged other operational units, which were not closely involved in the development or roll-out of either EMS or Safeguards. Some headquarters-level interviewees noted that the EPACT development process has helped to demonstrate the relevance of the Environmental Policy to WFP's broader work beyond just EMS and Safeguards.

### 2.1.3 EQ1.3: To what extent does the policy include provisions for policy implementation?

#### Finding 5 | The ESSF clarifies some implementation requirements, but key gaps remain

The original policy lacks detail on institutional, human and financial resource requirements for implementation. The ESSF does much to address this lack of detail, specifying tools, processes, resources and institutional ownership. However, important gaps remain, particularly regarding funding sources, how the policy should work alongside existing functions and tools (especially those relating to social standards), and an absence of accountability mechanisms, particularly for Safeguards. Moreover, the ESSF only specified requirements for implementation of the policy tools (Safeguards and EMS), with no detail provided on requirements for application of the broader policy vision, objectives and principles.

64. The policy acknowledges that human and financial resources would be required for implementation, but only broad requirements are discussed in the policy, with no specific budget lines or staff allocations being defined.
65. However, the ESSF provides significantly more detail on resource requirements, focusing on EMS and Safeguards. The institutional ownership of the tools (and, indeed, the broader ESSF) is confirmed, as are the tools' programmatic and operational coverage and boundaries. Roles and responsibilities are also defined across the headquarters, regional bureaux and country offices, with Safeguards-related responsibilities also identified for cooperating partners. This extends to the allocation of responsibilities against existing, named positions within WFP, and the identification of where new WFP positions would be required, most notably regional bureau-based advisers for both EMS and Safeguards.
66. The ESSF's granular level of detail on roles and responsibilities provides a basis upon which budgets (for staffing, at least) can be developed. However, the ESSF does not include a costed implementation plan. Also no potential long-term funding sources or strategies are discussed, either within the ESSF or the accompanying Executive Director's circular.
67. Significant detail on high-level implementation **processes** is also presented in the ESSF. For example, the alignment of Safeguards processes with the WFP programme cycle (including as part of risk control) is specified to some extent, and steps for establishing country-level EMS are defined. As noted in paragraph 53, linkages with relevant existing WFP policies are also identified.
68. However, in some crucial respects, the ESSF does not identify whether or how relevant existing WFP **functions and tools** can work alongside Environmental Policy processes. This is a particularly important gap for Safeguards and especially for the four social sustainability standards. The ESSF does not specify whether or how the Safeguards process would make use of WFP's existing expertise and competencies in the relevant social areas. For example, no detail is provided on the role of WFP's gender function in the screening of the gender equality sustainability standard, nor on whether the regional bureau gender advisers or country office-level gender focal points would be involved. Neither is the relevance or applicability of pre-existing WFP **tools** defined in the ESSF. To an extent, tools such as gender analyses and conflict sensitivity standards include similar considerations, assessments and risk analyses to those required by their equivalent ESS screening processes. However, the ESSF

provides no detail on whether or how such existing tools could be used alongside or instead of the Safeguards screening processes.

- 69. A further gap in the ESSF is the limited extent to which accountability mechanisms are defined. Responsibilities are identified, but no detail is elaborated on how compliance with the policy would be incentivized, and how non-compliance would be addressed. As explored more in Section 2.4, the poorly defined accountability mechanisms are particularly consequential for the operationalization of Safeguards.
- 70. A further limitation is that the ESSF only focuses on specifying requirements for the operationalization of Safeguards and EMS. As explored more in sections 2.2.2 and 2.3.1, the application of these tools has been limited to a narrow set of activities which curtails the achievement of the higher-level vision of the policy.

**Finding 6 | No TOC has been developed and there is a weak policy monitoring framework**

While the policy's high-level rationale and logic is generally clear, it is not supported by a more detailed TOC or results framework setting out what the policy aims to achieve and its level of ambition. Basic policy monitoring processes, including corporate results framework (CRF) indicators, are identified in the ESSF, but these are focused exclusively on the policy tools. The quality and usefulness of these processes and indicators is weak. However, the upcoming EPACT provides a potential starting point for a policy-wide results framework.

- 71. Neither the policy nor the ESSF includes a TOC or a results framework. The absence of these elements means that, in turn, there is little detail around how the policy's high-level rationale and vision would be operationalized and what results are to be expected. Some monitoring processes are established within the ESSF, including a requirement for WFP annual country reports (ACRs) to incorporate a new 'Environment' section, which presents qualitative reporting on "the environmental sustainability of WFP operations and the application of the [ESSF]".<sup>64</sup> However, no further guidance is provided.
- 72. The ESSF also confirms the two cross-cutting indicators that would be used within WFP's CRF to report on progress against Safeguards and EMS, along with management key performance indicators (KPIs) for environmental reporting (Table 9).

**Table 9: CRF indicators and management KPIs identified in the ESSF**

|                        |  |
|------------------------|--|
| <b>Safeguards</b>      | Proportion of FLAs/MOUs/CCs for CSP activities screened for environmental and social risks |
| <b>EMS</b>             | Percentage of WFP operations implementing the EMS  |
| <b>Management KPIs</b> | Percentage of countries reporting on GHG emissions   |
|                        | Percentage of countries reporting on waste management                                      |
|                        | Percentage of countries reporting on water management                                      |

Source: WFP. 2021. *Environmental and Social Sustainability Framework Module 1*.

- 73. As explored further in section 2.2, these indicators have supported a degree of policy monitoring and reporting. However, the indicators are focused exclusively on the implementation of Safeguards and EMS, and are only capable of tracking activities and outputs relating to those tools. They do not provide a basis for measuring progress against the policy's objectives or any policy-related outcomes, so there is no measure of the substantive, real-world differences that the policy may be contributing to with respect to the environmental sustainability of WFP's work. Consequently – and even before

<sup>64</sup> WFP. 2021. *Environmental and Social Sustainability Framework Module 1*, page 13, para 56.

considering the accuracy and coverage of the actual reported data – the indicators have limited informational value for understanding policy-related contributions and results.

74. Country office-level evaluation interviews also suggested that the focus of the Safeguards indicator on FLAs, MOUs and CCs was problematic in two related ways. First, the indicator, by definition, does not measure the screening of CSP activities that are not delivered through FLAs, MOUs or CCs. The risk here is that the indicator is not capturing the full extent of screening work being undertaken. Second, the indicator’s focus on FLAs, MOUs and CCs has – in some instances – resulted in a misunderstanding among some country office staff that only FLAs, MOUs and CCs should be screened: because WFP-led activities are not listed in the indicator, a misunderstanding has arisen that screening is not applied to WFP-led activities.
75. The upcoming EPACT has the potential to provide a considerably stronger foundation for policy monitoring as it already has key elements of a results framework in place (e.g. activities, milestones, targets and impacts). The EPACT also encompasses work with an environmental sustainability focus being delivered by WFP and its partners beyond the areas currently covered through the Safeguards and EMS tools. As such, the EPACT could help to capture a considerably broader range of results, guided by the Environmental Policy, its objectives and principles.
76. WFP’s involvement in the annual United Nations-wide Greening the Blue process represents another channel through which policy-relevant results are monitored and reported. The initiative is heavily focused on reporting environmental footprint metrics, with only limited coverage of Safeguards (Table 10). However, the report uses both quantitative indicators and qualitative measures to track system-wide progress; moreover, most indicators have been tracked since – and in some instances before – the policy’s launch in 2017. When compared with the indicators and corporate monitoring processes defined in the ESSF – and notwithstanding the limited coverage of Safeguards – WFP’s inputs into Greening the Blue provide a more informative and stronger basis for tracking and understanding some aspects of the Environmental Policy’s progress.

**Table 10: Indicators and measures reported through Greening the Blue**

|  |  |
|--|--|
| Total GHG emissions                            | Per capita GHG emissions                         |
| Waste generated per capita                     | Waste disposal routes                            |
| Proportion of staff covered by waste inventory | Water use  |
| Existence and extent of EMS                    | Existence of environmental and social Safeguards |
| Level of sustainable procurement processes     | Level of environmental training for staff        |

Source: UNEP. 2023. *Greening the Blue Report 2023*.

#### **2.1.4 EQ1.4: What can WFP learn from other organizations’ approaches to environmental and social sustainability?**

##### **Finding 7 | WFP’s policy framework is more aligned with international financial institutions (IFIs) than other humanitarian agencies**

Multilateral agencies and funders invariably have a policy framework that is analogous to WFP’s, although the tendency is to combine environment and climate in the same policy or plan, with the emphasis mostly on climate. It is also notable that WFP’s incorporation of Safeguards within its Environmental Policy framework is aligned with the approaches of multilateral development banks (MDBs) and climate funds, whereas other United Nations agencies and humanitarian organizations keep their Safeguards functions separate from their environmental/climate/sustainability policy frameworks. However, the flipside to WFP’s alignment with IFIs is that the structure of the IFI model is geared towards

Safeguards for development interventions, as opposed to humanitarian and emergency responses, which often require greater agility and efficiency.

77. The evaluation's external lessons review included a consideration of the overall institutional approaches to environmental (or equivalent) policies. The humanitarian and development agencies reviewed – the International Committee of the Red Cross (ICRC), the United Nations High Commissioner for Refugees (UNHCR) and the United Nations Children's Fund (UNICEF) – all have integrated environmental and climate strategies, with the emphasis generally placed on climate action. The general scope of these frameworks tends to be in line with the vision, principles and objectives of WFP's Environmental Policy, and it was notable that – as in WFP – Greening the Blue is a key external driver for UNHCR and UNICEF's work in this domain too. However, a key difference is that these other agencies all keep their Safeguards policy and function quite separate from their environmental policy framework.
78. This is in contrast to the general approach of multilateral finance institutions – IFIs, MDBs and climate funds – which mostly incorporate their Safeguards function within an overarching environmental and social sustainability framework or policy. Consequently, WFP's approach in this respect is better aligned with those of multilateral finance institutions than other humanitarian agencies.
79. Having a Safeguards system that is based on the prevailing IFI model does – by definition – align WFP's approach with international best practice. However, the external lessons review demonstrates that the IFI model is designed for environmental and social risk management of longer-term development interventions. WFP does deliver long-term development interventions, but most resources are allocated to crisis response. This suggests that alignment with the development-focused IFI model for Safeguards may not be the most appropriate approach for WFP.

#### Finding 8

**Safeguards processes and standards are similar across all agencies, although some of WFP's standards are divergent, potentially introducing funding and reputational risks**

In line with broader efforts to harmonize Safeguards processes and standards, United Nations agencies' Safeguards systems share the same key components and tools. Equally, agencies tend to apply thematically similar ESS, albeit with differing terminologies. However, WFP's approach to the social dimensions of sustainability in the standards is slightly divergent: although other agencies address the same social dimensions, they incorporate them within their institutional guiding principles or cross-cutting priorities, which tends to lend support to implementation, accountability and resourcing in these areas. Also, in contrast with other agencies, WFP does not have standards on labour; land acquisition, displacement and resettlement; and cultural heritage. These gaps could introduce funding and reputational risks for WFP.

80. By the time WFP had adopted its Environmental Policy in 2017, there was already a well-established model for Safeguards systems among IFIs and there was momentum for the same among United Nations and other humanitarian and development agencies. The review of external agencies confirmed that almost all Safeguards systems comprise the same key components, as follows:
  - a policy statement;
  - a set of ESS;
  - procedures setting out how standards are applied within the agency's project cycle, which are linked to project preparation, approval and implementation;
  - clear roles and responsibilities of the relevant actors, both within the agency and the borrower or beneficiary;
  - dedicated technical staff and resources;
  - tools, templates and technical guidance;
  - stakeholder engagement mechanisms;
  - grievance redress mechanisms;
  - disclosure requirements; and
  - monitoring and reporting requirements.

81. There is also considerable thematic consistency across the ESS applied by agencies. However, the precise terminology and labels for individual standards vary across agencies. Table 11 identifies the thematic categories that standards can be classified within, and which agencies apply standards that fall within those thematic categories.

**Table 11: Environmental and social sustainability standards adopted, by agency**

|   | World Bank | IFC | AfDB | ICRC | IADB | ADB | UNEMG | UN-Habitat | UNICEF | UNDP | FAO | WFP         |
|---|------------|-----|------|------|------|-----|-------|------------|--------|------|-----|-------------|
| Assessment and management of environmental and social risks and impacts <sup>65</sup> |            |     |      |      |      |     |       |            |        |      |     |             |
| Labour  |            |     |      |      |      |     |       |            |        |      |     |             |
| Resource efficiency and pollution prevention  |            |     |      |      |      |     |       |            |        |      |     |             |
| Community health, safety and security   |            |     |      |      |      |     |       |            |        |      |     |             |
| Land acquisition, displacement and resettlement                                       |            |     |      |      |      |     |       |            |        |      |     |             |
| Biodiversity conservation, ecosystems, sustainable natural resource management        |            |     |      |      |      |     |       |            |        |      |     | 2 standards |
| Vulnerable people, indigenous groups  |            |     |      |      |      |     |       |            |        |      |     | 2 standards |
| Cultural heritage   |            |     |      |      |      |     |       |            |        |      |     |             |
| Financial intermediaries  |            |     |      |      |      |     |       |            |        |      |     |             |
| Stakeholder engagement <sup>66</sup>  |            |     |      |      |      |     |       |            |        |      |     |             |
| Climate change  |            |     |      |      |      |     |       |            |        |      |     |             |
| Gender  |            |     |      |      |      |     |       |            |        |      |     |             |
| Law   |            |     |      |      |      |     |       |            |        |      |     |             |

Source: Elaborated by the evaluation team.

<sup>65</sup> Not a standard in WFP's ESS, but the essence is covered in the sustainability principle, ESSF Module 1 and implementation procedures outlined in Module 3.

<sup>66</sup> Not a standard in WFP's ESS, but covered under WFP's standard for AAP.

82. As is evident from Table 11, WFP's approach to sustainability standards is somewhat distinct from other United Nations agencies. This is especially the case with the social standards, which cover the same topics and issues as most IFIs and the United Nations Model Approach to ESS, but have been constructed to mirror WFP policies and strategic cross-cutting priorities, such as gender equality, protection and AAP. Rather than adopting specific standards, other agencies tend to integrate these themes at a higher level, within their institutional guiding principles and/or as institutional cross-cutting priorities. This has perhaps helped other agencies to better mainstream social standards across their body of work, and better align the corresponding tools and resources with the standards.
83. Other distinctions include WFP's adoption of two standards – biodiversity and ecosystems, and natural resources – which other agencies typically treat as a single standard, under the broad theme of biodiversity conservation, ecosystems and sustainable natural resource management. Similarly, other agencies have one standard around people in vulnerable situations (usually focused on indigenous peoples), while WFP has two: protection and human rights, and AAP.
84. WFP is also distinct from other agencies in not adopting standards around: labour; land acquisition, displacement and resettlement; and cultural heritage. The absence of these standards is potentially significant for WFP. First, IFIs may take the position that the WFP standards are not fully compliant with their requirements for a Safeguards system as a whole, even if there are no relevant risks likely in the specific programme being funded. Second, some areas of WFP development programmes, such as resilience, may in certain contexts pose risks associated with these standards. Several internal and external evaluation interviewees suggested that the failure to address these standards could undermine WFP's efforts to manage social and environmental risks, with resultant negative outcomes for people in vulnerable situations, reputational risks for WFP and, ultimately, the possible loss of IFI funding for WFP. There is a case, therefore, for adopting such standards in a revised Safeguards system, as these particular concerns do not lend themselves easily to being incorporated into existing standards through amendments.

#### **Finding 9 | The challenges WFP faces in implementing Safeguards are similar across agencies**

All institutions face a similar set of challenges and barriers when implementing Safeguards, including resource limitations, capacity constraints and inadequate long-term monitoring.

85. The evaluation's external lessons review analysed recent evaluations and assessments of the environmental policies and, in particular, the Safeguards approaches applied by other agencies. In combination with the evaluation's interviews with external agencies and WFP partners, a number of consistent findings were identified, reflecting that all agencies face similar challenges when implementing Safeguards. The full analysis is presented in Annex X, with the most prevalent challenges and barriers identified as:
  - There are **resource gaps** in staffing, finance and in technical capacity and knowledge. While MDBs do invest significant funds into their Safeguards systems, even they face in-country capacity and resource constraints.
  - Following risk screening, development of mitigation measures (e.g. ESMPs) and investment approval, the **ongoing monitoring of Safeguards application is often insufficient**. Where monitoring does take place, it tends to be compliance-orientated, with no focus on measuring results. Evidence around the outcomes and impacts of Safeguards was, therefore, limited.
  - Coupled with the limitations around ongoing monitoring, most agencies have either **weak accountability mechanisms**, or **weakly enforced** accountability mechanisms.

#### **Finding 10 | WFP's approach to EMS is more systematic and structured than is evident across other agencies**

Other agencies apply environmentally focused measures as part of their facilities management, but these approaches, with some exceptions, tend to be sporadic, disparate, not fully implemented and mainly exist as a series of disconnected tracking tools, rather than as a formal EMS.

86. The evaluation's external lessons review found that, while most other agencies do not have a formal EMS, they invariably have policies, strategies and/or systems to mitigate and manage their operational



environmental impacts. These agencies are pursuing decarbonization plans and facility greening – in particular solarization, waste management and building electric vehicle fleets at the headquarters level. As for WFP, much of this work is at least partly driven by – and reported through – the Greening the Blue initiative.

87. To an extent, WFP is a positive outlier compared with its peer agencies: the Environmental Policy and the ESSF give the organization's approach to EMS more structure, standardization and rigour than is evident across other agencies. It is particularly notable that WFP was the only agency identified that is pursuing alignment with ISO 14001. One example was identified of another agency (UNICEF) requiring its suppliers to comply with ISO 14001, but this requirement does not extend to the agency itself.
88. A potentially valuable example of an innovative approach to **resourcing** EMS efforts was identified through the review of UNHCR's greening efforts. The organization – after analysing its operations, identifying specific measures to reduce its environmental footprint and quantifying (in detail) the associated cost requirements – established a ring-fenced Green Financing Facility.<sup>67</sup> UNHCR is now using this facility to solicit earmarked donations from funders, thereby raising finance directly for their greening efforts and – in so doing – removing the need to fund EMS-related measures through core funding. UNHCR reported that donors have expressed significant interest in this approach, and, at the time of writing, the facility has raised USD 36.5 million against a target of USD 60 million. WFP has now established and widened its decarbonization fund in this vein.

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<sup>67</sup> UNHCR. 2024. Green Financing, <https://www.unhcr.org/what-we-do/build-better-futures/climate-change-and-displacement/greening-unhcr/green-financing> (accessed 10 December 2024).

## 2.2 EQ2: WHAT ARE THE RESULTS OF THE ENVIRONMENTAL POLICY ON WFP'S PROGRAMME ACTIVITIES AND MANAGEMENT OPERATIONS?

### SUMMARY OF FINDINGS

The policy has led to significant improvements in environmental management of WFP facilities (e.g. energy efficiency improvements, waste reuse/recycling), although this is only a small portion of the organization's environmental impact – and not all facilities are EMS compliant at this point in time. An important caveat is that some offices were already planning or implementing some form of environmental management prior to the development of the policy and ESSF: although the latter did bring further impetus, consistency and structure in many places.

The roll-out and implementation of Safeguards, albeit at an early stage, has been inconsistent; and has failed to integrate and achieve coverage across CSP activities as envisaged in the ESSF.

The main policy indicators relate to the two ESSF tools only, and therefore wider sustainability results have not been captured in robust or consistent ways. Good practice programmatic examples are evident but there is a lack of aligned principles, approaches or minimum standards in relation to sustainability, against which to monitor in any meaningful or consistent way. Such practices are aligned with the policy's vision, objectives and principles but are not directly attributable to the policy's implementation and are often secondary or even unintended 'by-products' of WFP interventions. There is a high degree of interest and innovation from staff regarding environmental and social sustainability issues, particularly around supply chain, procurement and logistics. Significant efforts have been made in recent years, driven in part by the policy, to develop a supply chain sustainability strategy, with this having the potential to vastly reduce WFP's carbon and broader environmental footprint. The evolving EPACT more successfully integrates supply chain and other aspects of the organization's environmental impact, and has developed clearer and more robust measures and indicators for success.

In terms of integration of the social dimensions of sustainability, this has been less successful, with poor awareness among staff and a lack of integration with existing functions, tools and processes. The failure to make a strong connection between environmental and social sustainability in the policy and operational aspects of the ESSF has inevitably led to gaps in results in this area. There is also a particular lack of indicators for the social dimensions of sustainability.

The overly narrow application of the ESSF on Safeguards and EMS has reduced focus on environmental aspects of wider programmatic, emergency and other activities. This, combined with the weak linkage with the social dimensions of sustainability, suggests that more is required to ensure that WFP activities are 'doing no harm' and 'maximizing benefits' as per the policy aims.

The inclusion of environmental and social sustainability in CSPs and other strategies or plans has, to a large extent, been tokenistic and lacking in firm commitment or accountability, although there is a sense that this is starting to improve in some more recent CSP processes.

Significant efforts have been made in terms of awareness-raising and training on environmental sustainability, but this has been confined to the two main policy tools (again perhaps skewing focus and leading to omissions in staff targeting and particular skills areas – for instance, more general understanding of socio-environmental links would be beneficial across the board), and has been dependent on regional and country investment and prioritization.

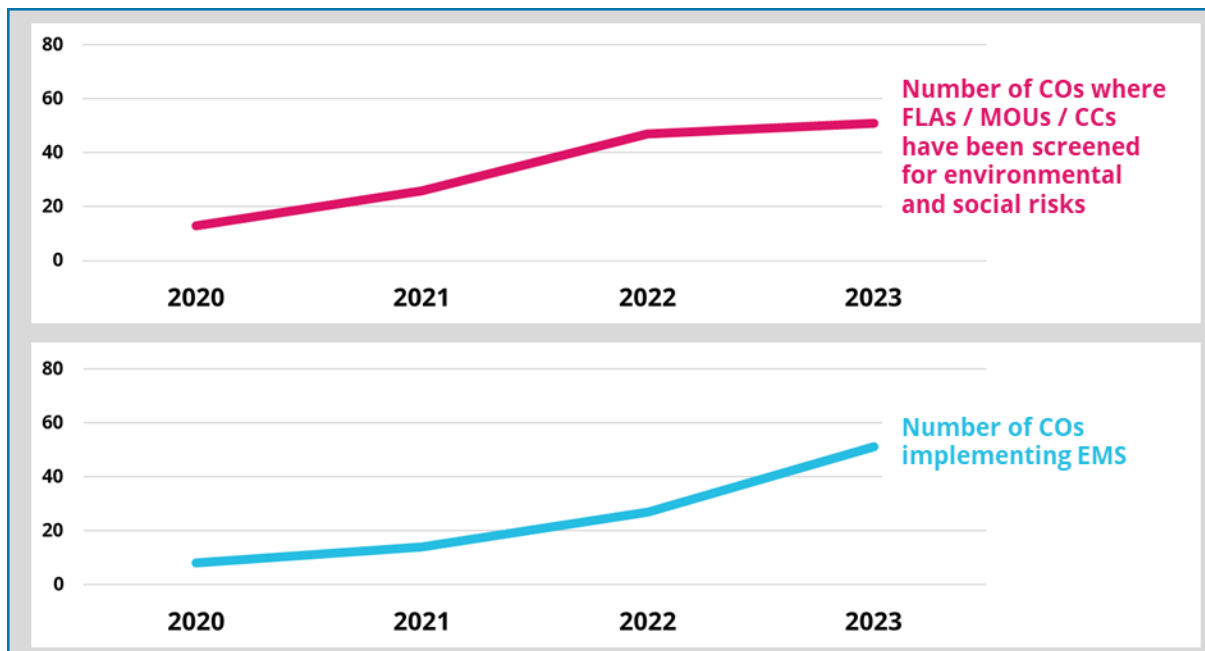
**2.2.1 EQ2.1: To what extent has WFP integrated environmental and social sustainability considerations, avoided ‘harming the environment’ and contributed to ‘maximizing environmental benefits’, as per the policy’s aims?**

**Finding 11 | Results reported through policy monitoring processes do not provide accurate measures of progress towards policy implementation**

Results of the policy’s implementation are being reported through the agreed policy monitoring processes and corporate indicators. However, these systems are almost exclusively focused on the two policy tools of Safeguards and EMS, providing no detail on results being delivered against the broader policy’s vision, objectives and principles. In any case, the policy monitoring processes are not providing a comprehensive or accurate picture of the extent to which Safeguards and EMS are being delivered or achieving results.

89. Data have been reported against the two cross-cutting indicators associated with the Environmental Policy since 2020. Both indicators exhibited positive trends, as seen in Figure 5.

**Figure 5: Data for Environmental Policy-related CRF indicators, 2020–2023**



Source: WFP APRs 2020–2023.

- 90. However, neither indicator has provided insight into the quality or depth of Safeguards or EMS implementation. Moreover, both indicators have methodological problems that have undermined the accuracy and usefulness of the data reported.
- 91. For example, a country office can report a positive value against the EMS indicator as soon as they have had an initial visit from a regional bureau EMS adviser or as soon as they have launched their effort to establish an EMS. The evaluation found instances in which country offices were reported against the indicator as ‘implementing EMS’, yet the EMS’s progress had not moved significantly beyond the initial launch in terms of deeper implementation or continuous improvement.
- 92. The Safeguards indicator is even more problematic. First, the indicator is focused exclusively on screening activity, providing no information on the broader efforts that are necessary to establish a structured approach to Safeguards application within country offices. Second, the indicator does not capture screening activity beyond that applied to FLAs, MOUs and CCs. Although the evaluation identified instances where country offices were undertaking screening activities on WFP-led activities, because those activities were not delivered via FLAs, MOUs or CCs, the efforts here were not reported via the indicator. Third, the CRF-level indicator is an aggregation of country office-level indicators that actually track the proportion of FLAs/MOUs/CCs that have been screened for environmental and social

sustainability risks. When country offices report any screening of FLAs/MOUs/CCs, it is subsequently recorded as a positive value in the CRF indicator, even if, for example, only 10 percent of those mechanisms have been screened. Consequently, the CRF indicator skews positive, which risks miscommunicating the actual extent of screening being undertaken by country offices. The combination of these idiosyncrasies has generated reports that – for some country offices – do not reflect the actual extent of implementation. For example, the Kyrgyz Republic country office has overseen 243 Safeguards screening exercises, which has been underpinned by cooperating partner capacity development and continuous support from the country office focal point. However, because all of this screening was undertaken through just 1 of 17 FLAs at the country office, it can only report a value of 6 percent against the CRF indicator.

93. Along with these quantitative indicators, a degree of qualitative, narrative reporting on Environmental Policy implementation is provided by country offices through the cross-cutting priority-focused ‘environmental sustainability’ section of their ACRs. However, these reports tend to be very high-level and generalized, mostly just confirming that Safeguards and EMS are under way or planned. The EMS tends to be discussed in more detail, identifying specific measures that a country office is undertaking. However, Safeguards is invariably not reported on in substantive detail. To quote one representative example, the Kenya 2023 ACR’s only reference to Safeguards was that “some programmatic activities were screened for environmental and social risks and mitigation measures were implemented”.<sup>68</sup>
94. This section of the ACRs also reports on broader work and results being delivered on environmental and social sustainability. However, these broader results are not reported against a consistent structure or against shared metrics (such as, for example, the five policy objectives), so are not readily aggregable beyond the individual country office. Moreover, reported results are invariably positive examples, with challenges or gaps rarely identified.

**Finding 12**

**Results reported through Greening the Blue provide a more comprehensive overview of environmental performance than WFP’s own systems, and are generally positive**

WFP’s annual reporting for Greening the Blue provides a considerably more detailed, granular insight into the organization’s environmental performance than WFP’s own corporate and environmental policy monitoring systems. Greening the Blue reporting covers only a small part of WFP’s GHG emissions, but it shows that, although total emissions have recently increased, emissions per staff member are declining slightly. WFP’s water usage is relatively stable, but WFP’s waste generation has decreased dramatically. While these metrics are informative and support an understanding of WFP’s performance against the Environmental Policy’s objectives and principles, an important caveat is that Greening the Blue reporting focuses almost exclusively on environmental (without consideration of environmental and social) sustainability results.

<sup>68</sup> WFP. 2024. *Kenya Annual Country Report 2023*, page 30.

95. Compared with WFP’s internal policy monitoring processes, the organization’s annual submissions (coordinated by MSDI) to Greening the Blue provide a broader and considerably more robust basis for understanding WFP’s environmental performance. Greening the Blue is not comprehensive: for example, it requires agencies to report their Scope 1 and 2 GHG emissions, but only a very limited quantity of WFP’s overall Scope 3 emissions, specifically relating to staff travel (Box 3). Nevertheless, the data are still useful for assessing progress against the Environmental Policy’s third objective: “minimizing the carbon footprint and increasing the resource-efficiency of operations and facilities management, particularly the management of materials, water, energy and waste”. Figures 6 to 9 present the data from 2017 to 2022 that are especially relevant to this objective.

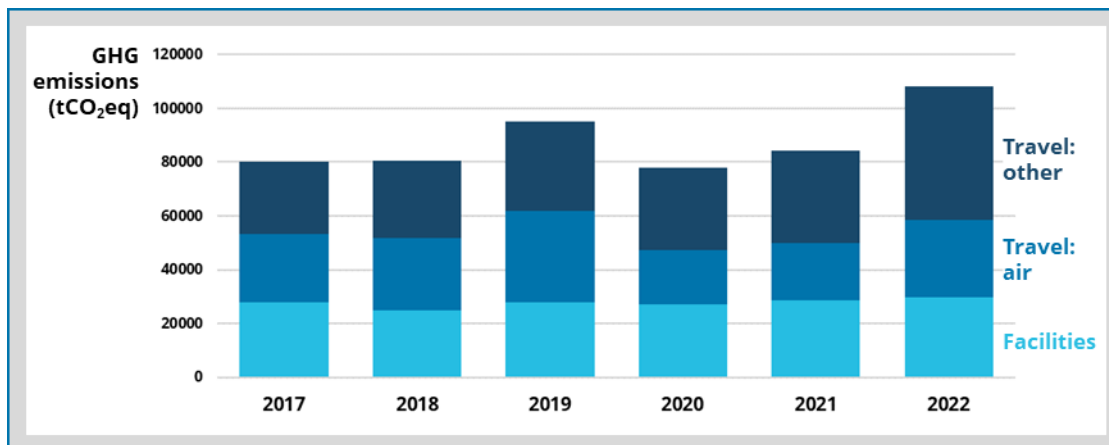
**Box 3: Scope 1, 2 and 3 emissions**

A central metric for Greening the Blue is the **carbon footprint** – and particularly the **annual GHG emissions** – of each agency. Greening the Blue uses the international [GHG Protocol](#) standard to calculate GHG emissions. The GHG Protocol categorizes emissions into three **scopes**:

- **Scope 1:** Direct emissions owned or controlled by an agency (e.g. agency facilities, agency vehicles)
- **Scope 2:** Indirect emissions purchased by an agency (e.g. electricity, fuel)
- **Scope 3:** Indirect emissions from activities upstream and downstream of the organization (e.g. emissions from suppliers, transportation of goods, use of the organization’s products)

To date, **Greening the Blue has only required agencies to report their Scope 1 and 2 emissions.** However (and as explored below) WFP are also undertaking work to calculate and measure their Scope 3 emissions.

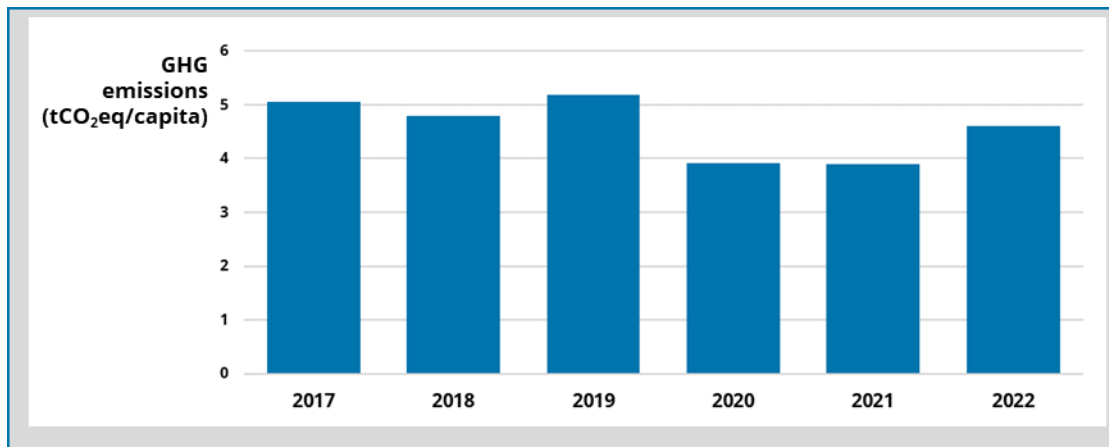
**Figure 6: WFP’s total GHG emissions (tCO<sub>2</sub>eq), as reported via Greening the Blue<sup>69</sup>**



Source: UNEP. *Greening the Blue Reports 2018–2023*.

<sup>69</sup> Greening the Blue applies the [GHG Protocol](#) for emissions tracking, and only includes [Scope 1 and Scope 2 emissions](#), plus [Scope 3 business travel emissions](#).

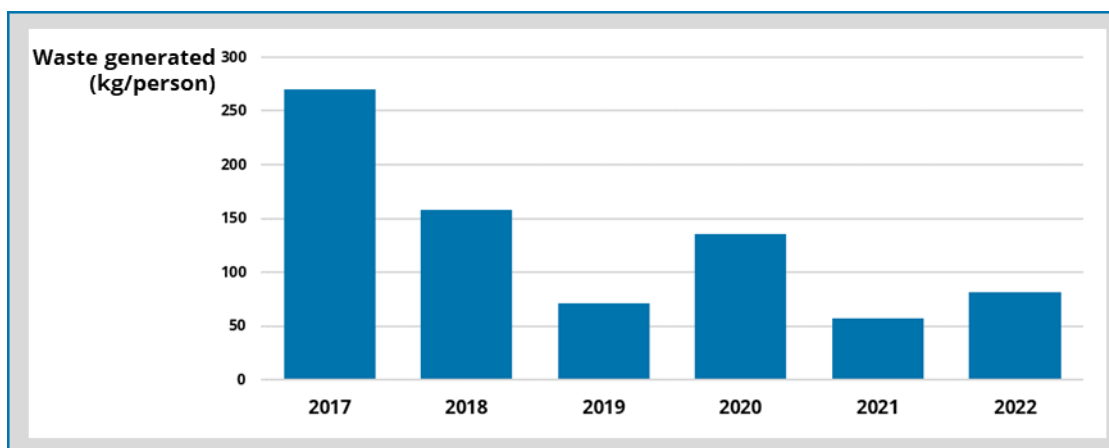
**Figure 7: WFP's per capita<sup>70</sup> GHG emissions (tCO<sub>2</sub>eq/capita), as reported via Greening the Blue**



Source: UNEP. Greening the Blue Reports 2017–2023.

96. Figure 6 indicates that WFP's absolute emissions have increased, particularly considering that its emissions in 2020–2021 were lower due to Covid-19 restrictions, rather than as a result of targeted emissions reductions. However, to a large extent, WFP's emissions are impacted by factors beyond the organization's control: if there are more crises, then WFP will have more responses to manage, which, inevitably, will raise the organization's emissions. The metric of emissions per staff member (Figure 7) arguably provides a more informative measurement of environmental performance, as it essentially provides a read of the emissions intensity of WFP's operations. Therefore, even though WFP's absolute emissions in 2022 reached a high point, the emissions per WFP staff member were actually trending downwards. An important caveat in considering these data is that the Greening the Blue methodology is not comprehensive, and only covers part of each United Nations agency's overall emissions – due to the complexity of calculations, a large proportion of each agency's indirect emissions (Scope 3 emissions) are not included in the calculations. Although WFP's Scope 3 baseline has not been formally validated yet, key informants noted that it is clear from initial calculations that Scope 3 emissions comprise the majority of WFP's emissions.

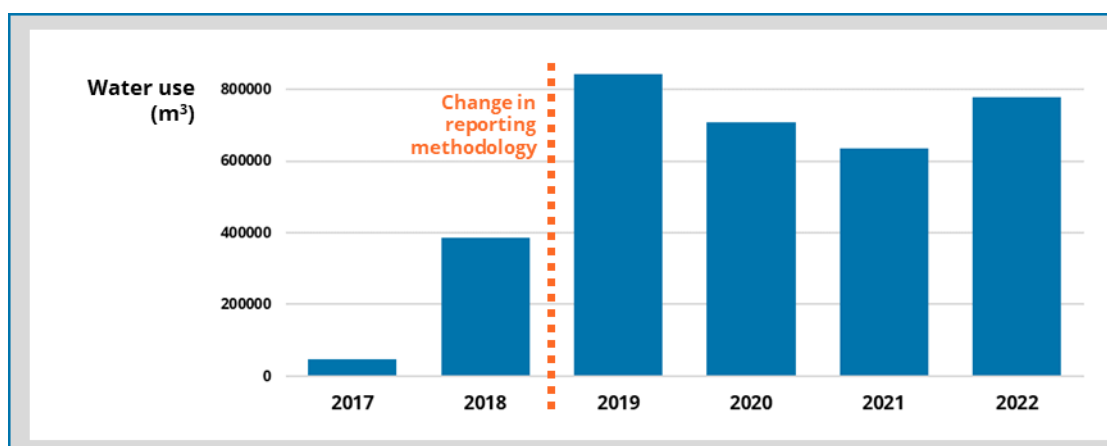
**Figure 8: WFP waste generated per capita (kg/person), as reported via Greening the Blue**



Source: UNEP. Greening the Blue Reports 2017–2023.

<sup>70</sup> This includes all types of personnel, regardless of contract duration (international staff, international consultants, national staff, local consultants, service contract holders, United Nations volunteers, interns).

**Figure 9: WFP water use (m<sup>3</sup>), as reported via Greening the Blue**



Source: UNEP. *Greening the Blue Reports 2017–2023*.

97. WFP’s narrative reporting for Greening the Blue attributes the significant drop in waste generated (Figure 8) to improved waste management practices within the organization, which can be linked to the Environmental Policy and the tools and resources the policy established for the EMS. Arguably, this represents the most tangible positive result that can be clearly linked to the Environmental Policy.
98. Figure 9 suggests that WFP’s water usage is potentially on a slight downward trend, although the current tracking methodology was only introduced in 2019, and Covid-19 restrictions will have affected usage in 2020 and 2021.
99. These and other Greening the Blue metrics provide useful data for tracking WFP’s environmental performance, including progress against the Environmental Policy’s third objective<sup>71</sup>. However – and as noted in Table 8 – the initiative’s tracking of environmental and social sustainability is restricted to a single indicator that confirms whether or not participating agencies have environmental and social Safeguards in place. Consequently, Greening the Blue’s value does not extend to supporting an understanding of WFP’s environmental and social sustainability performance.

**Finding 13 | Implementation of Safeguards has been limited, inconsistent and unsystematic**

It is too early to assess the results or influence of the Safeguards process on the environmental and social sustainability of WFP interventions. However, there was clear evidence that the roll-out of the Safeguards process has been limited, inconsistent and unsystematic. The extent of implementation varies across countries, and also within countries. Coverage of WFP interventions is also inconsistent, with a skew towards implementing Safeguards for development-focused work, and very little work undertaken to embed or even explore the potential application of Safeguards within emergency contexts.

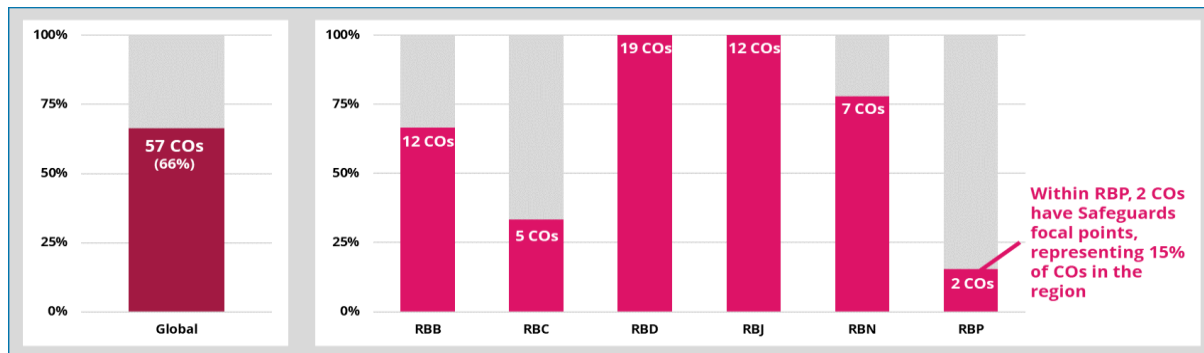
100. As implied by Figure 5 – and notwithstanding the previously discussed methodological weaknesses with the Safeguards-focused CRF indicator – the majority of Safeguards activity has only been happening within country offices since 2022. Consequently, it is too early to assess the extent to which Safeguards have enhanced or influenced the environmental and social sustainability of the screened interventions: the activities to which Safeguards have been applied are not yet fully implemented and their sustainability has not been assessed. As noted in section 2.1.4, the ongoing, long-term monitoring of Safeguards was found to be weak across all agencies. Agencies focus on ensuring compliance with standards, and little work has been undertaken to track the extent to which

<sup>71</sup> Minimizing the carbon footprint and increasing the resource-efficiency of operations and facilities management, particularly the management of materials, water, energy and waste

Safeguards actually deliver results or at least influence the environmental and social sustainability of screened interventions.

101. However, the quality of Safeguards implementation can be assessed. The institutional structure and roles required for implementation were identified within the ESSF, and these included: the PPGR-hosted Safeguards Unit at headquarters; a Safeguards adviser within each of the six regional bureaux; and a Safeguards focal point within each of WFP's country offices. The headquarters-based Safeguards Unit has been staffed by four or five consultants (rather than permanent WFP staff) since its formation in 2018, with the exception of a period in 2019–2020 where the unit was led by a short-term (non-core funded) member of staff. However, at the time of writing, funding for this unit had not been secured beyond 2024. While five out of the six WFP regional bureaux had a funded Safeguards adviser in post until early 2024, as with the headquarters unit, these advisers were all consultants rather than permanent staff. Following the recent organizational restructuring (and at the time of writing), only two of these regional bureau advisers remain in post. While the ESSF-stipulated headquarters and regional bureau staffing requirements have largely been met since the ESSF's adoption, there is currently a significant degree of uncertainty as to how or whether these headquarters and regional bureau functions will continue to meet the ESSF's requirements in the future. The reduced resources could undermine the extent to which WFP's workforce and partners are adequately equipped to identify, avoid and manage environmental and social risks.
102. The ESSF also guided country offices to appoint Safeguards focal points, but these positions were not funded. Instead, focal points were to be identified from within the existing staff base of each country office, taking on Safeguards-related responsibilities alongside their existing responsibilities. Figure 10 identifies the number of country offices that have allocated at least one Safeguards focal point, as well as the proportion of country offices with a focal point, both globally and within each region.

**Figure 10: Country offices with at least one Safeguards focal point, as of July 2024**



Source: WFP PPGR internal tracking data.

103. There are significant regional variations in the extent to which country office focal points have been established and the roll-out of the country office focal point function has been inconsistent, again undermining the skills, tools and knowledge, and the overall focused resource, available to offices for ESS. Section 2.3 explores the factors behind these variations in more detail.
104. In addition to specifying the requisite roles, the ESSF also identifies CSPs as a key tool for environmental and social sustainability risk assessment. CSPs are essentially an entry point for country offices to establish a systematic approach to Safeguards. The ESSF also requires an environmental and social sustainability risk assessment of proposed CSP activities at the point of CSP preparation. In this respect, CSPs that were developed after the 2021 ESSF do acknowledge the ESSF, whereas before 2021 CSPs rarely mentioned Safeguards. Illustrative examples of CSPs responding to the ESSF requirements include the Nicaragua 2024–2029 CSP, which states: “In line with WFP’s [ESSF], all CSP activities will be screened for environmental and social risks using WFP’s corporate tool. This will ensure that programme activities do not cause harm ... to the environment or people. Where necessary, WFP will develop [ESMPs] based on the results of screening.”<sup>72</sup> Similarly, the Kyrgyz Republic 2023–2027 CSP

<sup>72</sup> WFP. 2019. “Nicaragua country strategic plan (2024–2029)” (WFP/EB.A/2024/8-A/3), page 19, para 104.



states: "In line with WFP's [ESSF], all WFP activities will be screened with a view to preventing, avoiding and mitigating any potentially negative direct or indirect impacts on the environment, gender equality and peace."<sup>73</sup>

105. While post-2021 CSPs respond consistently to the ESSF on paper, the practical application of Safeguards within the actual implementation of the CSP varies considerably. Only a handful of examples were identified of country offices making substantive progress towards applying a systematic, CSP-wide approach to Safeguards application, as envisaged by the ESSF. No examples were identified of CSPs meeting the requirement to undertake an environmental and social sustainability risk assessment of proposed CSP activities. Across the evaluation sample of 11 country offices, the Yemen country office had the most developed approach, with two country office Safeguards focal points in place: one overseeing environmental standards and the other overseeing social standards. Under the coordination of these focal points, all CSP activity managers have been trained and have taken responsibility for Safeguards screening where it is required. There are still gaps with the system – for example, immediate emergency responses are not covered and there are ongoing concerns about cooperating partner capacity to undertake screening – but the 'mainstreaming' of the process across activity managers was a positive development, and one that was not identified to the same extent elsewhere. Other country offices, including Afghanistan, Ghana and Madagascar, had started to take a similar approach to mainstreaming environmental and social sustainability risk assessment across activity managers, but this work was still at a preliminary stage in these country offices.
106. Far more evident across the evaluation's country office sample were markedly less systematic approaches to Safeguards. For most country offices within the evaluation sample, approaches to Safeguards were driven less by strategy and more by the need to respond to donor requirements for one-off interventions. These reactive approaches focused only on undertaking the required screening, rather than establishing or embedding a long-term system within the country office or supporting the CSP implementation period. Headquarters and regional bureau interviews further confirmed that this reactive, donor-driven and intervention-specific approach was the dominant way of operationalizing Safeguards within country offices.
107. Where Safeguards is being applied, work is targeted exclusively on development activities rather than on emergency-focused interventions. This includes country offices where there are active emergency responses under way. Indeed, WFP's Emergency Activation Protocol<sup>74</sup> – the framework that guides the organization's emergency responses – does not include any reference to the ESSF or to Safeguards. Even within Afghanistan and Yemen – both of which are more advanced than other country offices in their systematization of Safeguards – the application of Safeguards is focused on their longer-term, development-focused activities (such as community asset building and smallholder agricultural development), rather than on the primary focus of their operations (i.e. immediate emergency responses). The evaluation interviewees confirmed that the Safeguards processes outlined within the ESSF have not been applied to any immediate WFP emergency responses. Section 2.3 will explore the internal and external factors that have impeded the application of Safeguards in different contexts.

#### Finding 14

#### Where Safeguards have been implemented, this has helped to meet donor requirements and has supported risk management

There were several examples where the application of the Safeguards process had clearly helped country offices to secure new funds – in these instances, if the Safeguards process had not been in place, funding would not have been secured. Country offices applying Safeguards also report that the process does help to improve environmental and social sustainability risk management for their interventions.

108. Arguably, the most tangible positive result that can be attributed to the Safeguards process is that WFP has secured a number of donor agreements as a direct consequence of the Safeguards process

<sup>73</sup> WFP. 2022. "Kyrgyz Republic Country Strategic Plan 2023–27" (WFP/EB.2/2022/7-A/7), page 22, para 124.

<sup>74</sup> WFP. 2023. *Executive Director's Circular – Emergency Activation Protocol*. OED2023/003.

being in place, especially where meeting donors’ Safeguards requirements was a prerequisite of the funding agreement. For example, this applies to funding channelled through the German Development Bank (KfW), which in 2023 amounted to almost USD 100 million. These resources would not have been secured without a Safeguards system being in place. At the country office level, the award of a USD 10 million Green Climate Fund grant in the Kyrgyz Republic was equally dependent on the deployment of Safeguards. Other instances within the evaluation country office sample include World Bank-funded interventions in Afghanistan, Madagascar and Yemen, and an African Development Bank (AfDB)-funded intervention in Madagascar.

109. More generally, those country offices within the evaluation sample that were applying Safeguards all indicated that – notwithstanding the shortcomings with the system– the process did improve the environmental and social sustainability risk management of their interventions. The requirement to apply a structured screening process pushed country offices to consider sustainability risk in a deliberate, systematic manner. Although only identified in one instance, this structured process also gave one country office – Yemen – a platform and leverage to discuss women’s empowerment with cooperating partners and people in vulnerable situations, which had previously been challenging to address in their context.

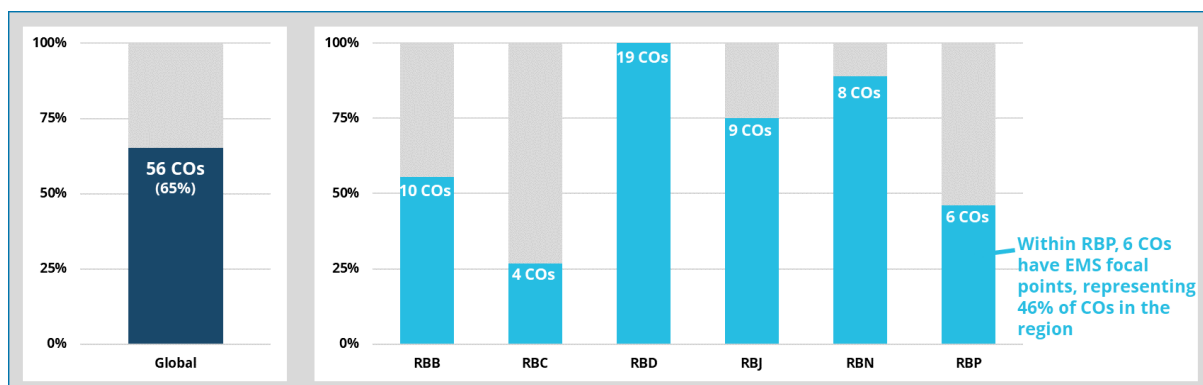
**Finding 15**

**Level and quality of EMS implementation varies, but early positive results are evident within some country offices**

As with Safeguards, the roll-out of EMS has been inconsistent. A phased, progressive approach to EMS was deliberately taken, but there has been inconsistency in the level of progression, and indeed prioritization/uptake observed across countries and regions. However, positive environmental and social sustainability results that are linked to EMS implementation were evident in some country offices. An important caveat, however, is that many country offices were already implementing some form of environmental sustainability measures prior to the policy’s adoption, although the policy and the ESSF, in particular, have brought more structure and consistency to those pre-existing efforts.

110. As with Safeguards, the ESSF has defined the institutional structure and roles necessary for implementing the EMS. This includes coordination and oversight from MSDI, an EMS adviser within each regional bureau and EMS focal points within each country office. Since the policy’s adoption, MSDI’s work on EMS has been supported by a staff base of three to six, with the current profile being three permanent staff and two consultants. In early 2024, four out of the six regional bureaux had a funded EMS adviser in post, but the recent organizational restructuring has resulted in this being reduced to two regional bureau advisers. Again, similar to Safeguards, the ESSF also required the identification of EMS focal points within each country office, and again these were existing staff members taking on EMS-related responsibilities alongside their existing responsibilities. Figure 11 identifies the number of country offices with at least one EMS focal point, as well as the proportion of country offices with a focal point, both globally and within each region. Section 2.3 will explore the factors behind the inconsistent roll-out of the EMS positions at the regional bureau and country office level. However – and as with Safeguards – variable resources could undermine the extent to which WFP’s workforce and partners are adequately equipped to identify, avoid and manage environmental and social risks.

**Figure 11: Country offices with at least one EMS focal point, as of July 2024**



111. The EMS-focused CRF indicator also provides a measurement of the extent to which ESSF requirements have been operationalized. Even though the indicator does not provide detail on the quality of country office-level EMS, it does confirm that 51 country offices have at least started addressing the ESSF requirements by embarking on the process of establishing an EMS.
112. Looking beyond these immediate measures of the extent of EMS implementation, WFP's annual reporting for Greening the Blue provides data on organization-wide results that are – as noted above – at least partly attributable to EMS. However, at the country office level, there was found to be no consistent or comparable data on the quality or extent of EMS implementation. Many country offices track the details of their EMS roll-out and results, but using different country- or region-specific processes and tools; for example, the Ghana country office has its own Business Operations Strategy Database, which is used to monitor and measure the EMS approach and actions. More broadly, the organization-wide Archibus system is the most consistently used, but this is restricted to environmental performance data, with no data on EMS milestones, processes or coverage. Moreover, many interviewees expressed concerns around the completeness and consistency of the data that are input into the system.
113. Across the evaluation's country office sample, the extent and quality of the EMS roll-out was found to vary considerably. The country offices in Ghana, the Kyrgyz Republic, Mali and Nicaragua provided examples of relatively structured approaches to EMS, supported by plans, milestones and monitoring processes, which are used to analyse and understand the efficacy of any implemented measures. At the other end of the spectrum, however, the Guatemala and Egypt country offices have only recently started to identify potential efficiency measures, and the Madagascar country office has yet to identify an EMS focal point. Interviews with headquarters and regional bureau staff confirmed that this variation is representative of EMS implementation across the broader organization.
114. The evaluation identified numerous country office-level results linked to EMS implementation, with representative examples provided in Box 4.
115. Some metrics associated with such country office-level results (e.g. emissions performance and waste reduction) are aggregable and comparable, meaning that they can be fed into the Greening the Blue reporting and, as such, can provide insight into some aspects of organization-wide performance. However, the evaluation did not identify consistent processes or metrics for analysing the cost effectiveness of EMS measures. Individual country offices, such as Ghana and the Kyrgyz Republic, routinely undertake a degree of cost-effectiveness analysis when considering EMS measures, but these are processes specific to the country offices, undertaken independent of any central guidance or direction.
116. While the examples identified in Box 4 are linked to the implementation of the EMS, driven by the Environmental Policy and the ESSF, it is important to acknowledge that many country offices were undertaking environmental sustainability measures before adoption of the policy. This work may not have been labelled 'EMS', but it was very much in line with the principles and objectives of EMS. However, those same country offices also confirmed that the EMS policy tool has brought more structure, direction and consistency to their efforts.
117. There are also instances where EMS-related results are being delivered, but those results can only be partly attributed to WFP. For example, the Namibia country office is housed in a building shared by

**Box 4: Examples of country office-level results linked to EMS implementation**

- **Emissions reductions and cost savings** in Mali due to the ongoing solarization of facilities.
- **Energy and cost savings** in Nicaragua due to the switch from fluorescent to LED lighting.
- **Reduced waste generation** in the Kyrgyz Republic due to the recycling measures and promotion of staff behaviour change.
- **Reduced water usage** in Kenya due to wastewater recycling and rainwater harvesting.
- **70 percent reduction in plastic bottle use** in Yemen through introduction of water dispensers.
- **Paper use reduction** in Namibia through staff engagement and behavior change prompting.

nine other United Nations agencies. A common services unit, led by the United Nations Development Programme (UNDP), is responsible for facilities management, and WFP is part of a coordinating committee. Here, similar results to those in Box 4 are seen – for example, reduced electricity costs due to solar panel installations – but the EMS is, by definition, a joint effort across multiple agencies.

**Finding 16 | EMS approaches alignment with ISO 14001**

EMS is approaching alignment with ISO 14001, representing good progress against the policy commitment of having an EMS that is consistent with this international benchmark.

118. As noted in section 1.2, the Environmental Policy committed WFP to adopting an EMS that is “consistent”<sup>75</sup> with standard ISO 14001. Crucially, however, WFP are only seeking alignment with the standard – rather than actual compliance. Gaining certification against ISO 14001 is a resource-intensive process, which – in WFP’s assessment (with which the evaluators agree) – does not justify the human and financial investment required. Equally, ISO 14001 is the predominant global benchmark for EMS, meaning that its principles offer a sound model against which to develop EMS. This approach of seeking alignment rather than compliance, is in line with the guidance provided by Greening the Blue and UNEMG.

119. Against this background, the evaluation’s methodology for assessing organization-wide EMS performance included the development of five key EMS principles, with these principles being derived directly from ISO 14001. Based on the evaluation’s analysis, Table 12 provides a summary assessment of WFP’s alignment with the principles (a detailed assessment is presented in Annex XII).

**Table 12: Summary assessment of EMS alignment with key principles derived from ISO 14001**

| EMS principle, as derived from ISO 14001                       | Summary assessment of WFP’s alignment |
|--|---------------------------------------|
| 1: Enhanced environmental risk management and performance      | Moderate                              |
| 2: Continuous improvement                                      | Moderate                              |
| 3: Transparency (effective communications/disclosure)          | Partial                               |
| 4: Leadership commitment and action                            | Moderate                              |
| 5: Providing significant costs and financial savings over time | Partial                               |

**Extent of alignment:**



Source: Elaborated by the evaluation team.

120. WFP’s strategy on EMS is approaching alignment with ISO 14001, with three out of the five principles moderately aligned with the standard. However, one of the strategy’s weaker points was transparently communicating the purpose, measures, options and results from the EMS at headquarters and country office levels to staff, partners and people in vulnerable situations (Principle 3). Additionally, the absence of comprehensive and consistent cost data associated with EMS measures is undermining alignment with Principle 5.

**Finding 17 | Evidence of some progress against all policy objectives, but significant gaps remain**

Some progress has been made towards the five Environmental Policy objectives. However, progress has been constrained by the inconsistent application of Safeguards, the limited scope of EMS and the fact that broader efforts to meet the objectives are still at an early stage.

<sup>75</sup> WFP. 2017. “Environmental Policy” (WFP/EB.1/2017/4-B/Rev.1\*), page 19, para 43.

121. As noted in Finding 11, the existing policy monitoring processes do not provide an adequate basis for assessing WFP’s progress against the policy’s objectives. However, based on the foregoing analysis of results, Table 13 provides a summary assessment of progress against the five Environmental Policy objectives.

**Table 13: Summary assessment of progress against Environmental Policy objectives**

| Policy objective  | Summary assessment of progress against objective   |
|---|--|
| <p><b>1:</b> Progressively enhancing the environmental sustainability of activities and operations, thus improving efficiency and outcomes over time</p>  | <p>The EMS approach has helped to enhance the environmental sustainability of WFP <b>facilities</b>, improving specific issues at the country office level, such as waste management and energy efficiency. However, the EMS has not been applied beyond facilities, to cover more substantial aspects of WFP <b>operations</b>, such as logistics or food procurement, which represent a significantly larger proportion of – for example – waste generated by the organization. No evidence is yet available to indicate the extent to which Safeguards have enhanced sustainability. In any case, broader application and monitoring of environmental sustainability (i.e. beyond just Safeguards and EMS) has not been systematic, so there is little evidence with which to assess progress against this objective.</p> |
| <p><b>2:</b> Protecting the environment and preventing pollution by managing risks and maximizing the environmental opportunities of all activities and operations</p>  | <p>A Safeguards system has been established to support risk management, but it is not being applied consistently or systematically, nor is it being applied to all WFP activities. Moreover, the system is compliance-orientated and is not currently being used to “[maximize] the environmental opportunities”. Beyond Safeguards and risk management, there is little evidence to suggest that WFP is systematically maximizing environmental opportunities through other channels, processes or tools.</p>   |
| <p><b>3:</b> Minimizing the carbon footprint and increasing the resource-efficiency of operations and facilities management, particularly the management of materials, water, energy and waste</p>  | <p>As part of its contribution to improved environmental sustainability, the EMS is resulting in reduced carbon intensity and increased resource efficiency of WFP <b>facilities</b>. As with the first objective above, though, the EMS has not been applied beyond facilities or to <b>operations</b>, so it has not had a substantial influence on – for example – the GHG emissions profile of WFP’s broader work. Efforts are being undertaken by the SCD to better understand WFP’s broader operational carbon footprint and resource usage, but this work is at an early stage.</p>   |
| <p><b>4:</b> Aligning WFP’s approach to environmental sustainability with global standards and good international practice, including in donors’ policies and expectations</p>  | <p>Both the Safeguards and EMS systems are reasonably well aligned with relevant global standards and practices. However, the Safeguards system does have some gaps in the standards that it applies, and donors have raised concerns about the inconsistent application of Safeguards across WFP.</p>   |
| <p><b>5:</b> Strengthening the understanding and capacities of national governments, cooperating partners, suppliers and, particularly, beneficiary communities in planning and implementing sound activities for food security and nutrition</p> | <p>A degree of training has been undertaken with partners, but this has mostly been focused on Safeguards and associated screening processes. Beyond that, there has been no systematic, external-focused capacity development or awareness-raising around environmental and social sustainability as it relates to WFP operations.</p>  |

**Finding 18****Beyond the policy tools, environmental and social sustainability results are being delivered, but are often secondary 'by-products' of the main intervention**

WFP is delivering a range of positive results relating to environmental and social sustainability. However, these results tend to be just aligned with – rather than driven by – the policy's vision, objectives and principles. Such results have also arisen as secondary or even unintended 'by-products' of WFP interventions.

122. Looking beyond Safeguards and EMS, the evaluation identified a range of discrete results, which have delivered or are delivering positive environmental and social sustainability benefits. Box 5 provides some representative examples.

123. However, none of the results identified by the evaluation can be explicitly attributed to the policy or its implementation. In most instances, there was no evidence that the policy even contributed to an achievement or result: the interventions that delivered results would invariably have happened anyway, regardless of whether the policy had been adopted or not. Moreover, in most cases across the evaluation country office sample, the sustainability-related results were secondary to the intervention's main targeted result(s). Taking one of the examples from Box 5, the main aim behind developing more efficient supply chains in Namibia was to reduce costs. In addition, the more cost-efficient supply chains and procurement processes also delivered the positive 'by-product' of emissions reductions.

124. However, not all results were unintended. Again, taking an example from Box 5, the resilience project in Ghana purposefully integrated sustainable agroforestry techniques to reduce water usage in the targeted communities, deliberately working to enhance the environmental sustainability of WFP's operation. However, such instances of intentional design to deliver explicitly identified sustainability-related results were in the minority.

**Box 5: Examples of environmental and social sustainability-related results**

- **Water conservation gains** in Ghana, due to improved agroforestry practices, applied in the implementation of resilience programming.
- **Emissions reductions** in Namibia, due to more efficient supply chains and a shift to single annual procurements.
- **More efficient use of natural resources** in the Kyrgyz Republic, due to school feeding interventions applying cleaner cooking processes.
- **Increased resource efficiency** in Egypt, through the use of agricultural waste in biogas production.
- **Reduced packaging waste** in Kenya, through a 'reverse logistics' supply chain initiative focused on a circular economy.
- **Reduced deforestation and indoor particle pollution** in Guatemala, due to promotion of solar energy and fuel-efficient cooking technologies in school meals programming.

**Finding 19****Foundations are being laid to enable a deeper understanding of WFP's environmental performance and to better inform decision making**

The Environmental Policy has been a key driver in the SCD's efforts to establish a rigorous and comprehensive understanding of the environmental footprint of WFP's supply chain operations. The SCD's work on environmental sustainability is laying strong foundations, which have the potential to significantly improve WFP's capacity to identify the most environmentally impactful aspects of its work (including, but also beyond, supply chain operations), and to, thereby, improve the incorporation of environmental considerations within WFP's decision making.

125. Although still in progress, considerable work is being undertaken within the SCD to build an understanding around the detailed environmental footprint (including GHG emissions and waste generated) of supply chain operations and, crucially, of where and how specific aspects of supply chain operations contribute to that footprint. Work is centred around a series of analyses and tools, including the calculation of WFP’s Scope 3 emissions baseline (see Box 6), the development of the ECODASH portal to inform decision making on sustainable procurement and logistics, and the commissioning of life cycle analyses to determine the environmental footprint of specific crops.
126. Much of this work is focused on establishing baseline data in order to understand WFP’s current position. With that baseline in place, WFP should then be in a better position to identify which aspects of its work have the most environmental impact, and which strategies could be applied to “avoid harming the environment” and to “maximizing environmental benefits”, as per the Environmental Policy’s aims. This could include – for example – working with suppliers to reduce their own environmental footprint.
127. Given the foundational nature of this work, by definition, no results have been achieved yet; indeed, the most appropriate results and targets have still to be identified. However, the work was (and continues to be) partly driven by the Environmental Policy’s objectives and principles, and the work on measuring Scope 3 emissions has been incorporated into the upcoming EPACT. All this work represents a tangible, positive example of how the policy has influenced work within WFP, above and beyond Safeguards and EMS.

**Box 6: Measuring WFP’s Scope 3 emissions**

A central strand of the SCD’s sustainability-focused work is the development of WFP’s Scope 3 GHG emissions baseline. As noted in paragraph 95, emissions data reported through the Greening the Blue initiative is not comprehensive, as it does not include many of each agency’s indirect (Scope 3) emissions. In WFP’s case, these indirect emissions include emissions generated by a food producer during the growth and processing of a specific crop. Although WFP is not directly generating these emissions, it is, nevertheless, buying a product that has a certain emissions profile and carbon intensity. Understanding the extent and nature of Scope 3 emissions could, therefore, inform WFP’s decision making concerning which suppliers and products to use, allowing the organization to consider environmental metrics alongside other criteria, such as cost and nutritional value.

**2.2.2 EQ2.2: Were there any unintended outcomes of the policy, positive or negative?**

**Finding 20**

**The ESSF’s emphasis on the policy tools drew focus away from the broader policy intent**

The centrality of the ESSF to the policy’s implementation has resulted in Safeguards and EMS becoming the primary channels through which WFP’s functions and staff engage with the Environmental Policy. However, the heavy focus and emphasis on these two policy tools within a narrow set of activities has potentially undermined the systematic application of the broader policy vision, objectives and principles.

128. As discussed in paragraph 48, the original 2017 policy document presented a contextual analysis that justified the need for an Environmental Policy, then it defined a vision, objectives and principles that WFP should apply across the whole organization. The policy also identified a set of tools to support policy implementation. The ESSF subsequently delineated those tools in considerable detail, including the requisite roles, responsibilities, systems and processes. The launch of the ESSF had direct implications for many of WFP’s functions and staff, with new tools and processes having a tangible influence on their day-to-day work. As noted in paragraph 27, the ESSF’s accompanying Executive Director’s circular “[established] the ESSF as WFP’s principal framework to increase the environmental

and social sustainability of its programme activities, support operations, and interactions with partners".<sup>76</sup>

129. Against this background, many evaluation interviewees – at both country office and headquarters level – perceived the ESSF (Safeguards and EMS) to **be** the policy, often interpreting the ESSF as the main document, rather than the policy itself. This perception introduces a risk that the overall policy vision, objectives and principles will be subsumed or even lost, and that the broader consideration of environmental and social sustainability (i.e. above and beyond the application of Safeguards and EMS) is not sufficiently attended to across WFP's operations.

#### **Finding 21 | Inconsistent application of Safeguards may be introducing reputational risks**

Donors have raised concerns about the inconsistent application and coverage of Safeguards across WFP.

130. A small number of evaluation interviewees indicated that some donors had expressed concerns about the extent to which Safeguards were (or were not) being applied consistently across WFP. A specific concern was that some interventions were applying a Safeguards process, but other thematically and contextually similar interventions were not.
131. One example identified by WFP staff (but not by donors) was in the Kyrgyz Republic, where the strategic outcome team – who were applying the screening – were unable to support interventions proposed by the local authority where they were classified as riskier than category C (the lowest risk intervention category). However, the local authority then took the exact same project to another WFP strategic outcome team, which did not yet have screening processes in place, and the work was subsequently funded through WFP. While specific examples were limited and the issue was only raised in a small number of interviews, this does, nevertheless, suggest that there are potential reputational risks when the Safeguards process is not applied consistently and comprehensively.
132. As noted in section 2.1.4, there may also be reputational risks associated with WFP not adopting Safeguards standards relating to labour; land acquisition, displacement and resettlement; and cultural heritage.

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<sup>76</sup> WFP. 2021. *Executive Director's Circular – Establishment of the WFP Environmental and Social Sustainability Framework* (OED2021/018), page 1, para 4.



## 2.3 EQ3: WHAT FACTORS HAVE ENABLED OR HINDERED THE IMPLEMENTATION AND ACHIEVEMENT OF THE POLICY OBJECTIVES?

### SUMMARY OF FINDINGS

#### Internal factors

A central enabling factor for policy implementation is the tangible business case behind each policy tool. Applying Safeguards can open the door to new funding streams, and EMS can reduce operating costs.

The roles, responsibilities and processes specified in the ESSF have also been essential in driving policy operationalization. In particular, a strong correlation was found between the extent of country office policy implementation and the extent of the support received from headquarters and the regional bureaux. The inverse also tends to be true: where there has been limited headquarters and regional bureau support, there has been limited policy implementation. Implementation is also dependent on country offices being able to identify sufficient new or existing resources. This has been challenging for country offices operating in increasingly resource-constrained environments.

The ESSF's extension of policy scope from environmental to environmental and social sustainability dimensions was not accompanied by sufficient guidance on how (beyond Safeguards) the social aspects of environmental and social sustainability should be incorporated within policy responses. This has limited the extent to which social sustainability issues are being addressed – or even considered – alongside environmental sustainability.

In terms of Safeguards implementation, this has been given little messaging or push from senior management since the launch, and management at the country office level often struggles to prioritize it, given resource constraints and other demands. Accountability measures are often lacking, unless donor funding is found to be at risk. The position of the Safeguards Unit within WFP's institutional hierarchy, and its staffing profile of consultants not core staff, has led to the interpretation that this is not a programmatic priority. Moreover, its position within WFP's Climate and Resilience Service (PPGR) has driven a misconception that Safeguards is concerned exclusively with environmental sustainability. WFP lacks a single, well-defined programme cycle, yet this is what the Safeguards approach is based on (in line with global best practice). Safeguards also suffers from a lack of understanding as to its relevance and utility within emergency and other contexts.

EMS uptake has been comparatively stronger, in part due to the tangibility and immediacy of the corresponding benefits. EMS can be perceived as more straightforward for staff to engage with, with measures such as recycling and energy conservation providing concrete demonstrations of how individual actions can directly contribute to the broader effort. However, EMS is restricted to facilities that are owned or leased by WFP, and is not suitable for facilities owned by WFP partners. This limited scope places corresponding limitations on the potential results that WFP could contribute to.

Policy-related collaboration between the EMS and SCD sustainability functions has been based on good interpersonal relationships, but there is no institutionalized connection here. The informality of these relationships risks undermining the policy's potential, especially when considering the SCD's extensive work on analysing WFP's environmental footprint.

#### External factors

The policy was largely developed as a response to external drivers, such as United Nations system-wide commitments and frameworks, the increasing prioritization given to environmental sustainability by national governments, and donor pressures on Safeguards. If anything, these external drivers have only strengthened since the policy's adoption.

External partners are supportive of WFP's efforts to establish a Safeguards system. However, governments and cooperating partners that have been involved in the Safeguards process face the same resource, capacity and expertise limitations as WFP. The training and support provided by WFP has been helpful, but a lack of in-country capacity – the absence of firms or consultants with the requisite experience – remains a constraint for many countries.

### 2.3.1 EQ3.1: What internal factors have enabled or hindered policy implementation?

#### Finding 22 | Enabler: strong business case for applying both Safeguards and EMS

A central enabling factor for the implementation of both Safeguards and EMS is the tangible business case behind each tool. Applying Safeguards can open the door to new funding streams and EMS measures can reduce operating costs.

133. Safeguards and EMS have tended to gain more traction in country offices where the business case for their application was already evident, or where headquarters and regional bureau advisers were able to effectively communicate the business case. Across the evaluation country office sample, the extent of policy application was deeply influenced by the extent to which actual and potential cost-benefits were demonstrable, whether through increased funding as a result of meeting donor Safeguards requirements or through reduced overheads as a result of EMS measures.
134. As noted in paragraph 108, some funding streams simply cannot be accessed unless Safeguards is in place and meets the donors' requirements. The business case in these instances can be striking; while it may take resources and effort to meet Safeguards requirements, the financial gains are quantifiable and often significant.
135. Regarding EMS, headquarters advisers, regional bureau advisers and country office focal points all identify the demonstration of EMS cost-benefits as being an important and sometimes essential basis for progressing implementation. For example, the initially limited engagement of the Central African Republic country office was overcome when the regional bureau adviser was able to outline how EMS could deliver potential savings of USD 100,000 for the office. Additionally, in Mali, EMS gained traction in a context of rapidly increasing energy prices and the pressing need to reduce electricity generator fuel bills.
136. The importance of the EMS business case could also potentially explain the limited application of water conservation measures across WFP. Such measures are not as prevalent as, for example, energy efficiency and waste management measures, since the requisite EMS measures often require considerably higher upfront capital investment and longer payback periods.

#### Finding 23 | Enabler: structures established by the ESSF have driven policy implementation

The roles, responsibilities, systems and tools specified within the ESSF have been essential for driving policy operationalization, particularly at the country office level. In particular, a strong correlation was found between the extent of country office policy implementation and the amount of support received from headquarters and the regional bureaux. The inverse also tended to be true: where there had been limited headquarters and regional bureau support, there had been limited policy implementation.

137. Many country office-level evaluation interviewees were previously unfamiliar with the two policy tools. In particular, country office focal points and staff tended to have had no prior engagement with or exposure to the associated concepts and processes of Safeguards. Consequently, the ESSF's detailed specification served as an essential foundation for newcomers to both understand and to start operationalizing the policy's requirements (the extent to which the ESSF's guidance was sufficient is explored further below in paragraphs 148 and 159).
138. However, when considering the ESSF's various resources and provisions, the strongest enabler of policy implementation was the direct support delivered by headquarters units (PPGR and MSDI) and regional bureau advisers. Across the evaluation's country office sample, a strong correlation was evident between the extent of policy implementation and the extent of support received from headquarters and the regional bureaux. For example, visits from advisers were identified as pivotal in the establishment of Safeguards in the Kyrgyz Republic, and for the systematization of EMS in Ghana and Mali. Remote support – whether through online training or through the provision of direct, country office-specific advice – was also frequently identified as critical to sustaining progress. For

example, a significant degree of technical backstopping from headquarters and the regional bureau contributed to the Madagascar country office's operationalization of Safeguards and its subsequent securing of World Bank funding.

139. However, the inverse was also evident across the evaluation country office sample, with little or no engagement from headquarters or regional bureau advisers being associated with limited or no progress on policy implementation. For example, the Madagascar country office has had very little engagement on EMS with headquarters or the regional bureau and has yet to initiate EMS implementation or even appoint an EMS focal point. This can be contrasted with the technical support noted in the previous paragraph from headquarters and the regional bureau to Madagascar on Safeguards and the corresponding positive progress. The implementation of EMS is similarly behind in Guatemala, where the country office has requested adviser visits, but resources have not been forthcoming.

**Finding 24 | Enabler: the tangible, immediate benefits of EMS have facilitated uptake**

The uptake of EMS has been comparatively stronger than for Safeguards. In part, this is due to the tangibility and immediacy of the corresponding benefits. EMS is also easier for individual staff to engage with because, aside from generating environmental benefits, measures such as recycling and energy conservation provide concrete demonstrations of how individual actions can directly contribute to the broader effort.

140. As noted in paragraph 133, an enabler for both policy tools has been the underlying business case. However, compared with Safeguards, the resultant benefits of EMS tend to be more assured and immediate. Safeguards can help to secure donor support, but beyond securing funding, the actual results of applying Safeguards – the difference the process makes to an intervention's sustainability – are difficult to demonstrate and may only be apparent later, or even following an activity's implementation. Conversely, EMS benefits are often highly visible and immediate; for example, the installation of solar panels clearly reduces electricity bills, recycling facilities improve waste management, and electric vehicles remove fuel costs. Across the country office evaluation sample, there was a palpable sense of pride in the EMS measures in place.
141. Most country offices also identified as another enabling factor the level of staff support for, and engagement with, the EMS. Indeed, many measures are dependent on staff behaviour change, including waste recycling and energy conservation through more efficient lighting management. In these instances, country office focal points invariably stated that staff behaviour change was occurring and that the necessary changes were generally not seen as an imposition, with staff being almost universally keen to contribute.

**Finding 25 | Constraint: limited country office-level resources, capacity and expertise**

Policy implementation is dependent on country offices being able to identify new resources or – more realistically – make use of existing resources. This has been challenging for country offices operating in increasingly resource-constrained environments. Identifying the requisite capacity and expertise has been equally challenging, particularly for Safeguards.

142. While the ESSF included resources for funded posts within headquarters and the regional bureaux, it was anticipated that country office-level Safeguards and EMS focal points would be integrated within existing roles. In the great majority of country offices, this is how focal points have been operationalized, with the Safeguards role typically being taken on by an existing programme staff member, and the EMS focal point role typically being taken on by existing finance, administration or engineering personnel. Induction, training and support from headquarters and the regional bureau adviser are available, with adviser visits to country offices often serving as a critical moment in country office focal points' orientation.
143. Most focal points undertake their ESSF-related responsibilities in addition to their core responsibilities. Within the country office evaluation sample, focal points often had a significant number of additional responsibilities. For Safeguards focal points, the additional workload was sometimes exacerbated by perceptions among operational staff that the focal point was solely responsible for Safeguards-related activities, so any Safeguards requirements could be 'offloaded' onto the focal point.

144. However, focal points' multiple duties and roles were sometimes advantageous. For example, in one country office, the Safeguards focal point also served as the country office's gender focal point, which facilitated the identification of linkages between the requirements of the ESS standard relating to gender equality and WFP's broader policy and work on gender. In most cases, the EMS focal point was already responsible for the country office's facilities management, therefore, to an extent, they were already fulfilling their 'new' policy-related responsibilities.
145. However, as noted above in para 137, many country office staff, including many country office Safeguards focal points, have had no prior experience with Safeguards systems or the associated concepts and processes. Headquarters and regional bureau support has helped and is sometimes essential, but most country offices in the evaluation sample identified the lack of in-country experience or expertise as being a significant hindrance to policy implementation, and particularly to the development of sustainable, mainstreamed in-country Safeguards systems.
146. The importance of expertise and resources is perhaps best demonstrated by the Yemen country office example. As noted in paragraph 105, Yemen's Safeguards system has progressed the furthest across the evaluation sample, with a level of mainstreaming not identified elsewhere. However, in contrast to other country offices in the sample, the Yemen country office's Safeguards was established through the support of a full-time international Safeguards consultant, who was deployed and fully funded as part of a World Bank project with the country office. Although no longer in post, the inputs received were assessed by the country office as being critical to their current position.

**Finding 26**

**Constraint: policy and ESSF design have limited the extent to which the social dimensions of sustainability have been addressed**

The ESSF's extension of policy scope from environmental to environmental and social sustainability was not accompanied by sufficient guidance on how (beyond Safeguards) the social aspects of environmental and social sustainability should be incorporated within policy responses or programme activities. This has limited the extent to which the social dimensions of environmental and social sustainability are being addressed – or even considered – alongside environmental sustainability.

147. While the ESSF was operationalized as the principal framework to address the environmental and social sustainability of WFP's work, only the Safeguards module of the ESSF defined any approaches to – or guidance on – social sustainability dimensions. The EMS module did not integrate social dimensions of environmental and social sustainability at all, nor did it refer to any of WFP's existing GEDSI-relevant policies. Beyond Safeguards, the only direction provided on environmental and social sustainability was within the original policy principles, as per Table 14.

**Table 14: Environmental and social sustainability-related clauses within policy principles**

| Policy principle                                   | Environmental and social sustainability-related clauses   |
|--|---|
| <b>Systematic consideration of the environment</b> | "... [seek] to understand correlations between healthy local ecosystems and the livelihoods of the people [WFP] serves".  |
| <b>Global requirements</b>                         | No references   |
| <b>Mitigation hierarchy</b>                        | "... work with communities and partners to seek first to avoid then to minimize, mitigate and remediate adverse environmental impacts of food assistance activities and in-house operations". |
| <b>Sustainable consumption</b>                     | "... engage local communities in the protection and sustainable use of natural resources, increasing awareness of the linkages between healthy ecosystems and food security."                 |
| <b>Precautionary approach</b>                      | "If an activity might harm human health or the environment, measures to prevent potential impacts should be taken..."   |
| <b>Life cycle thinking</b>                         | No references   |
| <b>Continual improvement</b>                       | No references   |

Source: Elaborated by the evaluation team, based on: "Environmental Policy" (WFP/EB.1/2017/4-B/Rev.1\*).Environmental Policy

148. These principles, of course, predated the framing of the ESSF as WFP's mechanism for addressing environmental and social sustainability, and in any case are too high level or tangential to constitute

guidance on how to practically consider and address environmental and social sustainability. The absence of substantive guidance or direction on the social dimensions of environmental and social sustainability continues within the upcoming EPACT, which, although not yet formally adopted, is squarely focused on WFP's environmental sustainability. This absence of guidance means that the application of other relevant WFP policies (for example, gender policy, protection and accountability policy) across 'environmental' activities, including EMS, is limited. This in turn could lead to missed opportunities for maximizing benefits and avoiding or mitigating risks to people in vulnerable situations and other GEDSI stakeholders. The lack of GEDSI consideration means that the commitment to environmental and social sustainability, rather than just environmental sustainability, remains at a conceptual level, and is largely omitted from the operationalization of the policy. At a minimum, links between staff wellbeing and the EMS could be more explicit.

149. As noted above in para 145, a central concern expressed by interviewees from across the country office evaluation sample was the limited extent to which country offices have access to capacity, expertise or guidance to address environmental sustainability within their work. When it comes to addressing environmental and social sustainability, there was even less confidence that there was sufficient capacity, or the right skills, in place or accessible. To generalize, country offices are struggling to systematically incorporate environmental sustainability considerations into their work, while the incorporation of environmental and social sustainability considerations are barely on their radar.

**Finding 27 | Constraint: limited formal links between EMS and SCD sustainability functions risks undermining the Environmental Policy's potential**

Policy-related collaboration between the EMS and SCD sustainability functions has been based on good interpersonal relationships: formalized institutional links have not been made. The informality of these relationships risks undermining the policy's potential, especially when considering the SCD's extensive work on analysing WFP's environmental footprint.

150. Although the SCD is not a policy owner, its work on establishing and analysing WFP's environmental footprint is deeply relevant to the Environmental Policy's objectives and principles. The relevance of that work has been an important driver in the ongoing collaboration between MSDI and the SCD, especially on the development of the EPACT. However, some evaluation interviewees were concerned about the collaboration being predicated on good interpersonal relationships, with the work and coordination between the SCD and MSDI not being formally institutionalized, meaning that it "depends on goodwill not to be territorial"<sup>77</sup>. Some interviewees felt that this lack of formality risked reducing the potential of WFP's environmental sustainability efforts, particularly in the upcoming EPACT.

**Finding 28 | Constraint: limited visible management commitment or 'push' to apply Safeguards**

Following the launches of the original policy and the ESSF, there has been little messaging or push from senior management to operationalize Safeguards. Safeguards is often not prioritized by management within country offices. Given resource constraints and the multitude of other priorities, Safeguards often falls down the list. Current accountability mechanisms do not incentivize the comprehensive application of Safeguards: unless donor funding is at stake, there are no internal consequences if Safeguards is not applied.

151. The ESSF and its accompanying Executive Director's circular established Safeguards as a mandatory requirement to be applied across all CSP activities. However, there has been little subsequent communication from senior WFP management in headquarters or the regional bureaux on this requirement, and there has been minimal encouragement to ensure the comprehensive application of Safeguards. Messaging has been similarly limited across many country offices. In 4 out of the 11 country offices in the evaluation sample, the staff who were most involved in Safeguards did not feel that their leadership were even committed to the implementation of Safeguards. Regardless of

<sup>77</sup> Key informant interviews

whether the senior management actually is or is not committed to the implementation of Safeguards, there was a common perception that Safeguards is a low priority.

152. Many interviewees attributed senior management's low prioritization of Safeguards, and the perception of its low importance, to the absence of associated accountability mechanisms. The ESSF did not establish any accountability mechanisms to support or incentivize compliance with the Safeguards requirements. Consequently, if Safeguards is not applied, there are no internal consequences.

**Finding 29**

**Constraint: institutional location and staffing profile of the headquarters Safeguards Unit has resulted in coordination and perception challenges**

The position of the Safeguards Unit within WFP's Climate and Resilience Service (PPGR) has driven a common misconception that Safeguards is concerned exclusively with environmental sustainability. Moreover, the position of the unit within WFP's institutional hierarchy, and its staffing profile of consultants not core staff, has sometimes been interpreted as a signal that Safeguards is not a programmatic priority. In some instances, these perceptions have resulted in communication and coordination challenges at the country office level, which impedes the mainstreaming of Safeguards.

153. The Safeguards Unit is hosted within the PPGR. Considering the eight ESS, some of the most relevant WFP functions and technical expertise are also hosted in PPGR. Most obviously, PPGR hosts expertise that can support the application of the climate change standard. However, PPGR also arguably has relevant expertise to support the application of ESS on natural resources, and on biodiversity and ecosystems. However, ESS also cover themes in which WFP have relevant functions and expertise that are hosted in other parts of the organization, including those functions relating to the four social standards: gender, security and conflict sensitivity, AAP and protection.
154. The evaluation interviewees who were the most closely involved all noted that the coordination between the Safeguards Unit and other ESS-relevant technical functions has strengthened over time. However, coordination and collaboration has been challenging, with interviewees partly attributing this to the novelty of Safeguards within WFP, and to the continuing uncertainties around precisely how the Safeguards process should align with and use existing functions, processes and tools, such as gender analyses and conflict sensitivity principles. Moreover, some interviewees (at headquarters, regional bureau and country office levels) felt that efforts to address these uncertainties have been undermined by the limited convening power of the Safeguards function. For some interviewees, this lack of convening power is due to the 'lower' position of the unit in WFP's institutional structure compared with other ESS-relevant technical functions, and also to the personnel profile of the unit, which has always been staffed entirely by consultants as opposed to core staff. The unit's lack of 'seniority' within WFP has sometimes been interpreted as a signal that Safeguards is not a programmatic priority.
155. While headquarters coordination has improved over time, some significant coordination gaps were evident across the country office evaluation sample. In one instance, the country office's gender, AAP and community feedback mechanism focal points were completely unaware that a Safeguards function even existed in WFP. This was an extreme example; however, gender focal points within a number of other country offices reported that, although they were aware of the Safeguards function, they had no involvement in the process whatsoever.
156. These coordination challenges were found to be partly due to a common misconception among the country office-level interviewees, who assumed that Safeguards was predominantly, even exclusively, concerned with environmental sustainability. In part, the combination of Safeguards being a tool of the Environmental Policy and PPGR's hosting of the Safeguards Unit gave rise to this misconception.

**Finding 30**

**Constraint: a key challenge for Safeguards implementation has been the diversity of WFP programme types and the lack of a consistent point at which Safeguards can or should be applied**

While WFP's basic model for applying Safeguards is well aligned with global best practice, the breadth and diversity of WFP's operations – from emergency response to technical support varying by context – has complicated the application of Safeguards. In contrast to other agencies that have a more

standardized programming model, it is often not clear when and how Safeguards should 'plug in' to WFP's various interventions.

157. As discussed in section 2.1.4, WFP's approach to Safeguards follows a well-established model that is similarly applied by IFIs, and increasingly among United Nations and other humanitarian or development agencies. However, the prevailing model and the underlying processes were developed by IFIs predominantly for application within their relatively standardized programme cycles. In these cases, the Safeguards processes tend to be applied at specific, well-defined points in the design, approval and implementation of any given programme.
158. The ESSF does identify specific points where Safeguards should be operationalized in WFP's programme cycle: first, at the CSP level; and second, at the activity level, including when developing FLAs, MOUs and CCs. However, country offices apply a diversity of approaches when translating CSP commitments into activity design and implementation. Activities can be based on direct funding by WFP, funding from donors, partnerships with non-governmental organizations (NGOs) and other local organizations, and service agreements with governments. In some cases, the detailed preparation of the activity is the responsibility of WFP; in others, it is the responsibility of cooperating partners, contractors or government agencies. Equally, there is considerable thematic and contextual diversity, with activities spanning the entire spectrum of Saving Lives and Changing Lives, as defined by WFP's Strategic Plan 2022–2025: from rapid emergency responses to long-term resilience and asset-building interventions, and technical support in development environments. In contrast to IFIs, WFP does not systematically embed Safeguards into set decision-making points taken by activity managers.
159. Interviewees at the headquarters, regional bureau and country office level noted that the ESSF's guidance is not sufficiently granular to deal with the diversity within WFP's programme cycle, or with the idiosyncrasies of different approaches to activity development. In some instances, the lack of activity-specific direction and guidance has slowed, delayed or even prevented the application of Safeguards. Notably, the absence of activity-specific protocols and of guidance was sometimes cited as one reason for the lack of Safeguards application within emergency responses. PPGR is in the process of developing activity-specific guidance and protocols, such as the ESSF Thematic Guidance Series – Environmental & Social Risk Screening in School Based Programme (SBP) Interventions. However, the previous absence of such guidance has hindered Safeguards implementation.

**Finding 31**

**Constraint: in some contexts, the rigidity of the Safeguards process and screening tool is seen as disproportionate and inappropriate**

The Safeguards process and screening tool was perceived as being cumbersome, disproportionate and inappropriate for some WFP interventions, particularly emergency responses. In combination with the apparent rigidity of the screening tool, this is sometimes contributing to a reluctance to operationalize Safeguards.

160. Many interviewees at the headquarters, regional bureau and country office level were critical of the inflexibility of WFP's Safeguards process, with the screening tool being frequently singled out as inappropriate for use in certain contexts. Most commonly, the length and detail of the screening tool was viewed as disproportionate to small-scale, low-value interventions, such as food-for-assets projects, and it was also viewed as inappropriate for emergency responses. In some instances, across the country office evaluation sample, the length and rigidity of the tool was explicitly identified as a barrier to the operationalization of Safeguards.

**Finding 32**

**Constraint: potential of EMS results are constrained by the limited control that WFP has on leased and partner-owned facilities**

The EMS approach is restricted to facilities that are EMS owned or leased by WFP. The approach does not extend to other facilities that are owned and operated by governments and other WFP partners. Even where WFP leases facilities, the extent to which WFP can implement EMS is often constrained. This limited scope places corresponding limitations on the potential results that WFP could contribute to.

161. The ESSF established the boundaries of the EMS approach as being WFP-owned or WFP-leased facilities. While it noted that some measures are under WFP's control (within facilities that WFP owns),

other measures can only ever be promoted by WFP (typically those within leased facilities). Across the country office evaluation sample, several examples were identified of WFP being able to implement EMS measures within leased facilities, such as solar panel installations and energy-efficient windows, with supportive landlords being the essential enabler. Equally though, examples were identified of the leasing arrangement being a barrier to EMS, such as solar panel installations being rejected due to landlord's objections.

162. Much of WFP's work is dependent on facilities that are owned and operated by governments or other partners, most notably warehouses: of the 790 currently active facilities logged in Archibus, 113 (14 percent) are owned by WFP, whereas 677 (86 percent) are leased.<sup>78</sup> While these leased facilities are outside of WFP's direct control, the ESSF acknowledges that WFP may be able to promote EMS within such third-party facilities. However, no further guidance has been provided by the ESSF or by headquarters or the regional bureaux on potential strategies. Unsurprisingly, no examples were identified across the country office evaluation sample of WFP even attempting to promote EMS within third-party facilities. Although not quantified, some interviewees felt that the potential environmental impact of third-party facilities – including the potential environmental benefit of EMS measures – could outweigh the corresponding impact of facilities under WFP's direct control.

### 2.3.2 EQ3.2: What external factors have enabled or hindered policy implementation?

#### Finding 33

#### Enabler: strong external drivers – multilateral frameworks, national priorities and donor requirements

The policy was largely developed as a response to external drivers, such as United Nations system-wide commitments and frameworks, the increasing prioritization given to environmental sustainability by national governments, and donor pressures on Safeguards. If anything, these external drivers have only strengthened since the policy's adoption.

163. The external drivers that influenced the design and adoption of WFP's Environmental Policy are still relevant today. Moreover, some of these drivers have become demonstrably more influential over time. For example, the high-level visions of external frameworks, such as the United Nations Climate Neutral Strategy, have been made concrete through the Greening the Blue initiative and the corresponding demands that it places on United Nations agencies to transparently track and report their environmental footprints.
164. Across all evaluation interviews, donor requirements were universally identified as the single most important driver of WFP's work on Safeguards, to the point that this was a markedly more important and influential factor than the policy itself. The driving factor here was clear: for some donors, if Safeguards is not applied, funding cannot be secured.
165. For country offices, national government priorities are a central driver of WFP's work, especially on the formulation of CSPs. Within the evaluation sample examples were identified of government priorities for environmental sustainability having considerably more influence on CSP design than WFP's Environmental Policy. For example, environmental sustainability is a central theme across Namibia's 2025–2029 CSP. However, the Environmental Policy was explicitly not a material influence here – the main driver was the need to align the CSP with the Namibian Government's priorities, particularly the national Green Agenda.

#### Finding 34

#### Enabler: governments and cooperating partners are supportive of policy and Safeguards processes

External partners appreciate the rationale for and value of Safeguards and are supportive of WFP's efforts to establish a Safeguards system. Partners are equally supportive of the overall policy's vision and intent.

166. Many internal WFP interviewees expressed concerns about the burden that the Safeguards process places on external partners. However, the great majority of the external partners interviewed through

<sup>78</sup> Archibus export, 27 August 2024.



the evaluation (e.g. government representatives and cooperating partners) did not share this concern and were highly supportive of WFP's move to apply Safeguards. These institutions are operating in the same environment as WFP, often facing the same donor pressures. The high-level principles behind Safeguards also generally align with external partners' own principles and accountability requirements.

167. Partners were similarly supportive of the broader Environmental Policy vision and intent. Again, partners are operating in the same global context as WFP and are having to address similar environmental considerations and pressures.

**Finding 35**

**Constraint: governments and cooperating partners face similar resource and capacity constraints to WFP**

Governments and cooperating partners that have been involved in the Safeguards process face the same resource, capacity and expertise limitations as WFP. The training and support provided by WFP has been helpful, but a lack of in-country capacity – specifically the absence of firms or consultants with the requisite technical experience – remains a constraint for many countries.

168. As with country offices, WFP's partners have often had no prior experience with Safeguards systems or the associated concepts and processes and are, therefore, on a similar learning curve to country office staff. However, where Safeguards is being applied, country offices are systematically providing training for cooperating partners, typically during the partner induction processes or through standing annual capacity development sessions. Within the evaluation sample, instances were also identified of cooperating partners openly budgeting for (and WFP funding) Safeguards-specific resources within their FLA contracts – for example, to allow a cooperating partner to buy in a biodiversity expert to support screening against the biodiversity and ecosystems standard.
169. Nevertheless, limited resources, capacities and the steep learning curve are still a hindrance to Safeguards implementation. While cooperating partners and governments do look for external support to undertake Safeguards screening, interviewees also noted that sometimes there was limited or even no domestic Safeguards expertise (e.g. firms or consultants), and/or no domestic technical expertise to support the screening and application of specific ESS.

### 3. Conclusions and recommendations

#### Conclusion 1

The policy sets out a clear rationale for taking a systematic approach to environmental and social sustainability. At the same time, WFP is laying strong foundations to better understand its environmental performance and inform decision making. However, WFP's focus on applying the safeguards and EMS has detracted from the policy's broader vision, objectives and principles, undermining the extent to which environmental and social sustainability is being addressed systematically across WFP..

170. The policy's vision, objectives and principles are well aligned with the external context, and the policy's intent is well supported by WFP's partners. Moreover, the external drivers that the policy was originally responding to have only strengthened since the policy's adoption. In addition, the two main policy tools – Safeguards and EMS – continue to be not just relevant but necessary components for ensuring a coherent, comprehensive approach to environmental and social sustainability.
171. However, the ESSF's focus on these tools and the corresponding allocation of resources towards these tools have resulted in the tools being completely synonymous with the policy: for many WFP staff, the tools **are** the policy. The split institutional ownership of the policy has only strengthened that perception: PPGR leads on Safeguards (and only Safeguards), MSDI leads on EMS (and only EMS). The absence of a higher-level lead or champion for the Environmental Policy overall may have undermined WFP's efforts to address environmental and social sustainability more broadly. Indeed, beyond Safeguards and EMS, there is a marked absence of direction and practical guidance on how to address policy objectives or apply policy principles. The implementation of WFP interventions are delivering results relevant to environmental and social sustainability and aligned with the vision of the policy, but these results are largely not being driven by the policy or its tools. These results are sometimes not even intentionally targeted, rather they are often the positive 'by-products' of the interventions' primary results – for example, emissions reductions delivered as a by-product of supply chain optimizations, or reduced waste generation delivered as a by-product of more cost-efficient food packaging.
172. However, strong foundations are being developed that could support the identification and intentional targeting of environmental and social sustainability results. The SCD's efforts to establish a rigorous understanding of the environmental footprint of WFP's supply chain operations has the potential to significantly improve the organization's capacity to identify the most environmentally impactful aspects of its work. While the methodologies and tools being developed here are nominally focused on supply chain operations, it will be possible to apply the tools to all aspects of WFP operations, including but also beyond supply chain operations. In turn, this deeper understanding will improve the incorporation of environmental considerations within WFP's decision making.
173. The analyses and tools being developed by the SCD are highly relevant to and tightly aligned with the Environmental Policy's objectives and principles, and have the potential to significantly improve the environmental and social sustainability of WFP's operations. However, in contrast to Safeguards and EMS, this work is not a key focus of the policy: despite its deep relevance, it is not formally a policy tool and the SCD is not a policy owner. While collaboration between the current policy owners and the SCD has been strong (particularly during the development of the EPACK), this has been based on good interpersonal relationships, and there is no formal, institutionalized connection between the SCD Sustainability Unit, the EMS function, or the broader policy implementation process. The informality of this relationship risks undermining the policy's potential, especially when considering the SCD's extensive work on analysing WFP's environmental footprint.

## Conclusion 2

The social dimensions of environmental and social sustainability have not been adequately incorporated into policy implementation.

174. While the rationale and need for a systematic approach to environmental and social sustainability is clear, the policy's incorporation and addressing of the social dimensions of environmental and social sustainability has been inadequate. Social and environmental sustainability, taken together, was not part of the original policy, rather it was the ESSF that recognized the inextricable linkages between environmental and social sustainability, extending the policy's scope accordingly. Even in the ESSF, the presence of social sustainability considerations were entirely restricted to Safeguards. Beyond Safeguards, no strategic or practical direction was provided on how social sustainability dimensions should be incorporated within Environmental Policy responses. The upcoming EPACT continues this trend, with no emphasis on social sustainability dimensions. All this has limited the extent to which social sustainability is being addressed – or even considered – alongside environmental sustainability within WFP. This absence of guidance means that the application of WFP's GEDSI policies and approaches across 'environmental' activities (such as EMS) is limited. This, in turn, could result in missed opportunities to maximize benefits and avoid or mitigate risks to people in vulnerable situations and other GEDSI stakeholders (e.g. host communities, cooperating partners). The lack of GEDSI consideration means that the commitment to environmental and social sustainability, together, remains at a conceptual level, and is largely omitted from operationalization of the policy.

## Conclusion 3

The presence of policy-focused teams at headquarters, regional bureaux and country offices, including focal points, has been essential to achieving progress in implementing the policy. However, challenges with temporary staffing and limited resourcing have compromised the sustainability of the policy and its results

175. For both Safeguards and EMS, there is a strong correlation between the extent of country office policy implementation and the level of the support received from headquarters and the regional bureaux. The inverse also tends to be true: where there has been limited headquarters and regional bureaux support, there has been limited policy implementation. Moreover, where additional dedicated resources have been secured – most notably, the appointment of a full-time Safeguards advisor in Yemen – policy implementation has benefited considerably. The extent of policy operationalization has therefore been dependent on several factors, including resourcing and the level of technical support from headquarters and regional bureaux. In turn, the inconsistency of resourcing and support has prevented systematic and comprehensive policy implementation.
176. WFP's resource limitations and the ongoing restructuring process have necessitated difficult resourcing decisions across the organization. However, even in this context, the extent to which Environmental Policy functions are being reduced represents a marked risk to ongoing policy implementation. Given that headquarters and regional bureau support functions have been essential for the policy's operationalization so far, it should be assumed that the continued implementation of the policy will only be possible if adequate resourcing models are identified.

## Conclusion 4

While efforts to meet the five environmental policy objectives are still at an early stage, some progress has been made towards each objective. The evaluation identified challenges to the achievement of results such as inconsistent application of safeguards and the limited scope of the EMS. Existing policy monitoring, however, does not provide an adequate basis for fully assessing WFP's progress against the policy's objectives.

177. Overall, and as highlighted in Table 2, the policy has helped to improve the environmental management of WFP facilities, and the approach to EMS is delivering some early positive results. However, the roll-out and implementation of both Safeguards and EMS have room to improve, as does the integration of the social dimensions of sustainability and wider awareness-raising with, and training of, partners. While good examples are available, environmental and social sustainability

results are often secondary 'by-products' of WFP interventions. More is therefore required to ensure that WFP activities are 'doing no harm' and 'maximizing benefits' as per the policy aims.

178. Specific progress on Safeguards and EMS are in Conclusions 4a) and 4b).

#### Conclusion 4a

It is too early to determine the extent to which WFP's safeguards have enhanced the environmental and social sustainability of its programming. WFP has designed a safeguards model that is generally consistent with models applied by other entities. However, its implementation has been limited and unsystematic, which, given the need to comply with donor requirements, could limit WFP's ability to maintain existing – and access new – funding streams

179. WFP's Safeguards system is based on a well-established model. However, despite the ESSF's mandatory requirements, there has been little pressure from senior management to apply Safeguards. This, coupled with the institutional location and limited convening power of the Safeguards Unit, is perceived as a signal that Safeguards is not a programmatic priority. Consequently, Safeguards is not being applied across all of WFP's operations.
180. Implementation has also been undermined by the challenges of applying Safeguards across the diversity of WFP's operations. There is insufficient direction and guidance on where and how Safeguards should 'plug in' to WFP's various activity design and implementation processes, with the most consequential gap being around emergency operations. The inflexibility of the current system and the lengthy screening tool have also resulted in a reluctance to apply Safeguards, with a prevalent perception that the process is disproportionate and/or inappropriate for some contexts.
181. WFP is not alone when it comes to these challenges: other organizations face similar problems, particularly those institutions working in emergency contexts. However, donor pressures to apply Safeguards are only strengthening (e.g. new requirements from the World Bank require integration of further components such as land acquisition and cultural heritage risks) and WFP's access to many funding streams will be increasingly dependent on the existence of a Safeguards system capable of meeting these donors' requirements.

#### Conclusion 4b

WFP's approach to its EMS is well-structured, generally aligns with global best practices and is yielding early positive results. However, the approach does not consider social sustainability and the work has only covered a small part of WFP's overall environmental footprint. There are opportunities for WFP to further engage with partners and governments to leverage WFP's work on environmental management systems.

182. WFP's high-level approach to EMS is well structured and rigorous. The EMS strategy is approaching alignment with ISO 14001, representing good progress against the policy commitment for the EMS to be consistent with this international benchmark. Although roll-out across the country offices has been inconsistent, positive results are being delivered, and the tangible benefits associated with the EMS have generated a good degree of support for the work across WFP's staff base.
183. However, the EMS does not address or consider social sustainability dimensions at all. Some country offices have identified EMS measures that consider and successfully address both environmental and social sustainability; however, these efforts have been undertaken independently, in the absence of any high-level corporate guidance.
184. The potential for EMS is also constrained because its application has been limited to WFP facilities that are directly under WFP's control. A significant proportion of WFP operations are dependent on rented facilities or partner-operated facilities, such as warehouses. Influencing partners' approaches to EMS could significantly reduce WFP's indirect environmental impacts. The focus on facilities also means that the EMS has not progressed to cover or address the environmental footprint of WFP's broader operations, such as procurement and logistics. (While sustainable procurement is included as a category in the EMS assessment/design, this seems to have been confined in its application; for example, alignment with broader supply chains has not always been made.)

## Conclusion 5

Policy monitoring processes are inadequate. They do not measure progress effectively and are not capable of supporting policy related decision making. However, other mechanisms – most notably, “Greening the Blue” and the forthcoming EPACT – provide a sound basis upon which to build future monitoring.

185. The policy monitoring mechanisms specified within the ESSF have been inadequate, generating data that provide little insight around the true extent or quality of policy implementation. The Safeguards CRF indicator is particularly problematic. Its focus is on a specific aspect of the Safeguards process – the proportion of FLAs/MOUs/CCs screened – and fails to capture any detail on the quality or broader application of Safeguards. More seriously, it has sometimes generated a misunderstanding around the scope of the Safeguards process. For example, instances were identified of the indicator leading staff to think that screening activities only applied to FLAs, MOUs and CCs.
186. However, reasonable alternative monitoring systems are already in place. Although developed independently of the policy, the Greening the Blue initiative provides a good basis for measuring WFP’s high-level environmental performance; it certainly represents a far more robust monitoring framework than the policy-specified processes. If approved, the upcoming EPACT will provide an even more granular basis against which to measure WFP’s environmental performance. However, Greening the Blue gathers no substantive data on social sustainability, and neither will EPACT in its current form. If WFP confirms that the policy’s scope covers environmental and social sustainability, more robust monitoring will be required.

## Recommendations

| # | Recommendation  | Rationale   | Responsibility  | Deadline            |
|---|---|---|---|---------------------|
| 1 | <b>Recommendation 1: WFP should establish a stronger approach and governance structure to ensure that environmental and social sustainability are systematically addressed across the organization.</b>   | Safeguards and the EMS are essential components of a comprehensive approach to environmental and social sustainability. However, these two tools have dominated policy implementation: the broader policy intent and the policy's applicability to other aspects of WFP operations have been somewhat lost. At the same time, work on supply chain sustainability being carried out by the Supply Chain and Delivery Division (SCD) has the potential to demonstrate the relevance of the policy to WFP's broader operations and to offer tools for improving decision making regarding environmental sustainability. While collaboration between the current policy owners and SCD has been strong (particularly on the development of the environmental plan of action), it has been based on good interpersonal relationships, and there is no formal connection between the SCD Sustainability Unit, the EMS function and the broader policy implementation process. The informality of this relationship risks undermining the policy. | Lead: Deputy Executive Director<br>Support: Management Services Division (MSD), Programme Policy and Guidance Division (PPG), SCD | Fourth quarter 2025 |
|   | <b>Sub-recommendation 1.1:</b> Complementing existing WFP policies, the environmental policy should be revised to reflect the updated framing, structures and conceptual approaches for environmental and social sustainability.  | At the country office level, the quality and extent of safeguard and EMS implementation are strongly correlated with the level of resources and technical support that the country office receives. Where resources and technical support are not available, there tends to be little or no progress on implementing safeguards and EMS.  | Lead: PPG<br>Support: MSD, SCD, Gender, Protection and Inclusion Service (PPGG)   | Fourth quarter 2026 |
|   | <b>Sub-recommendation 1.2:</b> WFP should establish a sustainability unit responsible for – at a minimum – safeguards and environmental management system (EMS), along with the sustainability functions performed by the Supply Chain and Delivery Division (SCD). Guided by a high-level champion (at the level of Deputy Executive Director or Assistant Executive Director), the unit should take the organizational lead on ensuring the operationalization of the environmental policy (including subsequent revisions) and the mainstreaming of sustainability across WFP. | Consistent with broader moves across the United Nations system, the ESSF extended the scope of the  | Lead: Programme Operations Department (PO)<br>Support: MSD, PPG, SCD  | Fourth quarter 2025 |
|   | <b>Sub-recommendation 1.3:</b> WFP should make it a priority to identify stable resourcing models for the sustainability unit. This should include – but not be restricted to – a “lift and shift” model, whereby existing resources for  |   | Lead: PO<br>Support: MSD, PPG, SCD  | Fourth quarter 2025 |

| # | Recommendation   | Rationale  | Responsibility   | Deadline            |
|---|--|--|--|---------------------|
|   | safeguards, EMS and the SCD sustainability unit are retained and redeployed to the newly formed sustainability unit.   | policy to encompass both environmental and social sustainability. However, this was not accompanied by the substantive involvement of relevant offices at WFP and – in practice – social sustainability has only been addressed to a very limited extent.  |  |                     |
|   | <p><b>Sub-recommendation 1.4:</b> The ESSF should be reviewed and revised as needed to support WFP's efforts to address environmental and social sustainability by providing practical guidance for all operations. This should include the following, as required:</p> <ul style="list-style-type: none"> <li>➤ References and guidance for applying tools and analyses developed by SCD, PPGG and other relevant units.</li> <li>➤ Guidance on incorporating environmental and social sustainability considerations into country strategic plans and activity design and implementation</li> </ul> |  | Lead: PO<br>Support: MSD, PPG, SCD, PPGG                                 | Fourth quarter 2025 |
|   | <p><b>Sub-recommendation 1.5:</b> WFP's forthcoming strategic plan should reflect the organization's strengthened approach to environmental and social sustainability by including social dimensions in its framing of environmental sustainability as a cross-cutting priority.</p>   |  | Lead: PO<br>Support: PPG, SCD, PPGG                                      | Third quarter 2025  |
| 2 | <b>Recommendation 2: WFP leadership should ensure that safeguards are applied across all country strategic plan activities.</b>  | Although WFP has tools in place to support the safeguard system, the inconsistent and unsystematic rollout of safeguards is a function of multiple shortcomings, including limited leadership and messaging, the limited convening power of the Environmental and Social Safeguards Unit, weak accountability mechanisms and gaps in activity-specific guidance and technical expertise. | Lead: PO   | Second quarter 2026 |
|   | <p><b>Sub-recommendation 2.1:</b> WFP's safeguards system should be strengthened through the following measures:</p> <ul style="list-style-type: none"> <li>• Establish an accountability mechanism that incentivizes and ensures the application of safeguards across all country strategic plan activities with a view to mitigating reputational risk and establishing access to new funding streams.</li> </ul>  |  | Lead: PPG<br>Support: Programme Cycle and Quality Unit (POCQ), HRM, PPGG | Second quarter 2026 |

| # | Recommendation  | Rationale   | Responsibility   | Deadline            |
|---|---|---|--|---------------------|
|   | <ul style="list-style-type: none"> <li>Develop a process that requires activity managers to ensure adherence to relevant safeguards before interventions are approved.</li> <li>Clarify where and how other WFP expertise (e.g. gender analysis) could be used or must be used during safeguard screening processes.</li> </ul>   |   |  |                     |
|   | <p><b>Sub-recommendation 2.2:</b> WFP should develop mechanisms that give greater priority to and tailor the safeguards system so that it is better aligned with WFP's mandate and operating model. In particular, WFP should:</p> <ul style="list-style-type: none"> <li>Explore whether, how and in what contexts tailored safeguards processes could be applied: this should include clearly defined thresholds for applying any streamlined processes.</li> <li>Develop a road map for analysing and identifying where safeguards would be feasible in WFP's emergency operations. This should include establishing whether – and if so, what – thresholds should be applied. WFP should consider undertaking this research in coordination with other humanitarian actors that are facing similar challenges. Consideration should be given to involving donors in this research, with a view to improving their understanding of the barriers to applying safeguards during emergency responses.</li> </ul> |   | Lead: PPG<br>Support: PPGE, Emergency Coordination Service | Second quarter 2026 |
| 3 | <b>Recommendation 3: Improve the extent to which environmental and social sustainability is addressed by the EMS and broaden the application of the EMS.</b>  | The EMS is well-structured, reflects best practice and is delivering results. These early achievements could be built on by broadening the scope of the EMS so that | Lead: MSD<br>Support: SCD, PPG                             | Fourth quarter 2026 |



| # | Recommendation  | Rationale  | Responsibility   | Deadline           |
|---|---|--|--|--------------------|
|   | <b>Sub-recommendation 3.1:</b> EMS documentation and guidance (including the environmental and social sustainability framework) should be screened to identify opportunities for incorporating social sustainability considerations into the design of the EMS and into the ESSF itself.  | both environmental and social sustainability are formally addressed. There are opportunities for WFP to further engage with partners and governments to leverage WFP's work on environmental management systems in line with WFP strategic outcome 5 (Humanitarian and development actors are more efficient and effective). | Lead: MSD<br>Support: PPGG   | Fourth quarter2025 |
|   | <b>Sub-recommendation 3.2:</b> WFP should develop protocols and guidance for engaging and supporting partners (including the landlords of facilities leased by WFP, vendors, governments and cooperating partners) in the application of the EMS.   |  | Lead: MSD<br>Support: SCD, PPGG  | Fourth quarter2025 |
| 4 | <b>Recommendation 4: Strengthen the monitoring of environmental and social sustainability across WFP.</b>   | Policy monitoring processes have not allowed WFP to measure progress and do not generate the depth of evidence needed to support policy related decision making.   | Lead: PPG  | Third quarter2025  |
|   | <b>Sub-recommendation 4.1:</b> The CRF indicator, "proportion of FLAs/MOUs/CCs that have been screened for environmental and social sustainability risks", should be reformulated to capture all activity management agreements (including those activities directly managed by WFP). Complementary qualitative indicators/processes should also be developed to track the rollout of safeguards. The EMS would also benefit from additional reporting focused on qualitative progress. |  | Lead: PPG<br>Support: MSD, Analysis, Planning and Performance Division (APP) | Third quarter2025  |
|   | <b>Sub-recommendation 4.2:</b> WFP should develop a monitoring framework capable of measuring WFP's work on environmental and social sustainability, including the results achieved.  |  | Lead: MSD<br>Support: PPG, SCD, PPGG, APP                                    | Third quarter 2025 |

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