



**WFP EVALUATION**

# Evaluation of WFP's Environmental Policy

Centralized evaluation report – Annexes (Volume II)

OEV/2023/017

**November 2024**



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# Annex I. Summary Terms of Reference

[docs.wfp.org/api/documents/WFP-0000155632/download/?\\_ga=2.44580708.1576771154.1726824022-586293440.1694610729](https://docs.wfp.org/api/documents/WFP-0000155632/download/?_ga=2.44580708.1576771154.1726824022-586293440.1694610729)

# Annex II. Evaluation timeline

Table A1: Evaluation timeline

Key action		By whom	Key tentative dates PE env
<b>Phase-1 - Preparation</b>			
	Submission of draft terms of reference (TOR)	EM/RA	18 July 2023
	2 <sup>nd</sup> level quality assurance (QA2) reviews TOR and sends feedback	QA2	21 July 2023
	Submission of revised draft TOR	EM/RA	18 August 2023
	Deputy Director of Evaluation (DDoE) clears TOR to send to stakeholders for comments	DDoE	11 September 2023
	TOR draft shared with Long Term Agreement (LTA) partner to start preparing their proposals	EM/RA	11 September 2023
	Revise TOR following stakeholder comments	EM/RA	25 September 2023
	TOR approval	DDoE	29 September 2023
	TOR final shared with stakeholders, LTA partners and posted	EM	29 September 2023
	Proposals from LTAs are received	ET	9 October 2023
	Team selection & Decision Memo submitted	EM	Mid-October (by 16 October decision submitted to procurement)
	PO finalization	Procurement	Early November 2023 (3 November)
<b>Phase-2 - Inception</b>			<b>Nov 2023–May 2024</b>
	Team preparation prior to HQ briefing (reading docs)	ET	November 2023
	Headquarters briefing	EM/RA & Team	Early December 2023
	Inception-phase interviews and desk review	EM/RA & Team	December 2023
<b>IR D0</b>	<b>Submission Draft 0 Inception Report (IR) to Office of Evaluation (OEV)</b>	<b>TL</b>	<b>26 February</b>
	Quality assurance and feedback on IR D0	EM/RA/QA2	29 February
<b>IR D1</b>	<b>Submission Draft 1 IR to OEV</b>	<b>TL</b>	<b>7 March</b>
	Quality assurance and feedback on IR D1	EM/RA/QA2	11 March
<b>IR D2</b>	<b>Submission Draft 2 IR to OEV</b>	<b>TL</b>	<b>13 March</b>
	Review IR D2	DDoE	27 March
	ET addressing comments	ET	28 March–3 April
	Review revised IR D2	EM/RA/QA2	4 April
	Share IR D2 with Internal Reference Group (IRG) for comment	EM	5–18 April

	Consolidate and share comments received	EM/RA	19-22 April
<b>IR D3</b>	<b>Submission Draft 3 IR to OEV</b>	<b>TL</b>	<b>23 April</b>
	Quality assurance on IR D3	EM/RA/QA2	25-26 April
	Seek clearance of final IR D3	DDoE	29-30 April
	Circulate final IR to stakeholders; post a copy on intranet	EM	2 May
<b>Phase-3 - Evaluation data collection phase</b>			<b>May-June 2024</b>
	Data collection, including missions/case studies & desk review	ET	May-June 2024
	Overall debriefing with headquarters, regional bureau (RB) and COs (ppt) – online session	TL	End June
<b>Phase-4 – Reporting</b>			<b>July-Dec 2024</b>
<b>ER D0</b>	<b>Submission of Draft 0 Evaluation Report (ER) to OEV</b>	<b>TL</b>	<b>19 August 2024</b>
	Quality assurance and feedback on ER D0	EM/RA/QA2	22 August 2024
<b>ER D1</b>	<b>Submission of Draft 1 ER to OEV</b>	<b>TL</b>	<b>4 September</b>
	Quality assurance and feedback on ER D1	EM/RA/QA2	5-9 September
	Review ER D1	DDoE	10-11 September
<b>ER D2</b>	<b>Submission of Draft 2 ER to OEV</b>	<b>TL</b>	<b>17 September</b>
	Review ER D2	EM/RA/QA2	18-20 September
	Clearance to circulate revised ER D2 for IRG comments	DDoE	20-23 September
	Share ER D2 with IRG for comment	EM	<b>24 September</b>
	Consolidate and share comments received	EM/RA	<b>9 October</b>
	<b>Stakeholder workshop</b>	IRG/TL/EM	<b>30 September-1 October</b>
<b>ER D3</b>	<b>Submission Draft 3 ER to OEV</b>	<b>TL</b>	<b>16 October</b>
	Quality assurance (including re-iterations)	EM/RA/QA2	16-18 October
	Submission revised D3	TL	21 October
	Clearance of ER to send to editing	DDoE	22-23 October
	Begin SER preparation	EM/RA	Early October 2024
	<b>SER</b>	<b>QA2</b>	<b>4 November</b>
<b>SER D0</b>	<b>Submission of Draft 0 Summary Evaluation Report (SER)</b>	<b>DDoE</b>	<b>8-9 November</b>
	Review SER	EM/QA2	10 November
<b>SER D1</b>	<b>Submission of Draft 1 SER for clearance to share with the Policy Committee</b>	<b>DoE</b>	<b>11-12 November 20204</b>

	OPC comment window	OPC	13–26 November 2024
<b>SER D2</b>	<b>Submission of Draft 1 SER + ER following OPC comments</b>	<b>EM</b>	<b>27–28 November 2024</b>
<b>FINAL SER/ER</b>	<b>Final review of ER + SER</b>	<b>DDoE/DoE</b>	<b>29 November 2024</b>
	Submission of SER to EB Secretariat + CPP	EM	29 November 2024
<b>Phase 5 Executive Board (EB) and follow-up</b>			<b>from Jan 2025</b>
	Formatting and posting approved ER	EM/Comms	January–February 2025
	Dissemination, OEV websites posting, EB round table etc.	EM	January–February 2025
	Presentation of SER to the EB	DDoE	February 2025
	Presentation of management response to the EB	CPP	February 2025

# Annex III. Methodology

## EVALUABILITY ASSESSMENT

1. The evaluation's TOR provided an initial evaluability assessment of the environmental policy. Building that analysis, a detailed evaluability assessment was undertaken by the evaluation team. Table A2 summarizes the main evaluability challenges identified.

**Table A2: Evaluability challenges and responses**

Evaluability challenge	Response/mitigation
<p>In the absence of a policy monitoring framework, relevant data were dispersed across different WFP systems and documents.</p>	<p>The inception phase helped to clarify which data were collected by each operational unit in WFP. However, new sources continued to be identified during the assessment, with additional sources emerging as the evaluation team engaged with COs, RBs and headquarters staff. The evaluation team continued to work closely with OEV throughout the evaluation period to identify and catalogue relevant data sources.</p>
<p>Inception briefings suggested that reporting against relevant CRF indicators was inconsistent and/or incomplete. Additionally, some CRF indicators only track the extent of reporting rather than the actual results (e.g. % of population in target communities reporting on environmental benefits).</p>	<p>CRF indicators provided some insight into the level and nature of the activities being undertaken in support of the policy. However, the indicators were of limited use in the evaluation because of the identified limitations in the quality and depth of the data. The evaluation used KIIs and CO visits to build a broader evidence base around the policy's results.</p>
<p>The cross-cutting nature of environmental and social sustainability means that a diversity of strategies and tools have been used to respond to the policy. Although there is a degree of crossover, the two main workstreams – Safeguards and EMS – are technically and functionally quite distinct in terms of how they have been conceived and implemented. Moreover, the Safeguards workstream involves the application of standards that cover a diverse set of principles and themes. A key evaluation challenge was identifying common trends and findings among this diversity.</p>	<p>The evaluation's thematic analysis enabled the analysis of diverse operations and data sets. It also looked beyond the immediate evaluation country sample, analysing CSPs and ACRs and the extent to which (and how) countries are addressing environmental and social sustainability.</p>
<p>While the policy was approved in 2017, the ESSF and its more tangible (monitorable) policy tools were only operationalized in 2021. This afforded a very limited timeframe across which results could be identified.</p>	<p>Despite the relative infancy of the ESSF, there are monitoring systems in place that are tracking both Safeguards and EMS-related activity. In addition to analysing these data, the evaluation used KIIs and CO visits to build a broader evidence base around the policy's results.</p>
<p>Where results could be identified, the complex operational and policy context of WFP made it challenging to attribute any given result to a specific intervention.</p>	<p>The evaluation did not aim to attribute specific results to specific interventions. Instead, the evaluation focused on ascertaining the extent of the different interventions' contributions to the results. Outcome harvesting was used as a method for tracing how a result had come about and which interventions contributed and how.</p>

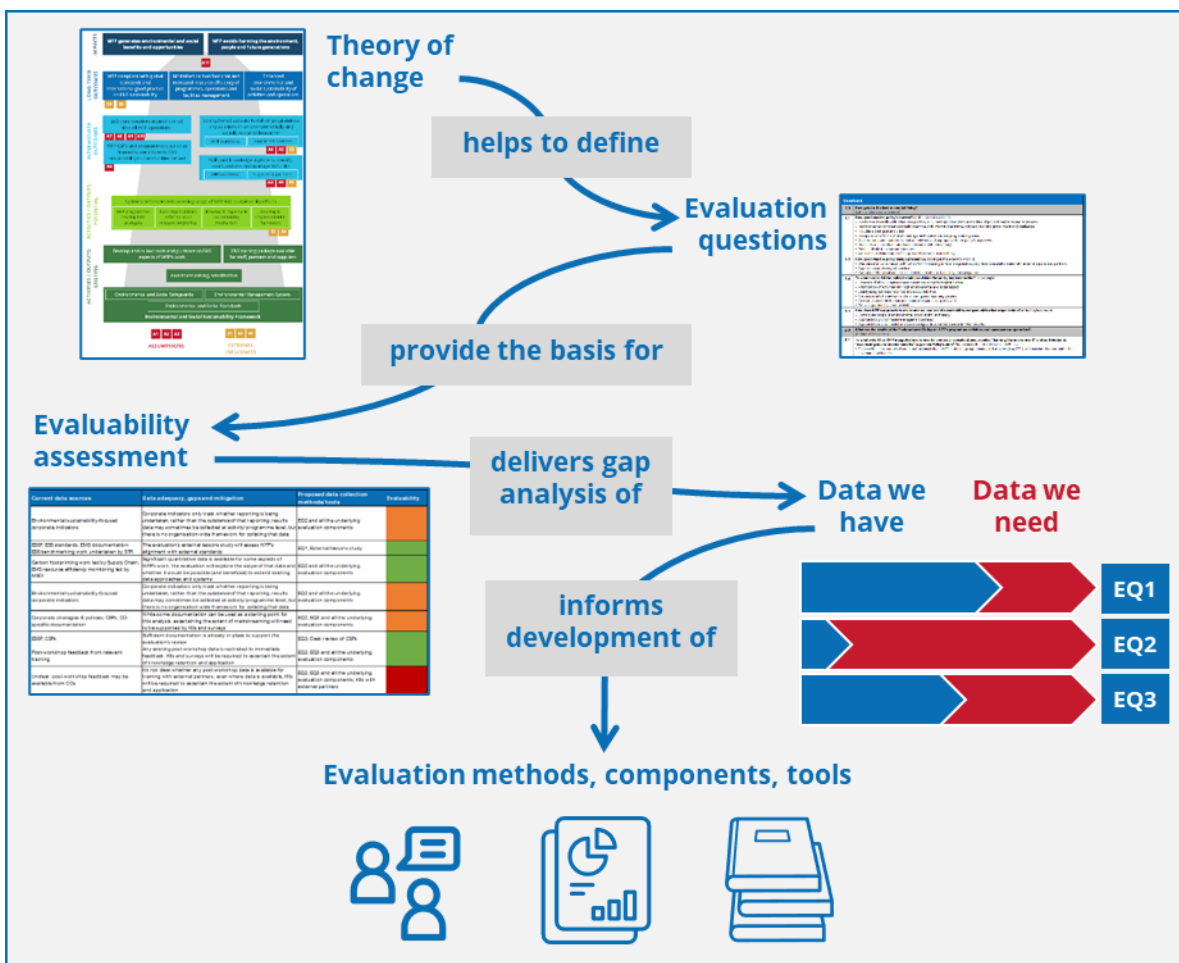
Capacity development was identified as a key element of the policy's TOC, yet limited results data were available for internal or external capacity development work.

Through KIIs, the evaluation generated data on whether and how workshops or other capacity development resulted in increased knowledge and behaviour change.

**OVERARCHING FRAMEWORK**

- The evaluation used a theory-based approach as its overarching framework. While this approach enabled the evaluation to assess high-level progress against the Theory of Change (TOC), gathering and analysing the underlying data necessary to make the final assessment depended on other methods, which targeted the specific challenges raised by this evaluation. To that end, the identification of the evaluation challenges and the corresponding selection of methods, components and tools was guided by the TOC, the evaluation questions (EQs) and the evaluability assessment (outlined in Figure A1).

**Figure A1: Development of evaluation methods, components and tools**



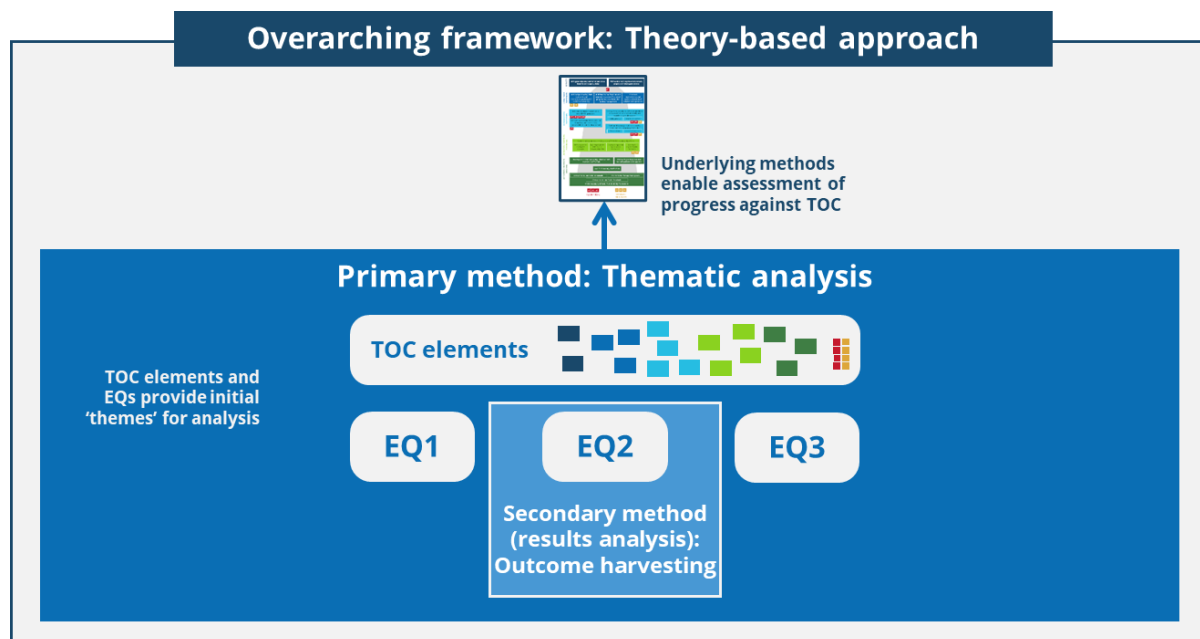
Source: Elaborated by the evaluation team.



## EVALUATION METHODS

3. The evaluation used specific methodological approaches to address the EQs (Figure A2).

Figure A2: Summary of methods



Source: Elaborated by the evaluation team.

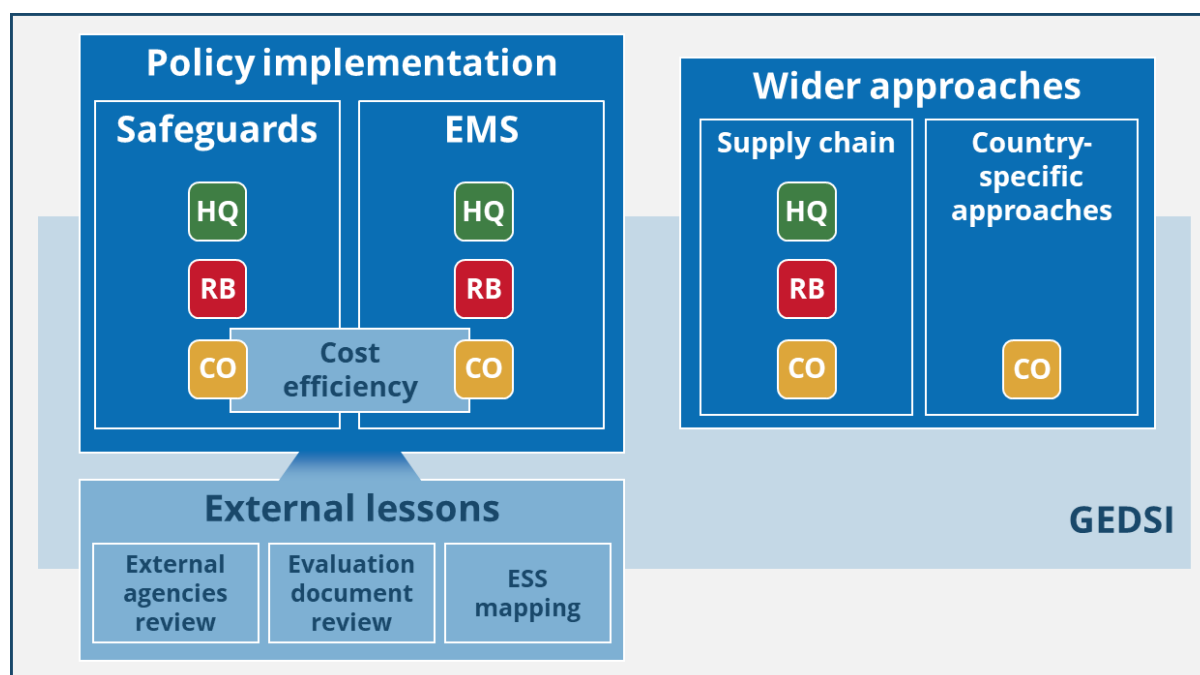
4. Thematic analysis was the primary method for organizing and exploring the data that were gathered. This qualitative approach is particularly suited to identifying potential commonalities and possible trends across a diversity of operations, allowing data to be gathered and analysed by unifying themes, regardless of the underlying technical or functional processes.
5. Outcome harvesting<sup>1</sup> was applied to specifically address EQ2 (results). Rather than looking at whether a predetermined results chain has delivered an expected result, outcome harvesting identifies results first, then works backwards to trace how a given result was achieved. This includes establishing what its contributory factors were.

## EVALUATION COMPONENTS

6. Within the overarching framework of this theory-based approach, the analyses and data collection were organized through two core components: 1. policy architecture and implementation and 2. wider approaches to environmental and social sustainability. These were strengthened by data collection across three supporting components: (1) external lessons, (2) cost efficiency, and (3) gender, equity, disability and social inclusion (GEDSI) support.

<sup>1</sup> Wilson-Grau, R. 2021. [Outcome Harvesting](#).

Figure A3: Evaluation components



Source: Elaborated by the evaluation team.

## CORE COMPONENT 1: POLICY ARCHITECTURE AND IMPLEMENTATION

- The first evaluation component gathered and analysed data on the policy's development, implementation and results. This included an exploration of the policy's coherence with other WFP policies and processes, and with external frameworks and factors.
- The policy has largely been implemented across WFP through two primary tools: the Environmental and Social Safeguards (Safeguards) and the Environmental Management System (EMS). The evaluation gathered data and analysed the approaches, results and progress of these two tools. This work was led by evaluators with expertise in the fields of Safeguards and EMS. While the two tools appear to be technically distinct within WFP, they are both linked and guided by the policy and the Environmental and Social Sustainability Framework (ESSF); therefore, in addition to analysing the discrete performance of each workstream, the evaluation also explored the linkages between the tools, including whether and how the design and delivery of the tools have/have not complemented each other in practice.
- Work on this component was closely informed by the evaluation's external lessons component, which identified relevant learning and best practice on Safeguards and EMS, as applied across other organizations.

## CORE COMPONENT 2: WIDER APPROACHES TO ENVIRONMENTAL AND SOCIAL SUSTAINABILITY

- A second evaluation component gathered data on operations that are beyond the immediate policy tools of Safeguards and EMS, but which still have relevance to the policy and its aims. Defining the scope of this component was a challenge, as environmental and social sustainability is arguably relevant to all WFP operations. The evaluation gathered data on broader approaches to this through two strands, which are outlined below:
  - Supply chain approaches to environmental and social sustainability:** As a cross-organizational function, WFP supply chain operations support work in every country office (CO) and regional bureau (RB). Moreover, the Supply Chain and Delivery Division (SCD) has been comparatively

structured and active in its work on environmental and social sustainability. In addition to analysing the extent of policy alignment and the direction provided on sustainability by headquarters and the RBs, the evaluation explored how SCD's environmental and social sustainability strategies have translated into practice within different CO contexts. The enablers and constraints behind SCD's work were also compared with those behind the key policy tools of Safeguards and EMS.

- **Country-specific approaches to environment and social sustainability:** The policy implementation component and the aforementioned analysis of supply chain approaches were used to explore core aspects of how environmental and social sustainability is being approached within each sample country. However, for each of the six sample COs visited, data were gathered and a light-touch analysis was undertaken to understand the nature of other environmental-and-social-sustainability-focused work being undertaken in each country. The aim of this light-touch work was not to identify and analyse every piece of relevant work, but to draw out examples of how environmental and social sustainability is (or is not) being taken into consideration beyond the EMS, Safeguards and supply chain, and the nature of any corresponding results being delivered. This helped the evaluation to build a broader and deeper evidence base around the influences, drivers and barriers to environment and sustainability work within specific country contexts.

### **SUPPORTING COMPONENT: EXTERNAL LESSONS**

11. An external lessons component gathered data on best practices and key lessons in the fields of environmental policy, Environmental and Social Standards (ESS) / Safeguards and EMS. This component informed the evaluation's assessment of the relative strengths and weaknesses of WFP policy and processes. First, an external agencies review gathered data on the approaches towards environmental policy, Safeguards and EMS in four other organizations: (1) the United Nations High Commissioner for Refugees (UNHCR); (2) the United Nations Children's Fund (UNICEF); (3) the International Committee of the Red Cross (ICRC); and (4) Cargill. This work included both document reviews and interviews with key stakeholders in the identified agencies. Second, an evaluation document review gathered data from publicly available assessments of environmental policies, Safeguards and EMS approaches. The focus here was on developing a more comprehensive understanding of the global context and knowledge base, which, in turn, informed the evaluation's ongoing analysis. Third, a light-touch ESS mapping exercise identified the nature, content and scope of the sustainability standards applied by other agencies.
12. In addition to gathering data on other organizations' practices and potentially instructive lessons for WFP, the external lessons review also informed the assessments undertaken through the policy implementation component. A synthesis of the external lessons review is presented in Annex X.

### **SUPPORTING COMPONENT: GEDSI**

13. A GEDSI component ensured that sufficient data were being generated to enable the evaluation's GEDSI analysis. This work included incorporating the necessary tools and questions across all of the components' designs, and regularly reviewing the data being collected through each evaluation component. The component ultimately ensured that sufficient data were available to support an assessment of where WFP's work sits along a GEDSI continuum, ranging from 'GEDSI discriminatory' to 'GEDSI transformative'. The GEDSI assessment is presented in Annex XIII.

### **SUPPORTING COMPONENT: COST EFFICIENCY**

14. The inception-phase briefings and the evaluability assessment indicated that it would be challenging to identify or generate sufficient data to enable a comprehensive cost efficiency analysis of the policy's implementation. Given the considerable diversity in approaches towards environmental and social sustainability, it would have been particularly difficult to analyse and compare cost efficiency across different operations, programmes or countries.
15. Instead, the evaluation's cost efficiency component aimed to gather data on aspects of the policy's implementation in a single country. It was hoped that restricting data collection to a single country would allow for a more robust analysis, particularly where financial data were sufficiently granular to explore the implementation costs of discrete policy-relevant activities, specifically Safeguards and EMS. While focusing on a single country could not have supported the development of generalizable

findings, the aim was to identify strengths, weaknesses and lessons to inform policy-relevant work in other countries.

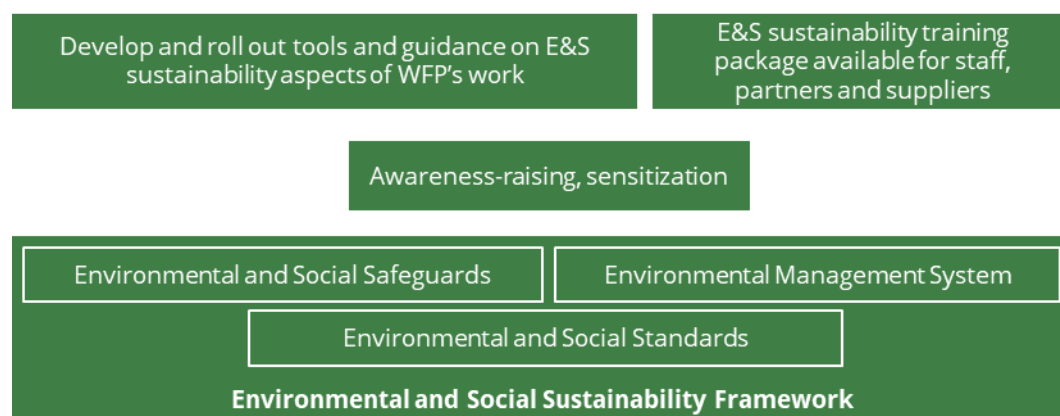
16. However, limitations in the consistency, depth and availability of relevant data (particularly relating to Safeguards) meant that a full cost efficiency analysis was not possible. Nevertheless, the process of attempting the cost efficiency analysis yielded valuable insights and helped to triangulate some of the evidence and findings generated through the other evaluation components, particularly around the inconsistency of cost efficiency data across the organization.

# Annex IV. Theory of Change assessment

1. To reiterate the context of section 1.3 in the main report, a Theory of Change (TOC) was not developed for the original environmental policy. However, for the purposes of this evaluation, a TOC was developed during the inception phase through a participative process involving many of the policy's key stakeholders. Crucially, the TOC reflects relevant current and proposed activity, as opposed to the policy as it stood in 2017: it represents WFP's efforts to become more sustainable now and in the near future, and does not comprise a TOC for the environmental policy alone.
2. The TOC is presented in full within the main report. Below, the constituent elements of the TOC are assessed in turn, including the assumptions underlying the overall logic of the TOC.

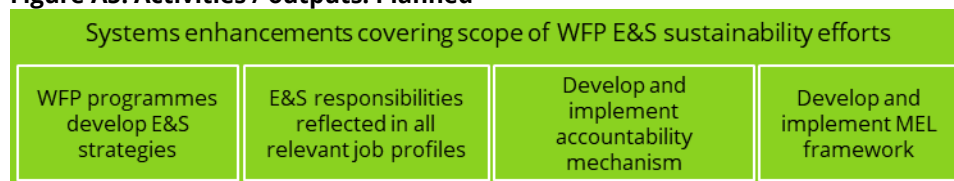
**Figure A4: Activities / outputs: Existing**

## Activities/outputs: Existing



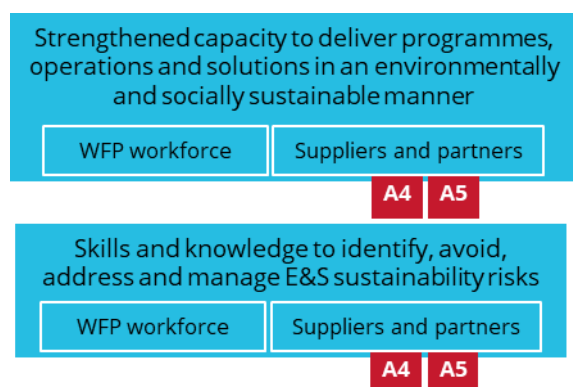
3. Evaluation findings indicate that progress towards delivering existing activities has been mixed. Most positively, the ESSF is in place. This has been supported by the development and roll-out of various tools and guidance, although the absence of activity-specific guidance has sometimes constrained the application of Safeguards, particularly within emergency responses. Moreover, tools and guidance have been restricted to the main policy tools of Safeguards and EMS, with no guidance developed on the broader application of the policy principles.
4. Guidance has included the development of training packages for both policy tools, including – for Safeguards – training packages for cooperating partners (CPs). CO and CP interviews suggest that these training packages provide an adequate introduction to the tools. However, CO interviewees consistently identified a need for more staff training and more technical capacity.
5. There has also been a degree of awareness raising regarding the policy, and particularly regarding the policy tools. However, evaluation interviews indicated that familiarity with the policy and the ESSF's requirements was limited, particularly within COs. For Safeguards at least, any lack of familiarity with policy details and requirements is also linked to the limited messaging or push from senior management.

**Figure A5: Activities / outputs: Planned**



6. This level of the TOC defines partially implemented and/or planned activities that were identified as critical elements for advancing WFP’s work on environmental and social sustainability. Only one instance was identified of a WFP programme/operation developing its own environmental and social sustainability strategy, namely the SCD Sustainability Unit (other examples were identified of WFP operations addressing environmental and social sustainability, but this work was not being planned or delivered against a specific sustainability strategy). The ESSF established detailed policy-relevant job responsibilities; however, beyond the SCD Sustainability Unit, no other instances of policy-relevant responsibilities being incorporated into job descriptions were identified.
7. The evaluation findings demonstrate that a significant gap at this level of the TOC is the absence of a robust accountability mechanism, particularly for Safeguards: there are essentially no internal consequences for non-application of Safeguards. The evaluation also found that the policy’s monitoring framework was inadequate, although other frameworks such as Greening the Blue and Environmental Plan of Action (EPACT) potentially provide a basis for stronger monitoring in the future.

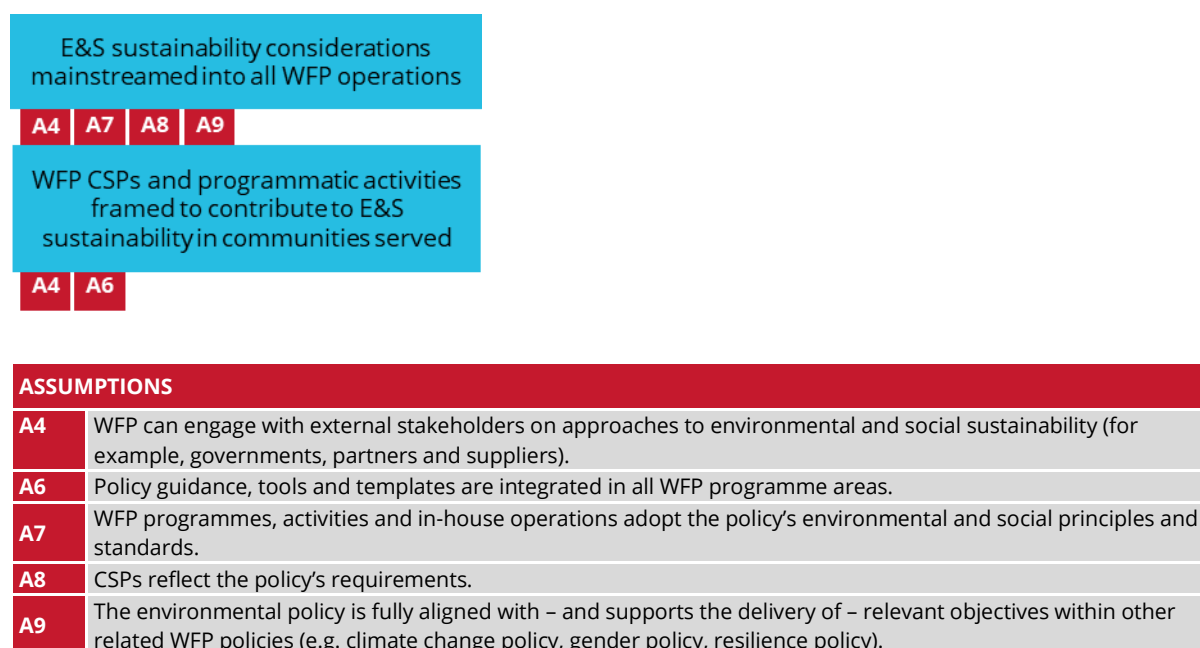
**Figure A6: Intermediate outcomes and related assumptions (I/II)**



ASSUMPTIONS	
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.

8. Progress against these elements of the TOC has been limited. Capacity development efforts have been restricted to the two policy tools of Safeguards and EMS. Moreover, capacity development for partners has been restricted to Safeguards. Capacity development for suppliers has not been undertaken. The training packages provide an adequate introduction to the policy tools for both WFP’s workforce and – for Safeguards – WFP’s partners. However, the evaluation also found that capacity gaps remain, both within WFP and across its partners.
9. The assumptions associated with these intermediate outcomes are mostly sound. Interviews with external partners indicated that WFP certainly has influence over partners’ approaches. For CPs, that influence can be direct – for example, in the form of contractual obligations to undertake Safeguards. However, interviews with government partners also indicated that WFP can engage with external stakeholders on approaches to environmental and social sustainability (for example, governments, partners and suppliers), with a representative quote being “if WFP say something, we listen”.
10. The evaluation also found that partners are willing to implement environmental and social sustainability approaches, and are supportive of WFP’s environmental policy. However, the evaluation also found that external partners face similar resource and capacity constraints to WFP.

**Figure A7: Intermediate outcomes and related assumptions (II/II)**



- There has been very little progress against these elements of the TOC. Some operations are applying Safeguards, but overall implementation has been inconsistent and unsystematic. Beyond Safeguards, though, the evaluation found no evidence of environmental and social sustainability considerations being systematically mainstreamed into WFP operations. Since the adoption of the ESSF in 2021, CSPs do on paper acknowledge the ESSF requirements. As above, though, the practical application of Safeguards within actual CSP implementation varies considerably. And again, beyond Safeguards, CSPs do not systematically or consistently address environmental and social sustainability considerations.
- With the exception of assumption A4 (already assessed above), evaluation findings suggest that the assumptions underlying these intermediate outcomes are, at present, too strong. Guidance, tools and templates have been developed, but these are only available for the two policy tools – and even for those two tools, the guidance has not been integrated in all programme areas. While there is evidence that some programmes and activities take into account the policy's principles, this is not yet systematic or consistent across the organization. Similarly, some programmes and activities have embedded the Safeguards standards, but this is not consistent. The evaluation found that CSPs reflect the policy requirements on paper, but the practical application of Safeguards within actual CSP implementation varies considerably. The evaluation also found that the policy is mostly coherent and aligned with other WFP policies; however, the extent to which the policy supports delivery of other policies is not clear. There are some important gaps around how relevant existing WFP functions and tools (including those associated with other relevant policies) could or should work alongside environmental policy processes.

**Figure A8: Long-term outcomes**



- While the evaluation found only limited progress against outputs and intermediate outcomes, there is more positive evidence of progress towards the TOC's long-term outcomes. Regarding global standards and good practice, the evaluation found that WFP's Safeguards process is broadly in line with the prevailing model applied by international financial institutions (IFIs), and that WFP's approach to the EMS is approaching alignment with ISO 14001. Where funding has been contingent on adequate Safeguards being in place, WFP has clearly met donor requirements. However, the evaluation also found that Safeguards operationalization has not been comprehensive, with a significant gap being the

non-inclusion of Safeguards within the WFP Emergency Activation Protocol. The EMS approach could also be strengthened against some ISO 14001 principles. Consequently, and although there has been tangible progress, the first long-term outcome has not yet been fully achieved.

14. Against the second long-term outcome, Greening the Blue trend data demonstrates a degree of increased resource efficiency, particularly on waste management. Moreover, that increased efficiency can be attributed to the application of the EMS. Work on minimizing the organization’s carbon footprint is at an early stage, but important foundational work is being undertaken by SCD to analyse, understand and address not just the carbon footprint, but also the organization’s broader environmental footprint.
15. Less progress is evident against the third long-term outcome. The evaluation identified discrete, one-off environmental and social sustainability results within activities and operations, but these results did not tend to be guided by the policy, its principles or a central strategic drive. Additionally, many of the identified results were unintended ‘by-products’ of each intervention’s main expected results.

**Figure A9: Impacts and related assumption**



16. The TOC’s impacts are intended as aspirational statements, providing a long-term vision for WFP’s work on environmental and social sustainability. However, they are measurable and – as noted above – the evaluation did identify examples of WFP’s work generating environmental and social benefits. The systematic application of Safeguards should also contribute to the avoidance of harm. However, WFP is not yet approaching these two impacts in a systematic way: the application of Safeguards has been limited and inconsistent, and – beyond Safeguards and EMS – there has been limited systematic application of the environmental policy principles. Moreover, WFP’s current monitoring systems are not well geared to tracking progress against these two impacts.
17. The **assumption** underlying the impact statements is solid, though: environmental and social sustainability results are being delivered, and these results are in line with the policy principles.

**Figure A10: Other assumptions**

ASSUMPTIONS	
A1	Support is available to enable policy implementation (e.g. 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 (e.g. within strategic plans, CSPs, APRs).

18. Rather than being associated with specific TOC elements, the above three assumptions underlie the whole logic of the TOC. However, the evaluation findings suggest that these foundational assumptions are too strong. While support and resources have been available for policy implementation, there has been limited push from senior management to adhere to policy requirements, particularly around Safeguards. Moreover, ongoing resourcing for the two policy tools – particularly Safeguards again – is currently uncertain.
19. The extent to which the social aspects of environmental and social sustainability have been addressed is also limited. The evaluation found that a lack of guidance on how social sustainability should be incorporated within policy responses has limited the extent to which social sustainability is being addressed – or even considered – alongside environmental sustainability.



# Annex V. Evaluation matrix

For each evaluation subquestion, the matrix below identifies measures of progress, current data sources and data collection tools. The matrix also outlines where and how all evaluation components contributed data to the main evaluation questions. **Dark green** represents a primary contribution and **light green** represents a secondary/supporting contribution.

**Table A3: Evaluation matrix**

EQ1: How good is the environmental policy?				Evaluation component				
Evaluation subquestion	Indicators / measures of progress	Current data sources	Data collection and analysis tools	Policy implem	Wider approach	External lessons	Cost efficiency	GEDSI
<b>1.1: How good was the policy's content?</b>	Extent to which the policy: <ul style="list-style-type: none"> <li>Is coherent internally with other WFP policies, WFP strategic plans and risk management processes (both at the time of policy formulation and at present)</li> <li>Has remained coherent externally over time with international frameworks and evolving global needs and challenges</li> <li>Includes a clear goal and vision</li> <li>Is responsive to WFP's different management operations and programming areas</li> <li>Outlines tools and frameworks that are relevant and appropriate to the policy's objectives</li> <li>Uses a clear conceptual framework and consistent terminology</li> <li>Defines clearly its scope and priorities</li> <li>Articulates and integrates WFP's approach to social sustainability</li> </ul>	<ul style="list-style-type: none"> <li>Policy, ESSF</li> <li>Documents on WFP's mission and range of programme operations, including strategic plans, CSPs and other policies</li> <li>Disability inclusion roadmap; internal documents on social inclusion</li> <li>SCD documentation</li> <li>CO documentation</li> </ul>	<ul style="list-style-type: none"> <li>KIIs</li> <li>Documentation review: Safeguards, EMS, SCD, CO</li> </ul>					

<p><b>1.2: How good was the policy design process?</b></p>	<p>Extent to which the policy design process:</p> <ul style="list-style-type: none"> <li>• Was based on consultation, both within WFP (including sufficient regional-/country-level consultation) and with external experts and partners</li> <li>• Applied lessons from past practice</li> <li>• Considered the social dimensions of environmental sustainability and Safeguards</li> </ul>	<ul style="list-style-type: none"> <li>• Policy, ESSF</li> <li>• EMS and related guidance</li> <li>• ISO 14001 (2015) guidance and materials</li> <li>• Other relevant ISO standards guidance/materials (e.g. supply chain)</li> <li>• Other relevant standards documentation (IFCs and World Bank, Sphere)</li> <li>• Gender policy, disability inclusion roadmap and internal documents on social inclusion</li> </ul>	<ul style="list-style-type: none"> <li>• Limited KIIs to ascertain how much influence there was from other standards/guidelines</li> </ul>					
<p><b>1.3: To what extent did the policy include provisions for policy implementation?</b></p>	<ul style="list-style-type: none"> <li>• Coverage of WFP management operations and programmatic areas</li> <li>• Extent to which activities with high environmental and social impact were identified and prioritized</li> <li>• Assignment of responsibilities and accountabilities</li> <li>• Presence of results framework and monitoring and reporting systems</li> <li>• Specification of human and financial resource requirements</li> <li>• Partnership arrangements</li> </ul>	<ul style="list-style-type: none"> <li>• Policy, ESSF</li> <li>• Equivalent documents from other agencies</li> <li>• Inception briefings</li> </ul>	<ul style="list-style-type: none"> <li>• KIIs with the headquarters staff responsible for developing ESSF</li> <li>• External lessons review</li> <li>• Analysis of data on staff and resource inputs</li> </ul>					
<p><b>1.4: What can WFP learn from other organizations' approaches to environmental and social sustainability?</b></p>	<ul style="list-style-type: none"> <li>• Content and scope of other organizations' environmental policy or similar strategy</li> <li>• Other organizations' approaches to EMS</li> <li>• Other organizations' approaches to environmental and social Safeguards or similar standards/frameworks</li> </ul>	<ul style="list-style-type: none"> <li>• Equivalent documents from other agencies</li> <li>• KIIs with relevant personnel in other agencies</li> </ul>	<ul style="list-style-type: none"> <li>• External lessons review</li> </ul>					

EQ2: What are the results of the environmental policy on WFP's programme activities and management operations?				Evaluation component				
Evaluation subquestion	Indicators / measures of progress	Current data sources	Data collection and analysis tools	Policy implem	Wider approach	External lessons	Cost efficiency	GEDSI
<p><b>2.1: To what extent has WFP integrated environmental and social sustainability considerations, avoided “harming the environment” and contributed to “maximising environmental benefits”, as per the policy’s aims?</b> This includes the extent to which WFP has:</p> <p>a. Enhanced the environmental and social sustainability of WFP strategies, programming and activities (e.g. CSPs) and maximized opportunities for environmental and social benefits</p> <p>b. Reduced the environmental/carbon footprint of in-house operations, consistent with the expectations of the policy</p> <p>c. Equipped the WFP workforce and partners with the skills, tools and knowledge to identify, avoid and manage environmental and social risks, and to maximize environmental and social benefits</p>	<ul style="list-style-type: none"> <li>• Extent and quality of EMS implementation</li> <li>• Extent and quality of Safeguards implementation</li> <li>• Extent to which WFP strategies, programming and activities incorporate environmental and social sustainability considerations</li> <li>• Extent and nature of environmental results that can be linked to policy implementation</li> <li>• Coherence of environmental policy implementation processes with other policy processes</li> <li>• WFP workforce and partner awareness, knowledge and capacities</li> <li>• WFP carbon footprint and greenhouse gas (GHG) emissions trends</li> <li>• Trends/progress against relevant CRF indicators</li> </ul>	<ul style="list-style-type: none"> <li>• Policy implementation updates to EB</li> <li>• CSPs, APRs, ACRs</li> <li>• Relevant CRF indicators</li> <li>• ESS screening data, environmental and social impact assessments (ESIAs), and environmental and social management plans (ESMPs)</li> <li>• EMS action plans, initial environmental reviews, Archibus</li> <li>• SCD strategies, dashboards, monitoring data</li> </ul>	<ul style="list-style-type: none"> <li>• KIs</li> <li>• Documentation review</li> <li>• Data systems review (e.g. Archibus)</li> <li>• Analysis of SCD data</li> <li>• Outcome harvesting to explore links between environmental results and policy</li> </ul>					
<p><b>2.2: Were there any unintended outcomes of the policy, positive or negative?</b></p>	<ul style="list-style-type: none"> <li>• Evidence of unintended results arising through implementation of EMS</li> </ul>	<ul style="list-style-type: none"> <li>• No current data</li> </ul>	<ul style="list-style-type: none"> <li>• KIs</li> <li>• Documentation review</li> </ul>					

	<ul style="list-style-type: none"> <li>Evidence of unintended results arising through implementation of Safeguards processes</li> <li>Evidence of unintended results arising through interactions between environmental policy processes and other WFP policies and processes</li> </ul>								
<b>EQ3: What factors have enabled or hindered the implementation and achievement of the policy objectives?</b>				<b>Evaluation components</b>					
<b>Evaluation subquestion</b>	<b>Indicators / measures of progress</b>	<b>Current data sources</b>	<b>Data collection and analysis tools</b>	<b>Policy implem</b>	<b>Wider approach</b>	<b>External lessons</b>	<b>Cost efficiency</b>	<b>GEDSI</b>	
<b>3.1: What internal factors have enabled or hindered policy implementation?</b>	<ul style="list-style-type: none"> <li>Clarity and coherence of roles and responsibilities for policy implementation and oversight</li> <li>Adequacy of human and financial resources for policy implementation</li> <li>Adequacy of incentives to support policy implementation</li> <li>Quality and coherence of policy monitoring and reporting mechanisms</li> </ul>	<ul style="list-style-type: none"> <li>Policy/ESSF</li> <li>Limited written data (not much reflective reporting available to draw on)</li> <li>CSPs, CSPEs, audits, Annual Performance Plans, ACRs</li> <li>SCD dashboards and monitoring data</li> <li>CO- and activity-specific monitoring systems and data</li> <li>Inception briefings</li> </ul>	<ul style="list-style-type: none"> <li>KIIs</li> <li>Analysis of data on staff and resource inputs</li> <li>Data systems review (e.g. Archibus)</li> <li>Analysis of SCD data</li> </ul>						
<b>3.2: What external factors have enabled or hindered policy implementation?</b>	<ul style="list-style-type: none"> <li>Clarity and coherence of partner roles and responsibilities</li> <li>Extent of partner support for and ownership of policy objectives and processes</li> <li>Alignment and coherence between WFP policy and processes and donor requirements and expectations</li> </ul>	<ul style="list-style-type: none"> <li>Limited written data available</li> <li>Inception briefings</li> </ul>	<ul style="list-style-type: none"> <li>KIIs</li> <li>Documentation review</li> </ul>						

# Annex VI. Data collection tools

## INTERVIEW PROTOCOLS

1. Semi-structured interviews were the most important evaluation data collection tool. These were guided by the following protocols, although interviews also explored other relevant issues and questions as they emerged during discussions. Not all questions were relevant to all stakeholders; using the protocols below, relevant questions were selected during preparations of interview-specific protocols in advance of each interview. The following table is therefore a 'menu' of questions that interviewers chose from and adapted according to each discussion.

**Table A4: Interview protocols**

Subject	Question	Stakeholder group			
		CO	RB	HQ	Ext
Safeguards	How was the ESSF designed? How was the content of the standards arrived at, especially the social standards in relation to linked policies?				
Safeguards	Did you refer to the content and process of the prevailing model of the IFI and United Nations Safeguards systems?				
Safeguards	How well suited has the Safeguards system been across WFP's different operating contexts (e.g. humanitarian versus development operations)?				
Safeguards	Are the current institutional responsibilities for Safeguards clear? What works? What does not work? Are there possible alternative approaches?				
Safeguards	How were the Safeguards requirements and tools developed?				
Safeguards	Based on the roll-out so far, do you feel the ESSF's content and process is or is not well suited to WFP's mission and operations?				
Safeguards	What is your assessment of how extensive the roll-out of the safeguards approach has been to date?				
Safeguards	In your region or CO, have there been any Safeguards training, awareness raising and technical support activities? Has this covered the social standards?				
Safeguards	In your region or CO, has the roll-out of the Safeguards resulted in risk screening of operations? Have ESIA's and ESMPs been prepared?				
Safeguards	How is the Safeguards system integrated into the WFP project cycle for its range of interventions? Does it embody the assigned responsibilities and accountabilities?				
Safeguards	Based on your experience so far, do you think there is any need for additional instruments, such as procedures, tools or guidance, to improve integration into the project cycle?				
Safeguards	Have any of the programmes that have been subject to the Safeguards system advanced sufficiently to determine if environmental and social risks have been managed or mitigated?				
Safeguards	Are you aware whether the Safeguards approach has contributed to other results, such as better awareness among programme staff or better capacity among local partners?				
Safeguards	Are you aware of any positive or negative unintended outcomes of the Safeguards implementation?				
Safeguards	Is it well integrated with the risk management function?				
Safeguards	In your region or CO, do you feel that there is a good level of management buy-in and commitment to the Safeguards implementation?				
Safeguards	In your region or CO, what is the level of staff resourcing to support the Safeguards implementation? Do these roles provide sufficient technical capacity to support implementation of the tools? Do they cover the full range of the ESS?				
Safeguards	In your region, what level of resourcing is allocated to providing training and technical support to Safeguards staff in the COs?				

Subject	Question	Stakeholder group			
		CO	RB	HQ	Ext
Safeguards	In your CO, what financial resources are allocated to Safeguards during the programme preparation and implementation? Are they sufficient?				
Safeguards	In your region or CO, how has working with donor partners influenced Safeguards implementation?				
Safeguards	To what extent are WFP's ESS aligned with donor requirements? If there are discrepancies, what are the implications for WFP's work?				
Safeguards	In your region or CO, how have cooperating partners (CPs) and suppliers handled their responsibilities for implementing parts of the Safeguards approach during implementation? Does WFP provide guidance and support?				
Safeguards	What monitoring, reporting and accountability mechanisms are in place, which focus on the Safeguards implementation and effectiveness?				
EMS	What were the key drivers/constraints to EMS implementation in your region/country?				
EMS	What are the drivers and incentives that might influence EMS development in the future (both internal and external, and positive and negative)?				
EMS	Was the EMS tailored to the context/operating modality of the country/region?				
EMS	Do you think the scope/boundaries of the EMS are clear? Are they set appropriately? Could it/should it be broadened to include supply chain, procurement, CP activity and so on?				
EMS	Do you think having different standards/modalities for implementing the EMS in crisis/emergency situations versus more developmental contexts would be useful? Is there a role for the EMS in a crisis situation?				
EMS	Were there any particular factors that enabled or hindered the establishment and development of the EMS (e.g. institutional, partner-related, human-/financial-resource-related or related to systems and tools)?				
EMS	Do you think the EMS has had any positive or negative results that have not been adequately captured (e.g. environmental, social, economic or institutional)? What were these? Is there any supporting evidence?				
EMS	Do you think the EMS had any positive or negative unintended impacts (e.g. environmental, social, economic or institutional)?				
EMS	Did you consider GEDSI issues when designing and implementing your EMS? Could you have/could you in the future?				
EMS	What do you think the possibilities are for integrating social considerations/integrating further into the EMS?				
EMS	How far are cost effectiveness / cost savings an incentive to engage with the EMS?				
EMS	What information and communications do you circulate to key stakeholders regarding your EMS?				
EMS	What is the link between the EMS and the Energy Efficiency Programme (EEP)?				
EMS	Did you consider GEDSI issues when designing and implementing your EMS? Could you have/could you in the future?				
EMS	Is there an internal audit function for the EMS? What is the process for regular reviews/audits?				
Cross-component	What financial resources have been / will be allocated to ESSF implementation?				
Cross-component	Should the headquarters Safeguards responsibility be integrated with the headquarters responsibility for the EMS?				
Cross-component	Should Safeguards and EMS advisors or focal points be combined?				
Cross-component	Is the oversight of safeguards well integrated with the units responsible for other policies or issues, such as gender, protection and accountability; indigenous peoples; and NGO partnerships?				

Subject	Question	Stakeholder group			
		CO	RB	HQ	Ext
Cross-component	In your CO, how do Safeguards advisors collaborate with other programme staff responsible for cross-cutting issues, especially those linked to the social standards?				
Cross-component	What is leadership's understanding/support of EMS/ESS like? How could this be improved?				
Cross-component	Will the CSP budgets include specific lines for ESS/EMS going forward?				
Cross-component	How closely do you work with counterparts on the EMS/ESS side and elsewhere (e.g. resilience)?				
Cross-component	How helpful is it to have separate EMS/ESS staff? Should/could these aspects be mainstreamed into other roles?				
Cross-component	Would combining ESS and EMS functions and supply chain make sense?				
Cross-component	How would COs manage EMS/ESS roll-out without RB support?				
Cross-component	How much do you/could you tailor the ESSF tools for your country/regional context? Should EMS and other ESSF tools be developed more from COs and be tailored accordingly?				
Cross-component	Does leadership/headquarters listen to feedback on the framework/tools? Are there clear mechanisms in place for providing feedback?				
Supply chain	How is SCD approaching environmental and social sustainability? What have been the main strategies, tools and activities?				
Supply chain	What have been the main drivers for SCD's work on environmental and social sustainability? What influence has the environmental policy had on this work?				
Supply chain	What have been the barriers to SCD's work here?				
Supply chain	What institutional structures are used to support this work? Headquarters-level, RB-level, CO-level, resources (human, financial)				
Supply chain	To what extent are these structures aligned with the ESSF structures (headquarters, RB, CO)? How do you work alongside the Safeguards and EMS functions?				
Supply chain	What processes and tools do you use when planning this work? WFP tools, own tools				
Supply chain	Have you had support or technical advice from other parts of WFP?				
Supply chain	How do you work with external partners to deliver this work?				
Supply chain	To what extent do you work with suppliers on sustainability-related capacity strengthening?				
Supply chain	To what extent has GEDSI been considered throughout all this work? Are there specific tools or processes that you've used here?				
Supply chain	How do you monitor this work (standard WFP processes, own processes)?				
Supply chain	What are the most significant results of this work so far (positive or negative)?				
Supply chain	Have there been any unintended/unanticipated results (positive or negative)?				
Supply chain	What areas of work have the highest impact (absolute and proportionate) on WFP's supply chain carbon footprint?				
CO-specific	How do you take into consideration environmental sustainability when planning your work?				
CO-specific	What are the drivers for this work? Community priorities, national legislation, global frameworks, WFP requirements?				
CO-specific	What about barriers? If you would like to incorporate environmental and social sustainability more into your work but have been unable to, why is that?				

Subject	Question	Stakeholder group			
		CO	RB	HQ	Ext
CO-specific	Do you consider environmental and social sustainability across all your work? If not, why not?				
CO-specific	What processes and tools do you use when planning this work (WFP tools, own tools)?				
CO-specific	Have you had support or technical advice from other parts of WFP?				
CO-specific	How do you work with external partners to deliver this work?				
CO-specific	<i>Activity-specific questions as required</i>				
CO-specific	To what extent do you consider GEDSI dimensions when planning this work? Are there specific processes or tools you use here?				
CO-specific	How do you monitor this work (standard WFP processes, own processes)?				
CO-specific	Through this work have you had any interaction with the WFP Safeguards process (and/or other Safeguards processes)? If relevant, what about EMS?				
CO-specific	What are the most significant results of this work so far (positive or negative)?				
CO-specific	Have there been any unintended/unanticipated results (positive or negative)?				



# Annex VII. Fieldwork agenda

1. The country office (CO) visits were between four and five days long. They mainly comprised interviews with WFP staff and external partners (e.g. CPs and government departments); however, site visits to WFP interventions were also undertaken. In advance of each visit, the evaluation team and CO collaboratively developed schedules, and identified which activities would be explored in more detail through the evaluation's second core component on 'Wider approaches to environmental and social sustainability'. Comprehensive desk reviews were also completed by evaluation team members in advance of each visit. Each country study visit was undertaken by an evaluation team member, with scheduling and logistical support provided by the relevant CO. The visits to Kenya and Egypt also enabled the evaluation team to consult with Regional Bureau Nairobi (RBN) and Regional Bureau Cairo (RBC), respectively. In these instances one day of each schedule was dedicated to RB consultations.
2. Following each visit, the evaluation team member provided the participating CO with a debriefing. This was either held in person on the last day of the visit, or remotely in the weeks following the visit.

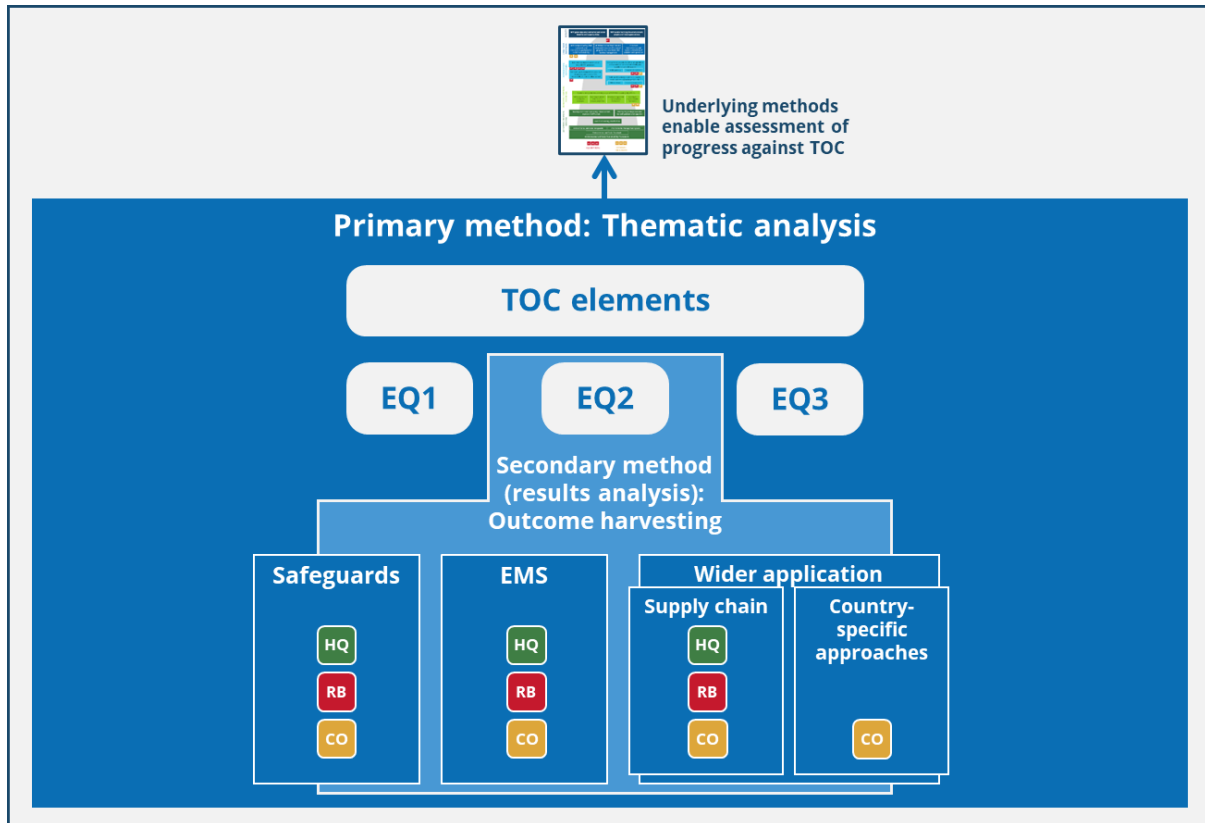
**Table A5: Country study schedule**

	13-19 May	20-26 May	27 May-02 Jun	03-09 Jun	10-16 Jun	17-23 Jun	24-30 Jun	01-07 Jul
Kyrgyz Republic								
Nicaragua								
Kenya								
Ghana								
Egypt								
Namibia								

# Annex VIII. Analytical framework

1. To address the challenge of evaluating the diverse policy-relevant operations, a thematic analysis was used to organize and explore the qualitative data. Outcome harvesting was then used to identify and analyse the results. The two core evaluation components were the primary channels through which the data – including the results – were gathered, organized and analysed.

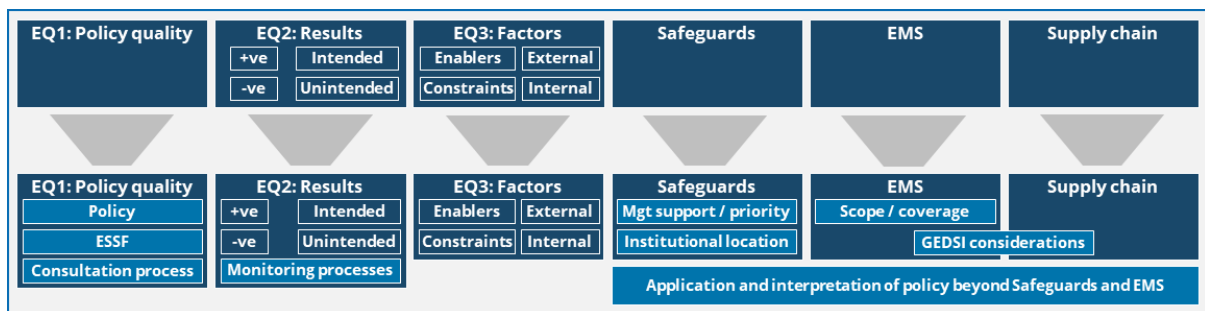
**Figure A11: Relationship between evaluation methods and components**



## THEMATIC ANALYSIS

2. To avoid pre-empting the findings or analysis, initial themes were set at a very high level, based only on the evaluation questions and evaluation components. More detailed, granular themes were then identified and developed on an emergent basis as the evaluation proceeded, primarily in response to emerging findings and trends that were arising through the initial country visits and headquarters/RB interviews. Individual evaluation substudies (e.g. external lessons, EMS) also developed their own study-specific themes to help organize analyses.

**Figure A12: Development of themes during evaluation**



## **OUTCOME HARVESTING**

3. When results were identified – whether through country visits, document review or other sources – the evaluation team used outcome harvesting to analyse whether explanatory factors could be identified for those results. This included analysis of whether the policy and its tools had a plausible contributory role, and/or whether the result was aligned with the impact pathways identified within the Theory of Change. In most instances, this process of result tracing was undertaken with interviewees: when interviewees identified a specific environmental benefit delivered through a WFP intervention, the interview would then move to discussing plausible reasons for the benefit being delivered, including whether and how the policy and/or policy tools contributed to that benefit.

## **DATA MANAGEMENT**

4. The documentation was reviewed manually. However, in support of this approach and of the evaluation's overall data management, qualitative data analysis software (MAXQDA) was used to organize the qualitative data generated through the document reviews and KIIs. A shared coding structure was used across the evaluation components to both ensure the comparability of the qualitative data and support the structured aggregation, triangulation and analysis of the findings.
5. The shared cross-component coding structure was essential in enabling the cross-evaluation thematic analysis and the outcome harvesting results analysis. However, the individual evaluation components also used component-specific coding structures to support component-level data organization and analysis. For example, while all components used shared codes to categorize the data they gathered (e.g. against relevant EQs), the EMS analysis used an additional set of EMS-specific codes to organize data according to relevant efficiency themes.
6. The underlying data were used as the basis for a series of analysis sessions, which were held at critical points during the data collection process. These sessions involved the whole evaluation team (including the QA lead). They were used to identify emerging themes and findings and, where relevant, to triangulate data across the various components and sources. They were also used to refine the lines of enquiry and review protocols, as necessary. 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 the remaining gaps in the evidence base.

# Annex IX. Mapping of findings, conclusions and recommendations

**Table A6: Findings, conclusions and recommendations**

Findings	Conclusions <sup>2</sup>	Recommendations
<p><b>1:</b> Policy vision, objectives and principles are clear and well aligned with external context but only partly addressed by selected tools</p> <p><b>2:</b> Generally coherent with other policies, although this is mostly one way</p> <p><b>3:</b> Policy does not substantively address GEDSI or social sustainability dimensions related to environmental sustainability, but this is partly resolved through the ESSF</p> <p><b>4:</b> Pilots, consultations and the EPACT have helped to strengthen policy design</p> <p><b>5:</b> The ESSF clarifies some implementation requirements, but key gaps remain</p> <p><b>14:</b> Where Safeguards have been implemented, this has helped to meet donor requirements and has supported risk management</p> <p><b>17:</b> Evidence of some progress against all policy objectives, but significant gaps remain</p> <p><b>18:</b> Beyond the policy tools, environmental and social sustainability results <i>are</i> being delivered, but are often secondary ‘by-products’ of the main intervention</p> <p><b>19:</b> Foundations are being laid to enable a deeper understanding of WFP’s environmental performance and to better inform decision making</p> <p><b>20:</b> The ESSF’s emphasis on the policy tools drew focus away from the broader policy intent</p>	<p><b>1:</b> The rationale and need for a systematic approach to environmental and social sustainability is clear, with Safeguards and EMS being essential components of that approach. At the same time, strong foundations are being laid to enable a deeper understanding of WFP’s environmental performance and to better inform decision making. However, the ESSF’s emphasis on Safeguards and EMS has drawn focus away from the broader policy vision, objectives and principles, undermining the extent to which environmental and social sustainability is being addressed systematically across WFP..</p> <p><b>2:</b> The social dimensions of environmental and social sustainability have not been adequately incorporated into policy implementation.</p> <p><b>3:</b> The presence of policy-focused teams at headquarters, regional bureaux and</p>	<p><b>1: WFP should establish a stronger approach and governance structure to ensure that environmental and social sustainability issues are systematically addressed across WFP.</b></p> <p><b>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.</p> <p><b>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.</p> <p><b>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 retained and redeployed to the newly formed sustainability unit.</p> <p><b>1.4:</b> The ESSF should be reviewed and revised as needed to support WFP’s efforts to address environmental and social sustainability by</p>

<sup>2</sup> Conclusion 4 is unpacked in Conclusions 4a, 4b and 5 and has not been included in the mapping.

<p><b>22:</b> Enabler: strong business case for applying both Safeguards and EMS</p>	<p>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.</p>	<p>providing practical guidance for all operations. This should include the following, as required: References and guidance for applying tools and analyses developed by SCD, PPGG and other relevant units. Guidance on incorporating environmental and social sustainability considerations into country strategic plans and activity design and implementation <b>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>
<p><b>23:</b> Enabler: structures established by the ESSF have driven policy implementation</p>		
<p><b>25:</b> Constraint: limited country office-level resources, capacity and expertise</p>		
<p><b>26:</b> Constraint: policy and ESSF design have limited the extent to which the social dimensions of sustainability have been addressed</p>		
<p><b>27:</b> Constraint: limited formal links between EMS and SCD sustainability functions risks undermining the environmental policy's potential</p>		
<p><b>33:</b> Enabler: strong external drivers – multilateral frameworks, national priorities and donor requirements</p>		
<p><b>34:</b> Enabler: governments and cooperating partners are supportive of policy and Safeguards process</p>		
<p><b>35:</b> Constraint: governments and cooperating partners face similar resource and capacity constraints to WFP</p>	<p><b>4a:</b> 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.</p>	<p><b>2: WFP leadership should ensure that Safeguards are applied across all country strategic plan activities.</b></p> <p><b>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> <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>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>
<p><b>7:</b> WFP's policy framework is more aligned with international financial institutions (IFIs) than other humanitarian agencies</p>		
<p><b>8:</b> Safeguards processes and standards are similar across all agencies, although some of WFP's standards are divergent, potentially introducing funding and reputational risks</p>		
<p><b>9:</b> The challenges WFP faces in implementing Safeguards are similar across agencies</p>		
<p><b>13:</b> Implementation of Safeguards has been limited, inconsistent and unsystematic</p>		
<p><b>21:</b> Inconsistent application of Safeguards may be introducing reputational risks</p>		
<p><b>28:</b> Constraint: limited visible management commitment or 'push' to apply Safeguards</p>		
<p><b>29:</b> Constraint: institutional location and staffing profile of the headquarters Safeguards Unit has resulted in coordination and perception challenges</p>		

<p><b>30:</b> 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</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>	
<p><b>31:</b> Constraint: in some contexts, the rigidity of the Safeguards process and screening tool is seen as disproportionate and inappropriate</p>			
<p><b>33:</b> Enabler: strong external drivers – multilateral frameworks, national priorities and donor requirements</p>			
<p><b>10:</b> WFP's approach to EMS is more systematic and structured than is evident across other agencies</p>	<p><b>4b:</b> 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.</p>	<p><b>3: Improve the extent to which environmental and social sustainability is addressed by the EMS and broaden the application of EMS.</b></p> <p><b>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..</p> <p><b>3.2:</b> WFP should develop protocols and guidance for engaging, and supporting partners (including landlords who WFP leases facilities from, vendors, government, and cooperating partners) in the application of EMS.</p>	
<p><b>15:</b> Level and quality of EMS implementation varies, but early positive results are evident within some country offices</p>			
<p><b>16:</b> EMS approaches alignment with ISO 14001</p>			
<p><b>24:</b> Enabler: the tangible, immediate benefits of EMS have facilitated uptake</p>			
<p><b>32:</b> Constraint: potential of EMS results constrained by limited influence WFP has on leased and partner-owned facilities</p>			
<p><b>6:</b> No TOC has been developed and there is a weak policy monitoring framework</p>	<p><b>5:</b> 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.</p>	<p><b>4: Strengthen the monitoring of environmental and social sustainability across WFP.</b></p> <p><b>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</p> <p><b>4.2:</b> WFP should develop a monitoring framework capable of measuring WFP's work on environmental and social sustainability, including the results achieved.</p>	
<p><b>11:</b> Results reported through policy monitoring processes do not provide accurate measures of progress towards policy implementation</p>			
<p><b>12:</b> Results reported through Greening the Blue provide a more comprehensive overview of environmental performance than WFP's own systems, and are generally positive</p>			

# Annex X. External lessons review

## METHODOLOGY

1. The external lessons review consisted of three components. The first component was a mapping of Environmental and Social Standards (ESS) and Safeguards across the multilateral development banks (MDBs) and select United Nations agencies. These consisted of:
  - Asian Development Bank (ADB)
  - African Development Bank (AfDB)
  - Inter-American Development Bank (IADB)
  - Global Environment Facility (GEF)
  - Green Climate Fund (GCF)
  - World Bank
  - United Nations Environment Management Group (UNEMG)
  - United Nations Food and Agriculture Organization (FAO)
  - United Nations Children's Fund (UNICEF)
  - United Nations Development Programme (UNDP)
  - United Nations Human Settlements Programme (UN-Habitat)
2. The above agencies are those meant when referring to MDBs, international financial institutions (IFIs) and United Nations agencies reviewed in the Safeguards portion of the findings.
3. The second component was a review of evaluations of Safeguards from MDBs and one United Nations agency. This review consisted of identifying publicly available evaluations, predominantly from MDBs, and reviewing their content to contextualize WFP's ESS, to identify general trends, shared challenges and constraints, and potential lessons to learn. The evaluations reviewed were of:
  - ADB
  - AfDB
  - IADB
  - GEF
  - GCF
  - UNICEF
4. The third, and most significant, component was case study reviews of three peer organizations and one private company. The three peer organizations and one private company identified, through stringent criteria outlined in the inception report, were:
  - Cargill
  - International Committee of the Red Cross (ICRC)
  - United Nations High Commissioner for Refugees (UNHCR)
  - UNICEF
5. Document and policy reviews were done for all four organizations, and interviews were secured with individuals working with environmental and social safeguards, facility greening and sustainable supply chains for the ICRC, UNHCR and UNICEF. When referring to United Nations agencies in terms of greening of operations, we specifically refer to UNHCR and UNICEF.

## OVERALL FINDINGS

6. It must be noted at the outset of this section that the language of the field is disparate and at times confusing. There is no consistent terminology, and terms and concepts range from 'environmental policy' and 'environment, society and governance framework' to 'climate strategy', with 'Environmental and Social Safeguarding' being conflated with 'Environmental and Social Sustainability' and 'Environmental and Social Standards' (all of which can be abbreviated as ESS across the organizations). Furthermore, even within these conceptualizations – for example, Environmental and Social Safeguarding – the discourse among agencies ranged from being wholly integrated across

environmental and social considerations to being solely focused on the 'Environmental' aspect, leaving social safeguarding to other units in the organization (as in the ICRC), or simply labelled as Environmental Risk Management (as in UNHCR), bypassing Safeguards as a term completely. The largest discrepancies were seen in reference to Environmental Management Systems (EMS), which ranged from 'greening facilities' (UNHCR) to a 'Decarbonization Roadmap' (ICRC) and a 'Sustainability Strategy' (UNICEF), despite all dealing with environmental initiatives internally within the organization. However, the lack of a common language did not hinder interviews, as it was understood in broad terms what was meant. Overall, WFP's language aligns more closely with the MDBs and climate funds than with its peer organizations, who also utilize a similar framing of environmental and social safeguards and standards.

### **Environmental policy/ESSF equivalents**

7. The MDBs and climate funds all have clear ESS policies and systems. GCF has its Environmental and Social Policy, which most closely resembled WFP's policy, while the rest have a variety of Safeguards policies. The funding agencies, such as the MDBs and climate funds, have consolidated their environmental sustainability policies into an integrated framework and umbrella policy, with clear ESS policies that clients can adopt for their project work.
8. As Cargill is a private company, its framework is around an Environment, Society and Governance (ESG) Strategy which informs its corporate social responsibility, addressing three interconnected areas: Land and Water; People; and Climate. The ESG Strategy was informed by a 'materiality assessment' completed in 2022 and commits Cargill to supporting the United Nations SDGs as a participant of the United Nations Global Compact.
9. The humanitarian/development agencies reviewed, including the ICRC, UNHCR and UNICEF, have integrated climate with their environmental strategies and policies, but lack an overall 'environmental policy' as a separate framework. UNICEF, for example, keeps its ESS separate from its Climate Strategy; consequently, it keeps its sustainability operations (e.g. facility greening and sustainable supply chains) separate from its Safeguards. In interviews, it was made clear that UNICEF's ESS, while still not officially implemented, will sit within a newly formed Risk Management Unit, which will also encompass its grievance redressal mechanism. UNHCR's Climate Action Strategy has three pillars, one of which is greening its own operations, with another focusing on environmental risk management.
10. As such, WFP has aligned more closely with MDB standards than the other United Nations agencies reviewed in this evaluation and has an overall framework (the ESSF) that anchors the ESS. This was unique among the sample of humanitarian/development agencies reviewed. This may indicate that WFP is better positioned than other humanitarian agencies to respond to safeguarding requirements set out by MDBs.

### **Approaches to environmental and social Safeguards**

11. All the organizations reviewed follow very similar approaches to Safeguards implementation – risk screening requirements, grievance redressal, checklists, risk/impact categories, monitoring and reporting, and documentation and disclosure requirements. Furthermore, these approaches are requirements by MDBs/ICFs for funding and are thus recognized by humanitarian/development agencies as necessary components of Safeguarding. Cargill, without necessarily needing the same stringency, also has a Human Rights Due Diligence Process (HRDD), involving a grievance redress mechanism.
12. Although these approaches are broadly similar, the specifics were found to vary. For example, there is surprisingly large variation among the organization's risk categorization, with different labelling and criteria. Some use an A–B–C model, while others use a numbering system.
13. Grievance redress mechanisms are universally present, although approaches vary from multiple levels (e.g. field, country and HQ) to project or CO levels, with widely different naming of the grievance redress mechanisms and different implementation modules. Disclosure rules are uniformly clear but flexible regarding timelines.
14. Our mapping of ESS showed that there are typically between eight and ten standards, often supplemented by additional guiding principles or cross-cutting issues. Two main ESS terminologies are



used: the World Bank standards and the UNEMG standards. Although there are slight differences in language and terminology, both sets share significant overlap in intent and meaning. Notable deviations included WFP and FAO standards, which differ more substantially. First, guiding principles and cross-cutting issues are integrated by WFP into the standards themselves, such as on gender and vulnerable groups, which the majority of other agencies integrate into their guiding principles and cross-cutting issues. FAO and IADB are the other two agencies that have a Gender Equality standard. Furthermore, WFP have two standards grouped around biodiversity – a standard on Biodiversity and Ecosystems, and a standard on Natural Resources – while other agencies have it as one standard on Biodiversity Conservation or Ecosystems and Sustainable Natural Resource Management.

15. Similarly, other agencies have one standard around Vulnerable Groups, usually focused on indigenous peoples, while WFP have two: one standard on Protection and Human Rights and another on Accountability to Affected Populations, which, as mentioned above, other agencies integrate into their guiding principles. WFP also differs when it comes to some practices that are widely adopted by other agencies, such as omitting standards on Labour and on Cultural Heritage, which all other agencies adopt.
16. Despite these differences, the standards generally have commonality across agencies, with minor wording changes reflecting agency specializations. Standards are grouped based on their overarching theme, collating the wide range of naming into the main thematic components, mapped in Table 11 of the Volume I. Notably, UNEMG and, subsequently, all other United Nations agencies have a specific standard on Climate Change, which the World Bank lacks. Of the MDBs, only ADB has a standard on Climate Change.
17. Cross-cutting issues are integrated either as guiding principles or core values, with some agencies embedding them fully into standards. Both donors and humanitarian/development agencies strive for consistency with best practices and often refer to the World Bank's Environmental, Health and Safety Guidelines as a default standard.
18. On the United Nations side, while variability exists, stringent donor requirements generally take precedence; WFP is an exception to this rule, preferring to adhere to its own regulatory frameworks, considering additional measures on a case-by-case basis. Based on interviews, however, it seems more likely that WFP will have to comply with World Bank requirements, as it has shifted from generally allowing organizations' own standards to be applied to insisting on its own standards being implemented.

### **Approaches to environmental management systems**

19. It should be noted that the understanding of EMS in this evaluation was of an internally used system, which covers facilities and other management functions. This was to differentiate between project- or programme-specific EMS, as was commonly mandated by donor agencies and climate funds for the implementation of their Safeguarding. As per WFP's use, EMS and Safeguarding was generally handled separately by IFIs, who mandated project-level EMS and not internal EMS. With that in mind, in the evaluation reviews, only GCF was found to have any information regarding EMS in its evaluation, as it was specifically an evaluation of its ESS and environmental and social management system (ESMS). The other evaluations reviewed only focused on ESS, or only specified EMS/ESMS at the project level, as something to be implemented on a project-to-project basis and not as a holistic management system for internal purposes.
20. However, UNEMG gives a clear recommendation for integrating Safeguards and EMS into one coherent framework. From our understanding, only UNDP has a systematic, formal and structured approach to its EMS, which is equivalent to WFP and follows the UNEMG recommendations. From the interviews, it was found that other humanitarian and development agencies use more ad hoc systems, which are yet to be formalized. Overall, environmental management systems do exist, although they are sporadic, disparate, not fully implemented and mainly exist as a series of disconnected tracking tools. UNHCR utilizes Greening the Blue as its auditing tool. Although UNICEF aims to adhere to ISO standards, it does not have an ISO-compliant EMS in place at this point, with it still being in a nascent stage.

21. Cargill also follows ISO standards for quality, environmental and food safety managements, and while its EMS is not publicly available, it does have an environment, health and safety (EHS) function that sets the global health and safety policy and management systems.
22. Conversely, the ICRC (for example) has no EMS in place, relying on a roadmap that is awaiting approval, and which it places under the overall framework of environmental risk management.
23. Despite not having, for the most part, formalized EMS, all agencies that were reviewed are pursuing the environmental sustainability of its internal functions, including decarbonization plans and facility greening. In particular, agencies were seen to be pursuing solarization and sustainable waste management, along with other initiatives, such as electric vehicle fleets at the headquarters level. The difficult contexts that agencies operate in make it far less likely that they will adopt electric vehicles in the field, although, according to the interviews, partial roll-outs in applicable COs are ongoing.
24. Based on our findings, WFP seems to be in a strong position to continue its roll-out and operationalization of its EMS, with other agencies in earlier stages of development or not having fully integrated EMS. Having said that, in terms of facility greening, beyond just having EMS to track this, further investment and strategies are still required. One such approach being taken by UNHCR is a funding mechanism that is specifically oriented towards funding the greening of facilities: the Green Financing Facility. This is a specific, limited fund that is aimed at providing the necessary resources to complete the greening of its facilities regardless of its overall resourcing situation. This has allowed UNHCR to continue its sustainability initiatives regardless of overall resource availability. Solarization is currently the most common approach because of its cost-saving and other immediately noticeable benefits. However, interviewees stated that simply focusing on cost savings and cost reductions distracts from the investments and resources needed to truly pursue environmentally sustainable solutions. It should be noted that WFP has now established and widened its Decarbonization Fund in the vein of the UNHCR Green Financing Facility, although fundraising is still at an early stage.

### **Approaches to sustainable supply chain**

25. One key finding from the review that should be emphasized is the cross-agency collaboration occurring across supply chain divisions within the humanitarian–development nexus. UNHCR stressed that the key to sustainability within supply chain is the cooperation and collaboration of supply chain divisions in pressuring suppliers to adapt to its sustainability needs. This was echoed by UNICEF, which also clarified the importance of stressing that this was non-reversible and non-negotiable. The review found that, despite limited resources, the sustainability work across the supply chain divisions reviewed made great progress in a short period of time (over the last three to four years). Apart from the collaborative element pressuring suppliers, another reason for these quick developments has been that the supply chains deal with material goods, making it easier to change the materials used and to quantify its impact – for example, swapping to fully recycled plastic or recycled tarpaulin for tents, or reducing packaging.
26. Despite this collaboration, particularly among the United Nations agencies, UNICEF, the ICRC and UNHCR each approach sustainable supply chains with distinct strategies, which reflect their organizational priorities and operational contexts. UNHCR integrates sustainability through a three-pillared strategy: Mitigate–Support–Minimize. This addresses environmental impacts at various stages of operations and strongly emphasizes collaboration with WFP and other United Nations agencies across its supply chain. UNHCR focuses on a full-lifecycle approach with collaborative partnerships across the humanitarian sector, in particular minimizing carbon footprints in its supply chain. Its efforts are comprehensive, involving detailed planning, sourcing and waste management, which contribute to both Scope 1 and Scope 2 emission reductions;<sup>3</sup> however, there was a recognition that its carbon footprint from supply chain activities remains substantial.
27. Cargill places sustainable supply chain as the third pillar of its ESG Strategy, and its main underlying approach as a corporation. It places a large emphasis on ‘reducing GHG emissions’ throughout its supply chain, including reducing the footprint of all the agriculture commodities it sources from farmers, emissions related to the transportation of commodities and products, and emissions related to the use

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<sup>3</sup> As per the [Greenhouse Gas Protocol](#), Scope 1 are direct emissions from sources owned or controlled directly by the organization, and Scope 2 are indirect emissions from the generation of purchased or acquired energy.

of the products it sells. Cargill has begun to explore innovative approaches, such as partnering with ‘Satelligence’ to monitor and identify deforestation risks in its soy, palm oil and cocoa supply chains.

28. UNICEF’s Climate, Environment, Energy and Disaster Risk Reduction (CEED) initiative influences its supply division by focusing on environmental, social and economic sustainability, with a particular focus on the social aspect by incorporating gender-responsive procurement into its social sustainability efforts. However, while UNICEF conducts materiality assessments for major programmes and has performed comprehensive Scope 3 greenhouse gas assessments, the organization lacks consistent sustainability criteria across its supply tenders. Furthermore, although UNICEF encourages suppliers to adopt ISO standards, it does not mandate them, opting instead for a more progressive, risk-based approach to economic sustainability, which spans the entire lifecycle of key commodities. Like the rest of UNICEF’s sustainability work, this work is still in its nascent stages and has only recently been implemented.

29. In contrast, the ICRC’s approach to sustainability is currently more personality-driven, centred on a single individual in procurement who oversees a Sustainable Supply Chain Plan. Although this plan is part of a broader Decarbonization Roadmap, its implementation lacks a strategic framework. While collaboration with other agencies has been successful, the lack of resourcing prevents comprehensive lifecycle analyses.

## **SHARED CHALLENGES AND CONSTRAINTS**

### **Monitoring and reporting**

30. All the organizations reviewed have gaps in the sufficient monitoring and supervision of Safeguards, lacking specific guidance and minimum requirements for monitoring. Other evaluations highlighted how the quality and focus of Safeguards monitoring are also poor. Some of the key findings with regard to monitoring and reporting were as follows:

- An ADB evaluation of its Safeguards highlighted gaps, with insufficient and infrequent monitoring, poor quality of reports and delayed disclosure.
- While the World Bank employs automated checks for vendors every night, this was not commonly standardized among other agencies, who do not promptly update vendor sanctions as a norm, leading to delays in monitoring.
- A GCF evaluation highlighted challenges stemming from less stringent reporting requirements, reliance on self-reporting, lack of oversight and inadequate information for remedial actions.
- A GEF evaluation highlighted the lack of systematic project-level monitoring and reporting, as each GEF agency follows its own format for reporting.
- Interviews with UNICEF noted that its sustainability policy is not yet implemented, and, thus, currently lacks overall monitoring and reporting frameworks. Challenges were also highlighted regarding real-time monitoring, especially in the social pillar.
- Interviews with the ICRC noted that monitoring and reporting processes are still being developed, with plans to include environmental indicators in their online project management tool. As such, the implementation and monitoring of solutions are currently not comprehensive or well coordinated.
- Interviews with UNHCR highlighted its use of Greening the Blue as its annual auditing tool, with no real-time monitoring or reporting being undertaken. There are, however, internal tools for real-time tracking to monitor environmental performance. While the data collection involves some automated systems (e.g. vehicle tracking and centralized travel apps), the majority of data (particularly around waste) are from self-reporting COs.

### **Resourcing**

31. The review showed inconsistencies in resourcing across all the organizations. While MDBs invest significant funds in their environmental and social Safeguards, in-country capacities and resources remain limited. Challenges across all the organizations reviewed included the following:

- financial resource constraints;
- limited staff capacity;
- limited training opportunities; and
- a lack of integrated data management systems.

32. In the interviews, the following points were made clear:

- For the ICRC, there were limitations in the human and financial resources dedicated to ESS, and its Decarbonization Roadmap goals will have to be revised to make them less ambitious.
- For UNHCR, restructuring led to the loss of a dedicated environmental unit, spreading the remaining environmental team across different divisions, such as management and logistics. While the core headquarters team that manages donor-funded projects was relatively unaffected, field operations faced significant resource constraints, which, in their own words, have affected the continuity and effectiveness of environmental initiatives. Dedicated focal points for environmental sustainability are limited, with many field staff juggling multiple roles, which hampers the implementation of EMS. Resource constraints have slowed down environmental initiatives in the organization, but there is an organizational commitment to continuing these efforts through targeted donor engagement.
- For UNICEF, ESS has been prioritized in the strategic plan, with management backing and resources made available. However, the nascent position of ESS and other environmental initiatives not having been fully implemented makes it hard to gauge future resourcing.

### **Outcomes and impact**

33. Overall, the findings indicated that Safeguards have been more compliance-driven than outcome- or impact-driven. However, there were still some outcomes and impacts from the sustainability strategies, as follows:

- The ADB evaluation found that Safeguards implementation added significant downstream value, with domestic legislation aligning with international best practices.
- The GEF evaluation noted that the application of minimum standards became a catalyst for GEF agencies to strengthen existing Safeguards policies and to adopt comprehensive Safeguards policy frameworks.
- UNHCR implemented greening operations, such as ride sharing and facility solarization, which led to cost savings. The donor-driven funding mechanism has improved donor engagement and attracted funding for further sustainability projects. There were some tangible outcomes for its sustainable supply chain initiatives, with notable improvements in the sustainability of the core relief items and supply chain processes. This was perceived as occurring due to a significant cultural shift within UNHCR towards sustainability, driven by awareness and advocacy.
- UNICEF has achieved some early sustainability successes, including establishing a Scope 3 baseline in 2023 and developing a corporate action plan. In 2024, the supply division sustainability roadmap was approved, with incremental improvements in product specifications and tender criteria for sustainability, including specific product changes, such as reduced-size immunization syringes and packaging materials. However, there are key outstanding needs, such as a sustainability data tracking system, clear corporate targets/key performance indicators and funding for further sustainability.

### **Drivers**

- UNICEF identified its main drivers as its Executive Board's desire to comply with the UNEMG Model Approach; a recognition of donor requirements; a desire to attract a broader range of donor funding, particularly from climate funds, which it currently cannot access; and a recognition that it must implement Safeguards to ensure no reputational risks – for example, from the use of child labour in the supply chain.
- UNHCR: Buy-in across all staff due to a recognition of the need for increasing climate mitigation and of the impact of climate and environmental change on refugees.
- ICRC: International humanitarian law has begun to incorporate environmental protection, and management has recognized that more environmentally sustainable work needs to be undertaken.

## Constraints and gaps

**Table A7: Constraints and gaps faced by other agencies**

Agency	Constraint/gap
<b>ADB</b>	<ul style="list-style-type: none"> <li>• Poor quality of Safeguards processing</li> <li>• Need to strengthen/increase monitoring and supervision</li> <li>• Poor quality and focus of monitoring reports</li> <li>• Projects not ready for Safeguards to be implemented</li> <li>• Poor timeliness of some report disclosures</li> </ul>
<b>AfDB</b>	<ul style="list-style-type: none"> <li>• Understaffing</li> <li>• Low number of specialists</li> <li>• Inadequate post-approval support</li> <li>• Varying knowledge of Integrated Safeguards System requirements</li> <li>• Gaps in gender inclusion, documentation, due diligence and archiving systems</li> </ul>
<b>GEF</b>	<ul style="list-style-type: none"> <li>• Limited institutional capacity to manage and review Safeguards</li> <li>• Country counterparts unaware of the need to apply Safeguards requirements</li> <li>• Lack of systematic project-level monitoring and reporting</li> </ul>
<b>GCF</b>	<ul style="list-style-type: none"> <li>• Weaknesses in accreditation processes</li> <li>• Inconsistent understanding of investment criteria across staff</li> <li>• Compliance challenges</li> <li>• Lack of established procedures for stakeholder engagement</li> <li>• Lack of customized policies and operational guidance</li> <li>• Poor tracking and capacity building</li> <li>• Lack of clear assignments of roles and responsibilities</li> </ul>
<b>UNICEF</b>	<ul style="list-style-type: none"> <li>• Resource constraints</li> <li>• Low awareness among staff</li> <li>• Donor-driven</li> <li>• Burden of compliance on COs</li> <li>• Misreporting on standards</li> <li>• Unclear relationships between policies</li> <li>• Confusion among staff regarding sustainability</li> <li>• Low adoption of grievance mechanism</li> <li>• Lack of finalized ESS systems and procedures</li> </ul>
<b>ICRC</b>	<ul style="list-style-type: none"> <li>• Resource constraints</li> <li>• Insufficient monitoring and reporting</li> <li>• Fragmentation and lack of coordination between ESS/Safeguards and EMS/risk (except in the charter)</li> <li>• No real system in place for the implementation of the charter, resistance to change, and the novelty of Safeguarding in humanitarian contexts</li> </ul>
<b>UNHCR</b>	<ul style="list-style-type: none"> <li>• Resource constraints</li> <li>• Lack of coherent environmental management system</li> <li>• COs self-report on water and waste</li> <li>• Climate action strategy does not incorporate EMS and Safeguards</li> <li>• No standalone ESS</li> </ul>

## KEY LESSONS

### Integrated environmental frameworks tend to be beneficial

34. The findings suggest that environmental sustainability efforts tend to be beneficial when integrated into core operations and supply chain processes. Embedding sustainable practices within existing workflows can help to ensure broader adoption and, thus, can lead to greater impact. Examples from AfDB's Integrated Standards System (ISS) and GCF's Environmental and Social Policy highlighted how frameworks that encompass policy statements, operational Safeguards and assessment procedures provide the foundations for thorough coverage of environmental and social risks.

35. This was also evident when looking at organizations that did not fully integrate their environmental approaches. For the ICRC, while there is a framework for minimum environmental requirements, its application was found to vary depending on the field personnel and partner standards. Moreover, while it is developing a standardized application of environmental Safeguards, its diverse contexts and

personnel have required it to take a flexible, voluntary approach, recognizing the existing need to develop clear guidelines, training plans and accountability mechanisms.

36. While still newly adopted, UNICEF's approach integrates environmental, social and economic dimensions into its sustainability strategy, including far-ranging factors, such as GHG emissions for its environmental sustainability, labour practices for its social sustainability and corruption for its economic sustainability. As part of its framework, the organization uses the language of the ISO standards (e.g. 9001 and 14001) to structure and guide sustainability efforts; however, it does not directly adhere to these ISO standards, with the end goal being to ensure consistency and accountability across the organization and with suppliers and partners. This sustainability strategy, however, is separate from its climate action strategy.
37. UNICEF's approach involves progressively integrating sustainability standards based on product and market readiness. For example, while some global suppliers meet advanced sustainability criteria, local market conditions may require a more gradual approach. In addition, UNICEF is continuously learning from its sustainability initiatives, adapting strategies based on new information, and evolving practices to meet changing conditions. For example, it is developing new tools and guidance to support sustainable procurement at COs.
38. GCF's 'living document' approach for its strategic plan indicates the value of flexibility and adaptability in policies to ensure organizations remain relevant and responsive to changing environmental and social conditions.

#### **Organizational structures should be clear and aligned**

39. The findings indicated that a clear and stable organizational structure with consistent leadership provides the infrastructure for the sustained implementation of environmental sustainability initiatives. For instance, UNICEF considers its Safeguards and ESS to follow a risk-based approach, and it is planning to place its ESS within the Risk Management Unit, alongside grievance redressal, prioritizing actions based on the level of associated risk.
40. UNHCR has developed not only a Strategic Framework for Climate Action (2021), and a specific Strategic Plan for Climate Action (2024–2030), but also an Operational Strategy for Climate Resilience and Environmental Sustainability (2022–2025), marrying the overarching policy framework to a clear six-year plan as well as a three-year operational approach.
41. Conversely, the ICRC's environmental sustainability efforts were initially supported by a strategic and institutional framework under the Executive Office, but following a restructure they are now overseen by Operations. . Along with resourcing restrictions, this has led to a reduction in the level of ambition within its environmental goals.

#### **Adaptable and innovative financing mechanism solutions can be considered**

42. As environmental sustainability efforts can be significantly impacted by resource constraints and organizational downsizing, it may be worth exploring alternative and innovative financing mechanisms, which can provide a steady pool of funding that is unaffected by broader resource constraints. Such a funding mechanism would maintain momentum in environmental sustainability efforts.
43. The key example here was UNHCR, which utilizes a donor-funded mechanism that offers financial support for energy transition projects, with repayment terms based on the cost savings. This is called the Green Financing Facility. The mechanism is results-bound rather than a permanent funding feature, meaning that, once it achieves its goals, it will no longer continue. UNHCR, thus, publicly highlights its commitment to continuing environmental initiatives through targeted donor engagement. However, concerns were raised that humanitarian and development funds would just be relabelled as environmental funds, which would not address the underlying resource constraints in any significant way.
44. Other examples of the need to decouple sustainability initiatives from core budgets were found in the ICRC, which faces a significant financial crisis and has seen a 25 percent reduction in staff. This has led to reduced ambition in its sustainability goals. While its ability to adapt its strategy and plans to cope with sudden financial or resource constraints is commendable, an independent funding source, such as through an internal travel or carbon tax, would have helped maintain momentum.

### **Institutional commitment is beneficial to fostering a strong enabling environment**

45. A recurring theme during the review was that, while the cost-saving narrative is a helpful one for institutional buy-in and interest, successful implementation of sustainability practices still requires substantial commitment in terms of material changes, capacity strengthening and institutional support. While all the organizations reviewed faced challenges with resource allocation for the implementation of their sustainability initiatives, UNICEF has seen an institutional commitment and subsequent investment in establishing Safeguards and a sustainable supply chain, for three main reasons:

- To comply with UNEMG requirements.
- To be eligible for funding opportunities from the GCF and other climate funds, understanding that greater investment in establishing Safeguards will now mean being able to access a larger pool of resources in the future.
- A recognition that to fully align with UNICEF's own mandate will require a strengthened Safeguards procedure.

46. While UNICEF is significantly behind WFP in its adoption of ESS, its structured roles and responsibilities for ESS development and implementation signify how clear institutional arrangements and supportive environments can help facilitate an effective roll-out, which is currently ongoing.

47. The ICRC highlighted that achieving sustainability goals requires cultural and organizational change to align the organization's mission with sustainability practices, requiring effective communication and change management strategies.

48. The challenges faced across all the agencies reviewed all stem from persistent staff shortages and resource constraints. For UNHCR, limited technical capacity and high staff turnover in field offices poses challenges in implementing environmental initiatives.

### **ESS requirements may be too stringent for emergency work**

49. The review found that there is a significant divide between development and humanitarian work in the application of ESS in emergencies. UNHCR flagged that it was unrealistic to expect the application of stringent ESS in humanitarian and emergency situations or in fragile contexts, where the overriding mandate is to save lives. This was also noted by the ICRC, which has taken a voluntary approach to ESS implementation. There are risks associated with not applying ESS, such as the medium and long-term consequences of neglecting environmental standards, reputational risks from neglecting social standards and funding risks due to non-compliance with established ESS. However, both UNHCR and the ICRC stressed that the most important thing in terms of environmental sustainability at the field level is issuing clear, easy-to-follow guidance and recommendations, which helps to overcome any deficiencies in technical capacities on the ground and helps staff to think about sustainability goals more clearly.

### **Clear monitoring and reporting mechanisms improve accountability**

50. The review of the evaluations established that implementing robust monitoring and measurement frameworks can help track progress, which improves accountability. This would enable the regular assessment of environmental impacts through clear key performance indicators. The ICRC was in the process of developing its environmental risk management screening tools during the review and acknowledged the need for monitoring tools.

### **Collaboration and stakeholder engagement help the implementation of sustainability initiatives**

51. The ICRC has put a collaborative roadmap in place, involving the units that contribute most of the carbon emissions across the organization. The aim of this is to collaboratively identify solutions. GCF emphasizes stakeholder engagement through the integration of indigenous peoples' guidelines.

52. UNHCR also focuses on the importance of collaboration, unified messaging and working closely with suppliers to drive industry-wide change. These efforts include vendor engagement to find sustainable supply opportunities, which is supported by partnerships with companies such as IKEA and Inditex, and by collaboration across the humanitarian–development sphere. It has also engaged with its beneficiaries while undergoing product testing and has used both academic and consultancy research to improve sustainability practices.

53. UNICEF communicates its sustainability expectations and works with suppliers, especially in high-impact areas such as vaccines, to signal the market direction and required standards. It also conducts thorough due diligence by screening vendors and their parent companies for compliance with ethical, social and environmental standards. This includes using databases such as RepRisk to identify financial crimes and misconduct.

**Alignment with international standards and best practices is worthwhile**

54. The MDBs and climate funds explicitly align with international best practices, generally adhering to globally accepted standards. WFP specifically notes in its ESSF that it adheres to its own framework as a United Nations agency.

55. While United Nations agencies, in general, have more leeway in terms of alignment with the MDBs and climate funds, they are expected to align with the United Nations' broader organizational policies, such as Greening the Blue and the United Nations Sustainable Procurement Indicators. WFP does participate in UN-wide coordinating bodies, such as the UNEMG and the Greening the Blue initiative, to align its efforts and to share best practices across United Nations agencies. Exploring further alignment with the MDBs, in particular the World Bank, may help to streamline and simplify the application of ESS.



# External lessons review appendix 1

**Table A8: Environmental Policy mapping**

Agency	Policy	Scope	Components/Approach
AfDB	ISS	<ul style="list-style-type: none"> <li>To promote socially inclusive and environmentally sustainable growth by protecting the environment and people from the adverse impacts of AfDB-financed projects.</li> </ul>	<ul style="list-style-type: none"> <li>Ten operational Safeguards.</li> <li>Encompasses ESAPs and integrated ESIA guidance notes.</li> </ul>
ADB	New Environmental Policy/Strategy due in 2024. Current focus on Safeguards Policy Statement	<ul style="list-style-type: none"> <li>Operational procedures in three sections: environmental considerations, involuntary resettlement and indigenous peoples.</li> </ul>	<ul style="list-style-type: none"> <li>Compliance-based, with specific policy principles required for funding.</li> <li>Unique among MDBs in having a standard on Climate Change. Otherwise, in line with the World Bank.</li> </ul>
IADB	Environmental and Social Policy Framework (2020)	<ul style="list-style-type: none"> <li>Places gender equality as an intrinsic value. Aligns with international best practice. Has an extensive 'exclusion list' of activities it will not finance.</li> </ul>	<ul style="list-style-type: none"> <li>Unique among MDBs in having a standard on Gender Equality and the Prevention of Gender-Based Violence. Otherwise, broadly in line with the World Bank.</li> </ul>
GEF	Policy on Environmental and Social Safeguards	<ul style="list-style-type: none"> <li>Has minimum standards to ensure consistency. Unique structure with various GEF agencies, so minimum standards act as catalyst for other GEF agencies to update their Safeguards policies.</li> </ul>	<ul style="list-style-type: none"> <li>Eight standards, key principles and conflict resolution commissioner.</li> </ul>
GCF	Environmental and Social Policy	<ul style="list-style-type: none"> <li>Integrates environmental and social considerations into decision making and operations.</li> </ul>	<ul style="list-style-type: none"> <li>Eighteen guiding principles, with a framework including Gender Equality, Stakeholder Engagement and indigenous peoples' guidelines.</li> <li>Country-driven, complementing other climate funds (e.g. GEF, Adaptation Fund and Climate Investment Funds).</li> </ul>
ICRC	Climate and Environmental Charter and a Decarbonization Roadmap awaiting approval.	<ul style="list-style-type: none"> <li>Incorporates Safeguards and EMS into a pillar system: Pillar 1 is Safeguards (Environmental Risk Management in Programmes), Pillar 2 is Greening Operations and Pillar 3 is Legal Side.</li> </ul>	<ul style="list-style-type: none"> <li>Safeguards framed as Environmental Risk Management – no specific ESS, but many other standards around its work.</li> </ul>
UNHCR	Strategic Framework for Climate Action (2021); Strategic Plan for Climate Action 2024–2030	<ul style="list-style-type: none"> <li>Guided by the common core principles for a UN system-wide approach to climate action.</li> <li>Three core pillars: Pillar 1 is Law and Policy, Pillar 2 is Operations (includes Protection) and Pillar 3 is Greening UNHCR (includes EMS).</li> </ul>	<ul style="list-style-type: none"> <li>'Protection' is the term used for Safeguards, positioned within Operations – no specific ESS developed by UNHCR, but follows international best practice. Not accredited to any climate fund. Humanitarian style of work makes it problematic for UNHCR to implement stringent ESS.</li> </ul>
UNICEF	Sustainability and Climate Action Plan 2023–2030	<ul style="list-style-type: none"> <li>Based on UNEMG, with a strategic plan (2022–2025) aiming for organization-wide implementation.</li> </ul>	<ul style="list-style-type: none"> <li>ESS and EMS not integrated into the action plan.</li> </ul>
Cargill	Environment, Society, Governance (ESG) Strategy 2022	<ul style="list-style-type: none"> <li>Focused on three interconnected areas: Land and Water, People, and Climate.</li> </ul>	<ul style="list-style-type: none"> <li>Large emphasis on 'partnership' approach, including with GWP, UN-WFP USA (World Food Programme USA), World Resources Institute, Save the Children, Care, Earthworm and TechnoServe.</li> </ul>

		<ul style="list-style-type: none"><li>• Food insecurity and climate is seen as inextricably linked, and proper management of natural resources is essential for food security, with improved livelihoods dependent on a more equitable, inclusive and resilient food system.</li><li>• The ESG Strategy was informed by a 'materiality assessment' completed in 2022, and commits Cargill to supporting the UN SDGs as a participant of the UN Global Compact. Its strategy and targets are aligned to UN SDGs (with a scorecard).</li></ul>	<ul style="list-style-type: none"><li>• Has an ESG 'scorecard', which has a set of indicators and set of target metrics to reach.</li></ul>
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## External lessons review appendix 2

**Table A9: ESS mapping**

Agency	Features	Structures/Principles
<b>AfDB</b>	Ten standards, called operational Safeguards	<ul style="list-style-type: none"> <li>Identical to World Bank standards (except OS7 – renamed as Vulnerable Groups but functionally the same).</li> </ul>
<b>ADB</b>	Ten ESS	<ul style="list-style-type: none"> <li>Institutional Safeguards against adverse impacts with explicit policy principles. Highly gender-responsive and inclusive.</li> </ul>
<b>IADB</b>	Ten ESS	<ul style="list-style-type: none"> <li>Identical to World Bank (except ESS9, around Gender Equality and Gender-Based Violence).</li> </ul>
<b>FAO</b>	Nine ESS	<ul style="list-style-type: none"> <li>Based on UNEMG (except ESS6, which is around Gender Equality and Prevention of Gender-Based Violence). (Shared with the IADB.)</li> </ul>
<b>UNICEF</b>	Eight ESS, based on UNEMG and World Bank influences	<ul style="list-style-type: none"> <li>Not officially launched as of June 2024.</li> </ul>
<b>GEF</b>	Adapted from World Bank standards (nine overall standards)	<ul style="list-style-type: none"> <li>Minimum standards for agencies: climate change and disaster risks are considered systematically in the screening, assessment and planning processes, but are not a specific standard.</li> </ul>
<b>GCF</b>	Adapted from World Bank standards to comply with best international practice.	<ul style="list-style-type: none"> <li>ESS standards are core to the ESMS, encompassing a wider range of requirements.</li> </ul>
<b>ICRC</b>	<p>The ICRC is developing its own Safeguards systems, having previously shared this task with the IFRC.</p> <p>One person runs Risk Management for Environment at headquarters. CO focal points are only in countries that have requested them, or demanded by donors (Myanmar and Yemen). Voluntary system is driven by personality and interest rather than anything systematic or institutional.</p>	<ul style="list-style-type: none"> <li>No standards, procedures or tools to integrate into project cycle in development. Currently, there is a 2009 Framework, which is optional. Screening process, risk classification and classification requirements: voluntary screening process – a light and practical approach, using a simple environmental screening tool, which categorizes projects into low-, medium- and high-risk.</li> <li>For high-risk projects, a full environmental and social impact assessment is required.</li> <li>Medium-risk projects will use an environmental management plan inspired by World Bank methodologies.</li> <li>The approach was designed to balance environmental risks with the primary mission of saving lives.</li> </ul>
<b>Cargill</b>	No specific ESS, but has a 'scorecard' approach. Standards are based on ISO standards for quality, environmental and food safety management, as well as Best Aquaculture Practices (BAP), Global Good Agricultural Practice (GAP) and organic standards for industry-specific assurance.	<ul style="list-style-type: none"> <li>Two KPIs for Climate (Scope 1 and 2 Operations): Reduce absolute operational greenhouse gas (GHG) emissions 10% by 2025; Scope 3 (Supply Chain): Reduce global GHG emissions from our global supply chain by 30% by 2030, measured per ton of product.</li> <li>Three KPIs for Land and Water (1 for Land, 2 for Water): Eliminate deforestation across agricultural supply chain by 2030; Implement water stewardship practices at all 72 priority facilities by 2025; Enable a water-positive impact in all priority regions by 2030.</li> <li>Four Targets for People. Provide 10 million farmer training courses in sustainable agricultural practices by 2030; Improve nutrition and economic livelihoods by reaching 100 million people by 2030 through production, promotion and consumption of poultry; Achieve gender parity in leadership by 2030 globally; Invest 2% global pre-tax earnings in advancing social and environmental impact priorities and supporting local communities.</li> </ul>

## External lessons review appendix 3

**Table A10: EMS mapping**

Agency	Features	Structures/Principles
<b>GCF</b>	ESMS for improved environmental and social outcomes.	<ul style="list-style-type: none"> <li>Implemented at facility, operations and policy levels. However, it lacks focus on how to achieve outcomes during the design, approval and monitoring stages.</li> </ul>
<b>ICRC</b>	<p>No actual EMS in place, currently just a roadmap awaiting approval to then be operationalized as part of environmental risk management.</p> <p>Efforts to reduce environmental impacts are integrated within the logistics and supply chain operations. This includes reducing air and sea transport, selecting appropriate vehicles and specifying durable environmental items.</p> <p>The goal is to ensure that these practices are embedded in the supply chain to achieve significant environmental benefits, rather than being treated as separate initiatives.</p>	<ul style="list-style-type: none"> <li>While environmental risk management focuses on preparedness and minimizing environmental impacts, it operates separately from the Decarbonization Roadmap. It is about the preparedness of delegations and design – not redesigning programmes, but integrating environmental risk considerations before implementation. The roadmap identifies specific solutions, such as replacing carbon-intensive products (e.g. rice) with more sustainable alternatives where feasible. GHG emissions accounting approach/methods: the Annual Global Carbon Accounting Inventory is an estimate and not entirely accurate at the delegation level.</li> <li>Procedures and tools to integrate into project cycle: sustainable delegation process is for facilities.</li> <li>Guidance materials and templates: limited, seen as a constraint.</li> <li>Approach to other environmental footprint factors (water and waste): Aware of it and want to track waste. Currently focused on decarbonization but recognize that this is limited.</li> </ul>
<b>UNHCR</b>	Dedicated unit for sustainable efforts, under Greening the Blue.	<ul style="list-style-type: none"> <li>Focus areas include reducing carbon emissions and energy efficiency, renewable energy adoption and energy security.</li> <li>Greening the Blue audits: These audits provide annual evaluations of UNHCR's environmental footprint, focusing on energy, water, waste, fleet and travel. The data collection involved both automated systems (e.g. vehicle tracking and centralized travel apps) and self-reporting from COs.</li> </ul>
<b>UNICEF</b>	Sustainability strategy is multidimensional and aims to be ISO-compliant, but is still nascent.	<ul style="list-style-type: none"> <li>UN offices strive to reduce their environmental footprint and report through Greening the Blue.</li> </ul>
<b>Cargill</b>	Has an Environment, Health and Safety (EHS) Function that sets the global health and safety policy and management systems, but not publicly available.	<ul style="list-style-type: none"> <li>Has a compliance-oriented 'Supplier Code of Conduct'.</li> <li>Has a Human Rights Due Diligence Process (HRDD), involving a grievance mechanism and centred on their Human Rights Policy. Identifies the human rights risk, assesses the risk for supply chains and operations, addresses findings and non-conformances, and then reports based on specific KPIs.</li> </ul>

# External lessons review appendix 4: Sustainable supply chain mapping

**Table A11: Sustainable supply chain mapping**

Agency	Features	Structures/Principles
UNICEF	UNICEF’s Climate, Environment, Energy and Disaster Risk Reduction (CEED) influences supply division values.	<ul style="list-style-type: none"> <li>• UN offices strive to reduce their environmental footprint through sustainable procurement and report through Greening the Blue.</li> <li>• UNICEF focuses on three main pillars: environmental, social and economic sustainability.</li> <li>• Materiality assessments are conducted for procurement and major programs, but consistent criteria for UNICEF supply tenders are lacking.</li> <li>• Climate change efforts include comprehensive scope: three greenhouse gas assessments, leading to science-based climate targets. However, specific sustainability targets and criteria for sustainability are not well defined across the organization.</li> <li>• UNICEF applies a risk-based approach to economic sustainability, where ESS also follows a risk-based approach. Economic sustainability as a pillar focuses on the entire supply chain lifecycle – and efforts are made to decentralize procurement for heavy products, such as therapeutic foods.</li> <li>• UNICEF’s Quality Management System is structured around ISO 9001, and UNICEF aims to progressively encourage service providers to adopt ISO 14001 (environmental management), but not as a mandatory requirement.</li> </ul>
ICRC	Sustainable supply chain plan.	<ul style="list-style-type: none"> <li>• Resides with one person in procurement, who directs its use across logistics, including fleet, procurement and supply chain.</li> <li>• Sustainable Supply Chain Management Policy/Plan: Part of Decarbonization Roadmap, but currently personality-driven rather than strategic.</li> </ul>
UNHCR	Integration with overall Environmental Policy/ESG: UNHCR has adopted a three-pillared strategy: Mitigate–Support–Minimize – addressing environmental impacts in various operational stages. Throughout UNHCR, sustainable strategy, three pillars and sustainable supply are separate from Greening the Blue, but still part of the overall strategy.	<ul style="list-style-type: none"> <li>• Full lifecycle focus, with strong collaborative elements and partnerships across the humanitarian sphere (e.g. WFP, ICRC, vendors and refugees). Looks at everything from procurement, design and storage, to transportation and delivery.</li> <li>• Scope 1 and 2 focus on UNHCR’s office infrastructure, travel and fleet, which contribute significantly to its carbon footprint (52 kilotons of CO<sub>2</sub>), with sustainable supply chain activities contributing even more (750 kilotons CO<sub>2</sub>).</li> <li>• Supply chain improvements: efforts to minimize the carbon footprint through better planning, sourcing, manufacturing, procurement, delivery and waste management.</li> <li>• Gender-responsive procurement is integrated into social sustainability.</li> </ul>
Cargill	Scope 3 in the ESG Strategy and the main approach as a food supply chain corporation. A big emphasis on ‘reducing GHG emissions’ in its supply chain, including reducing the footprint of all their agriculture commodities it sources from farmers, emissions related to the transportation of commodities and products, and emissions related to the use of the products it sells.	<ul style="list-style-type: none"> <li>• Partnering with ‘Satelligence’ to monitor and identify deforestation risks in their soy, palm oil and cocoa supply chains.</li> <li>• With a goal of reducing their global supply chain emissions 30% by 2030, investing in products, services and programmes that are ‘scalable and measurable’.</li> </ul>

# Annex XI. Safeguards assessment

## EQ1: How good is the environmental policy?

### How does the Safeguards component of the ESSF align with international donor best practice?

1. The ESSF aligns well with the international financial institution (IFI) Safeguards model, making it distinct from other humanitarian organizations.
2. The external lessons review revealed that the WFP Safeguards approach is well aligned with the major IFIs, including major United Nations agencies and climate funds, as well as with the United Nations Model Approach to Environmental and Social Standards for United Nations Programming. It shares a similar architecture with the United Nations Model Approach in the following elements:
  - its policy statement;
  - its standards;
  - its procedure, which includes steps to assess environmental and social risks, to carry out an environmental and social impact assessment (ESIA) for high-risk activities, and to prepare an environmental and social management plan (ESMP) for medium- and high-risk activities; and
  - its requirements for grievance mechanisms and information disclosure.
3. However, the review also reported that WFP's Environmental and Social Standards (ESS) are somewhat distinct from those of most IFIs and the United Nations Model Approach, especially regarding the social standards. Although these mostly cover the same topics and issues as most IFIs and the United Nations Model Approach, they were drafted to mirror other relevant WFP policies, such as Gender Equality, Protection and Human Rights and Accountability to Affected Populations. WFP's inclusion of a standard on Climate Change is also distinct. Furthermore, the WFP standards do not cover cultural heritage or labour standards, unlike most IFIs.
4. WFP is, however, unique among comparator humanitarian agencies, which have not adopted comparable Safeguards systems; however, UNICEF is preparing to launch its system and others also have a range of environmental and social policies, commitments and procedures.

### Is it fit for purpose for WFP's mission and diversity of operations and to respond to different operating contexts?

5. There are some challenges in aligning the IFI Safeguards model with the WFP's humanitarian mission and its complex and diverse range of interventions. WFP has several distinct characteristics that are relevant to any analysis of whether the ESSF is fit for purpose.
6. First, WFP's mission is mainly humanitarian, responding to emergency situations and working in difficult contexts, both geographically and socially. A senior headquarters key informant (KI) noted that 58 percent of WFP's global spend is concentrated in ten countries, all of which are emergency contexts, while 6 percent of its spend is spread over 43 small countries.
7. Second, its development or programme activities cover a range of different activities to address food security and nutrition, as well as climate resilience. These activities are developed by diverse means, such as direct funding from WFP, funding from donors, partnerships with NGOs and other local organizations, and service agreements with governments. In some cases, the detailed preparation of the programme is the responsibility of WFP, while in others it is the responsibility of cooperating partners (CPs), contractors or government agencies.
8. It was evident from the Environmental and Social Sustainability Framework (ESSF) that the Safeguards system was designed to be applied in a comparable way to how IFIs and other development agencies apply Safeguards to their development programmes and projects. However, as stated clearly in the Executive Director's circular, the Safeguards should be applied to the diversity of all WFP's programme activities, as set out in its country strategic plans (CSPs). It is also worth noting that WFP is a highly decentralized organization, which is currently facing significant financial constraints and staffing shortages.

9. It has been a challenge to determine whether this system is fit for purpose. It is reasonable to say that the Safeguards focus is largely directed at a relatively minor component of WFP's total operations. It was reported, however, that there has been a slight increase in the proportion of development activities compared to emergency operations, which is partly due to the availability of more funding for climate-related operations. WFP's mission and the diversity of its activities and how these are funded or designed are more complex than is typical in IFIs, which tend to have a standard programme or project cycle into which the Safeguards requirements are integrated. Some KIs highlighted that there is no single programme cycle at WFP and there is a diversity of scenarios, especially relating to who designs the interventions and who would be responsible for ensuring ESS compliance.
10. Some KIs at the headquarters and regional bureau (RB) level revealed concerns that the IFI model is not ideal for how WFP operates, both in terms of the complexity of the programme cycle and the prevailing culture of the organization. However, this was not a universally held view.

#### Box A1: Example of IFI procedures for integrating safeguards into the project cycle

##### **The African Development Bank's (AfDB's) Environmental and Social Assessment Procedure (ESAP), 2015**

Following the introduction of the AfDB's Integrated Safeguards System (ISS), it issued the ESAP to provide a clear procedural basis for the operationalization of the ISS at each stage of the project cycle, thus ensuring that the borrowers, the AfDB's sector departments, and the Safeguards and Compliance Division collaborated effectively to meet the ISS requirements.

It addressed the application of the ISS at the following stages of the project cycle:

- Country programming: mainstreaming environmental and social considerations;
- Project identification: screening and categorization;
- Project preparation: scoping and conducting the required environmental and social assessments;
- Project appraisal: assessment summaries reviewed and cleared;
- Project implementation: implementation of ESMPs, monitoring and supervision; and
- Project completion: environmental and social audit.

For each stage, the respective roles of the borrower, the AfDB's sector departments, and the Safeguards and Compliance Division are defined and the intended output of the ISS step is identified. Importantly, the requirements for satisfactory compliance checks and consequent decisions or approvals are established, including how the output is incorporated into the key project cycle outputs, such as the project brief, the project concept note, the project appraisal report and the project loan agreement, and how they are approved or rejected.

The ESAP also includes an extensive set of templates for how the outputs of the various steps in the ISS process are presented, including the memoranda seeking clearance or approvals at each stage.

#### **Does the policy have clear objectives, with the means to implement them? In particular, does it make it clear how the Safeguards system will be integrated into the WFP programme cycle for its range of development interventions, with clearly assigned responsibilities and accountabilities?**

11. While the ESSF is strong on how to operationalize the standards in the programme cycle, it currently lacks the detailed procedural guidance needed and the accountability mechanisms to ensure compliance within the organization.
12. The ESSF sets out the overarching principles and objectives of the Safeguards and their implementation. It also sets out detailed steps to be followed, and who is responsible for carrying them out and approving the outputs, such as risk screening and preparing ESMPs. Moreover, it provides tools and templates for the main steps in the Safeguards procedure. However, at the CO level, it does not set out a standard Safeguards implementation modality that clarifies how the Safeguards requirements should be mainstreamed into the key steps of the CO's programme cycles or who is responsible for ensuring this happens systematically.

13. To some extent, the ESSF does cover how Safeguards should be operationalized in the overall programme cycle – first, at the CSP level and, second, at the point of developing a field-level agreement (FLA), memorandum of understanding (MOU) or construction contract (CC) (it also identifies links with other processes, such as the corporate results framework (CRF), community feedback mechanisms and the corporate risk register). It was reported that these were identified during the design of the ESSF as the two most predictable stages of the WFP programme cycle. However, a KI involved in the design of the ESSF commented that what happens between the CSP and the FLA is a “grey area”. In addition, there are a wide range of parallel programme design tools, covering themes such as gender and conflict. It was not established how the ESSF tools should integrate with these to bring about a streamlined programme design approach.
14. It should be noted that the responsibility for carrying out the risk screening lies with whoever is responsible for the detailed design of the intervention: it could be the WFP activity manager, the CP, the WFP engineer or the government partner. The responsibility for combining or streamlining the application of the tools should lie with this person.
15. One of the ESSF’s principles is accountability. The ESSF includes measures to link with community feedback mechanisms and information disclosure. It also describes the links with risk management, and there is a component on environmental sustainability in the corporate risk framework. Accountability also includes an indicator on applying the risk screening to FLAs, MOUs and CCs, which is to be reported in the annual country reports (ACRs). However, it is not clear how RB and CO management are systematically held accountable for the ESSF’s implementation. This is an issue that was raised by a number of KIs as a missing element in an otherwise robust accountability system.
16. The ESSF does not include the detailed procedures and guidance on how the Safeguards should be integrated into the programme cycle that form part of some IFI Safeguards systems. This was a concern raised in several interviews with headquarters and RB Safeguards advisors. It was also evident from some of the discussions at the Regional Bureau Johannesburg (RBJ) workshop, in which CO focal points expressed confusion about how the Safeguards should be applied in different programme cycle scenarios.
17. The Climate and Resilience Service (PPGR) has been working on producing a set of guidelines on how to apply Safeguards to different activities. In consultation with the teams responsible for those areas of work, guidance is being/has been drafted for ten WFP activities/types of operation. To varying degrees, they address how to assess the ESS risks in different types of operations, under different preparation scenarios. Good examples of this are the school-based programmes (SBPs), in which the guidance includes “a procedural guidance which describes the application of the environmental and social risk screening (ESRS) tool in the design and implementation of School Based Programme...interventions, and subsequently provides guidance on how to conduct the ESRS for SBP proposals”.<sup>4</sup>

**Does it include an estimation of the human and financial resources required?**

18. The ESSF lacks an estimation of the human and financial resources needed for full implementation.
19. It is clear from the policy that no estimation of the human resources necessary to achieve full implementation of the Safeguards requirements in WFP operations is provided.
20. It is also clear that no estimation of the financial resources needed to achieve full implementation or how they would be sourced is provided.

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<sup>4</sup> WFP. n.d. *ESSF Thematic Guidance Series – Environmental and Social Risk Screening in School Based Programme (SBP) Interventions*.



## **EQ2: What are the results of the environmental policy on WFP's programme activities and management operations?**

### **To what extent has WFP enhanced the environmental and social sustainability of its programming and operations and maximized opportunities for environmental and social benefits, taking account of the extent of the buy-in and roll-out of the Safeguards requirements?**

21. It is too early to assess the results of the ESSF on the ground, but there is evidence that management buy-in is not adequate across the organization and that the ESSF roll-out has been inconsistent.
22. It is too early in the adoption of the ESSF to determine the extent to which it has enhanced the sustainability of programme activities on the ground. This is because the programmes to which the ESSF has been applied have not been fully implemented and their sustainability has not been assessed. However, there was evidence of increasing awareness and commitment to the ESSF. Recent CSPs in the countries visited or subject to a desk review showed a greater emphasis on the need to comply with the ESSF and apply the Safeguards compared to earlier CSPs. For example, the Guatemala 24–29 CSP stated: "In line with WFP's environmental and social sustainability framework, all CSP activities will be screened for environmental and social risks using WFP's corporate tool. WFP will develop environmental and social management plans based on the screening results, where necessary." Moreover, the Kyrgyz Republic's 2023–2027 CSP stated: "In line with WFP's social and environmental safeguards framework, 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."
23. However, from the CSP reviews and interviews with the RB and CO Safeguards advisors, it was evident that there has been little, if any, systematic application of the ESSF to the CSPs themselves, in the manner set out in the ESSF; none of our key informant interviews (KIIs) or country visits revealed any visible momentum towards applying the ESSF to CSPs. This can partly be explained by the timescale and duration of CSPs – few will have been prepared since the ESSF was introduced. Despite this, many COs have still made considerable progress in adopting the systematic screening of programme activities, as described below.
24. It was possible to broadly assess the scale of the ESSF roll-out at a programme level and, within that, the extent to which the planned interventions are subject to risk screening and the preparation of ESMs. The WFP APR of 2023 stated that 51 COs used a risk-screening tool during programme design, which was up from 47 COs in 2022 and 26 COs in 2021. However, according to most of the KIIs, the data at the CO level are poor. Furthermore, there was no evidence about how these actions have contributed to the environmental and social sustainability of the interventions on the ground; however, realistically, it is currently too early to ascertain this.
25. PPGR produces a tracker that covers several Safeguards implementation parameters, as reported by the RB and CO Safeguards team members, including the Safeguards focal points, donor engagement with Safeguards requirements, the training and support received, the status of the roll-out, and challenges. Data from the tracker indicate the following:
  - The presence of focal points varied considerably from region to region. For example, in Regional Bureau Dakar (RBD) all countries have one, whereas, in Regional Bureau Panama (RBP) almost none have one. Moreover, most RBJ COs have one, but there are not many in Regional Bureau Cairo (RBC).
  - The majority of COs have some degree of donor engagement or are submitting proposals for donor funding.
  - Almost all countries have received some online Safeguards awareness raising and training. Many have also had in-country missions, often in response to donor Safeguards requirements.
  - Data on Safeguards implementation were very inconsistent: in some cases they were based on the reporting of the Safeguards cross-cutting indicator, yet in others this was not available. More detailed data were available for Regional Bureau Nairobi (RBN) and Regional Bureau Bangkok (RBB), which often referred to donor requirements.
26. The ACRs currently have a section on environmental sustainability and an annex on the risk screening cross-cutting indicator. This section in the reports did not often provide good data on the extent of the

roll-out. Comparing ACRs in different countries, it was clear that they are inconsistent in structure, coverage and detail. In many cases, they are imprecise and simply indicate that the CO will carry out more vigorous roll-outs in future. As stated above, the indicator was widely considered to be poorly, sometimes inaccurately, reported. Additionally, this reporting does not cover implementation beyond risk screening, such as ESMPs or ESIAs, or the quality of these measures. However, they did reveal that risk screening, as reported, is rarely, if ever, applied to all activities in a CSP.

27. Interviews with HQ and RB advisors consistently revealed that the roll-out is inconsistent – good in some cases and non-existent in others (see the box below). However, it should be highlighted that the pressure from specific donors to apply Safeguards to their programmes has sometimes encouraged COs to take steps towards Safeguards implementation for other interventions where there are no donor pressures to apply Safeguards. Overall, the consensus was that the situation is improving, but slowly, and that it is often boosted by ESS team country missions and workshops.
28. KIs reported that ESS requirements are rarely applied, if at all, to emergency response operations. However, it was suggested that there would be value in applying Safeguards to emergency preparedness and to more protracted response interventions following a crisis.

#### **Box A2: Key findings from country visits and desk reviews**

There was found to be significant variation in terms of the implementation of Safeguards across the COs. The main drivers have been donors, in particular IFIs. Increasingly, however, the drivers have also been governments, who have mandated the implementation of Safeguards for the funding of projects and compliance. There was a strong correlation between the extent of Safeguards implementation and the presence of projects with Safeguards requirements from donors, such as in Afghanistan, the Kyrgyz Republic, Madagascar and Yemen. This was particularly evident when the donor engagement resulted in dedicated Safeguards expertise over a prolonged period, such as in Yemen.

Other COs, such as Egypt, Mali, Namibia and Nicaragua, have seen limited Safeguards activity or roll-out. The reasons were varied – while COs such as Namibia or Nicaragua may lack resourcing or local capacity due to their size, a CO such as Mali (despite high CRF indicator reporting) has limited Safeguards roll-out due to a lack of guidance from headquarters and the RB. Mali and Egypt also both experienced limited prioritization of Safeguard by CO management.

Some COs, such as Ghana and Guatemala, have seen significant integration of Safeguards, without donor projects being the main driver. This is due to active Safeguards focal persons delivering their responsibilities and, in the case of Ghana, a particularly strong CO leadership commitment to environmental and social sustainability.

There was even significant variability among the COs that have implemented Safeguards screening for projects, with some COs, such as Afghanistan, Madagascar and the Kyrgyz Republic, only conducting screening for donor-supported projects, with limited adoption beyond these. The exception is in Yemen, which is a large CO responding to emergency needs. There, a specific donor provided funds for dedicated Safeguards expertise to meet its requirements focused on its programme, which has brought about Safeguards implementation for all activities, including more protracted interventions that respond to longer-term emergency situations.

The challenges that are faced across the COs include resource constraints; low management commitment; and the allocation of staff responsibilities, with Safeguards focal points always holding other duties. Furthermore, there was a perception that the Safeguards tools are bureaucratic, inflexible, generic and unwieldy, particularly for emergency response operations. Capacity strengthening was also highlighted as a significant need and, although there has been considerable training for partners in some COs (such as Ghana and Egypt), it was suggested that more comprehensive and streamlined training was lacking.

### **Has the Safeguards system contributed to other results, such as better awareness among staff or capacity among local partners?**

29. There was evidence that the effort to implement the ESSF has contributed to greater awareness of and capacity for environmental and social risks among the COs and CPs.
30. The KIIs in headquarters and RBs, the country visits and the desk reviews showed that the training, workshops and country missions have made a significant contribution to COs' awareness and knowledge about the Safeguards system and about environmental and social risks in general. Indeed, this has been the main pillar of the Safeguards headquarters and RB teams' work. Although it was hard to quantify, this has undoubtedly resulted in more commitment to and a better understanding of how to address environmental and social risks in WFP programmes.
31. In the Q4 2023 Critical Corporate Initiative (CCI) Quarterly Report, it was stated that in-country support missions to COs increased in the second half of 2023, reaching 25 countries in total. It stated: "In achieving this target, the role of regional bureaux in facilitating the missions remains crucial. The same applies to ESS integration in regional processes and ESS advisors' reporting dynamics, as well as for three days regional workshops required to share knowledge, good practices, challenges and strategize for ESS implementation (entirely paid by CCI)."
32. However, it also said: "... due to calendar restrictions the regional workshops that 3 regions had planned for 2023, have resulted in confirmation of only 1 in RBN, while RBJ added the workshop to Q2 of 2024 and other RBs have indicated 2024 as the preferred year. However, all workshops with the exception of RBJ were indefinitely postponed by regional management."
33. In the Q2 2024 CCI Quarterly Report, it was stated that 11 in-country ESS support missions had been conducted since January 2024 and an additional ten had been planned during the rest of the year.

### **Were there any unintended positive or negative outcomes of the Safeguards requirements?**

34. There was no clear evidence of unintended outcomes.

## **EQ3: What factors have enabled or hindered the implementation and achievement of the policy objectives?**

### **How well does the current institutional architecture facilitate the implementation of the Safeguards? For example, in terms of the roles and responsibilities for implementation and oversight.**

35. There was considerable evidence that the institutional location of the headquarters Safeguards team has hindered effective implementation.
36. The institutional location of the corporate Safeguards function was a consistent issue among the KIIs at every level. One KI stated that having EMS and Safeguards in different divisions caused a dilution of senior management ownership of the policy and ESSF. Other KIIs revealed the widespread view that the Safeguards function should not be housed within the Climate and Resilience team, as it applies to all WFP areas of operation. Staff in other teams assumed that it did not really apply to them but was primarily a resilience issue. Moreover, it was reported that, prior to the recent reorganization, the function was at a lower level than other cross-cutting teams, which made it harder to bring about collaboration with other teams. A senior headquarters KI reported that the question of institutional location for the Safeguards team had not been addressed during the reorganization process, as had been hoped (and lobbied for).
37. A key headquarters KI stated that Safeguards was not intended to be another self-standing cross-cutting functional unit, but a procedure for bringing relevant cross-cutting units together during programme preparation and design, under programme and activity management. At the RBJ workshop, this view was echoed by the CO focal points, who felt that other units in the COs assumed that they did not need to involve themselves because Safeguards was the responsibility of the focal points. There was certainly little evidence that CO programme or activity managers took ownership of complying with the Safeguards requirements and mainstreaming them into programme design.

38. It was clear from many of the KIIs that the Safeguards team, because of its location, does not have the convening power to bring together the other key teams with the expertise needed to respond to the range of social standards in the ESSF. Some KIs suggested that these teams were better established institutionally and better resourced. Because they have had the experience of providing their input to programme design independently, they have limited motivation to adapt to the Safeguards system. One KI at headquarters suggested it might be better for the Safeguards specialists to be incorporated into the Gender, Protection and Inclusion team.
39. It is important to note that all the advisors are consultants, which, in the opinion of one senior KI, may reduce their credibility and “clout” with their headquarters and CO colleagues. This is because consultants are generally less familiar with the reality of CO humanitarian challenges, the programming diversity or the burden of multiple policy requirements. It was even said that there may be a “culture clash”.
40. In two regions, the mechanisms initiated to bring together the cross-cutting staff to facilitate collaboration on programme design were highlighted. In RBC, one such cross-cutting team was the Policy Priorities team; however, this was discontinued. In RBP, prior to proceeding to design specific interventions, there was a pilot that brought the cross-cutting staff together in a workshop to assess shared issues for a CSP.
41. Another issue related to the WFP institutional architecture is its decentralized structure. A number of KIs drew attention to this as an impediment to buy-in at the CO management level – one KI stated: “CO Directors can do what they want.” The same observation was made about senior CO staff, in general. In addition, several KIs drew attention to the high prevalence of staff rotation as a hindrance. Others mentioned that CO staff are generally overstretched and burdened by a multitude of different policy requirements.

**How have management commitment and staffing levels, technical capacity, and financial resources at RBs and COs affected the safeguards roll-out, including the safeguards support provided by the RBs?**

42. There is evidence that management commitment, staffing levels and the security of financial support are important factors in supporting and mobilizing the Safeguards roll-out across the organization.
43. Many KIs reported that the level of management buy-in and commitment to implementing the Safeguards is inconsistent across the different management contexts, as follows:
  - At the headquarters level there is a need to communicate and enforce the need for compliance.
  - At the RB level there is a need to maintain Safeguards capacity and the effort to provide technical support to COs.
  - At the CO level there is a need to ensure commitment to integration within programme cycles.
44. Moreover, some KIs reported that, in some cases, CO management is not adequately aware of the Safeguards rationale or the specific requirements. Some RB advisors reported not being able to get missions approved by COs and that workshops had been postponed even when funds were available, limiting technical support for Safeguards implementation in COs.
45. The Safeguards staffing situation has deteriorated over recent months, as described in the previous section. At headquarters, one post is unfilled and the Safeguards coordinator post is expiring. Furthermore, RBB has not appointed a regional Safeguards advisor; one post has been discontinued in RBD; three Safeguards advisor posts have been discontinued in RBP, RBD and RBC. In addition, the KIs stressed that CO focal points typically perform a number of roles and are rarely Safeguards specialists.
46. Moreover, any potential solutions to staffing problems are hindered by the WFP-wide hiring freeze and resource constraints. It was reported by the KIs that headquarters is trying to find “patch up” solutions – for example, by appointing CO Safeguards advisors with a regional role.
47. KIs also consistently expressed their concern for how the Safeguards teams at headquarters and the RBs will be funded in the future. To date, these posts and their work have been funded by ‘one-off’ arrangements, such as the CCI. However, it is not clear how long this can be relied on. It was also

reported by senior headquarters KIs that this situation compares unfavourably with other cross-cutting teams, which are largely funded by Programme Support and Administrative core funding.

48. A senior headquarters KI emphasized that the model for operationalizing the Safeguards system – with a small headquarters team and RB Safeguards advisors linking to CO focal points – was intentionally decentralized. They also reported that its success depended on the robustness of this functional structure and its secure funding; therefore, with a seriously dwindling staffing deployment and uncertain funding, its success is clearly at risk.

**Are appropriate monitoring, reporting and accountability mechanisms in place to enable the management of environmental and social risks?**

49. There were concerns about the reporting of Safeguards implementation and accountability mechanisms to ensure compliance.
50. It was not clear how RB or CO management is held accountable for ensuring compliance with the ESSF. Several KIs referred to the absence of a visible mechanism for ensuring accountability as a significant hindrance.
51. The cross-cutting Safeguards indicator in the CRF is, in the opinion of several KIs, of limited value, as it only covers the percentage of FLAs, MOUs or CCs that have been subject to the risk screening and not whether ESMPs or ESIAs are prepared and implemented. It does not, therefore, cover programmes that are directly funded by WFP.
52. The data on Safeguards implementation collected by the headquarters Safeguards team in its tracker covers reporting by COs on the CRF indicator. The data were better for some regions than others, depending on how the regional Safeguards advisor collected them. It was noted that some COs have not reported at all, have reported on the incorrect indicator, or have incorrectly set the baseline at 100 percent. A regional Safeguards advisor considered that activity in several COs had been inaccurately or unrealistically reported. Most COs report on some but not all of their CSP activities and it was further noted that, in many cases, it is not possible to obtain any supporting documentation on the screening.
53. These views were reinforced by the interviews with other regional Safeguards advisors, some of whom have indicated that COs have not collected the data systematically or effectively. Moreover, they highlighted the fact that responsibility for collecting data in a timely manner is not clearly assigned or understood. As mentioned above, some of the COs have reported unrealistic results – for example, reporting that the indicator is 100 percent when this was not the case. It was evident from the ACRs reviewed for the selected COs that the indicator is only reported on for certain activities rather than across the full range of CSP activities. The RB Safeguards advisors did, however, report that the situation is improving, albeit slowly.

**How has working with donor partners enabled or inhibited the achievement of results from the Safeguards system? How has the delegation of Safeguards to CPs contributed to results achievement?**

54. There was strong evidence that donor Safeguards requirements have been the main driver for applying the WFP Safeguards system. Delegating the responsibility of applying the Safeguards to CPs has challenges, and WFP has provided training and capacity building in some cases.
55. Donors' Safeguards requirements are considered to be the main driver for developing ESS capacity at the CO level. Donors are increasingly strict about their Safeguards requirements being met and about their partners having an effective Safeguards system. For example, the World Bank is in the process of setting up stricter requirements on reporting and the rapid notification of any Protection from Sexual Exploitation, Abuse and Harassment incidents. Moreover, WFP will need to reapply for GCF accreditation soon, which has a strong focus on the strength of the Safeguards system (including its supporting monitoring and reporting system).
56. Donor Safeguards requirements provide a strong motivation for enabling funds to be accessed but also create a financial and reputational risk if not complied with. For example, one KI referred to a USD 200 million donor-funded project that was cancelled for this reason. Donors sometimes require that COs have a Safeguards specialist; it is also possible that they sometimes fund this. The

headquarters Safeguards team prepared an analysis of the Safeguards systems and requirements of different donors to assist COs in preparing proposals for donor funding. Regional Safeguards advisors indicated that engagement with donors usually triggers requests from the COs for technical support.

57. Importantly, headquarters and regional Safeguards advisors indicated that responding to donor Safeguards requirements often raises awareness about Safeguards at the CO management level, which provides momentum for COs to roll out the WFP requirements more widely. An equally important point was raised in several KIIs: the challenge WFP faces in accessing future funds from key donors if they do not consider the Safeguards system, including grievance mechanisms, monitoring and reporting arrangements, and the adequacy of its implementation status to meet their requirements.
58. In many cases, CPs play an important role in implementing the WFP ESS system – for example, when they are responsible for designing interventions or for conducting environmental and social risk screening prior to agreeing FLAs. Training and capacity building are, therefore, of great importance. It was reported by the headquarters Safeguards team that online and in-person training has been provided to CO CP staff since 2020. This has been included in each country mission since that time. Often, the training is related to a specific programme – especially in cases where there are donor requirements that need to be met through the role of the CPs – and covers both the donor requirements and the WFP ESS system. In addition, the team has developed a training presentation to be delivered to CPs via global workshops organized by the NGO unit. The KIIs also noted that the COs have provided Safeguards training to CPs when needed.
59. In support of this effort, the headquarters Safeguards team developed a Safeguards clause for the 2022 FLA template. More recently, it has developed FLA guidance on Safeguards and amended the call for proposals template to reflect the Safeguards requirements.

## CONCLUSIONS

### EQ1

60. The ESSF standards and Safeguards requirements are consistent with and largely modelled on the Safeguards systems adopted by IFIs and some United Nations agencies – systems that have evolved over the past few decades and are, to a large extent, harmonized.
61. WFP is predominantly a humanitarian organization, with a large proportion of its operations responding to food emergencies in contexts characterized by vulnerability, fragility and conflict. In addition, it does deliver development-focused programmes related to food security and climate resilience, which are often funded by major donors or by service agreements with governments. This profile is unlike typical IFI or donor operations, which raises the question of whether an IFI-style Safeguards system is appropriate and well suited to WFP.
62. Furthermore, the design of the Safeguards system was found to be strong in terms of its required steps, tools and responsibilities. However, the challenge is in defining how it is mainstreamed into WFP's programme cycle so that it is aligned with the key steps in programme preparation, appraisal and approval, making it integral to the decision-making process. This challenge is compounded by WFP's diverse types of operations and its variable programme cycles.
63. A key flaw in the design of the Safeguards system is that a clear estimation of the staff and financial resources needed to achieve full implementation, and how those resources will be made secure, is absent.
64. Therefore, while it is a good system, it may not be ideally suited to the humanitarian mission of WFP because of the particular characteristics of humanitarian operations, as mentioned above. It also lacks the corporate procedures to make it integral to decision making and to ensure secure resources.

### EQ2

65. The ESSF was introduced in 2021. Since then, Safeguards teams at headquarters and the RBs have been put in place; many COs have appointed Safeguards focal points, who often perform more than

one role; online awareness raising and in-country training and support has been delivered to many COs; the key environmental and social risk screening tool has been used by a growing number of COs; and environmental sustainability has been adopted as a cross-cutting issue, with an indicator reported on in ACRs by more COs each year. In addition, many COs, with support from RBs and headquarters, have responded to donors' Safeguards requirements. However, it is too early to say if the Safeguards system has contributed to better environmental and social sustainability on the ground.

66. However, the KIs, country visits and desk reviews highlighted that the roll-out has the following shortcomings:
- The Safeguards are not applied to the preparation of CSPs, as required in the ESSF.
  - The Safeguards system is not systematically mainstreamed into the CO programme cycle alongside the work of other functional units under the programme and activity managers.
  - The roll-out is inconsistent and varies significantly from region to region, with signs that not all COs feel that they need to apply the Safeguards.
  - Not all RB and CO managers have supported the work of the Safeguards advisors in delivering workshops or in-country missions to galvanize and support Safeguards implementation.
  - The reporting on the CRF indicator has been problematic, although it is slowly improving.
67. In conclusion, although much has been achieved in a relatively short period, there is much more to be done to ensure the Safeguards are embedded in the preparation and decision making of WFP's programmes in a consistent and predictable manner across the range of its operations. Looking ahead, there are potential challenges in the form of dwindling ESS staffing and a lack of secure funding.

### EQ3

68. The institutional location of the HQ Safeguards team, which is within the Climate and Resilience team, has contributed to the challenges affecting the roll-out of the Safeguards system. Safeguards should be applied to all of WFP's activity areas and should bring together the expertise of a range of technical functions relevant to the scope of the ESSF standards. Being located in Climate and Resilience sends the wrong message and hinders the efforts to mainstream Safeguards across the organization. While this issue has been recognized by many within WFP, it was not addressed in the recent reorganization.
69. WFP is a decentralized organization, and it was clear that the commitment from RB and CO management has been inconsistent, ranging from full buy-in to limited awareness of the requirements. In addition, in a period of severe resource constraints, the Safeguards staff deployment at the headquarters and RB levels is dwindling and secure funding for the future is not in place. Consequently, the delivery of the highly effective training and in-country missions to COs to stimulate and support Safeguards roll-out is at risk.
70. Accountability for compliance with the Safeguards system is weak and the environmental and social sustainability cross-cutting indicator, which COs report on in their ACRs, is problematic. Consequently, there is limited institutional leverage to ensure that the Safeguards are implemented in the manner set out in the ESSF and the Executive Director's circular. This is an issue of some concern if WFP has ambitions to align with the environmental and social risk management processes adopted by the United Nations system and the wider community of donors.
71. It is engagement with donors that has been the most visible driver for COs to implement the Safeguards system in a way that is compliant with the donor's Safeguards requirements, often with additional resources from the donor funding to put in place for dedicated expertise. COs have had to focus on the ESSF requirements and collaborate with donors to ensure their capacity is sufficient to meet their expectations. The Safeguards requirements of IFIs, climate funds and other donors are often stringent and necessitate extra support and commitment to comply with them. In some cases, these requirements are becoming more demanding, meaning that WFP may need to make extra efforts to keep up with their requirements to ensure further funding from these sources.

## Overall

72. The drivers for stronger environmental and social risk management within the humanitarian and development community are gaining momentum. In this context, WFP is ahead of its immediate peer group, as it has adopted a robust policy and ESSF, which has brought about significant change. However, in comparison with the wider development donor community, it lacks some key elements that are vital making it effective, such as consistent management commitment to its full implementation, accountability mechanisms to ensure compliance, and adequate staffing and financial resources. The Safeguards should not be optional but need to be mainstreamed in the programme cycle so that the approval of interventions depends on the requirements being met. At present, it is clear that some parts of the organization have made good progress in adopting the Safeguards, but others need to give it greater priority.



# Annex XII. EMS assessment

## FINDINGS

1. In terms of context and subject detail related to the environmental management system (EMS), this can be found in the main evaluation and inception report (IR).
2. The findings of the EMS component of the evaluation are explored further against each of the main evaluation questions (EQs). In particular, the EMS report is structured around the key evaluation subquestions, which were mapped out in the IR (see Annex III).

### EQ1: How good is the environmental policy?

#### How good was the EMS guidance content within the EMS?

3. **EMS module content:** As previously outlined, WFP's EMS design and guidance was elaborated in Module 4 of the EMS in 2021.<sup>5</sup> The module contains a good level of detail (with signposting to more detailed templates, documents and tools) and refers to the guiding ISO 14001 standard and other United Nations guidance<sup>6</sup> and inter-agency work.
4. The module sets a clear corporate objective (the corporate results framework (CRF) indicator) and specifies that country-/field-level objectives will be elaborated in due course. No broader Theory of Change (TOC) or results framework is provided; however, a TOC is not appropriate or necessary but a results framework does merit further thought, particularly at the corporate level. While the CRF indicator lacks detail, particularly regarding the extent/quality of the EMS implementation, the emerging Environmental Plan of Action 2030 (EPACT)<sup>7</sup> moves the EMS more firmly in this direction, situating it in a broader framework of environmental targets and actions for WFP.
5. The EMS is structured around five key areas, in line with the United Nations Strategy for Sustainable Management: (1) energy, (2) waste management, (3) water and wastewater, (4) sustainable procurement, and (5) training and awareness. It is, however, understood that this guidance has to be considered and applied in country contexts and in line with the resources available in the future.
6. **EMS module and policy coherence:** It is perhaps more important that the main, overarching 2017 policy is coherent with wider WFP policies. Currently, the EMS module makes no explicit reference to other WFP policies, whereas the WFP Climate Change Policy<sup>8</sup> and Supply Chain Environmental Strategy<sup>9</sup> both refer to the EMS (noting that the latter was drafted in 2024). It would benefit particularly from better alignment with Safeguards (as the other core ESSF component) and from better signposting to/coherence with existing social policies and processes. As previously mentioned, the EMS does not consider social integration/social sustainability aspects at all. As one senior headquarters KI noted: "It's still not nicely linked together."
7. The evaluation's external lessons review noted that other agencies do not have specific EMS, but they do have environmental policies or systems to mitigate and manage their operational environmental impacts. WFP is distinct because it has sought to build more structure, standardization and rigour around this aspect than its peers.
8. **Extent to which the policy looked forward, and was innovative and flexible:** As indicated above, WFP is distinct in that it has its own specific EMS. It is also possibly the only humanitarian organization that is aligned so closely to the ISO standard – as opposed to the general measures others have in place to improve environmental performance. This shows innovation.

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<sup>5</sup> WFP. 2021. *Environmental and Sustainability Framework (ESSF)*.

<sup>6</sup> For example, the UN High-Level Committee on Management (HLCM), *Greening the Blue and the Strategy for Sustainability Management in the UN System 2020–2030*.

<sup>7</sup> WFP. Forthcoming. *WFP Environmental Plan of Action 2030*, draft report.

<sup>8</sup> WFP. 2017. "Climate Change Policy" (WFP/EB.1/2017/4-A/Rev.1\*).

<sup>9</sup> WFP. 2024. *Supply Chain Environmental Strategy*.

9. Although the EMS module is detailed, the only aspect that is actually specified or that is close to being mandated is that EMS must be established/launched in each country and across regions (as per the CRF indicator). Otherwise, given the decentralized nature of WFP and its systems, countries and individual facilities are reasonably free to flex aspects of the EMS guidance to suit particular contexts and constraints. However, there are drawbacks to this flexibility: the quality and extent of EMS implementation across countries and regions varies and there is a lack of oversight and impetus, affecting WFP's ability to realize its greater ambition for environmental performance.

#### **How good was the EMS module in terms of design?**

10. The ESSF built on earlier progress and decisions, most notably a commitment to establishing and screening for ESS; the existence of pilot initiatives to establish EMS; and other environmental management approaches within operations, which were not necessarily 'packaged' as EMS. The commitment to Safeguards also helped to frame the policy document and tools, with "a need to cover both environmental and social sustainability" (MSDI staff member). The EMS module of the ESSF was largely driven and developed by Management Service Division – Infrastructure and Facilities Management Branch (MSDI) staff at headquarters, drawing heavily from wider United Nations processes and documentation, in particular the UNEMG and the Greening the Blue initiative.
11. The ESSF and its constituent tools were tested across a sample of six countries/contexts, and were the subject of broader consultations at the headquarters, RB and CO levels. However, given WFP's diverse stakeholders, and its mandate and work, the breadth of these consultations is being questioned. Although gender colleagues were involved, the wider social advisory cadre do not appear to have been involved to a significant extent. Some social advisory cadre staff reported that they have not been involved either historically (in terms of the ESSF) and are not involved now (as part of the EPACKT). However, it is important to note that staff turnover may have meant that, in some cases, consultation occurred with former colleagues. Moreover, although many of the EMS staff (particularly at the regional level) were recruited after the formulation of the environmental policy and ESSF, they have been more involved in the EPACKT. Feedback from a number of KIs stated that the ESSF was not harmonized well in terms of the status quo or the existing and potential capacities of the organization, with many saying it was overly ambitious, particularly in terms of ISO alignment.
12. Several KIs indicated that combining Safeguards with the EMS in one policy was unhelpful, as they have very different scopes and remits. However, many saw that there were potential opportunities regarding EMS approaches and the staff being able to support programmatic or supply chain sustainability efforts. The synergies regarding supply chain were the most apparent (see section 3.2.2).
13. However, an arguably more important factor in the design was the fact that EMS and Safeguards (and now supply chain) were housed in different divisions and teams during the core period of policy implementation. Despite individual and group initiatives to increase collaboration, this has inevitably led to some siloed working practices and a lack of coordination from headquarters throughout the regions and countries. Most KIs said that this had resulted in a lack of clear leadership and ownership in the overall policy. The organizational restructuring has eased this to some extent, but structure is only part of ensuring coordination and collaboration.
14. In terms of its timelines and appropriateness, the EMS module came four years after the development of the original policy document. However, it is understood that COVID-19 significantly disrupted WFP's business activity for at least two years. Given the lack of tangible tools and guidelines in the main policy document, this was a significant gap, both in time and in support for EMS policy implementation. However, it was evident that the pace of the roll-out and implementation has been relatively rapid since ESSF was finalized (see section 3.2.1).

#### **To what extent did the EMS module include provisions for implementation?**

15. Overall, the module successfully mapped out the initial way in which EMS should be put into practice, including the key roles and responsibilities. Unfortunately, there were no allocated resources at the regional or country level, which has limited implementation in some respects: "If there's no funding available at the lowest level (CO level) to at least implement some of these activities, then you will not see the difference."

16. The plan to have regional advisors proved effective in most instances where the regions have been willing and able to fund the positions. However, in some cases where advisors have had to cover both ESS and EMS functions, this has led to confusion, the dilution of effort and messaging, and inefficiencies because of these advisors having to take on too many roles.
17. Moreover, at the CO level, some EMS focal points are core staff who have subsumed EMS into their responsibilities. However, this still requires resource mobilization and fundraising to implement specific EMS plans and activities. The efficacy of the focal point system is discussed in section 3.2.
18. One key challenge in the EMS implementation concerns shared or rented facilities, which is the prevailing model across WFP operations. This severely limits WFP's ability to adapt premises and improve environmental performance; however, this was not anticipated in the EMS design.
19. **Monitoring:** The Archibus database predated the policy and, thus, provided a ready tool for inputting monitoring data and extracting reports on country-level management (including improving efficiency gains in terms of both energy and cost) and organization-wide/United Nations-level reporting.
20. The CRF indicator (see section 3.2) for EMS is insufficient to cover the range of activities outlined in the policy and EMS module because it is purely quantitative. For example, when it says that the EMS is 'implemented', this simply means it has been 'launched', and there is no measure of quality or continuous improvement/progress year on year.
21. The headquarters MSDI team keeps a basic tracker of all EMS projects (e.g. their type and status), giving a good overview of EMS extent and high-level quality – or at least the level of implementation. Archibus also provides a high-level, albeit slightly unwieldy, report on EMS status/levels of implementation.
22. The recent work on the EPACT is a welcome addition in this respect, establishing more detailed targets and actions, roles and responsibilities, and interconnectivity between key actors, and identifying resources (where possible). In terms of resources, it is hoped that the WFP carbon tax or Decarbonization Fund, which is currently being expanded, could help fund a portion of its implementation.

#### **How does the EMS align with the key principles of the ISO 14001 (2015)?**

23. In terms of international standards and best practices, the ISO standard 14001 (2015) is the main standard against which the EMS is benchmarked and audited. The IR identified some key principles derived from the ISO standard that WFP should seek to align with (see Table A1 in the IR for a detailed description of the principles). The alignment of the WFP EMS against each principle, in turn, is discussed below. (Please note that these principles were derived by the evaluation team.)

#### **Principle 1: Enhanced environmental risk management and performance**

24. In the context of the EMS having only recently been launched and rolled out across WFP, the level of environmental risk management is good. Offices tend to focus on energy and waste management, which are clear priority environmental impacts for the organization.
25. There are isolated examples of water harvesting or conservation (e.g. wastewater recycling in Kakuma, Kenya), but given the many arid and semi-arid environments within which WFP works, this requires more attention.
26. There are also challenges around certain wastes (e.g. sanitary, hazardous and engine oil), with many sustainable solutions being prohibitively expensive (e.g. sanitary and clinical waste in Kakuma, Kenya). Additionally, sometimes the appropriate infrastructure is unavailable in the country/region concerned (e.g. e-waste in Ghana). However, solutions are being sought and innovation is being used where possible – for example, improving clinical packaging reuse in partnership with the ICRC, in Kakuma, Kenya. Good examples were also found (e.g. RBD) of working with government partners such as the Ministry of Environment to identify local solutions and providers where possible.

27. The design of the EMS and its tools to cover five key areas (see section 3.1.1<sup>10</sup>) was reasonably comprehensive; however, people see these areas as a list of options rather than a recommendation that all of the aspects should be reasonably addressed.
28. Overall, regulatory compliance was found to be good, with close engagement with environmental authorities being seen in some countries (e.g. the National Environment Management Authority (NEMA) in Kenya). However, there is an over-reliance on these partnerships and on trust, and insufficient oversight and tracking of compliance at a higher level.
29. According to feedback from MSDI, monitoring and data collection on waste management still require further effort and improvement in order to report to the United Nations in a robust and consistent manner.
30. One KI commented: "I would like to see a bit more focus on the supply chain part. I think that would be super helpful to solve issues down the line pre-emptively." This indicated that risk management would be more comprehensive if a focus on supply chain was included. This comment is explored further in section 3.2.2.

### **Principle 2: Continuous improvement**

31. Again, given that EMS roll-out is relatively new, performance is strong with respect to continuous improvement. In most of the offices visited as part of this evaluation, examples of creative solutions and innovation were observed (e.g. e-waste recycling in Kenya and exploring fuel from human waste in Ghana). During the interviews themselves, even focal points and staff were thinking about improvements that could be made (e.g., in Ghana, bringing the RB EMS advisor into quarterly review meetings).
32. This principle also looks at adapting EMS for particular contexts and crises. In WFP's case, this includes considering adaptation for implementation in emergency/crisis contexts. This is an aspect that is being considered by MSDI, but there are already some initiatives being led by regional advisors (e.g. RBD) to include modules/guidance for emergency preparedness and response (EPR) staff in considering/integrating the environment into emergency planning. This was noted as another area that will require creativity and innovation to generate context-appropriate solutions.
33. "If you're going to provide food for 50,000 people in the middle of nowhere and you're bringing in 1 ton of plastic, then you've added 1 ton of plastic of problem into that community that has no waste management structure because they barely have bathrooms. It begs the question when we're working with folks in our supply chain, to look at some of the better products we can utilize that have the minimum impact to the environment.
34. "This is when you do it before an emergency – that's why that plan is so important because you're not always in an emergency. When you have that pause/period of reprieve, that's when you start thinking about what ESS/EMS is."
35. The regional or headquarters advisors tend to provide the auditing function; however, this is more of an advisory than a 'policing' capacity. Although monitoring and reporting through Archibus and Greening the Blue is a reasonable initial system, further systematization of reviews and continuous improvement at a country level is required. For example, one good practice example was Ghana's weekly, monthly and quarterly reviews.

### **Principle 3: Transparency**

36. Transparency (including communications, feedback and disclosure) is relevant in terms of engagement with staff (as the main users of WFP facilities) and neighbours who may be affected by poorly managed facilities and any resultant environmental damage or hazards (e.g. the programme beneficiaries close to warehouses storing food or housing staff). Overall, this was found to be a weak area in WFP's EMS and requires further consideration.

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<sup>10</sup> MSDI. 2022. EMS: An Introduction. PowerPoint Slide Deck.

37. In Kenya, for example, despite this being the EMS pilot country, there was poor internal knowledge of the system across staff. During the evaluation, the social advisory cadre staff seemed open to adapting existing community feedback mechanisms to enable feedback on environmental issues. One isolated example of this was a report of noise pollution from a refugee camp air strip. The RBN EMS team showed innovation here by releasing short videos on LinkedIn, which have an internal and external communications purpose.
38. In Ghana, for instance, informal feedback has already been received from engaged staff members who wish to improve facility management. However, the focal point is considering formalizing this to properly collate and respond to feedback. Additionally, in Egypt, the communications officer initiated an internal sustainability campaign to raise awareness, which was beyond the remit of their core role and showed significant personal initiative.
39. EMS transparency is also about sharing results in terms of the risks managed and/or mitigated. In WFP, this is mainly done via reporting into the UNEP Greening the Blue initiative. Greening the Blue's WFP page<sup>11</sup> provides data on WFP's environmental impact between 2017 and 2022. Because the report is published in December of each year for the year preceding, there was no annual data available for 2023 or beyond. Archibus is the main tool that enables reporting into the Greening the Blue report, which focuses on total greenhouse gas (GHG) emissions, per capita GHG emissions, waste generated per capita, water use and waste inventory proportionality to personnel count. It was not possible to identify firm trends for the data currently available, because COVID-19 influenced the results – for example, there was less travel during this period (see sections 2.2, 2.2.1 and 2.2.3 in the main report).
40. Some COs reported that they did not understand what happened with the Archibus data and what its purpose is, so this requires greater awareness raising and communication.
41. One regional EMS advisor explained the importance of this principle of the EMS in driving uptake and investment. In addition, good transparency and communications provide positive feedback loops from staff, management and donors who may be interested in supporting the expansion of the work: "The advocacy part of our work is 60 percent of it – you're not going to be successful doing ESS and EMS, or even climate change discussions, because people don't understand these concepts – so you spend a lot more time explaining what it means for you at a personal level, for them at a professional level, and then it becomes personal for them and they embrace it and run with it."

#### **Principle 4: Leadership commitment and action**

42. Throughout the data collection, leadership commitment to and action on EMS tended to be stronger than on ESS. A strong driver of this was the potential for and realized cost savings (see Principle 5), as well as more tangible examples of environmental risk management and positive impact. Knowledge of the EMS was strong at the leadership level in particular COs (e.g. Kenya). Pride in achievements was also evident, particularly regarding softer impacts, such as staff awareness leading to personal initiatives.
43. However, this was not uniform across the COs, with some having limited leadership buy-in (e.g. in Egypt, where other priorities have come to the fore) and having to rely on the initiative/motivation of key individuals or departments.
44. One KI also felt that senior management at headquarters had shown more support for EMS than ESS, overall.

#### **Principle 5: Cost saving**

45. Principles 4 and 5 have a strong connection because cost savings are a potential 'hook' for leadership engagement and investment in EMS. In some of the most EMS-advanced regions (such as RBD), the regional advisor presents the business case for EMS alongside the environmental opportunities and benefits. It is important to note, however, that some EMS activities require significant upfront investment; therefore, it is important that leadership and finance staff are aware of this so they can budget appropriately. The finance staff consulted during the evaluation were often very supportive of

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<sup>11</sup> Greening the blue. Nd. <https://greeningtheblue.org/entities/wfp>, accessed in August 2024.

the EMS initiatives and worked to find financial solutions for strong EMS proposals. Options of partnering with others who share neighbouring facilities were explored (e.g. working with UNHCR to share solar panels/power and desalination apparatus in Kakuma, Kenya).

- 46. While cost saving is a core benefit and tenet of EMS, extensive and comprehensive data on cost savings were not available for the evaluation. Only isolated examples or proxies were available, such as generators only being used as a back-up a few times a month as opposed to each day due to solar panel installation. Considering the resource-constrained environment, it is advisable to monitor this potential for saving resources more closely.

**Other ISO alignment/compliance**

- 47. It is also worth noting that the WFP headquarters building in Rome has various sustainability certifications and credentials, including Leadership in Energy and Environmental Design (LEED) certificates. Moreover, in Kenya, the CO and RB are located within the ISO 14001-certified United Nations Office at Nairobi (UNON) building compound.

**How does the EMS module measure up against best practice and other agencies?**

- 48. Much of this has been discussed in previous sections. In summary, WFP’s EMS is well aligned with the key principles of the ISO 14001 standard, and WFP stands out from its peer agencies because it has developed a specific and focused EMS.

**Table A12: Summary assessment of EMS alignment with key principles derived from ISO14001**

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

Extent of alignment:

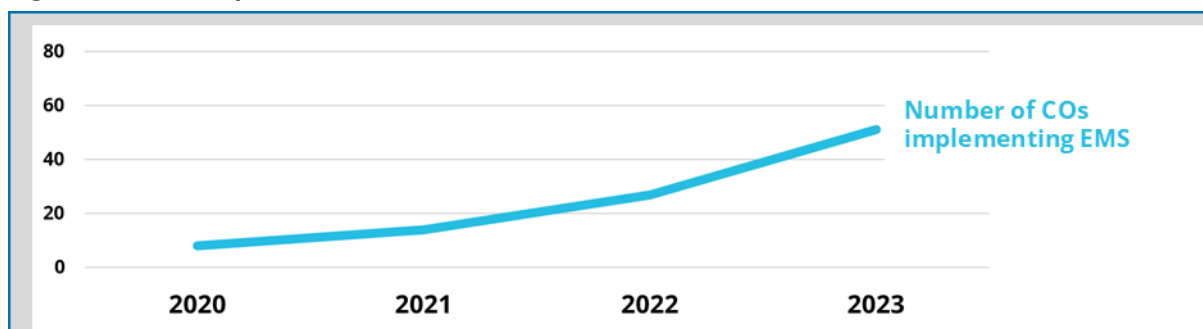


**EQ2: What are the results of the environmental policy on WFP’s programme activities and management operations?**

**To what extent has EMS been rolled out across WFP operations/programmes (i.e. number and level of implementation/operationalization)?**

- 49. The main data set regarding EMS roll-out relates to the CRF indicator (see sections 2 and 3.1.1). In the WFP APR 2023,<sup>12</sup> it was reported that 51 offices had EMS launched/implemented. The indicator was found to have been presented in different and, at times, confused ways in the reporting, referring at different times to both a “percentage” and a “definitive number” of offices with EMS, or to the number of staff “covered”.

**Figure A13: EMS implemented since 2020**



50. It can be concluded from the CRF and APR data that levels of EMS implementation have essentially doubled year on year since 2020 and the launch of the ESSF in 2021. It can also be concluded that only around 60 percent of WFP offices are covered by such systems; therefore, there is still some work to do in both launching and implementing EMS so that it is more embedded.
51. Because EMS was already underway when the ESSF was developed, it had an advantage over Safeguards. However, EMS roll-out was severely hampered by COVID-19, with headquarters and RB advisors unable to visit COs. Furthermore, given the global crisis situation, the issue (particularly as a relatively new one to the organization) was not a main priority.
52. Beyond the main CRF indicator, the policy owner, MSDI, has internal targets to increase coverage by up to 10 percent year on year. By 2028, EMS must be launched in all countries where WFP has a presence.<sup>13</sup>
53. A key foundation of EMS in WFP is the sensitization of regions, particularly COs, around ESSF and where this sits in the corporate priorities. Many KIs cited the increased awareness of EMS, and environmental sustainability more broadly, as a key result since the policy launch.
54. In order to launch EMS in a country, a visit from a headquarters and/or regional EMS advisor is required, so they can undertake an initial scoping and assessment of the key sites/facilities and prevailing risks. The CO, and particularly the focal point, is then left with a defined action plan to help them move forward with implementation. In some cases (e.g. in the Kyrgyz Republic), COs have implemented their own systems for managing environmental performance and have not required a mission or have struggled to get the mission to materialize despite requests (e.g. in the Egypt CO). This latter issue has often been due to limited headquarters/RB staff and/or a lack of support from leadership.
55. The evaluation used the country visits and desk review sample to verify and explore the CRF data. While no particular inaccuracies were found in the reporting against the indicator, it was found that EMS only needed to have had the initial mission or launch to be reported as implemented. In many cases, we found that progress had not moved significantly beyond those plans in terms of deeper implementation or continuous improvement. The indicator also provided no assessment of the quality or comprehensiveness of EMS.

#### **What is the quality of the EMS that have been established across WFP programmes/operations?**

56. There were no consistent or comparable data regarding EMS quality across the organization. Individual countries and regions track the details of this, but in different ways and in different places/databases. The main place in which EMS data were found to be harmonized was in the Archibus platform. However, this is confined to data on performance (e.g. emissions levels), and even this is not always input or is input inconsistently.
57. Due to the nature of the CRF indicator, the emphasis has been on the launch and initial implementation, with less time and fewer resources available for follow-up, co-developing action plans or providing support for particular solutions. Headquarters teams reflected on this: "It would've been better to have time to follow up with them ... rather than being in a hurry to move on to the next one." In conclusion, the next phase of EMS implementation needs to be about depth as well as breadth. A key gap that also needs to be addressed is that not all CO regions have dedicated EMS advisors or focal points.
58. The evaluation observed the following variations in EMS quality across the countries and regions visited:
  - **Strong innovation and creativity was observed across the organization:** WFP is clearly an organization of innovators, and this has been evident in how particular wastes and environmental risks have been managed during EMS implementation. For example, in Ghana, the possibility of making cooking fuel from human waste was explored as part of a circular economy initiative for

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<sup>13</sup> WFP. Forthcoming. *WFP Environmental Plan of Action 2030*, draft report.

programmes and operations.

- **Some challenging waste management issues:** Common challenges across COs were the management of hazardous wastes, particularly engine oil/diesel, and the disposal of sanitary or clinical waste. Many sustainable solutions were found to be prohibitively expensive or it was found that the infrastructure for disposal/recycling was not yet available in the given context. E-waste was found to be a challenge in many contexts (e.g. in RBB, with the exception of Bangladesh); however, innovative solutions were found in some countries – for example, in Kenya, e-waste is transported back in empty WFP trucks to Nairobi, where it is recycled/repurposed.
- **Waste and energy are clear focal areas:** This is understandable given the nature of WFP's work and the potential and real environmental impacts therein. However, as outlined in section 3.1.4, to align with ISO Principle 1, WFP must consider water resource management and conservation more carefully.
- **Regional EMS advisors often play a key role in launches and further implementation:** The benefits of this support were evident. For example, RBN launches an EMS in each country, tracks progress at the regional level, and gives focused technical advice and inputs for country investments or projects (e.g. specialist waste recycling processes). However, in some cases, this has meant that little moves forward between visits from the regional advisor.

### **Have the EMS boundaries been set appropriately (e.g. inclusion of supply chain or CPs where appropriate/possible)?**

59. The ESSF clearly establishes that the current boundaries of EMS are WFP-owned or leased premises and facilities. It is understood why these boundaries were selected: they are clear and manageable and results within these boundaries are highly achievable. However, WFP does not operate on its own, but through many partners, such as NGOs (CPs), government partners and peer organizations. WFP also conducts most of its work via programmes that are conducted through such partners and its own procurement, logistics and supply chain services. Confining the EMS to the current boundaries ignores the majority of WFP's activities and impact. At a minimum, it would make sense to ensure that CP facilities and operations consider EMS, or other sustainability measures, and that efforts are made to influence government partners to do likewise.
60. There were some limited examples of EMS measures and associated awareness and behaviours extending beyond core facilities – for example, in Kenya, solar power has been implemented in staff accommodation.
61. **EMS and supply chain:** The sustainability efforts around WFP's supply chain have been evaluated in other sections of this evaluation report. Suffice to say, going forward, it will be important for WFP to consider whether or not EMS and supply chain could be further integrated or merged. The two functions already collaborate to an extent and share expertise. For example, EMS experts review solarization plans on the supply chain side, and there is collaboration on the e-truck pilot in Kenya (the Kenya CO has been able to secure limited stock e-vehicles for testing on key supply routes). There are also plans to move some data collection from EMS/Archibus to the fully automated system under supply chain (EcoDash).
62. Sustainable procurement is one of the five core EMS areas, so some degree of overlap with supply chain and procurement already exists (e.g. negotiating buy-back or recycling agreements for electronic goods and hardware).
63. **EMS and Safeguards:** Across the KIs and evaluation, generally, there were very mixed views regarding whether EMS and Safeguards should or could be further aligned and integrated. For example, the RBP staff found that having a joint role did not work for either component sufficiently. Many felt they were very separate and distinct, despite being 'housed' in the same policy document. Others, however, felt that there were synergies to explore, such as the overlap between environmental standards and environmental risks being managed on the operational side. However, it was also felt that the current organizational structure and incentives did not facilitate this. For example, in the Kyrgyz Republic, EMS and Safeguards visits were previously arranged separately and were only combined at the CO's insistence.



“The way in which the units are placed right now, it’s difficult for them to talk to each other and I don’t think that should be the way. If they decided to place both services in different units, there should at least be an official channel of communicating, exchanging experiences, etc.

“There could be a lot of synergies in the missions for country offices and that is slowly happening but because of the initiative of their own members, not because of senior management seeing the usefulness of that.”

64. Across the countries visited (and those for which a desk review was undertaken), significant variation was found in the levels of collaboration between the two functions. This ranged from no collaboration to close engagement, such as in Ghana, where EMS and Safeguards focal points collaborate to find environmental solutions for particular wastes common to programmes and operations.
65. In some regions, insufficient prioritization of the policy and its resources has meant that one person must undertake the role of both EMS and Safeguards advisor. Some KIs viewed this as unsatisfactory, as the advisor has too many remits and issues to manage. They also questioned whether one person could have all the skills/knowledge necessary to perform both roles. However, others saw the potential benefits to this arrangement: “It allows for a more holistic view covering both EMS and Safeguards” and “in a resource-stretched organization, that joint role might have more benefit than not having anyone”.
66. **EMS and programmatic work:** Aside from the ESS, which has clearly been implemented on the programmatic side, a number of countries identified opportunities to utilize EMS staff, skills and learning to support programmatic work. For example, Kenya has been proactive in rolling out EMS requirements to CPs and other contractors and, in RBN, they are using EMS skills/staff even for relief activities. Many KIs felt these opportunities should be explored further: “I do feel MSDI is doing good work when it comes to COs – small scale, but greening initiatives. But there’s a disconnect between what MSDI and PROC [Climate & Disaster Risk Reduction Programmes Unit] are doing.”
67. In Nicaragua, an exceptional example of integration was emerging: the CO, on its own initiative, is attempting to develop a holistic office environmental plan. This will go beyond corporate EMS requirements in seeking to incorporate and integrate ESS but also some programmatic and climate action elements.
68. In summary, there are many individual initiatives being undertaken to increase collaboration across sustainability and policy components, but this is not institutionalized or specifically supported or mandated: “That’s something I learned when I started working at the UN – everything works in silos and if you don’t break the wall you’re not going to achieve much and that is definitely a challenge. Now it’s kind of split into three – you have the EMS that focuses on facilities and so forth, but those other two components I think it could be valuable for at least one person to have oversight of everything.”

#### **Is EMS sufficiently varied/tailored to the differing contexts and operating models?**

69. EMS tends not to be applied to emergency or crisis contexts in WFP, but some were found to be open to the benefits of considering this, particularly in terms of EPR processes (see section 3.1.4).
70. EMS is led by CO focal points and often embedded in administrative and/or engineering departments, where those designing and implementing actions have a strong understanding of contextual issues, needs and priorities. On some occasions, advice received from regional advisors was not context-appropriate, such as in the Kyrgyz Republic.

#### **What extent of monitoring and reporting (including internal audits) is evident in relation to EMS?**

71. Archibus is the main data repository and reporting source for WFP (see section 3.1.3). Although data are extracted from this to support reporting upwards into the United Nations Greening the Blue report, these data are not utilized for WFP’s own country or organization-wide reporting. For example, in Kenya, the Research, Assessment and Monitoring team was not aware of these data being collected on EMS or supply chain. Inputs into Archibus are often inconsistent, with some countries not entering data at all and others leaving gaps or responding to different data requests in different ways. Different countries and regions have different systems for monitoring and reviewing their EMS (see section 3.1.3); therefore, some degree of alignment and consistency would be beneficial. Moreover, auditing tends to be undertaken as informal reviews and as support provided by headquarters or RB advisors.

72. Each country is required to report against the CRF indicator, but not all do. Beyond this, no other monitoring is mandatory.
73. Ghana had some strong country-level systems in place, which could provide examples and lessons learned for other countries/regions. For example, they use weekly check-ins at all sites/offices as well as monthly reviews, and are piloting some new indicators. Cost savings are tracked (many offices were not able to provide this data) in a separate business operations strategy database. Archibus data are used to monitor and review performance at the office level and to report upwards.
74. RBN has strong tracking at the regional level, which is undertaken by the EMS advisor. They utilize a dashboard showing planned and executed actions across each country and site. Namibia participated in the development of an innovative system, whereby all agencies sharing the Common Service Unit used a formula to determine their share of the emissions, for example, which was reported into Archibus and elsewhere.
75. A key drawback with the Archibus system is that it is manual and requires additional work to validate and 'clean' data. As indicated in section 3.2.2, moving towards further integration with the automated EcoDash system would save time and effort and yield more accurate performance data.

### **What results have been achieved through the EMS roll-out and implementation?**

76. The main way in which EMS results are currently collated and reported is via Archibus and the United Nations Greening the Blue reports. A full analysis of these results is presented in the main report – see sections 2.2, 2.2.1 and 2.2.3; in summary, though, there were gaps in the data and the levels of inputting into Archibus, and the organization is still grappling with how to adequately track waste and water management.
77. As previously stated, EMS was implemented before other aspects of the policy, and it also benefits from its tangibility, which improves engagement. One senior headquarters staff member stated: “The EMS strand of the policy has been established for years with well-trained staff, providing a solid foundation: it’s comfortable, we know what we’re doing.”

### **EXAMPLES OF COUNTRY-LEVEL RESULTS**

78. Across the evaluation, the following key examples of country-level results were collated:

**Some COs undertook EMS-related work, but this predated or was not driven by the policy:** For example, in Afghanistan, significant efforts have been made to undertake the solarization of facilities. The Faizabad area office solar project, which was completed in 2022, was a huge success, resulting in substantial cost savings and decreased carbon emissions. As a result, solar energy options are being rolled out across staff premises and there are also efforts being made to reduce plastic use. However, these all commenced prior to the policy, so were born from independent initiatives. Moreover, in Guatemala, progress towards recycling e-waste seems to have been more influenced by government policy changes than by the policy. Additionally, in the Kyrgyz Republic, EMS as a principle and as a practical approach was already well embedded in the CO before the policy was launched. The central factors here were Archibus, which was launched in 2014, and the clear and supported responsibilities and knowledge of key staff members.

**Some COs have not yet rolled-out the EMS:** For example, in Egypt, although some environmentally conscious measures were already noted in the 2023 ACR,<sup>14</sup> including digitization and the consequent reduction in paper use, limited improvements have been made since then. For example, while there was evidence of paper waste recycling and some energy conservation measures, plans to expand recycling coverage had not yet been actioned. Moreover, even a broad-based awareness of the policy and its tools had not been achieved in Egypt, which may explain the lack of prioritization and roll-out to date. Additionally, in Madagascar, progress was found to be limited on the official EMS and there was no dedicated EMS focal point; nevertheless, some environmental measures were evident in the form of solar panels and paper recycling.

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<sup>14</sup> WFP. 2023. *Egypt Annual Country Report*.

**Some regions had relatively low coverage:** For example, RBP challenges were evident, including the last-minute cancellation of EMS (and Safeguards) missions and a lack of regional prioritization and buy-in. Furthermore, RBB has only recently appointed a regional advisor and this position is being discontinued in 2024 due to funding constraints.

**While many COs reported cost savings as a result of EMS, many of them were not able to accurately quantify this:** Ghana, for instance, was able to report cost savings of USD 2,000 per quarter, as a result of energy efficiency measures at the Accra office. Namibia (with the caveat that this is a shared facility with other United Nations agencies, so only a portion is attributable to WFP) was able to report a reduction of between 50 and 60 percent in electricity costs due to the installation of solar panels and improved waste management, which has freed up office space, further reducing costs. However, Kenya was unable to provide accurate cost savings as a result of the solarization of the extended food distribution point in Kakuma, with only a proxy being provided regarding the significantly reduced back-up generator use.

**Many COs had comprehensive EMS in place:** For example, Nicaragua's EMS includes the following:

- the partial replacement of fluorescent light bulbs with LED bulbs;
- the reconfiguration of air conditioning temperatures;
- individual limits on printing;
- fuel savings on staff travel;
- the replacement of purified water jugs with ecological containers with filters;
- the installation of dual flush toilets; and
- the donation of plastic as recycling material to charitable organizations or recycling companies.

**Many WFP offices are in shared premises, and this limits the extent of the sustainability measures that can be put in place:** For example, in Guatemala, although some measures have been advanced, such as recycling and water-saving measures, and some solar installations have been provided for warehouses, the measures have not been able to go beyond this.

**Some regions and countries have seen substantive roll-out:** For example, in RBN, Kenya was selected as a pilot country for EMS around 2016, before the environmental policy was in place. This embryonic work expanded significantly across the region, leading to the establishment of various staff positions and a strong system of support for implementing CO projects, not just oversight. By 2020, EMS was nearly fully implemented and, to date, there is full coverage across all countries. In RBD, full coverage has been reached in 1.5 years.

**Some countries have made rapid progress in a short timeframe, often with support from the regional advisor:** For example, in Mali, a mission led by the RBD advisor took place in 2022, culminating in a comprehensive action plan (including even water conservation measures, which is lacking in many areas where EMS has been implemented) with clear roles, responsibilities and budget lines. Measures for continuous improvement were also identified. For instance, the CO was encouraged to research local recycling options, including for e-waste. Additionally, in 2023, a waste segregation system was rolled out from the Head Office to all of the sub-offices. This was accompanied by staff awareness raising. Solar panels are also to be installed across all offices in 2024 and are already being built into the new head office.

79. Beyond these results on environmental risk management and performance, there were also some 'softer' EMS results, which are harder to track and quantify, such as the following:

- Most KIs attested to increased awareness levels across the organization in general. For example, in Nicaragua, the heads of units and the administrators of the cooperatives/CPs have participated in training on reducing the environmental footprint of their operations.
- In COs where there have been advisor missions or particular engagement by leadership, increased environmental risk management and performance was observed (e.g. in Ghana).

- Particular progress had been made and best practices had been developed by key staff members/groups. For example, in Kenya, non-food product management was seen to be successful, such as reusing polypropylene bags and plastic pallet recycling.
  - In Kenya, where, although at the field level EMS as a concept/term does not hold much importance, there is in general significant awareness of environmental sustainability and management and initiatives taken around it – for example, solarization initiatives at food delivery points, and wastewater treatment and recycling at the main compound. This contrasts with the Kenya CO, where there is little awareness/ownership of EMS beyond those directly involved in implementing/monitoring and senior leadership.
80. In terms of the policy implementation results, there are also now key funded EMS staff positions in headquarters and in the regions. However, these have been impacted in some instances by the lack of Safeguards advisors, forcing EMS advisors to perform dual roles. Also, not all regions have benefited (e.g. RBJ). However, despite recent budget cuts and restructuring, EMS has been able to retain previous funding and staffing levels to a reasonable degree.
81. Given that the ESSF was only launched a few years ago, the establishment and roll-out of the system is a key result that must not be overlooked: “Putting in place a system forced the organization to think systematically about sustainability.” This has laid a solid foundation upon which WFP can build towards improved environmental risk management and performance: “A lot of progress [has been made in the] past two years, [but we] still need to reap the benefits of those systems.”

### **EQ3: What factors have enabled or hindered the implementation and achievement of the policy objectives?**

#### **What has enabled the establishment and implementation of EMS in WFP countries/regions?**

##### **INTERNAL ENABLING FACTORS**

##### **Funding and resources**

82. **EMS focal points:** WFP’s EMS is driven mostly by core staff who take on extra responsibilities as EMS focal points. While this spreads energies and time across a number of tasks, EMS does benefit from the fact that these staff members tend to remain in post. This is contrary to Safeguards, where staffing is largely via consultants who are on short contracts, resulting in high turnover and a lack of power and authority to enact and drive Safeguards forward.
83. **EMS staffing has largely escaped significant cuts in the recent organizational restructuring:** There are some exceptions to this, however. For example, the RBB EMS advisor’s contract has not been renewed, despite it only commencing in 2023.
84. **EMS benefits significantly from the Decarbonization Fund:** Apparently, this fund and access to it is set to increase going forward, which will provide further support to deepen and expand EMS activity.
85. **The EEP has been a particularly important benefactor and partner to EMS:** Some regions (e.g. RBN and RBD) have received significant levels of funding to support solar expansion. This has been achieved through proactiveness and the production of high-quality EEP bids/proposals. The EEP is a subset of the Decarbonization Fund, which provides grants for CO energy efficiency initiatives. The programme has performed well since a new lead was appointed a few years ago. COs must fund 25 percent of the investment costs to show ownership and buy-in, and the EEP funds the remainder. However, the EEP funding available is limited, and a loan rather than a grant facility is being considered, with COs paying back the original EEP investment over time, as energy efficiency schemes begin to cover costs: “The EEP came just in time. We went to country offices and were lucky to have a specialist who was really in love with solar energy, and when we did the missions, he helped with the paperwork. When we did the EEP application he did simulations, checked all the numbers, and the package was so nice that we basically got all the money for the year 2022 – almost USD 500,000 for two countries.”

86. **Critical role of regional EMS advisors:** Overall, (with some exceptions noted in section 3.2), COs demonstrated significant progress and benefits as a result of both EMS advisor missions (including from headquarters) and close and regular engagement with regional advisors. In RBN, for example, the advisors are quite practical, designing renewable energy systems and writing/reviewing recycling tenders. In Mali, the regional advisor has been pivotal in driving and supporting progress on EMS, which has been comprehensive and achieved at pace: “[the regional advisor] is always there, his guidance is clear”, and “Regional support feels closer than HQ”.
87. **Examples of cross-functional working groups leading to improved integration:** In RBN, there has been innovation in the creation of a cross-functional working group, with various cross-cutting and other advisors, including EMS. This is stimulating demand for inputs – such as EMS staff, skillsets and experience – from the programme side. EMS staff are, thus, expanding and pivoting their role to become programme environmental advisors and technicians.
88. **Potential for significant cost savings:** The ability of EMS investment to yield substantial cost savings for resource-constrained COs over time is an enormous incentive for engagement. For example, the RBD advisor was able to demonstrate potential savings of USD 100,000 for the Central African Republic office, which significantly enhanced engagement and senior leadership support.

### Levels of awareness and buy-in

89. **Tangibility:** EMS benefits from more visibility and tangibility in terms of its measures and impacts. Overall, this has tended to lead to more ready engagement and more buy-in compared to the ESS.
90. **Links with staff well-being:** EMS also benefits from a closer and more tangible link with staff well-being. For example, in Ghana, the main Accra office staff are allowed to tend to the kitchen garden – which utilizes drip irrigation and agro-forestry techniques – within office time. They are also allowed to take produce home. Furthermore, the garden also improves the immediate environment of the office building.
91. **Positive communications and making the business case:** In RBD, there has been a rapid engagement and roll-out over a relatively short period of time because of its two-pronged communications strategy: (1) making a convincing and upfront business case regarding the potential financial savings and benefits; and (2) using passionate and optimistic messaging. This has also helped to inform and encourage other regions to mirror this in their own EMS development.
92. **Implementation approach:** The approach to EMS implementation has tended to be more incentive-based than punitive, focusing on problem-solving, solutions and cost-saving potential, rather than insisting on mandatory compliance. This approach has necessitated a slower pace and a more incremental approach. It has also necessitated the identification of individuals and groups in COs who could be EMS champions. However, once COs started to engage, onboarding and scale-up became more rapid.
93. **Strong existing systems and databases:** EMS measures and the Archibus database existed long before the policy and particularly the ESSF EMS module/guidance. Archibus, for example, has driven and underpinned EMS implementation in the Kyrgyz Republic.

### EXTERNAL ENABLING FACTORS

94. **High and growing levels of general/public awareness regarding environmental sustainability:** Staff across the organization were generally very motivated and engaged in improving environmental sustainability, due to their own knowledge and awareness of the increasing effects of climate change and other forms of environmental degradation and threats. This may have helped to influence the high-levels of leadership and financial buy-in in this area, relative to Safeguards implementation.
95. **High levels of innovation:** WFP is a highly innovative and solutions-focused organization, which lends itself well to identifying pioneering solutions (e.g. hydroponic farming, e-waste recycling and multi-mode transport) to challenging and complex environmental risk management issues.
96. **Increasing donor interest and requirements:** More donors are now showing an interest in funding EMS initiatives and are requesting the inclusion of this in proposals. For example, the private sector

donors in RBB are showing an interest in funding hybrid or electrical vehicle fleets. This donor interest in EMS is an opportunity that WFP has not yet fully recognized.

## **What has hindered the establishment and implementation of EMS in WFP countries/regions?**

### **INTERNAL HINDERING FACTORS**

#### **Funding and resources**

97. **Potential siloes have been created because of the placement of EMS focal points in the CO organogram:** Focal points often sit within administrative and/or engineering functions, which can lead to the creation of siloes and a lack of wider engagement with EMS from staff and leadership. However, the benefit of this is that these staff are involved with buildings/facilities design and operations. While staff resourcing was previously noted as being more stable than for Safeguards, there is still a high staff turnover in some offices (e.g. in Namibia). This means that existing systems are having to be reinforced and more training undertaken, particularly in Archibus data entry. This turnover also makes tracking EMS progress from headquarters more challenging. Additionally, the fact that EMS is often siloed means that this turnover presents a high risk to EMS, where institutional knowledge resides with just one or two individuals and, thus, may be lost after their departure.
98. **At times, focal points lack technical skills and the ability to dedicate time to EMS because of their other duties:** While it was previously stated that focal points being part of CO core staff is often an advantage, their role and focus is also split across other areas and responsibilities. Some regional advisors, for instance, found that the focal points do not always have the technical competencies necessary to engage in EMS discussions and planning to the level required, causing blocks and delays. Some focal points also reported that they had had no/limited inductions related to their EMS responsibilities: "Personally, I think that the focal point, their attention is split because it's not their only responsibility – that's part of the reason why we're struggling to get information out of the COs. I think dedicated resources might make more sense if you have feet on the ground that are always there, it would be a lot easier for us to interact with the CO if you have technical person there that can speak the same language. It can delay things quite significantly" (regional advisor).
99. **No allocated/additional funding for EMS activities:** There has been a small amount of HQ funding available to support regional advisor's mission costs. Otherwise, there is no allocated funding for the positions or implementation activities beyond those at headquarters. This means that much of EMS staff time is spent on resource mobilization and making the business case for potential cost savings through EMS, rather than more technically focused inputs and work. While this has led to some creativity in leveraging relationships with partners and fundraising for EMS-related investments, overall, the lack of funding in an already restricted context was considered a significant risk to EMS implementation and sustainability.
100. **Although a critical role, there is an insufficient number of regional EMS advisors:** Section 3.3.1.1 noted the critical role that regional advisors can play in WFP's EMS processes. However, there are currently only advisors in two regions (RBN and RBD), with the RBB advisor departing imminently and the RBP advisor having left during the early part of this evaluation. This means that headquarters staff must cover RBC, RBJ, RBP and (soon) RBB. This does not bode well for EMS sustainability in WFP going forward. This is particularly important, as more depth is required in EMS at this stage in the roll-out, going beyond initial planning and launches. This has also meant that some countries feel unsupported in their EMS planning and implementation, despite making proactive requests for missions and assistance.

"For them to now get another person onboard it will take a lot more resources. If we were to have a stable resource, you can make a lot more progress and show a lot more improvement in terms of environmental performance.

"One can understand that the organization's main aim is to feed beneficiaries or to help with capacity building, but if one were to make commitments like this in formal documents you also have to consider the impact on the resources required to actually achieve those."
101. **Potential for costs savings largely linked to energy efficiency only:** There are challenges for instance in terms of expanding the EMS business case to aspects such as water conservation, as this

requires significant capital investment upfront. Other incentives and motivational factors have to be found for wider EMS aspects.

### Levels of awareness and buy-in

102. **Some regions and countries show limited awareness and engagement from senior management:** As previously mentioned, some regions have low EMS coverage. This can be for a number of reasons, such as context-related because of the lack of awareness or knowledge regarding how to build EMS-type considerations into pre-emergency preparedness and planning. However, the feedback was that this is often the case due to a lack of buy-in and prioritization from senior management, with missions sometimes not being approved or cancelled at the last minute. This showed that, despite the Executive Director's Circular on the policy,<sup>15</sup> more needs to be done to ensure actual buy-in from the organization's senior management.

### Implementation approach

103. **No mandatory requirements beyond the CRF indicator:** Beyond the CRF indicator having to simply launch or implement an EMS, there are no mandatory requirements to undertake EMS activities. Even this indicator is not attached to any particular sanctions or accountability measures if it is not achieved. Additionally, EMS tends not to be included in CSPs or their logical frameworks. This leads to a reliance on the motivations and initiatives of CO leadership and/or (as is more often the case) individual staff members or groups. For example, in Egypt, the communications officer took the initiative to lead sustainability practices, commencing with a staff awareness/sensitization campaign.
104. **No institutional co-ordination between EMS and other key functions:** There is no official structure, working group or directive to ensure communication and collaboration among EMS and its key counterpart functions (e.g. supply chain). This means that any existing collaboration is reliant on personal/group motivations and is liable to unravel if staff leave the organization: "I don't think there are any significant challenges in terms of how receptive people are to this – people are very open to new initiatives. People ask ... but there's only so much we can do with what we have."

### EXTERNAL HINDERING FACTORS

105. **WFP COs are often based in rented or shared facilities, limiting the organization's influence over/the extent of EMS measures and improvements:** For example, in the Nicaragua CO, the installation of solar panels is not possible under the terms of the current rental agreement. Often, the facilities are also old, meaning that they are generally less energy-efficient than newer buildings, which tend to incorporate green building principles by default in many countries/regions. The EMS module and the linked headquarters teams currently do not provide explicit guidance around this common scenario, nor around strategies that can be used to influence governments in the country-capacity-strengthening-focused contexts (e.g. to influence governments in sustainably managing the warehouses that they are assuming ownership of).
106. **Government regulatory frameworks can be prohibitive to or, at best, unsupportive of sustainability measures:** For example, in Egypt, regulations were said to limit the ability to implement certain environmental practices, especially when linked to procurement/supply chain. In Ghana, a lack of government regulatory frameworks and corresponding enforcement was said to be an inhibitor to the effectiveness of sustainable procurement measures, which was described by one KI as "advocacy without teeth".
107. **There is a lack of country/local infrastructure to support EMS solutions:** Related to the above, many country contexts do not have the technology, infrastructure or market conditions to support certain EMS solutions, such as recycling or the safe disposal of hazardous and electronic waste. This was particularly evident in Ghana and Egypt.

### GEDSI – What has enabled or hindered the integration of GEDSI within EMS and/or any achievements in relation to GEDSI integration?

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<sup>15</sup> WFP. 2021. *Executive Director's Circular – Establishment of the WFP Environmental and Social Sustainability Framework*.

108. GEDSI was not integrated in the design or guidance around the implementation of EMS. Any GEDSI-related achievements have, therefore, been made in spite of the process rather than as a result of policy documentation or implementation processes.

**GEDSI – Does the technical expertise support WFP’s ability to integrate and implement GEDSI within EMS?**

109. The focus of the EMS staffing roles has been on technical environmental skills, in line with the policy design. In order to integrate GEDSI considerations better in EMS going forward, it needs to be embedded in the EMS module and related guidance. Moreover, WFP staff require GEDSI training, and/or specific staff with socioenvironmental knowledge, skills and experience need to be hired.

**CONCLUSIONS**

110. In conclusion, the EMS component of WFP’s environmental policy and ESSF has been reasonably well designed, with notable exceptions, such as the indicators not being suitably comprehensive, the absence of a results framework and a lack of consideration or integration of GEDSI aspects (with design and implementation being assessed ‘GEDSI-blind’: see Annex XII) .

111. Implementation has taken some time since the environmental policy’s formulation in 2017, partly due to COVID-19’s impact on corporate activities; however, the pace has increased considerably since the ESSF was launched in 2021. To date, the focus has been on achieving a certain breadth of EMS coverage in key contexts or on addressing particularly pressing environmental management needs. The focus from this point needs to be on depth – ensuring plans are enacted and that all aspects of risk are managed (beyond energy and waste) – and on seeking to expand coverage (to date, one third of offices have still to launch an EMS).

112. The EMS systems align well with the ISO 14001 (2015) standard’s principles. The weakest area is transparency, which includes ensuring two-way transparent communication with both staff and the neighbouring stakeholders or beneficiaries.

113. Although results could be better tracked and captured, there were strong examples of cost savings and reduced emissions/energy utilization. There were also innovative results around initiatives such as e-waste and circular economy solutions to plastic and polypropylene use. Innovation and creativity, as well as an invested and environmentally conscious staff base, are key assets that WFP is leveraging and can continue to leverage to support continuous EMS improvements.



# Annex XIII. GEDSI assessment

1. The findings of the evaluation in terms of the gender, equity, disability and social inclusion (GEDSI) component are analysed in detail against each of the main evaluation questions (EQs). Specifically, this component seeks to answer the GEDSI subquestions outlined in the inception report (IR)), as follows:

**Table A13: GEDSI subquestions**

<b>EQ1: Quality</b>	<ul style="list-style-type: none"> <li>• To what extent did the EMS/Safeguards design process consider GEDSI?</li> <li>• To what extent do EMS/Safeguards integrate WFP's approaches towards GEDSI, which are outlined in internal documents?</li> <li>• To what extent did EMS/Safeguards include provisions to prioritize activities for GEDSI impact?</li> </ul>
<b>EQ2: Results</b>	<ul style="list-style-type: none"> <li>• Have EMS/Safeguards considered all aspects of GEDSI, in line with WFP's policies and principles?</li> <li>• How has WFP's broader environmental work integrated GEDSI considerations in line with WFP's GEDSI policies and principles?</li> </ul>
<b>EQ3: Process</b>	<ul style="list-style-type: none"> <li>• What has enabled or hindered the integration of GEDSI within EMS/Safeguards and any achievements in relation to GEDSI?</li> <li>• Does the technical expertise support the ability to integrate and implement GEDSI in EMS/Safeguards?</li> </ul>

## EQ1: Quality

### 1.1 To what extent did the Safeguards/EMS design process consider GEDSI?

2. The 2017 environmental policy was found to lack any consideration of the needs of different gender identities, people affected by disability and indigenous communities. This fails to reflect both WFP's existing social policies and priorities in these areas, or to integrate the needs of the communities WFP serves on the ground. As summed up by a regional advisor working on areas of GEDSI, "I didn't know about the environmental policy. Upon reading it – it is gender blind – there is no consideration and mention. It is only mentioned three times, and two are photo captions." However, this gap is also in part due to the fact that the United Nations disability strategy only came out in 2018, and that 'indigenous people' is a group that WFP has only recently started focusing on, whereas the environmental policy was drafted in 2017.

### Safeguards

3. The environmental and social Safeguards outlined as part of the Environmental and Social Sustainability Framework (ESSF) (Module 3) were designed using the Environmental and Social Standards (ESS) (Module 2) as a benchmark.<sup>16</sup> Standards five to eight cover different areas of social inclusion: Protection and Human Rights; Gender Equality; Community Health, Safety, Security and Conflict Sensitivity; and Accountability to Affected Populations. These standards set out a number of minimum requirements each WFP activity needs to meet in order to adequately address each area of social inclusion.
4. Among the Safeguards tools, the environmental and social risk screening (ESRS) tool is a good example of the integration of social inclusion into the design process. The screening tool's thematic areas reflect the structure of the standards and, as such, address social standards five to eight (outlined above in the subquestions), which were designed to identify the level of risk associated with a given programme/activity. The tool includes gender-related questions, which cover the themes of unpaid work, gender inequities and gender-based violence. It also provides practical examples of the risks in these areas and additional references. The tool also addresses the inclusion of indigenous

<sup>16</sup> WFP. 2021. *Environmental and Social Sustainability Framework Module 2*; WFP. 2021. *Environmental and Social Sustainability Framework Module 3*.

communities throughout the social and environmental thematic areas, both through specific subquestions and practical examples.

5. The tool does not include any mention of people affected by disability in either its 2021 version or the more recent 2023 update, which was received as part of the evaluation's data collection.<sup>17</sup> Although one KI working in disability inclusion stated that there had been close collaboration with the ESSF team to ensure the integration of disability considerations, the analysis found no evidence of that in the versions of the tool received as part of the evaluation: "The ESSF team are aware that those social safeguards are protection-related safeguards on the social side, so if they are disability-inclusive and they're mitigating risk before it happens then they will be reducing the need to do it post-disaster and post-emergency. [The team] has really tried to strengthen the text and language in the screening tool for the FLAs to ensure that they are disability-inclusive."
6. The lack of disability inclusion, as well as the lack of clear measures to address social risks, may be related to the absence of formal mechanisms for collaboration between the Safeguards team and WFP's GEDSI focal points/dedicated staff as part of the Safeguards design process.

## EMS

7. WFP's EMS design and implementation has not integrated social sustainability considerations or referred to existing GEDSI policies/approaches. In part, this is because the EMS was already underway prior to the creation and adoption of the Environmental and Social Standards; however, this only provides a partial explanation, as there have been opportunities to integrate GEDSI, such as when drafting the EMS module. In general, the social aspect of EMS does tend to be markedly less prominent than the environmental aspect, although the work of the evaluation team suggests that it is not entirely absent in this case, as was highlighted by some headquarters KIs (see Principle 3 in Annex XII). In the EMS module, the document explicitly excludes social risks/issues: "The EMS seeks to address all environmental aspects outlined in WFP's Environmental and Social Standards, which may be updated over time."<sup>18</sup> However, one regional advisor did discuss how "The work [they] do in the protection of the environment is for the good of people. The people should always come first."  
  
"I think the EMS is typically done within our facility – we're looking at buildings that we either own or rent or we have staff working in, and also warehouses. If you look at the social aspect of EMS, first of all it's where we're working – our employees – how we're protecting employees from the harm of products we're using, the building in which they're sitting, what are we doing to improve their environment in which they are working on a day-to-day. But also, what is the impact of our operations on the communities where we're operating."  
  
"The work we do in the protection of the environment is for the good of people."  
  
"The people should always come first, and part of the discussion is that we want to show to the communities that we take protecting and restoring the environment seriously" (regional EMS advisor).
8. EMS was traditionally born out of the private sector and was designed for a more commercial/corporate context. Therefore, given WFP's particular mandate and context, it is important that their EMS is adapted to integrate the needs of key stakeholders. This will only increase in importance if there are firmer links and integration efforts made with supply chain, and if the boundaries of WFP's EMS are considered for expansion.
9. Although WFP has been influenced heavily by the United Nations Environment Management Group (UNEMG) and the Greening the Blue initiative, the social integration in these has been negligible. However, in the Greening the Blue Quick Start EMS Guide,<sup>19</sup> there is a section/slide on gender, which highlights gender empowerment opportunities throughout EMS.
10. In terms of international-development-related standards and benchmarks, the World Bank does talk about environmental and social management systems (ESMS), which would be developed to

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<sup>17</sup> Updated ESRS tool dated 25 October 2023.

<sup>18</sup> WFP. 2021. *Environmental and Social Sustainability Framework Module 4*, p. 4.

<sup>19</sup> Greening the Blue. n.d. [UN Environmental Management System Tool: A Quick Start EMS Guide](#).

implement environmental and social management plans (ESMPs). These are often at a higher level than the WFP EMS, but, again, given WFP’s mandate and context, it is important to consider whether social issues could be better integrated.

**1.2 To what extent do Safeguards/EMS integrate WFP’s approaches towards GEDSI, which are outlined in internal documents?**

- 11. The WFP policy ecosystem includes policies and documents designed to target GEDSI areas. These include the Gender Policy (2022); the Protection and Accountability Policy (2020); and inclusion documents such as the Disability Inclusion Roadmap (2020–2021) and the Inclusion Action Statement (2023).
- 12. At the inception phase, the 2023 Inclusion Action Statement was highlighted by staff as a significant document, resulting from WFP’s internal work towards ensuring that social inclusion is mainstreamed across all areas. The statement included seven guiding principles of inclusion (see Table A14), which guided the design and application our GEDSI methodology.

**Table 14: WFP principles of inclusion**

<b>1</b>	Coherence on policy and strategy
<b>2</b>	Partnerships
<b>3</b>	Inclusion as a proactive and intentional way of working
<b>4</b>	Inclusion as context-dependent
<b>5</b>	Using evidence to inform inclusive programming and identifying pathways to change
<b>6</b>	Inclusion inherently linked to root causes and a respect of rights
<b>7</b>	Inclusive from within the workplace

- 13. This section looks at the way in which WFP’s policies around GEDSI were integrated into the design of the policy’s ESS and EMS components.

**Safeguards**

- 14. As mentioned in section 1.1, the ESRS did include areas of GEDSI in its design, and there were some examples showing that the screening tool speaks to the existing policies. For instance, the Gender Policy is referenced in Section 6 of the screening tool, in relation to how “interventions must not create, exacerbate or contribute to gender inequalities or discrimination, and must mitigate risks of gender-based violence”.<sup>20</sup> Similarly, the staff conducting the screening are referred to in the Protection and Accountability Policy in Section 5, in relation to protection and human rights. These examples show the intention, at least at a high level, to embed the Safeguards within the existing policies. However, as mentioned above, the Safeguards do not include considerations around people with disabilities, either through consultation with relevant staff or by embedding the existing Disability Inclusion Roadmap into the screening tool’s design. However, it should be noted that the Disability Inclusion Roadmap has only very recently been introduced.
- 15. In the KIIs, staff highlighted that, while there was an internal effort and intention to ensure that policies are coherent with each other, in practice this can prove difficult because there is no formalized structure to define responsibility and accountability for the integration of social and human rights considerations across policies: “We want to integrate all these policies and ensure they’re all speaking to each other, but it gets complicated if there’s a lot of social responsibility elements or human rights in an environmental policy”, and “I think the responsibility and accountability can get blurry because the coverage is there but there’s no formalized structure to ensure I implement that. We have to reference the different policies that speak to each other but how do you do that in a way that’s

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<sup>20</sup> WFP. 2021. *Environmental and Social Sustainability Framework Module 3*.

coherent and co-ordinated? I think that's always been the challenge with this environmental and social safeguards piece."

## **EMS**

16. As mentioned in section 1.1, GEDSI advisors/staff were not consulted extensively regarding the ESSF, and now the same is true of the EPACT, for which few gender advisors have been consulted. More consultation would help to integrate a GEDSI perspective into the EMS documentation and processes.

### **1.3 To what extent did Safeguards/EMS include provisions to prioritize activities for GEDSI impact?**

#### **Safeguards**

17. Beyond the integration of social considerations in the screening tool, there was no evidence of the prioritization of activities for GEDSI impact. As suggested in section 1.1, opportunities for GEDSI impact could be generated by strengthening the collaboration with GEDSI advisors/staff and designing GEDSI considerations into the ESIA and ESMP processes, which would both mitigate negative impacts and enhance positive outcomes.

## **EMS**

18. Following on from the above GEDSI questions, the absence of GEDSI consideration and integration within the EMS module and its design process clearly afforded no opportunities to prioritize activities for GEDSI impact.

## **EQ2: Results**

### **2.1 Have Safeguards/EMS considered all aspects of GEDSI in line with WFP policies and principles?**

#### **Safeguards**

19. The evidence generated from the consultations with key stakeholders highlighted that, in practice, the implementation of the social Safeguards has faced several challenges and has many gaps.
20. Staff at the HQ level highlighted a challenge in linking environmental and social aspects effectively, particularly following the organizational restructuring. Specifically, the organizational restructuring was described as having missed the opportunity to elevate the social standards in the ESSF, thus, keeping them siloed rather than integrated across the organization. This was said to have impacted buy-in and the overall organizational understanding of the social Safeguards. Additionally, staff identified a lack of comprehensive guidance on integrating Safeguards into different programmatic areas: "I think we haven't managed to successfully make the link between environmental and social [...] Definitely since the reorganization we haven't re-established those links very strongly", and "The leadership issue is huge, and with the latest reorganization especially. There was an opportunity to elevate the standards to make it a combined feature, and instead of elevating that, it was kept within the climate and resilience service."
21. Reflecting the above points on the lack of disability inclusion in the Safeguards, consultation with key stakeholders working on this area revealed that implementing the inclusion of disability on the ground is a significant struggle. KIs highlighted that, due to local stigmas, making people with disabilities agents of change was a particular challenge. Therefore, activities and programmes to implement disability inclusion are needed from the beginning. Currently, this gap is not being addressed through the implementation of ESS.
22. These considerations were echoed at the country level, where staff reported significant gaps around the inclusion of gender, disability and indigenous people. For instance, in Kenya, respondents stated that ESS processes often exclude gender advisors, that disability inclusion is not conducted appropriately, and that gender considerations were often reduced to a tick-box exercise. In Nicaragua, for example, there was an evident absence of consideration being given to people with disabilities and indigenous populations. More respondents stated that, at the CSP level, environmental and social

Safeguards are often an afterthought, with clear processes for mainstreaming policies into programming yet to be established.

## **EMS**

23. As mentioned above, GEDSI was not at all integrated within the design and implementation plans for WFP's EMS. It is, therefore, not surprising that this remains a gap in terms of actual implementation and the results on the ground, to date. For example, the Mali 'desk review plus' uncovered no overt inclusion or consideration of social issues within the country's EMS. Moreover, in Kenya there was very little engagement with social/inclusion advisors. Nonetheless, the evaluation identified some efforts at various levels to better integrate GEDSI. At present, these efforts remain entirely dependent on individuals, groups or office initiatives, which are piecemeal, ad hoc and relatively overlooked in monitoring and reporting.
24. Some examples of isolated initiatives related to EMS that have sought to better consider and integrate GEDSI are as follows:
25. MSDI EMS staff mentioned having undertaken missions alongside disability and inclusion experts, as well as occupational health and safety colleagues.
26. In Kenya, social considerations mostly focus on staff well-being and encouraging behaviour change at work and at home (e.g. raising AC temperatures, recycling and reuse, installing solar panels/power at home/in staff buildings). Gender is also considered in building/facility design (e.g. in design of and access to sanitary facilities), alongside staff well-being and occupational health and safety considerations (e.g. provision of access to green spaces). There are also some social provisions in technical contracts for building/operating facilities (e.g. avoiding child labour, business/supplier providing community co-benefits ).
27. In Namibia, a small-scale, sustainable, agriculture-focused greenhouse has been established within the shared United Nations compound. Beyond its environmental benefits, the greenhouse serves the dual purpose of promoting staff well-being and is able to tap into earmarked funds accordingly.
28. In Nicaragua, activities have involved training women as solar engineers to install solar panels.

## **2.2 How has WFP's broader environmental work integrated GEDSI considerations in line with WFP's GEDSI policies and principles?**

29. The integration of GEDSI considerations into WFP's broader environmental work was found to vary across different contexts and regions. For example, there were significant examples of GEDSI-targeted work in countries, such as in the Latin America region. Here, programming highlights a focus on indigenous foods, and looking at ways to support local producers and collectively oriented indigenous community structures. In Ghana, WFP targets women and youth in agri-business, supporting women's employment in agriculture and emphasizing gender and economic empowerment. Moreover, staff in Egypt stated that they conduct gender analyses at the beginning of each project; perform annual assessments of gender equality; and examine the impact of climate change on gender dynamics, access to resources and domestic violence. Additionally, environmental activities in Egypt showed efforts to integrate disability considerations, such as through the training of young people with disabilities in green jobs and renewable energy.
30. Although this GEDSI-targeted work is taking place in countries, the COs are currently not making the link between this work and EMS/Safeguards. In fact, the majority of CO staff showed a lack of awareness around the ESS component of the environmental policy and, therefore, no clarity on how it might be integrated into their programmatic work.
31. The interviewees also stated that the environmental and social Safeguards missed an opportunity to make the link with the work taking place at the supply chain level. However, the evaluation team found a number of positive examples in the way that supply chain teams are integrating and implementing both environmental and social considerations. For instance, multiple respondents highlighted a recent initiative around trying to reduce packaging sizes, while also increasing the use of more portable bags. This focus on the bags addressed communities' feedback about the risk of their being exploited while

transporting goods. This involved working across local systems and understanding local markets and procurement processes. The way that it addressed both environmental concerns around packaging and social concerns about the safety of communities was referenced: “The angle was to get easier packages for women, older people, people with disabilities, so they didn’t get exploited at distribution points.”

32. The connection between environmental and social Safeguards and the work taking place at the supply-chain level was not at all considered, which was highlighted as a missed opportunity and an area that warrants further consideration and attention in the future.

### **EQ3: Process**

#### **3.1 What has enabled or hindered the integration of GEDSI within Safeguards/EMS and any achievements in relation to GEDSI?**

##### **Safeguards**

33. As previously mentioned, a significant issue that was found to hinder the integration of GEDSI in the Safeguards was the lack of formal structures and comprehensive coordination mechanisms, which leads to sporadic and ad hoc engagement between teams. This is exacerbated by the noted disparity in resources and staffing levels, with the GEDSI agenda often being managed by small teams tasked with global responsibilities. This resource constraint is worsened by the perceived lack of visibility of Safeguards.
34. In Egypt, stakeholders highlighted a need for clearer guidelines and accountability measures, and for establishing indicators and monitoring systems similar to the gender markers. However, the country was also found to be the source of the following GEDSI-related achievements:
  - Staff cited positive examples of collaboration among teams and the integration of social Safeguards, such as the close collaboration between the ESS Unit and the gender staff.
  - Social Safeguards were seen to be integrated into The cash-based transfer (CBT) programme, including safe spaces for vulnerable groups and complaint mechanisms.
35. Staff also noted that the Bangladesh CO will be starting a project that requires the integration of standards and Safeguards. As such, in anticipation of this project, there has been significant collaboration among teams to ensure social inclusion – for instance, through the involvement of tribal groups.

##### **EMS**

36. As outlined in previous sections, GEDSI was not integrated in the design or guidance around the implementation of WFP’s EMS. Any GEDSI-related achievements have, therefore, been in spite of, rather than related to, policy documentation or implementation processes.

#### **3.2 Does the technical expertise support the ability to integrate and implement GEDSI in Safeguards/EMS?**

##### **Safeguards**

37. One of the key challenges in this area is the disconnect between regional advisors’ backgrounds and the broader GEDSI agenda. For instance, regional ESS advisors often have climate and environmental backgrounds, so may not possess the necessary knowledge regarding human rights, gender or protection, which can hinder their ability to effectively integrate GEDSI into social Safeguards. This was evident in the experiences of some staff, who noted that the advisors struggled with the implementation of these cross-cutting issues due to their limited exposure to such topics.
38. The organizational structure also contributes to these challenges. Examples were cited of there still being a disconnect in collaboration despite ESS advisors being placed within teams responsible for cross-cutting priorities: “I led a team of cross-cutting priorities, and I managed a regional ESS advisor. Even though he was in my team, he wasn’t consulting very closely with me or others on protection or AAP [accountability to affected populations] in general, so there was still a disconnect even though he

was physically part of my team. Gender was always in that food systems team, which meant that they were focusing on a completely different area of programming, such as development and resilience.”

- 39. This siloed approach limits the potential for GEDSI integration, as the necessary collaboration between different areas of expertise is lacking.
- 40. In some instances, efforts have been made to address these gaps. For example, in Egypt, there has been a focus on conducting training sessions on environmental and social Safeguards, which include key topics, such as gender equality and complaint mechanisms. This showed an understanding of the need for capacity building to enhance the integration of GEDSI into ESS.

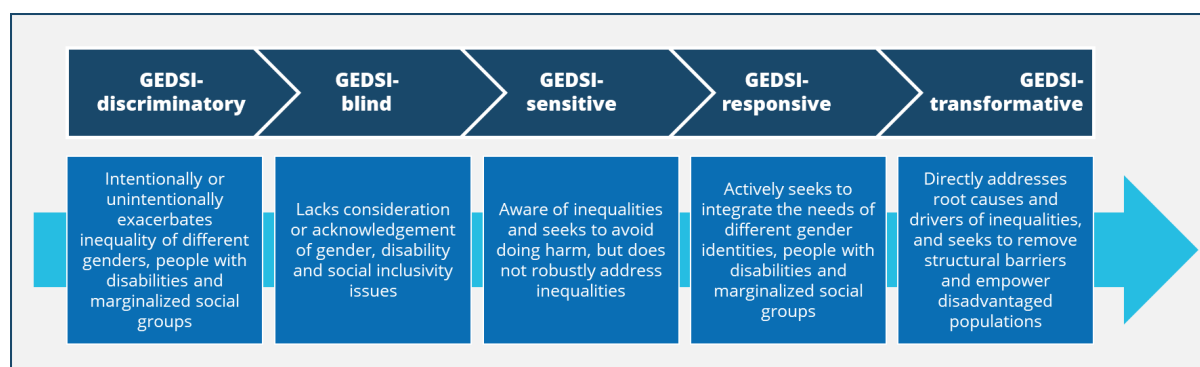
**EMS**

- 41. The focus of the staffing of EMS roles has been on technical environmental skills, in line with the policy design. In order to better integrate GEDSI considerations into WFP’s EMS going forward, GEDSI should be embedded in the EMS module and related guidance. Staff should also undergo training, and/or specific staff should be hired with socioenvironmental knowledge, skills and experience.

**Assessment against the GEDSI Continuum**

- 42. As agreed during inception and outlined in the inception report (IR ), our methodology for the GEDSI component would result in an assessment of each element of the policy against a GEDSI continuum (see Figure A14 which has been adapted from UNICEF’s Gender Equity Continuum).<sup>21</sup>

**Figure A14: GEDSI continuum**



**Table A15: Assessment of policy components against GEDSI continuum**

Policy component	Design	Implementation	Rationale
Environmental policy	GEDSI-blind	GEDSI-blind	The environmental policy lacks any consideration or acknowledgement of GEDSI and, as such, has been assessed as being GEDSI-blind.
Safeguards	GESI-sensitive, but disability inclusion blind	GEDSI-blind	<b>Design:</b> Safeguards show some meaningful considerations and sensitivities towards integrating the needs of women and girls, affected populations and indigenous communities in risk assessments, as well as the integration of a human rights approach. In their design, the Safeguards adhere to principles of inclusion 1, 3 and 4, showing some coherence across policies and an understanding of inclusion as a proactive way of working and as context-dependent. As such, design of the Safeguards has been assessed as GESI-sensitive. However, the lack of disability inclusion makes the design process blind in this regard.

<sup>21</sup> UNICEF. 2019. *Gender Equality: Global Annual Results Report 2019*.

			<b>Implementation:</b> As discussed in the above sections, however, the implementation of the Safeguards has not been undertaken systematically, and was found to be GEDSI-blind in practice.
EMS	GEDSI-blind	GEDSI-blind	The EMS was assessed as GEDSI-blind for both design and implementation, based on the above review and the GEDSI stress test of the country sample and against evaluation questions.

**Table A16: SWOT analysis**

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• <b>Established Safeguards that include social standards:</b> The inclusion of environmental and social standards as part of the policy is a strength in itself. The social inclusion areas reflected in the ESRS lay the groundwork for integrating GEDSI considerations in programming.</li> <li>• <b>Evidence of alignment with other WFP policies:</b> The ESRS tool references existing WFP policies like the gender policy and AAP and protection policy, showing an intention to align with broader organizational priorities on GEDSI.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Lack of disability inclusion:</b> The ESRS tool lacks explicit provisions for disability inclusion, which undermines comprehensive GEDSI integration.</li> <li>• <b>Siloed approach:</b> The organizational structure and lack of formalized collaboration mechanisms contribute to a disconnect between GEDSI integration and Safeguards, making the approach ad hoc and inconsistent.</li> <li>• <b>No GEDSI considerations as part of the EMS.</b></li> <li>• <b>No mention of GEDSI in the policy document.</b></li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>• <b>Skilled and competent workforce working on areas related to GEDSI</b> who share a strong desire to see social and environmental considerations treated as deeply interconnected.</li> <li>• <b>Significant GEDSI-related work</b> is taking place across programmes and supply chain, which represents an opportunity to ensure that Safeguards and EMS are integrated alongside these initiatives.</li> <li>• <b>The inclusion of environmental sustainability in the latest WFP strategic plan</b> as a cross-cutting priority represents an opportunity to maximize the synergies across all cross-cutting areas, which would facilitate the incorporation of GEDSI considerations in environment-related activities.</li> <li>• <b>EMS scope:</b> The EMS can be adapted to include social sustainability considerations, aligning with GEDSI policies and providing a more holistic approach to environmental and social management.</li> <li>• <b>The UN has a disability strategy</b> which can be used to help guide integration of disability considerations into WFP's environmental policy.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Limited uptake:</b> The current siloed approach and lack of awareness among COs regarding Safeguards may create resistance to integrating GEDSI considerations more fully, especially if this requires significant changes to established processes.</li> <li>• <b>Limited capacity for engagement across initiatives:</b> The GEDSI agenda is often managed by small teams with global responsibilities, leading to resource constraints that could hinder the effective integration of GEDSI into Safeguards and EMS.</li> <li>• The organizational restructuring has led to <b>missed opportunities to elevate social standards.</b> Safeguards sits in PPGR and remains at a remove from MSDI, SCD and social functions, which can further hinder the integration of GEDSI.</li> </ul>



# Annex XIV. Policy quality assessment

The table below presents an assessment of the policy and Environmental and Social Sustainability Framework (ESSF) against WFP's policy quality criteria.<sup>22</sup> For each criterion, the 2017 environmental 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.

**Table A17: Policy quality assessment**

Extent to which criteria met:	Not met	Partial	Moderate	Met
Criteria for policy quality	Policy	Policy and ESSF	Rating rationale	
1. Presence of a clear conceptual framework	Met	Met	The original policy document provided a clear, high-level vision for WFP's approach to environmental sustainability, with the intent of the policy further elaborated through a set of tangible objectives and principles. The policy and its vision, objectives and principles were – and continue to be – responsive to and well aligned with external contexts, frameworks, drivers and strategies.	
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	The policy is generally coherent with other WFP policies, at least identifying other relevant policies and processes. However, other policies do not tend to reference the environmental policy. The ESSF similarly identifies relevant WFP policies but in more granular detail, outlining linkages between other policies and EMS and Safeguards. 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.	

<sup>22</sup> Criteria based on WFP. 2011. "Policy Formulation" (WFP/EB.A/2011/5-B); WFP. 2018. *Evaluation Top 10 Lessons*; and WFP. 2020. *Synthesis of Evidence and Lessons from WFP's Policy Evaluations 2011–2019*.

Criteria for policy quality	Policy	Policy and ESSF	Rating rationale
5. Ensures external coherence			The original policy's exclusive focus on environmental sustainability was not completely aligned with one of the policy's central drivers: <i>A Framework for Advancing Environmental and Social Sustainability in the United Nations System</i> . As the title suggests, this framework is entirely built on – and pushes the UN system to adopt – the conceptual model of environmental and social sustainability, particularly where agencies are developing Safeguards. But this gap in alignment is largely addressed through the ESSF, which essentially extends the scope of the policy to cover environmental and social sustainability, thereby bringing WFP's approach into tighter alignment with the external drivers that initially influenced the policy. Importantly, the context and rationale for this incorporation of social sustainability are clearly articulated in the ESSF.
6. Develops a vision and a TOC			While the policy's high-level rationale and logic was generally clear, it was not supported by a more detailed TOC.
7. Defines its scope of activities and priorities			While the original policy identified overall scope and high-level tools, the ESSF provided significantly more detail on resource requirements, focusing on EMS and Safeguards. Institutional ownership of the tools (and, indeed, the broader ESSF) were confirmed, as were the tools' programmatic and operational coverage and boundaries. Roles and responsibilities were also defined across the headquarters, RBs and COs, with Safeguards-related responsibilities also identified for CPs.
8. Integrated gender considerations			The original policy did not include any GEDSI-relevant analyses or considerations. However, the Safeguards modules in the ESSF necessarily addressed GEDSI considerations, due to the introduction of the four social sustainability standards. The Safeguards screening tool integrated most GEDSI dimensions relatively well, although disability considerations were absent. However, the EMS module in the ESSF did not integrate GEDSI or social sustainability considerations at all.
9. Policy development is based on internal consultations			The original policy was informed by the early testing of EMS and Safeguards approaches in some COs, with that process in itself being part of UN system-wide pilots associated with <i>A Framework for Advancing Environmental and Social Sustainability in the UN System</i> . Following WFP's adoption of the environmental policy, a broader piloting process for EMS and Safeguards subsequently informed the detailed design of the implementation-focused ESSF. These processes engaged

Criteria for policy quality	Policy	Policy and ESSF	Rating rationale
			headquarters-, RB- and CO-level stakeholders, 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.
10. Outlines clear institutional arrangements and defines accountabilities and responsibilities			The original policy lacked 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 and how the policy should work alongside existing functions and tools, especially those relating to social standards.
11. Identifies the financial and human resources required for its implementation			
12. Presence of a robust results framework (e.g. targets and milestones)			Neither the original policy nor the ESSF included a results framework. Some monitoring processes were 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]". However, no further guidance was provided.
13. External dissemination took place			The policy and ESSF are available on WFP's public website; otherwise, targeted promotional activity has been limited.

# Annex XV. Key informants' overview

**Table A18: Key informants' overview**

Organization/Unit	Number of informants interviewed
ADI - Kyrgyz Republic	2
Arstanbap Municip - Kyrgyz Republic	1
Canada - Nicaragua	1
Catholic Relief Services - Nicaragua	2
Australian Department of Foreign Affairs and Trade - Ghana	1
DG ECHO	1
Department of Refugee Services - Kenya	1
Environmental Investment Fund - Namibia	1
EU - Nicaragua	1
FAO - Kenya	1
FAO - Namibia	1
Got Produce - Namibia	1
ICRC	4
IRC - Kenya	3
LOKADO - Kenya	2
Ministry of Agriculture, Water and Land Reform - Namibia	2
Ministry of Education, Arts and Culture - Namibia	2
Ministry of Environment, Forestry and Tourism - Namibia	1
Ministry of Gender Equality, Poverty Eradication and Social Welfare - Namibia	2
Ministry of Agriculture - Egypt	10
Ministry of Natural Resources and Ecology - Kyrgyz Republic	1
NamAFa - Namibia	1
Office Prime Minister - Namibia	3
SNV Netherland Development Organization - Kenya	2
Savannah Women Integrated Development Agency (SWIDA) - Ghana	6
UN Namibia	2
UNDP - Namibia	3
UNDP-WFP-FAO GCF Proposal nt - Namibia	1
UNESCO - Namibia	1
UNFPA - Namibia	1
UNHCR	4
UNHCR - Kenya	2
UNICEF	4
UNOPS - Nicaragua	1
WeWorld and GVC - Nicaragua	1
WFP - Afghanistan	4
WFP - Analysis, Planning and Performance Division	1
WFP - Berlin	2
WFP - CBT	2
WFP - CPPG	4

WFP - Egypt	15
WFP - EME	2
WFP - ETO	1
WFP - GEN	3
WFP - Ghana	9
WFP - Global Partner Countries Division	2
WFP - Guatemala	2
WFP - INK	1
WFP - Innovation Division (INN)	1
WFP - Kenya	18
WFP - Madagascar	1
WFP - Mali	3
WFP - Multilateral and Programme Country Partnerships Division (MPC)	4
WFP - MSD	1
WFP - MSDE	1
WFP - MSDI	6
WFP - NGO	1
WFP - Nicaragua	20
WFP - NUT	1
WFP - PPG	10
WFP - PPGE	1
WFP - PPGR	2
WFP - PPRO	2
WFP - PRO	1
WFP - PROC	1
WFP - PROP	2
WFP - Programme and Policy Division – climate and resilience service PROR	1
WFP – Programme and Policy Division – capacity strengthening service (PROT)	1
WFP - RBB	1
WFP - RBC	9
WFP - RBD	2
WFP - RBJ	2
WFP - RBN	9
WFP - RBP	3
WFP – Risk Management Division (RMD)	1
WFP - SBP	1
WFP - SCD	9
WFP - STR	1
WFP – Technology Division (TEC)	1
WFP - Yemen	3
WFP - Kyrgyz Republic	23
WFP - Namibia	12

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# Annex XVII. Acronyms and abbreviations

<b>AAP</b>	accountability to affected populations
<b>ADB</b>	Asian Development Bank
<b>ACR</b>	annual country report
<b>AfDB</b>	African Development Bank
<b>APR</b>	annual performance report
<b>CBT</b>	cash-based transfers
<b>CC</b>	construction contract
<b>CCI</b>	Critical Corporate Initiative
<b>CEED</b>	Climate, Environment, Energy and Disaster Risk Reduction
<b>CIFOR-ICRAF</b>	Center for International Forestry Research and World Agroforestry
<b>CO</b>	country office
<b>CP</b>	cooperating partner
<b>CPPG</b>	Corporate Planning and Performance Division – Performance Planning and Reporting Branch
<b>CRF</b>	corporate results framework
<b>CSP</b>	country strategic plan
<b>DG ECHO</b>	European Union’s Directorate General for European Civil Protection and Humanitarian Aid Operations
<b>DDoE</b>	Deputy Director of Evaluation
<b>DoE</b>	Director of Evaluation
<b>EB</b>	Executive Board
<b>EM</b>	Evaluation Manager
<b>EME</b>	Emergency Operations Division
<b>EMS</b>	environmental management system
<b>EPACT</b>	Environmental Plan of Action 2030
<b>EPR</b>	emergency preparedness and response
<b>EQ</b>	evaluation question
<b>ESG</b>	environmental and social governance
<b>ESIA</b>	environmental and social impact assessment
<b>ESMP</b>	environmental and social management plan
<b>ESMS</b>	environmental and social management system
<b>ESRS</b>	environmental and social risk screening
<b>ESS</b>	Environmental and Social Standards
<b>ESSF</b>	Environmental and Social Sustainability Framework
<b>ET</b>	Evaluation Team
<b>FAO</b>	Food and Agriculture Organization Of the United Nations
<b>FLA</b>	field-level agreement
<b>GEDSI</b>	gender, equality, disability and social inclusion
<b>GCF</b>	Green Climate Fund
<b>GEF</b>	Global Environment Facility
<b>GEN</b>	Gender Office

<b>GESI</b>	gender equity and social inclusion
<b>GEWE</b>	gender equality and women's empowerment
<b>GHG</b>	greenhouse gas
<b>HLCM</b>	High-Level Committee on Management
<b>IADB</b>	Inter-American Development Bank
<b>ICRC</b>	International Committee of the Red Cross
<b>IFAD</b>	International Fund for Agricultural Development
<b>IFC</b>	International Finance Corporation
<b>IFI</b>	international financial institution
<b>INK</b>	Innovation Knowledge Management Department
<b>IR</b>	inception report
<b>IRG</b>	internal reference group
<b>ISO</b>	International Standards Organization
<b>ISS</b>	Integrated Safeguards System
<b>JIU</b>	Joint Inspection Unit
<b>KI</b>	key informant
<b>KII</b>	key informant interview
<b>KPI</b>	key performance indicator
<b>LEED</b>	Leadership in Energy and Environmental Design
<b>LTA</b>	Long-Term Agreement
<b>MDB</b>	multilateral development bank
<b>MOU</b>	memorandum of understanding
<b>MSD</b>	Management Service Division
<b>MSDE</b>	Management Service Division – Management Services Engineering Branch
<b>MSDI</b>	Management Service Division – Infrastructure and Facilities Management Branch
<b>NEMA</b>	National Environment Management Authority (specific to Kenya)
<b>NGO</b>	non-governmental organization
<b>NUT</b>	Nutrition Division
<b>OEV</b>	Office of Evaluation
<b>PPG</b>	Programme Policy and Guidance Division
<b>PPGR</b>	Programme Policy and Guidance Division Climate and Resilience Service
<b>PPRO</b>	Public Partnerships and Resourcing Division – Operational Support Team
<b>PRO</b>	Programme Humanitarian and Development Division
<b>PROC</b>	Climate & Disaster Risk Reduction Programmes Unit
<b>PROP</b>	Emergency and Transitions Unit
<b>PSA</b>	Programme Support and Administrative Core Funding
<b>QA</b>	Quality Assurance
<b>RA</b>	Research Analyst
<b>RAM</b>	Research, Assessment & Monitoring Division
<b>RB</b>	regional bureau
<b>RBB</b>	Regional Bureau Bangkok
<b>RBC</b>	Regional Bureau Cairo
<b>RBD</b>	Regional Bureau Dakar
<b>RBJ</b>	Regional Bureau Johannesburg

<b>RBN</b>	Regional Bureau Nairobi
<b>RBP</b>	Regional Bureau Panama
<b>SBP</b>	school-based programme
<b>SCD</b>	Supply Chain and Delivery Division
<b>SDGs</b>	Sustainable Development Goals
<b>SER</b>	Summary Evaluation Report
<b>STR</b>	Strategic Partnerships Division
<b>TOC</b>	Theory of Change
<b>TOR</b>	terms of reference
<b>UN</b>	United Nations
<b>UNDP</b>	United Nations Development Programme
<b>UNEG</b>	United Nations Evaluation Group
<b>UNEMG</b>	United Nations Environment Management Group
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change
<b>UN-Habitat</b>	United Nations Human Settlements Programme
<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>UNICEF</b>	United Nations Children’s Fund
<b>UNON</b>	United Nations Office at Nairobi
<b>WFP</b>	World Food Programme

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