



**Food and Agriculture
Organization of the
United Nations**



Government of the Republic of South Sudan

Ministry of Agriculture and Food Security

EMERGENCY LOCUST RESPONSE PROJECT (P174546)

**ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK (ESMF)**

November 2021

Juba, South Sudan

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Abbreviations and Acronyms

AAP	Accountability to Affected Populations
BDC	<i>Boma</i> Development Committee
C-ESMP	Construction Environmental and Social Management Plans
CAD	County Agriculture Development
CBCM	Community -based Complaint Mechanism
CBO	Community-based Organization
CFIA	FAO Investment Center - Africa Division
COC	Code of Conduct
CSA	Climate Smart Agriculture
CSC	Construction Supervising Consultant
CSF	FAO Finance Division
DRC	Democratic Republic of the Congo
DRM	Disaster Risk Management
E&S	Environmental and Social
ECOP	Environmental Code of Practices
ECRP	Enhancing Community Resilience and Local Governance Project
EHSG	Environment, Health, and Safety Guidelines
EIA	Environmental Impact Assessment
ELRP	Emergency Locust Response Project
EMG	Environment Management Group
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESP	FAO Inclusive Rural Transformation and Gender Equity
ESS	Environmental and Social Standard
ESSRF	Environmental and Social Screening Report Format
ETH	Ethics Office
FAO	Food and Agriculture Organization of the United Nations
FAOR	FAO Representative
FAOSS	FAO South Sudan Office
FI	Financial Intermediaries
FO	Farmer Organisation
FPIC	Free Prior Informed Consent
GBV	Gender Based Violence
GHG	Greenhouse Gases
GIIP	Good International Industry Practice
GRC	Grievance Redress Committee

GRM	Grievance Redress Mechanism
GRS	Grievance Redress Services
HCT	Humanitarian Country Team
HQ	Head Quarters
ICR	Implementation Completion Report
IDP	Internally Displaced People
IGAD	The Intergovernmental Authority on Development
ILO	International Labour Organization
ILOAT	International Labour Organization Administrative Tribunal
INDC	Intended National Determined Contributions
IPF	Investment Project Financing
IPMP	Integrated Pest Management Plan
IPP	Indigenous Peoples Plan
IPSSAHUTLC	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
IUCN	International Union for Conservation of Nature
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MAFS	Ministry of Agriculture and Food Security
NAPA	National Adaptation Programmes of Action
NEP	National Environment Policy
NGO	Non-Governmental Organisation
NRM	Natural Resource Management
OCB	Office of Climate Change Biodiversity and Environment
OER	Office of Emergency and Resilience
OHS	Occupational Health and Safety
OIG	Office of the Inspector General
PDC	<i>Payam</i> Development Committee
PDO	Project Development Objective
PEHSP	Provision of Essential Health Services Project
PCU	Project Coordination Unit
PIU	Project Implementation Unit
PIM	Project Implementation Manual
PPE	Personal Protective Equipment
PTI	Project Targeting Indicator
PSEA	Prevention of Sexual Exploitation and Abuse
PSU	Project Support Unit
RAF	FAO Regional Office for Africa
R-ARCSS	Revitalised Agreement on the Resolution of the Conflict in the Republic of South Sudan
RTGoNU	Revitalised Transitional Government of National Unity

SA	Social Assessment
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SFE	FAO Sub-regional Office for Eastern Africa
SH	Sexual Harassment
SLT	Save Lives Together
SMP	Security Management Plan
SSSNP	South Sudan Safety Net Project
ToR	Terms of Reference
TOT	Training of Trainers
TMP	Traffic Management Plan
TPM	Third Party Monitoring
TPMA	Third Party Monitoring Agency
UN	United Nations
UNMAS	United Nations Mine Action Service
UXO	Unexploded Ordinances
VGGT	Voluntary Guidelines on the Responsible Governance of Tenure
VLDF	Voluntary Land Donation Framework
VLDG	Voluntary Land Donation Guidelines
WB	World Bank
WMP	Waste Management Plan

Executive Summary

1. The worst desert locust (DL) upsurge in a generation threatens the food security and livelihoods of tens of millions of people across East Africa, the Middle East, and South Asia. The DL is the most dangerous migratory pest in the world, and since 2019, swarms have spread from the Arabian Peninsula to East Africa (ranging from Djibouti to as far south as Tanzania and as far west as the Democratic Republic of Congo) and Western Asia. The DL could be the latest transboundary pest to become a continuing threat to South Sudan's food system. The Inter-governmental Authority on Development's Climate Prediction and Application Center (ICPAC) has identified the States of Eastern Equatoria, Jonglei, and Upper Nile as very high risk for DL swarms and adult locust invasion, while Central Equatoria and Lakes are identified as high risk. South Sudan needs to rapidly build its knowledge and expertise on how to identify and manage desert locust, not just for this upsurge but for the potential increasing threat in the future.

2. **Project Overview:** The Emergency Locust Response Project (ELRP, hereafter "the project") aims to respond to the threat posed by the DL outbreak and to strengthen systems for preparedness in South Sudan. To achieve this Project Development Objective, the ELRP is structured in five components:

- **Component 1:** Surveillance and Control Measures, including: (i) Subcomponent 1.1: on Swarm Surveillance and Monitoring; and (ii) Subcomponent 1.2: on Swarm Management Measures;
- **Component 2:** Livelihoods Protection and Rehabilitation, including: (i) Subcomponent 2.1: on Safeguarding Food Security and Protecting Human Capital; and (ii) Subcomponent 2.2 on Food production and building the natural resource base for crops and livestock;
- **Component 3:** Strengthening South Sudan's National Prepared Systems;
- **Component 4:** Project Management, Monitoring and Communication;
- **Component 5:** Improving Regional Coordination through the Inter-Regional Platform for Management of Desert Locusts and other Transboundary Pests (IGAD Information Platform). Response

3. Target locations have been proposed based on desert locust invasion experienced or strong risk of future invasions, food insecurity level (IPC ratings), and the suitability for cropping or pasture restoration. Discussions with officials from the Ministry of Agriculture and Food Security (MAFS), the Food Agriculture Organization of the United Nations (FAO), and the United Nations Office for Project Services (UNOPS) and analysis of data on food security and locust flyways, initially identified target areas as: Central Equatoria (Juba county), Eastern Equatoria (Magwi, Lafon, Torit, Kapoeta East counties), Jonglei (Pibor, Bor counties), Northern Bahr el Ghazal (Aweil North county), and Upper Nile (Renk, Melut counties).

4. A rigorous mobilization effort will engage agriculture officials down to the payam level, traditional leaders at the boma level, and the broader community to raise awareness of the project and its goals, to assess the status of the area. Beneficiaries will be identified and selected at the payam level through the participatory, inclusive, and transparent community-based targeting process led by community

representatives and facilitated by FAO and UNOPS as lead technical partners of MAFS, the implementing agency of the Project.

5. The Crisis Response Window - Early Response Financing (CRW-ERF) funds allow the project to intensify their support to households experiencing high food insecurity due to impacts of the East Africa upsurge. Instead of three months of support through safety net payments, targeted households will receive six months of support. Priority will be to use labour-intensive public works for garden and nursery establishment and for pasture restoration activities, so that immediate food security needs are met while investing in rehabilitation of production and the productive resource base. Additionally, households will get access to seeds for cereal crops and fishing kits to accelerate the production of healthy foods.

6. **Risk Management:** The project is expected to have a substantial positive impact from economic, social and environmental point of views. However, in order to manage potential environmental and social risks and negative impacts resulting from the project activities, this Environmental and Social Management Framework (ESMF) has been developed. It enables the project to address remaining uncertainties related to potential changes in geographical areas of intervention.

7. Key aspects of this ESMF include: (i) legal review and gap analysis to identify the necessary safeguards-related regulatory actions for the project; (ii) the social and environmental (including climate) baseline of the tentative project areas; (iii) risk categorization; (iv) identified project risks, impacts, and mitigation measures; (v) procedures for screening, review, clearance and implementation of subprojects; (vi) monitoring procedures; (vii) grievance redress mechanisms; (viii) capacity development and training; and (ix) overall budget.

8. The legal review and gap analysis describes the policy and legal framework within which the project will operate. The World Bank Environmental and Social Framework (ESF), and Environmental and Social Standards (ESSs) of both the World Bank ESF and FAO's Environmental and Social Guidelines are considered more stringent than existing national regulations, and thus the ESMF has gap-filling measures to ensure these standards are met. The review demonstrates how the various national policies and regulations align with World Bank and FAO safeguards requirements, and areas where gap-bridging measures will be required. It covers the WB ESF and ESSs, FAO Environmental and Social Guidelines, national legislation and policies including customary laws, international commitments of South Sudan, and supporting instruments, as well as the United Nations E&S Safeguards. At present, South Sudan is strengthening its regulatory framework and institutions and this ESMF recognizes the remaining inconsistencies between some national laws and international ratified conventions, such as those related to the worst forms of child labor or the approaches for customary laws. The gap analysis has been developed to ensure alignment with the ESF and use of the strongest requirements.

9. This ESMF also establishes procedures and methodologies for environmental and social assessments, as well as for the review, approval, and implementation of the sub-projects to be financed under the ELRP-3 project as the nature, scope and the specific geographical locations of subproject activities are not exactly known at this stage.

10. **Identified Potential Risks & Impacts:** The project is classified as high risk due to the complexity of the fragile country context and the inability of the World Bank to conduct on-the-ground supervision,

coupled with the country's weak legal and institutional arrangements to manage, supervise, and enforce ESF compliance during implementation. Specifically, both environmental and social risk ratings for the Multi-phase Programmatic Approach (MPA) to which ELRP belongs are high, thus ELRP is also classified as a high-risk project.

11. The positive impacts of ELRP largely outweigh its adverse risks. The project is expected to contribute to restoring livelihoods and production abilities to communities experiencing or at risk of experiencing DL invasions in South Sudan. ELRP is likely to benefit and improve longer term resilience to future invasions, improved food security, and livelihoods resilience. However, potential negative environmental and social impacts and risks remain.

12. For component 1, the main potential environmental risks and impacts relate to the DL control operations and include: (a) transport, handling, storage of the pesticides, dosage (that is, proper calibration of the spraying equipment to get the right dose of active ingredient per hectare) during the treatment and disposal of used pesticide containers; (b) risk of polluting ecologically sensitive habitats such as wetlands, national parks and water bodies; (c) risks that pasture, local water sources and cropping areas may be contaminated; (d) potential contamination and poisoning of the pesticides control teams; (e) risk of diversion of pesticides for other uses; (f) inappropriate use of pesticides; and (g) potential high risk of accumulation of obsolete stocks. For component 2, the potential environmental risks and impacts include: (a) potential soil erosion and pollution; (b) dust emissions; (c) generation of solid waste; (d) occupational health and safety risks related to minor construction works for the proposed construction of storage facilities; (e) potential degradation of the rangelands; and (f) potential contamination and poisoning by farmers handling farming pesticides.

13. Specifically, the overall environmental risks are high even though the application of the pesticides will be limited and most likely confined to a few locations in Eastern Equatoria. The application of these pesticides poses a risk of potentially negative impacts on local populations dependent on natural resources for their livelihoods such as pasture and crop fields. Given the large areas to be covered, the quantity of pesticides to be used is large and there is risk of accumulation of obsolete stocks. The use and application of pesticides through ground and aerial spraying could impact sensitive ecological areas such as water bodies, wetlands, national parks and reserves, forests, soils, pasture grasslands, standing crops, and so on. The potential impacts relating to pesticide use are mitigated through the accompanying Pest & Pesticide Management Plan, including identification and mapping out of sensitive ecological and agronomical areas, establishing and respecting standard operating procedures (SOPs), and judicious selecting of pesticides (that is, biopesticides which could be used in/near potentially sensitive areas). As the use and application of the pesticides will pose adverse effects on the health of the workers on field control teams and on local communities where both ground and aerial spraying operations may take place, regular testing and monitoring will be conducted before, during, and after the campaign to measure acetylcholinesterase blood level of personnel involved in the locust control campaigns. The testing will help to monitor exposure to chemical pesticides and put in place a rotation of applicators to avoid/limit overexposure and potential health impacts.

14. The approach taken by ELRP is one of Integrated Pest Management (IPM). South Sudan has a stock of synthetic chemical pesticides and will purchase *metarhizium acridum* biopesticide if needed for DL

control activities. The pesticides are in ultra-low volume (ULV) formulations. The synthetic chemicals owned by South Sudan are Malathion and Chlorpyrifos, which are both organophosphates, and can be used for both aerial and ground spraying for locust control activities as they are fast-acting, effective, non-persistent, moderately hazardous. FAO, as an implementing agency, will provide guidance on the method of treatment dependent on the phase of the locust populations. These organophosphates are World Health Organization (WHO) Class II and they have been approved for use by the Bank. The biopesticide is the preferred treatment for hoppers and for spraying near or around ecologically sensitive areas and cropping areas; synthetic chemicals work better for adult swarms. South Sudan, through component 3 will investigate additional botanical control methods—such as neem—to limit the use of synthetic pesticides as much as possible. The DL control activities will integrate environmental monitoring during and after a campaign. These activities will include: (i) training of monitoring teams; (ii) pre- and post-medical examinations of the control teams; (iii) procurement of monitoring equipment; (iv) ecological monitoring; (v) occupational health monitoring; (vi) residue sampling; and (vii) evaluating the health and environmental impacts post the campaign.

15. With regard to social risks, the risk rating is high due to concerns for the health and safety of community members from labor influx to support spraying activities, GBV risk through activities in component 1 and 2, and security management issues while working in areas of the country that are still subject to localized conflict. The principal social risks associated with the project fall broadly into two main categories (i) risks to the community and workers from the locust control measures under component 1 and (ii) the social risks associated with the livelihood rehabilitation and enhancement measures under component 2. Primary risks under component 1 include risks to community and workers' health through proximity to locust control measures and potential livelihood impacts through control measures impacting livestock and crops. In addition, labor influx associated with these control measures may impact upon the community through SEA of vulnerable communities or spreading disease (including COVID-19) to otherwise isolated rural communities with limited access to health services. The primary social risks under component 2 include the risks of exclusion of vulnerable people and groups most in need of assistance, risk of exacerbating social tension through pastoralist migrations to avoid the impacts of DL on forage, presence of internally displaced peoples (IDPs) or refugees and/or labor risks associated with cash for work (CFW) projects. Consequently, the social risk mitigation measures focus on: (i) communication, stakeholder engagement, and grievance redress with affected communities; (ii) ensuring effective engagement with Sub-Saharan African historically underserved traditional local communities where they are present; (iii) mitigating social tensions through community involvement and engagement; (iv) addressing gender dimensions of the operation including GBV; and (v) labor aspects including worker safety. Environmental and social risks associated with the project are addressed through a blend of this ESMF and the accompanying Integrated Pest Management Plan (IPMP), GBV Action Plan, Labour Management Procedures (LMP), and Stakeholder Engagement Plan (SEP).

16. **Implementation of the ESMF:** This ESMF also outlines the institutional and implementation arrangements for the use of these instruments and lays out a Monitoring Plan for ESMF measures to be integrated in the overall ELRP M&E system. The Government of the Republic of South Sudan (GRSS) is the “borrower” and will implement the project through the Ministry of Agriculture and Food Security (MAFS), which is the lead technical ministry overseeing safety nets and food and crop production. MAFS will

maintain a project coordination unit (PCU) and will use direct contracting to bring in lead technical partners for implementation – the Food and Agriculture Organization of the United Nations (FAO) for components 1, 2.2, and 3 and technical assistance for ESF and other management priorities; and the United Nations Office for Project Services (UNOPS) for sub-component 2.1.

17. To achieve a more efficient use of budget resources and promote increased collaboration, ERLP will share the PCU with the Resilient Agricultural Livelihoods Project (RALP), another WB-funded project being implemented in parallel. This will maximize the potential for collaboration between the two projects, which together cover a continuum of emergency, recovery, and development activities. The shared PCU will also facilitate policy dialogue across the two projects, provide consistent reinforcement of capacity building activities for the government under RALP, and saves overhead costs by sharing PCU resources. To ensure sufficient support is provided to both projects, each project will have a dedicated Project Officer. The Project Officers will work closely together to ensure that PCU resources are adequately allocated between the two projects.

18. FAO will establish and maintain a Project Support Unit (PSU) which has the overall responsibility for the implementation of this ESMF and other safeguard related instruments. For that purpose, the PSU of this project will share with the RALP project three full time staff, respectively, for Environmental Risk Management, Social Risk Management and Gender Officers. Also shared will be teams for: (i) fiduciary management; and (ii) knowledge management, communications, and M&E. The E&S team will be supported by the wider ELRP team from the PSU and the decentralized PIUs as they directly contribute to key standards of the ESF. FAO, UNOPS and implementing partners will receive Environmental and Social risk management staff capacity development in order to perform screening and implementation of all risk mitigation measures related to the respective project activities and, whenever possible, this will occur in tandem with those conducted for RALP. A Third-Party Monitoring Agency (TPMA) will also verify the implementation of environmental and social risk mitigation measures.

19. The FAO South Sudan Office will host the PSU and is already implementing a grievance redress mechanism (GRM) under the Inter Agency community-based complaints mechanism (CBCM) and is involving traditional authorities for that purpose. Complementary measures have been integrated to align it with the WB ESF in fragility, conflict and violence (FCV) contexts. The GRM will be operated in addition to a separate Gender-Based Violence (GBV) Mitigation and Action Plan, which includes reporting and referral guidelines. In line with the provisions of ESS2, a grievance mechanism is also available for all direct and contracted workers to raise workplace concerns under the Labour Management Procedures (LMP).

20. **Budget:** The ESMF Budget for ELRP is shared with RALP, given that both will utilize the same team of E&S specialists. This budget covers all related frameworks and is built into the two projects (both ELRP and RALP). In order to avoid double counting across projects, many safeguards-related rated activities have been built directly into the respective projects, and the specific ESMF expenses identified within the RALP ESMF to cover specialists (which are shared with ELRP) throughout the project life cycle amount to a total of USD 2,426,000. As the project timelines do not coincide perfectly, the sharing of resources would occur during the first three years of the RALP, which covers the entire duration of ELRP, as this project runs from 2021-2024 (three years total).

21. **Consultations & Disclosure:** The inclusive consultation process with stakeholders for the development of ELRP has been constrained by insecurity, the global COVID-19 pandemic, subsequent movement restrictions, and the uncertainty with regard to precise location of interventions at the time of design. Local community consultations have, however, provided a starting point in the context of other FAO implemented projects in relevant regions and on similar topics. Further consultations have been made with Government institutions, Multilateral and Bilateral Donors, UN Agencies, NGOs and FOs. **These stakeholders and emerging concerns are presented in the Stakeholder Engagement Plan.**

1 Project Description

1.1 Introduction and Context

22. The worst desert locust plague in decades continues to threaten the food security and livelihoods of tens of millions of people across East Africa, the Middle East, and South Asia. The desert locust (DL) is the most dangerous migratory pest in the world, with swarms devouring all vegetation at their disposal and inflicting significant damage to the available plant biomass, green or dry. This damage will cause severe shortage in livestock feed and endanger the very survival of domestic and game animals. The DLs first invaded South Sudan in February 2020, with the swarms coming from the neighbouring countries of Uganda and Kenya and settling in Eastern Equatoria State. Subsequent swarms came from the same countries in March and from Kenya and Ethiopia in May-June 2020. This was the first desert locust invasion to occur in the country in 32 years.¹
23. Development in South Sudan has been marred by decades of political strife and violence. However, the Revitalized Peace Agreement signed in 2018 provides some hope for movement forward. Nearly a third of the country has been displaced with 8 out of 10 people living below the poverty line and 60 % suffering from some level of food shortage. The current DL crisis represents an unprecedented threat to food security and livelihoods in the region and could lead to further suffering, displacement, and potential conflict. The expanding swarms could affect more than 2.7 million people, many living in areas with severe food insecurity and in need of humanitarian assistance.
24. The impact of DL outbreak is a regional issue that required a regional response. It is in this spirit that the World Bank (WB) approved a horizontal Multiphase Programmatic Approach (MPA), prepositioning funds that qualifying countries can access up to its current investment ceiling of US\$500 million. The MPA Program Development Objective is to respond to the threat posed by the DL outbreak and to strengthen systems for preparedness.
25. The Emergency Locust Response Program Phase 3 (South Sudan and IGAD), hereafter referred to as Emergency Locust Response Project (ELRP), aims to respond to the threat posed by the locust outbreak, protect and restore livelihoods and food security, and strengthen systems for preparedness.² The project objectives are aligned to the results chain of the multi-regional Emergency Desert Locust Response Program (DLRP) under the MPA.
26. The project activities are expected to have an overall positive impact on the country's socioeconomic and natural environment. However, in order to ensure that there are no negative environmental or social impacts emerging from the complexities of this project in South Sudan, this Environmental and Social Management Framework (ESMF) has been developed. The framework assesses environmental and social risks and prescribes mitigation measures and a management structure to ensure implementation of these measures.
27. The project will finance the activities described below with a preliminary budget estimate of US\$50.7 million over a project period of three years administered as a grant to the Government of the Republic of South Sudan (GRSS).

¹ According to records, the previous swarms of desert locusts invaded Sudan between 1986 and 1989; South Sudan was then part of Sudan.

² PROJECT APPRAISAL DOCUMENT, South Sudan Emergency Lost Response Project (P174546), World Bank

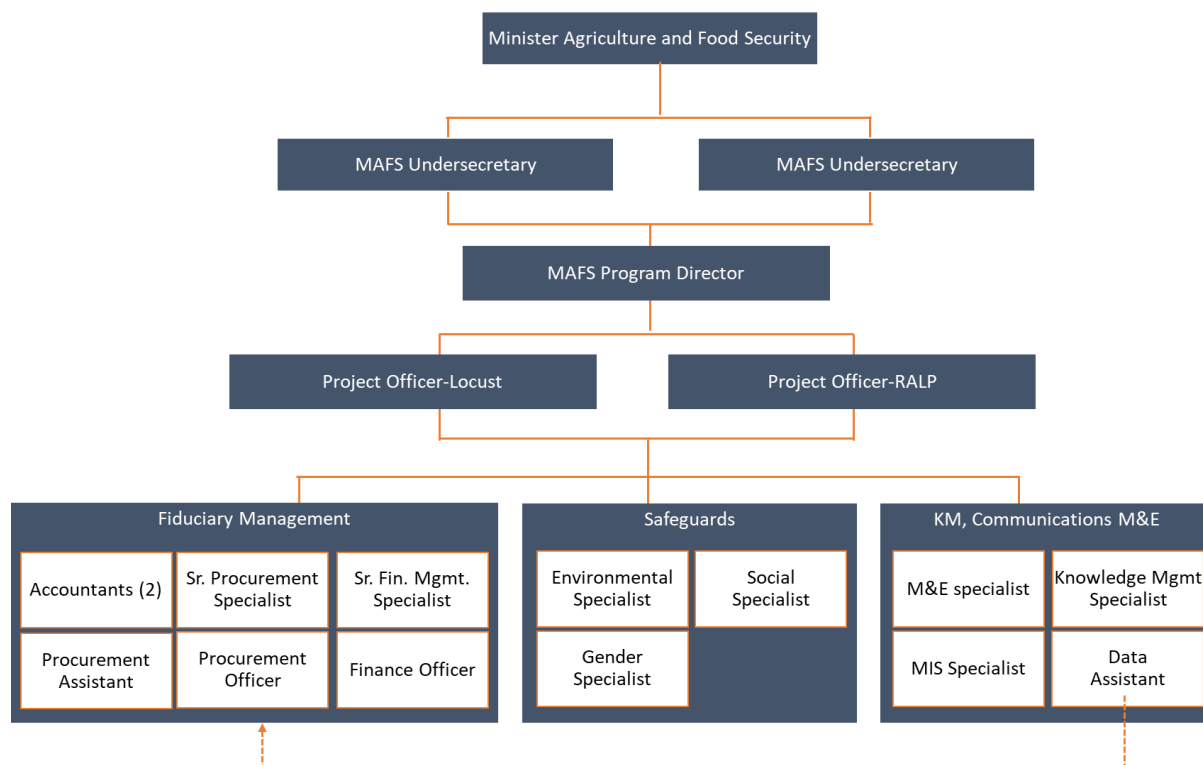
1.2 Project Objective and Components

28. The Project Development Objective (PDO) of ELRP is to respond to the threat posed by the locust outbreak, protect and restore livelihoods and food security, and strengthen systems for preparedness.
29. **Component 1. Surveillance and Control Measures:** This component encompasses limiting the growth and spread (driven by climate change) of current desert locust populations, while mitigating the risks associated with control measures and their impacts on human health and the environment. The component includes the following activities:
- **(Subcomponent 1.1) Swarm surveillance and monitoring** which includes the deployment and operation of field teams in locust prone areas to monitor for new swarms entering the country; investigation of sightings by communities; raising awareness among communities about locusts, effective control, safety issues regarding pesticides, and locust identification; and guiding response teams to swarms for control operations.
 - **(Subcomponent 1.2) Swarm management measures** which includes direct control operations using agrichemicals and bio pesticides, as well as the assessment losses due to the desert locusts and the impacts of pesticides on human, animals, and environment with necessary safety measure being implemented. As a last resort, the project will support swarm control using existing pesticide stocks—upon approval of the World Bank’s leading pest management specialist and under the strong guidance of FAO. The scaling up of integrated pest management (IPM) among affected communities will be supported.
30. **Component 2. Livelihoods Protection and Rehabilitation:** This component will support activities related to:
- **(Subcomponent 2.1) Safeguarding Food Security and Protecting Human Capital**, which includes providing emergency direct income support, in the form of unconditional cash transfers, to locust affected households to protect against livelihood and asset loss and meet their urgent food needs, smooth consumption gaps and enhance purchasing power for basic commodities.
 - **(Subcomponent 2.2) Food production and building the natural resource base for crops and livestock**, which includes helping farming and livestock households return to production for improved food security and restore the biodiversity of the affected areas by investing in land use systems that integrate crops, trees, and livestock to restore lost biodiversity caused by DLs and the measures to control the swarms.
31. **Component 3: National Preparedness and Regional Coordination:** This component will support investments in the research/informational, institutional, and strategic elements of desert locust management by the GRSS and its strategic partners. More specifically, it will support: (i) applied research in DL control techniques; (ii) training and technical assistance; (iii) development of a suitable policy framework and regulations for effective and sustainable management of DL and other transboundary pests; and (iv) establishing linkages with regional and international organizations to improve knowledge sharing, early warning systems and response mechanisms to address transboundary pests.
32. **Component 4: Project Management, Monitoring and Communication:** This will finance the associated costs of the Project Coordination Unit (PCU) and its functions, including core human resources to manage the project; incremental costs for the Ministry of Agriculture and Food Security

(MAFS) staff to provide technical assistance and oversight of project activities; equipment for project management; monitoring and evaluation including third-party verification; and communication and knowledge management. More specifically, it will cover implementation support, financial management (FM), procurement, environmental and social management, communication and knowledge management. The communications component will help promote increased community awareness about the impacts of the locust swarms and the response efforts to support communities before, during, and after the crisis. Monitoring and evaluation will include a variety of techniques to monitor implementation progress and the achievement of results including data collection on DL sightings and locations, damage and loss assessments; a management information system for reference and sharing; capturing successes and good practices as well as lessons learned through case studies; use of the Geo-enabled Monitoring and Supervision system supported by the World Bank to gather data using open source software that will feed into the overall monitoring system; and third-party verification of project activities and processes.

33. **Component 5: Improving Regional Coordination through the IGAD Information Platform:** This will support the Intergovernmental Authority on Development (IGAD) in its multi-donor effort to establish an Inter-Regional Platform for the Management of Desert Locusts and other Transboundary Pests. Through this, the establishment of the Desert Locust and Transboundary Pests Response Coordination Unit (DLRCU) will be financed. The DLRCU will promote regional coordination and information exchange (making available relevant information on DL and other transboundary pests), hosting consultations and learning exchanges among member nations and would provide a sustained effort to coordinate and support countries that are being affected by these transboundary pests.
34. **Institutional Arrangements:** For Components 1-4, the implementing agency will be MAFS as the lead Ministry for food security and food production systems. MAFS will use direct contracting to bring in two lead technical partners – The Food and Agriculture Organization of the United Nations (FAO) and the United Nations Office for Project Services (UNOPS) – to implement on the ground and to provide technical assistance to the PIU and capacity building for MAFS staff. FAO will be contracted to lead implementation for Components 1, 2.2, and 3 and to manage the implementation of the ESF instruments while building the capacity of government staff to manage the ESF system in future projects. UNOPS will be contracted to implement subcomponent 2.1.
35. To achieve a more efficient use of budget resources and promote increased collaboration, ERLP and the Resilient Agricultural Livelihoods Project (RALP) will share one Project Coordination Unit (PCU). This will maximize the potential for collaboration between the two projects, which together cover a continuum of emergency, recovery, and development activities. The shared PCU will also facilitate policy dialogue across the two projects, provide consistent reinforcement of capacity building activities for the government under RALP, and saves overhead costs by sharing PCU resources. To ensure sufficient support is provided to both projects, each project will have a dedicated Project Officer. The Project Officers will work closely together to ensure that PCU resources are adequately allocated between the two projects. Please refer to **Figure 1** for an overview of the PCU with critical positions which need to be filled throughout project implementation.

Figure 1: MAFS Project Coordination Unit Structure



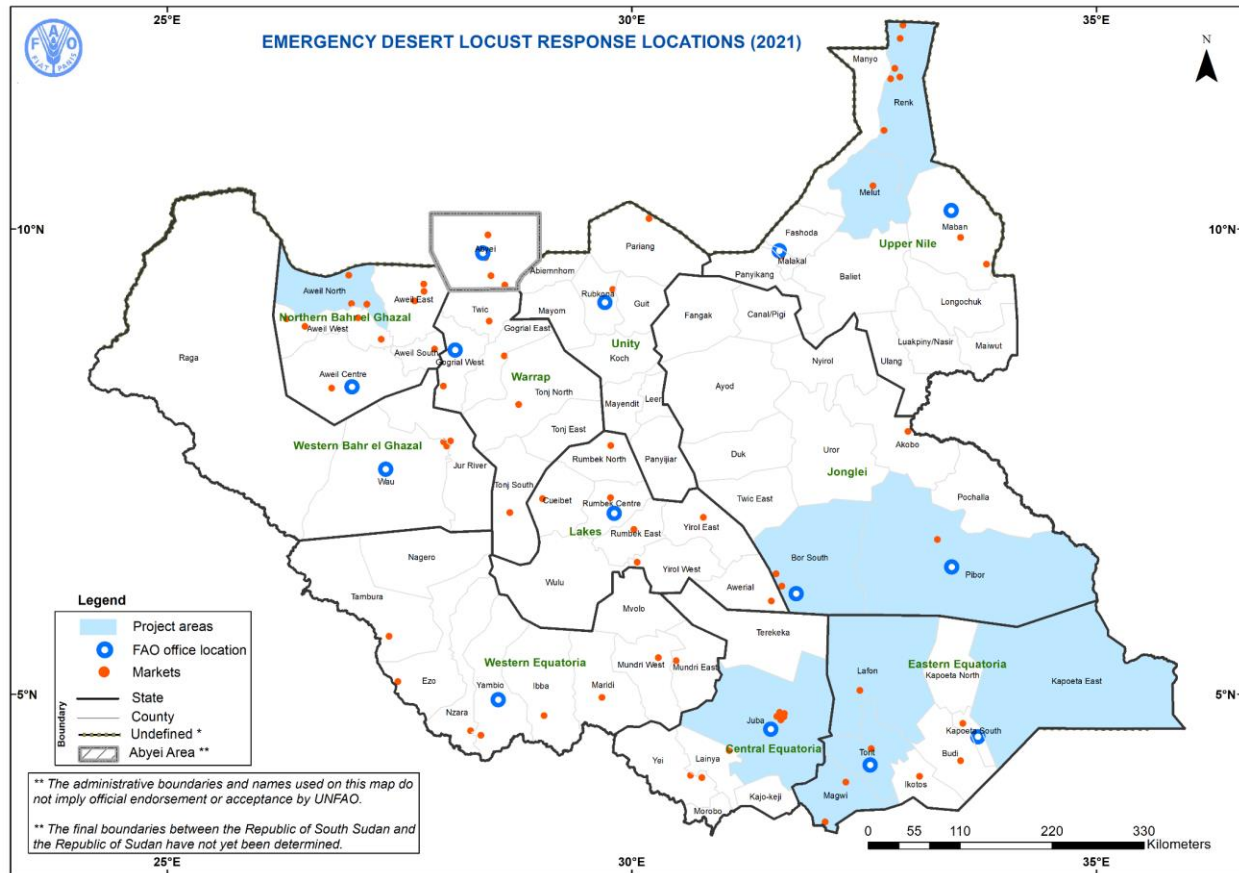
1.3 Project Areas and Beneficiaries

36. **Project Areas:** Geographic targeting varies by component. Components 1 and 3 will work in states/counties that experienced swarms in the current upsurge or that are at strong risk for future invasions. Work in these areas will focus on capacity, safety, and preparedness for invasions and control operations. Since Component 2 invests in livelihood protection and restoration of affected areas, the targeting criteria will be determined by a combination of exposure/impact of the locust upsurge, food insecurity level (IPC ratings), and the suitability for cropping or pasture restoration. Within the broader geographic areas, the presence of other donor-funded programs will be used to determine whether the project can leverage an intervention to maximize impact or should target another locality to avoid duplication of effort. The areas for locust implementation are either at IPC3 or IPC4 the entire year, so the project can follow a horizontal scale-up of the project starting with the initial counties in Eastern Equatoria. Targeting areas for support to food security will be driven by security; the IPC rating; the potential for agriculture, livestock, and/or fisheries investments; and the presence of existing donor programs to serve the local population.

37. Discussions with officials from MAFS, FAO, and UNOPS, and analysis of data on food security and locust flyways, initially identified targeted areas, including: Central Equatoria (Juba County), Eastern Equatoria (Magwi, Lafon, Torit, Kapoeta East counties), Jonglei (Pibor, Bor counties), Northern Bahr el Ghazal (Aweil North County), and Upper Nile (Renk, Melut counties). The proposed counties are a mix

of urban and rural locations, across a range of agro-ecological and livelihood zones. **Figure 2** provides an overview of the proposed project areas.

Figure 2: Proposed ELRP Areas of Intervention



38. **Beneficiaries:** Within targeted areas, the beneficiary population can be divided into 2 broad groups: (1) households and communities that are affected by locust; and (2) households and communities affected by chronic food insecurity. Where these populations overlap in areas; however, this is not a problem as those who are food insecure would either need (a) both direct income support and help to restart/increase food production; or help to restart/increase food production. For this project, the plan is to provide the direct income support to vulnerable households (female headed household, households with malnourished children, single mothers, widows, elders, handicapped or chronically ill, refugees, youth at risk), and through labour-intensive public works (LIPW) to deliver some of the agriculture and natural resources activities defined under Subcomponent 2.2.
39. The beneficiary identification criteria for both locust and the project will manage that risk through biometric registration of beneficiaries. The process of targeting households for safety net and agriculture interventions will follow the good practice approaches established by FAO and UNOPS. To identify the households in need of direct income support, the project will use the process established by UNOPS for the South Sudan Safety Net Project (SSSNP). The project will target at least 60 percent

female beneficiaries. Implementation partners (IPs) will encourage the formation of community groups and committees that will participate in the identification of beneficiaries, their registration, and encourage them to be present during the distribution. The various procedures for verification of beneficiaries will also be discussed in the Project Implementation Manual (PIM).

1.4 Objective of the Environmental and Social Management Framework

40. The main purpose of this ESMF is to establish procedures and methodologies for environmental and social (E&S) risk assessments and management of all investments to be financed under ELRP as their nature, scope and locations become known.

41. This ESMF has been developed as the E&S instrument for assessing, managing and monitoring E&S risks and impacts of ELRP. The ESMF establishes the screening processes and tools to be directly implemented by MAFS, FAO, UNOPS and other implementing agencies and contractors in assessing the risks and impacts of the sub-projects. This will facilitate the recommendation of appropriate mitigation and monitoring measures for each subcomponent and/or activity.

42. The ESMF describes the policy and legal framework in which the environmental and social standards (ESS) are embedded, including national legislation and policies, international commitments of South Sudan, World Bank Environmental and Social Framework (ESF) and supporting instruments, FAO E&S guidelines and United Nations E&S Safeguards. It further lays out an environmental and socio-economic baseline; classifies the social and environmental risks and tables E&S risks and mitigation measures in the format of an Environmental and Social Management Plan (ESMP). The document then explains the institutional and implementation arrangements for ELRP and for the ESMF and lays out the Monitoring Plan for project safeguards. It also lists ELRP Grievance Redress Mechanisms (GRM) and explains anticipated training and capacity development initiatives.

43. Specific E&S instruments designed for the risk mitigation of the ELRP-3 have either been annexed to this ESMF (see Annexes 1, 3, 8, 9, 10)³ or have been prepared as standalone documents (see Annexes 4-7 and Annex 12 for a summary of the standalone documents)⁴. These include the Environmental and Social Screening Report Format (ESSRF), Procedures for Managing Contractors & UN Supplier Code of Conduct (2017), Environmental and Social Monitoring reports Format, Stakeholder Engagement Plan (SEP), Labour Management Procedures (LMP), Integrated Pest Management Plan (IPMP), Gender-Based Violence Mitigation and Action Plan, Security Management Plan (SMP), Voluntary Land Donation Guidelines (VLDG)⁵, Cultural and Chance find procedures, E&S legal and standards gap analysis, Social Assessment (SA), and Third-Party Monitoring ToRs template.

³ Annex 1 (E&S Screening Form); Annex 3 (E&S Reporting Templates); Annex 8 (Security Management Plan Summary); Annex 9 (Voluntary Land Donation Framework); and Annex 10 (Cultural and Chance Find Procedures).

⁴ Annex 4 (Stakeholder Engagement Plan); Annex 5 (Labour Management Procedures); Annex 6 (Integrated Pest Management Plan); Annex 7 (Gender-Based Violence Mitigation and Action Plan); and Annex 12 (Social Assessment).

⁵ Voluntary Land Donation Guidelines are based on the FAO Voluntary Guidelines on the Responsible Governance of Tenure (VGGT) of land, fisheries and forests in the context of national food security (2012) including the WB principles of VLD of the ESS4 guidance note (GN 4.11, GN 4.12, GN 4.13 and GN 4.14).

2 Legal and Institutional Framework

44. The World Bank ESF, and ESSs prevail as the most stringent framework. The policy and legal review intend to show how the various policies complement each other.

2.1 National Regulatory and Policy Framework

45. Since attaining Independence in July 2011, the GRSS has adopted a new constitution, as well as policies and legislation related to E&S standards. Some legislation from the previous 'Southern Sudan' remains in place. At the same time, other laws and regulations are still being drafted, with the ultimate aim of enhancing sustainable socio-economic development. The policies and laws provide procedures to be followed in the planning and implementation of activities in order to utilize resources and execute programs to maximum benefit.

2.1.1 *The Transitional Constitution of 2011*

46. The transitional Constitution of the Republic of South Sudan of 2011 emphasizes the bill of rights (article 9) as a commitment to respect and promote human rights and fundamental freedoms enshrined in this Constitution. It integrates main considerations on the rights of women (article 16), the rights of children (article 17) and the protection of the unit of society, the family (article 39).

47. The Transitional Constitution incorporates numerous provisions that have a bearing on the environment. Article 41 (1) provides that the people of South Sudan have a right to a clean and health environment, (2) every person have the obligation to protect the environment for the benefit of present and future generations, and (3) Every person have the right to have the environment protected for the benefit of present and future generations, through reasonable legislative action and other measures that:

- Prevent pollution and ecological degradation;
- Promote conservation; and
- Secure ecologically sustainable development and use of natural resources while promoting rational economic and social development to protect the biodiversity of South Sudan.

48. Furthermore, Article 166 (6) expects local governments involve communities in decision making in the promotion of a safe and healthy environment.

2.1.2 *National Policies*

2.1.2.1 *The National Environment Policy, 2015-2025⁶*

49. The National Environment Policy (NEP) 2015-2025 calls for a comprehensive EIA to be conducted before ELRP execution, and it should focus on negative impacts, their mitigation, management, and remediation. The policy's goal is to ensure protection and conservation of the environment and sustainable management of renewable natural resources to meet the needs of its present population and future generations. The objectives of the environmental policy seek to:

⁶ Ministry of Environment. 2015. National Environment policy 2015-2025

- Improve livelihoods through sustainable management of the environment and use of natural resources;
- Build the capacity of the government and other stakeholders to better manage the environment;
- Integrate environmental considerations into development policies, plans, and programs among communities, government, and private sector; and
- Promote effective, widespread, and public participation in the conservation and management of the environment;

50. The policy gives guidance on:

- Natural resource management: oil, energy, mining resources; forest and tree resources; wetlands, rivers, lakes and other water resources; land resources; animal resources; fisheries; wildlife and biological diversity; Hills, Mountains and Plateaus; Natural Heritage;
- Climate change including waste management, pollution prevention, natural disasters, desertification, conflict and environment, ozone layer depletion, and renewable energy
- Environmental rule of law: national environmental legislation; environmental crimes, including compliance, enforcement, punitive measures, and sanctions; registration of environmental consultants, consultancies, and firms; environmental assessments, environmental standards;
- Capacity building supporting institutional, human, school-based and non-governmental capacity building.

51. The NEP is important to this ESMF because it provides legal guidelines and principles to be followed in environmental management during the implementation of ELRP. It specifies that: (a) development activities require an Environmental and Social Impact Assessment (ESIA) and must obtain an Environmental Certificate before implementation; (b) approved development activities should conduct regular environmental audits; and (c) the Ministry of Environment and Forestry must review the issuance of all permits, licenses and compliance certificates.

2.1.2.2 The Agriculture Sector Policy Framework, 2012-2017

52. The Food and Agriculture Policy Framework (FAPF) of the Ministry of Agriculture and Food Security (MAFS) emphasizes the need to transform agriculture from a traditional/subsistence system and achieve food security through science-based, market-oriented, competitive, and profitable agriculture without compromising the sustainability of the natural resources for generations to come. Its strategic objectives include:

- Priority policies that quickly boost agricultural production
- Make agricultural inputs, including credit facility, affordable to farmers
- Rehabilitate and expand rural infrastructure, including feeder roads and markets
- Develop and provide research and extension services and market linkages

- Develop and strengthen institutional and human resource capacity
- Protect, regenerate, and conserve natural resources; formulate policy incentives for rational and sustainable management, and use.

2.1.2.3 The Health Policy 2016-2025

53. The National Health Policy 2016-2025 aims to ensure improved health services by defining new paradigms for health service delivery, health financing, strategic information, leadership and governance, human resources for health, and access to essential medicines.

54. Policy objectives are to strengthen: (i) organisation and infrastructure for effective and equitable delivery of the basic package of health and nutrition services; (ii) leadership and management of the health system and increase health system resources; (iii) partnerships for healthcare delivery and system development.

55. Guiding principles are: (i) health and health services as a human right; (ii) primary health care approach; (iii) decentralisation; (iv) partnerships; (v) international conventions and guidance; (vi) gender mainstreaming; (vii) community participation; (viii) efficiency and effectiveness; (ix) respect for values and cultures.

56. ELRP is aligned with the need and health priorities by improving service delivery needs for food and nutrition security as well as preventing any adverse impact due to phytosanitary products, defined in the IPMP.

2.1.2.4 The Draft Land policy (DLP), 2014

57. The Land Policy has not been validated yet and will be object to a second reading at the Parliament. DLP is as a crucial piece of legislation for South Sudan with the potential to lay the foundations to strengthen communities' and women's land rights, promote transparent land governance, peacefully resolve land-related disputes, and support the displaced population to protect and re-assert their land rights. Key aspects to note include: (i) the DLP recognises IDPs and returnees will likely migrate to urban areas and therefore support securing tenure for new residents; (ii) women and men enjoy equality of rights to land and other property; (iii) the DLP further recognises the importance of community tenure arrangements in providing land to South Sudanese citizens, especially in rural areas.

2.1.2.5 The Draft National Disaster Risk Management Policy, 2020

58. The policy is under validation and define the pillars of disaster risk management in South Sudan: (i) institutional framework; (ii) preparedness and timely intervention; (iii) early warning system; (iv) traditional mitigation and coping capacities; (v) Post-integration recovery and stabilization; (vi) institutional linkages; (vii) capacity building; (viii) cross-sectoral coordination and cross cutting issues integration; (ix) resource mobilization.

59. It defines the following regulatory framework to be developed: (i) National Disaster Management Act; (ii) 5 years national Disaster Risk Management Strategy Plan of Action; and (iii) an alignment of existing plan considering disaster risk management.

2.1.2.6 The Draft Forest Policy, 2015

60. The Forest Policy of 2012 was revised and a draft Forest Policy (2015) was formulated to broadly protect the role forests play in the ecological stability of rivers, lakes, swamps, and agricultural production systems. It also seeks to optimize the benefits from forestry and agro-forestry activities for food security and poverty alleviation.

61. The policy integrates forest sector management with rural development efforts to ensure that the rural population of South Sudan can meet their basic needs—such as, household food security; shelter; wood fuel; safe water, sanitation, and health facilities; primary education; good local governance; empowerment and self-reliance. This policy is founded on the following guiding principles:

- All forest and tree resources of South Sudan will be managed sustainably to ensure streams of benefits to present and future generations;
- Permanent forest estates (PFE) will be established and managed to ensure conservation of biodiversity and a steady flow of benefits;
- Forests and tree resources will be managed in accordance with set criteria and indicators for sustainable management;
- Appropriate specific policies, legislation, institutional reforms will be implemented to support rapid growth of the forest sector;
- Industrial and other plantations will be sustainably managed to meet growing wood demands;
- There will be increased participation and benefits for communities in forest management through collaborative management schemes;
- Tree based industrial development (forest products processing) will be promoted and supported to increase the economic benefits from forest resources;
- Forestry institutions and services will be strengthened to increase productivity, achieve household food security, alleviate poverty, and contribute to the macro-economy of South Sudan;
- There will be sustained commitment to forest-related regional and international agreements and conventions; and
- Management of forests and tree resources will be guided by best knowledge and information.

2.1.3 National Bills and Acts

2.1.3.1 The Environment Protection and Management Bill, 2013

62. Section 18 of the Draft Environment Protection Bill, 2013 Chapter 5 intends to introduce the requirement for Environmental Impact Assessment (EIA), which is defined as “a systematic examination conducted to determine whether a project will have any adverse impact on the Environment and

prescribe mitigation measures". According to this Bill, no developer or proponent will implement a project that is:

- likely to have a negative environmental impact; or
 - for which an environmental impact assessment is required unless an environmental impact assessment has been concluded and approved in accordance with Schedule I of the Regulations.
63. An EIA will consider environmental, social, cultural, economic, and legal considerations, and will:
- identify the anticipated environmental impacts of the project and the scale of the impacts;
 - identify and analyze alternatives to the proposed project;
 - propose mitigation measures to be taken during and after the implementation of the project; and
 - develop an environmental management plan with mechanisms for monitoring and evaluating the compliance and environmental performance which will include the cost of mitigation measures and the time frame of implementing the measures.
64. Section 19 defines an Environmental Audit as the systematic, documented, periodic, and objective evaluation of how well environmental organization, management and equipment are performing in conserving the environment and its resources. The guiding principles for an Environmental Audit include:
- assess how far project activities and programs conform with the approved environmental management plans and with the required environmental quality standards;
 - provide mechanisms for coherent implementation procedures of a project to mitigate adverse environmental impacts; and
 - provide regulatory bodies with a framework for ensuring compliance with, and the performance of an environmental management plan.
65. The Bill provides for freedom to access environmental information and underline public disclosure that is supporting public awareness (section 66).
66. The Ministry of Environment and Forestry is the institution in charge of EIA process.
67. The EIA regulation also provides for Environmental Audits for all projects with an EIA. All projects should take all practical measures to comply with predictions made in the EIA. The project-level EIA is undertaken through the development of this ESMF and related annexes, whilst specific EIAs would be made for sub-projects according to the schedule I of the national law. Mid-term and completion environmental audits will be carried out for the project. The ELRP requires an EIA.
- 2.1.3.2 The Land Act, 2009*
68. The Land Act promotes a land management system to protect and preserve the environment and ecology for the sustainable development of South Sudan. It also provides for fair and prompt compensation to any person whose right of occupancy, ownership, or recognized long-standing occupancy/customary use of land is revoked or otherwise interfered with by the government.

69. The Land Act reinforces government recognition of customary land tenure: ‘Customary land rights including those held in common shall have equal force and effect in law with freehold or leasehold rights.’ Community land can be allocated to investors if investment activity ‘reflects an important interest for the community’ and ‘contributes economically and socially to the development of the local community’. It also requires that state authorities approve land acquisitions above 250 feddans (105 hectares) and create a regulated ceiling on land allocations. The Land Act requires government to consult local communities and consider their views in decisions about community land. It also gives pastoralists special protection: ‘No person shall without permission ... carry out any activity on the communal grazing land which may prevent or restrict the residents of the traditional communities concerned from exercising their grazing rights’. Therefore, Subprojects must also conduct ESIA before undertaking any activity that might affect people or the environment, including land access and use right consideration.

2.1.3.3 The Local Government Act (2009)

70. The Act defines primary responsibilities of local government and traditional authorities in the regulation and management of land. Section 110 of the Local Government Act specifically deals with the rights of women and provides the same protection as the Constitution and the Land Act by reaffirming that “women shall be accorded full and equal dignity of the person with men” and that “women shall have the right to own property and share in the estate of their deceased husbands together with any surviving legal heirs of the deceased

2.1.3.4 The Wildlife and National Parks Protection Act, 2003

71. This Act has been promulgated for use in South Sudan based on the provisions of the Republic of Sudan. The Draft Wildlife Bill (2013) combined with the Act is the key legal instrument available for wildlife management at national level. These are the main features of the Act:

- i. It defines the national parks and identifies the competent authority that gives permits for entering, staying in, and hunting in the parks;
- ii. It lists the prohibited acts inside national parks—e.g., felling trees, setting fires, excising parkland, constructing houses, digging or mining, bring in domestic animals, carrying guns, disrupting water courses, and culling or disturbing game;
- iii. It indicates the measures and the competent authority for declaring new areas as game reserves. The general manager of a park or sanctuary may issue hunting permits and also has the power to determine the rules that govern hunting in terms of the hunting season, the means and duration of hunting, and the types, and ages of animals to be hunted;
- iv. It sets out the regulations for trade in game animals and/or their parts;
- v. It indicates the level of penalties for all wildlife offences; and
- vi. It lists the animals that are prohibited from being hunted, animals that may be hunted under permit, and animals that are prohibited from being exported without a permit.

72. The Wildlife Officers’ Provisional Order (2011) provides guidance to the officers responsible for the management and protection of wildlife resources. The Draft Wildlife Bill (2013) is under revision.

2.1.3.5 *The Draft Wildlife Bill, 2013*

73. The Draft *Wildlife Bill 2013* establishes an autonomous South Sudan Wildlife Service (SSWS) as proposed by the Constitution with a board of trustees and headed by a Director-General both appointed by the President. One of its key functions will be coordination with other relevant authorities of all issues affecting wildlife management including issues of security, infrastructure, private investment and land use planning. This will be done by ensuring the enforcement and implementation of the law with respect to the use of wildlife, the management of protected areas and other uses of natural resources. The Bill also provides for the protection of wetlands which could potentially be in conflict with the Ministry of Environment's role (section 60). It proposes that the Ministry of Wildlife Conservation and Tourism (MWCT) be the Competent Authority with responsibility for ensuring sustainable management and protection of wetlands in coordination with the Ministry of Environment and Forestry.

2.1.3.6 *The Forest Bill, 2009*

74. The Bill is meant to operationalize the *Forestry Policy* covering all matters concerned with forests and woodlands and all forest reserves in the country. The *Forests Bill* provides for a governance structure for all the forests in the country, national sustainable forest management standards, certification systems and schemes, and private and voluntary standards; procedures and decision-making processes, and; complaint and appeal mechanisms. The Bill establishes the South Sudan Forest Commission (SSFC) to function as semiautonomous body which is business oriented. The Bill also establishes a National Forest Fund (NFF) to be managed semi autonomously to support forestry research, education and protection of forest biodiversity and heritage.

2.1.3.7 *The Water Bill, 2013*

75. The Bill provides for the protection of water sources from pollution, erosion or any other adverse effects by creating Protected Zones within a catchment draining to, or above any water facility forming part of a water supply or any catchment, lake, reservoir, aquifer, wetland, spring, or any other source of water (section 34).

76. The Bill aims to develop procedures for prioritizing allocation of water resources for different social, economic and environmental uses, efficiency, system reliability and environmental sustainability principles. It also aims to conserve available water resources, to manage water quality and to prevent pollution of ground and surface waters; manage floods and droughts and mitigate water related disasters, and; establish appropriate management structures including mechanisms for inter-sectoral coordination and stakeholder participation.

2.1.3.8 *The Public Health (Water and Sanitation) Acts, 2008*

77. These acts emphasize the prevention of pollution of air, water and encourage sanitation. Some areas of emphasis include protecting the sanitation of the environment:

- Air and water pollution: (a) measures to prevent pollution of water resources; (b) measures to prevent pollution of potable water, (c) anyone who offers potable water for food/human consumption, including use in frozen foods, should ensure that the water conforms to the

potability regulations; (d) management and disposal of hazardous wastes; and (e) storage of wastes on the premises of waste generators.

- **Atmospheric pollution:** (a) regulations and measures to combat all elements of pollution and protect the natural environment and public health; (b) measures to prevent noise and other nuisances; (c) allowable toilet systems and excreta disposal methods; (d) rearing and straying of animals and pets; (e) activities and behaviors likely to cause environmental pollution or vector breeding; (f) Individual and communal recycling of waste; and (g) any other matters that demands local regulation to achieve and maintain a clean and healthy environment.

78. The ELRP is aligned with the policy by applying ESS3 and developing a C-ESMP, including waste management plan and IPMP⁷.

2.1.3.9 The Pesticide Control Bill for South Sudan (Proposed as of 2021)

79. The Proposed Pesticide Control Bill for South Sudan (2021) addresses all stages of the pesticide life cycle from the manufacture, import, packaging to the storage, use and final disposal of pesticides, to ensure their quality, efficacy and safety; so that they do not set off any damage to the environment and cause human and animal health hazards. Chapter IX focuses on Safety, Health and Environmental Measures including appropriate use of pesticides and their products and in the context of integrated pest management. There are also guidelines on occupational safety, reporting of accidents, intervals of harvest after application of pesticides, control of pesticides residues in food, and associated duty of care.

2.1.3.10 The Child Act (Act No. 10 of 2008)

80. The Child Act prohibits child labor and outlines protections for children and young persons from hazardous child labor.

2.1.3.11 The Labour Act (Act No. 64 of 2017)

81. The Act establishes a legal framework for the minimum conditions of employment, labor relations, labor institutions, dispute resolution, and provisions for health and safety in the workplace. It further reinforces the right to equal access and remuneration for work of equal value as guaranteed by the constitution.

- **Non-discrimination.** Article 6(1) of the Labour Act provides that: *‘No person shall discriminate, directly or indirectly, against an employee or job applicant in any work policy or practice’*. Section 6(2) also forbids discrimination by any Trade Union, Employers Association, or Federation. Section 6(3) defines discrimination as *‘any distinction, exclusion or preference with the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation’* based on a series of grounds including sex and pregnancy or childbirth.

⁷ The project-level WMP can be found in the IPMP as well as Annex 14 of this document.

- **Sexual Harassment.** Article 7 provides that “No person shall sexually harass an employee or an employer” and that “employer shall ensure that no person shall sexually harass an employee in the course of such employee’s work for the employer”.
- **Prohibition of forced labour.** Section 10 prohibits forced labor: “No person shall engage in the recruitment or use of forced labour or assist any other person to engage in such activities”. And emphasize that recruitment of children for use in armed conflict shall be deemed to be forced labour.
- **Minimum age of work.** As per Section 12 of the Labor Act, the general minimum age for work is 14 and 12 for light work (which is in accordance with ILO standards on minimum age where a country’s economy and educational facilities are insufficiently developed). Nevertheless, Article 12(2) allows children between the ages 14 and 18 to engage in the worst forms of child labor, violating international standards: “no person shall engage or permit the engagement of a child under the age of 14 years to perform works defined under section 13 as worst forms of work”. Compulsory education age (13) is inconsistent with minimum age for work (14).
- **Health and Safety.** Chapter XI of the law states safety, health and welfare at workplace.

82. While the Labour Act provides additional protections for children, it lacks clarity on prohibitions on the worst forms of child labor. The national army and opposition groups continues to recruit, sometimes forcibly, children to fight. Children are further engaged in other worst forms of child labor, including in commercial sexual exploitation. The government has failed to bring any perpetrators to justice.⁸ Children between the ages of 10 and 14 are further employed in agriculture and industry and services, including in rock-breaking, construction (building and transporting materials), and brickmaking.

2.1.3.12 The NGO Act, 2016

83. The Section 18 (2) from the Act states the NGO employing will “not discriminate against any applicant or employee on the ground of region, race, religion, gender, and political affiliation”.

2.1.4 Customary Laws

84. The 2009 Local Government Act recognizes customary law as one of the sources of law in South Sudan. The Act further establishes customary law courts at the *boma*, *payam*, and county levels. The Transitional Constitution of South Sudan passed on 9 July 2011 when South Sudan became an independent country, affirms customary law as one of the sources of law for the new nation.⁹ Preservation of indigenous cultural values and customs against the encroachment of centrally imposed sharia jurisprudence from Khartoum was a key element of the independence struggle for South Sudan. The ELRP will ensure sensitization of customary authorities in using World Bank standards while managing project

⁸ South Sudan – on advancement – efforts made but complicit in forced child labour, accessed at: <https://www.refworld.org/pdfid/5bd05af20.pdf>

⁹ UNDP South Sudan; UNDP Focus on... Customary law in South Sudan.

<https://www.undp.org/content/dam/southsudan/library/Documents/2011-AWPs/DG/UNDP-SS-customary-law-08-12.pdf>

activities related grievance, through stakeholder engagement and the project grievance redress mechanism.

2.2 International Conventions Signed and Ratified by South Sudan

2.2.1 *The International Plant Protection Convention (IPPC), 1951*

85. The IPPC is an intergovernmental treaty overseen by FAO that aims to protect the world's plant resources from the spread and introduction of pests, and promoting safe trade. The Convention introduced International Standards for Phytosanitary Measures (ISPMs) as its main tool to achieve its goals, making it the sole global standard setting organization for plant health. The first ISPM was adopted in 1993 and there were 44 adopted ISPMs, 29 Diagnostic Protocols and 39 Phytosanitary Treatments as of March 2021. These international standards:

- Protect sustainable agriculture and enhance global food security
- Protect the environment, forests and biodiversity
- Facilitate economic and trade development

2.2.2 *The United Nations Framework Convention on Climate Change (UNFCCC), 1992*

86. The UNFCCC establishes methods to minimize global warming and greenhouse gas emissions. It was adopted in 1992 and came into force in 1994. The main authority for the implementation is the Ministry of Environment and Forestry. South Sudan ratified the convention on 17 February 2014 with accession. Regarding the National Adaptation Programme of Actions (NAPA), RALP contributes to three Priority Adaptation Projects, specifically:

- Promotion of reforestation and agroforestry to reduce vulnerability to droughts and floods;
- Agriculture: Promotion of climate-smart agricultural techniques to improve livelihoods and food security under changing climatic patterns;
- Policy and Institutional Framework: Strengthening the institutional capacity of the Government of South Sudan to integrate climate change into national policies and planning processes.

87. Regarding the Intended Nationally Determined Contributions (INDC), ELRP-3 will contribute to the mitigation scenario through land use and land use change and limiting deforestation by supporting alternative economic resources. ELRP is aligned with the adaptation strategy of the INDC given the frequent droughts experienced in the country, with the promotion of the harvesting and retention of water for different uses and community-based approaches. South Sudan submitted its first National communication (NC1) on the 19th August 2019, which states the priorities for the country. ELRP is aligned with agriculture sector adaptation strategies, e.g.: (a) promoting climate-smart agricultural techniques to improve livelihoods and food security under changing climatic patterns, and (b) enhancing agricultural production despite climate change through infrastructure development and strengthening extension services.

2.2.3 The United Nations Convention on Biological Diversity (UNCBD), 1992

88. The Convention on Biological Diversity requires Parties to adopt national strategies, plans and programs for the conservation of biological diversity, and to integrate the conservation and sustainable use of biological diversity into relevant sectoral and cross-sectoral plans, programs and policies. South Sudan acceded to the Convention on 17 February 2014. It submitted its National Biodiversity Strategy and Action Plan (NBSAP) on the 17th December 2019 and its Fifth National Report on the 11th April 2016.¹⁰

2.2.4 The United Nations Convention to Combat Desertification (UNCCD), 1996

89. The UNCCD was adopted in 1994 and came into force in December 1996. The objective UNCCD is to combat desertification and mitigate the effects of drought in seriously affected countries, especially those in Africa, Latin America, the Caribbean, Asia, and Northern Mediterranean. It seeks to achieve this through integrated approaches to development supported by international cooperation and partnership arrangements in the affected areas. It emphasizes long-term strategies that focus on improved land productivity and the rehabilitation, conservation and sustainable management of land and water resources, leading to improved living conditions, particularly at the community level.

2.2.5 Vienna Convention on the Protection of the Ozone Layer

90. The Vienna Convention was an intergovernmental negotiation for an international agreement to phase out ozone depleting substance in March 1985. It ended in the adoption of the Vienna Convention for the Protection of the Ozone Layer. The Convention encourages intergovernmental cooperation on research, systematic observation of the ozone layer, the monitoring of CFC production and the exchange of information. The GRSS acceded to the convention on 12 January 2012.

2.2.6 The Ramsar Convention for the Conservation and Sustainable Utilization of Wetlands

91. The Convention is an international treaty for the conservation and sustainable utilization of wetlands, recognizing the fundamental ecological functions of wetlands and their economic, cultural, scientific and recreational value. South Sudan has been party to the Convention since 10 October 2013. South Sudan has currently one site designated as Wetlands of International Importance.

2.2.7 Convention on the Rights of the Child

92. The Convention on the Rights of the Child from 1989 is the most comprehensive compilation of international legal standards for the protection of the human rights of children. It acknowledges children as individuals with rights and responsibilities according to their age and development, as well as members of a family or community. This includes non-discrimination, the best interest of the child, the right to life, survival and development and the right to participation. South Sudan has been party to the Convention since 23 January 2015.

¹⁰ CBD website assessed on the 26.11.2020. <https://www.cbd.int/countries/?country=ss>

2.2.8 *International Labor Organization conventions*

93. The constitutional principle is that universal and lasting peace can be established if it is based on social justice. The ILO has generated such hallmarks of industrial society as the eight-hour workday, maternity protection, child labor laws, and a range of other principles. South Sudan has been a member of the ILO since 29. April 2012. South Sudan ratified 7 out of the 8 fundamental conventions.

- **ILO Worst Forms of Child Labor Convention (1999) N°182.** The convention calls for immediate action to prohibit and eliminate the worst forms of child labor. The predefined forms of child labor include all forms of slavery, trafficking of children, debt bondage or any other form of bonded labor, forced or compulsory labor, commercial sexual exploitation of children, prostitution and the production of pornography, as well as work that is likely to harm the health, safety or morals of children. South Sudan ratified the convention in 2012.
- **ILO Minimum age Convention (1973) N°138.** The convention provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed. South Sudan has informed the ILO that it has set the general minimum age at 14 years. South Sudan ratified the convention in 2012. Nevertheless, worldwide child labour in agriculture remain a huge challenge.¹¹
- **ILO Forced Labour Convention (1930) N° 29 and ILO Abolition of Forced Labour Convention (1957) N° 105.** The Objective of the conventions is to define and suppress forced labor in all its forms. South Sudan ratified the convention in 2012.
- **ILO Discrimination (employment and Occupation Convention (1958) N° 111.** The convention calls upon states to enable legislation prohibiting all forms of discrimination and exclusion on any basis, including race, sex, religion, etc. South Sudan ratified the convention in 2012.
- **ILO Equal Remuneration Convention (1951) N°100.** The convention aims at equal remuneration for work of equal remuneration between men and women. South Sudan ratified the convention in 2012.
- **ILO Right to Organize and Collective Bargaining Convention (1949) N°098.** South Sudan ratified the convention in 2012.

2.2.9 *Convention on the Elimination of all forms of Discrimination against Women*

94. CEDAW places explicit obligations on states to protect women and girls from sexual exploitation and abuse, among other issues. South Sudan ratified the CEDAW in 2014. The accession to CEDAW enabled the country to address issues of customary law involving women's right to inherit and own productive assets, as well as their lack of voice and decision making in family and community matters and the denial of their right of choice to found a family especially in rural settings.

11

2.2.10 Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa in October 2017 (The Maputo Protocol) and the African Convention for Protection and Assistance of Internally Displaced Persons in Africa (The Kampala Convention).

95. South Sudan made several reservations to key provisions under the Maputo Protocol, namely under Article 6, which discourages polygamous marriages, and Article 14, which focuses on reproductive rights including family planning and abortion.

2.2.11 UN Security Council Resolution 1325/2000 on Women, Peace and Security.

96. The GRSS developed the National Action Plan 2015-2020 for the implementation of the UN Security Council Resolution 1325 on Women, Peace and Security.

2.3 National institutional analysis

97. The Ministry of Environment and Forestry is the responsible institution for EIAs and has the mandate for Environmental Impact Assessment.

- **National Ministry of Environment** has the responsibility among other to develop policy, to set standards and to coordinate, cooperate and collaborate with the ten states and local government. They are a key stakeholder to validate the actual ESMF and keep track of the overall ELRP.
- **State Ministries of Environment** are responsible among other to implement the policy and coordinate local environment department.
- **Local Environment Department** ensure that the national environmental standard to conduct the environmental impact assessments and protect areas of ecological interest. Therefore, they will be included during E&S screening and during E&S complementary studies.

2.4 FAO Current Policies and Environmental and Social Safeguards

98. A detailed presentation of the FAO policies and E&S safeguards have been presented in the Gap analysis annex (Annex 11). The following paragraph only named relevant policies and safeguards for the project.

2.4.1 FAO Policies

99. FAO relevant policies for this project are:

- FAO Accountability Policy (2014);
- FAO Whistleblower protection policy (administrative circular N°2019/06);
- FAO Protection from sexual exploitation and sexual abuse (PSAE) N° 2013/27.
- FAO Policy on the prevention of harassment, sexual harassment and abuse of authority N° 2015/03 (2015) and FAO policy on sexual harassment (13 February 2019)
- FAO Policy against fraud and other corrupt practices N° 2015/08 (2015)

2.4.2 *FAO Environmental and Social Management Guidelines*

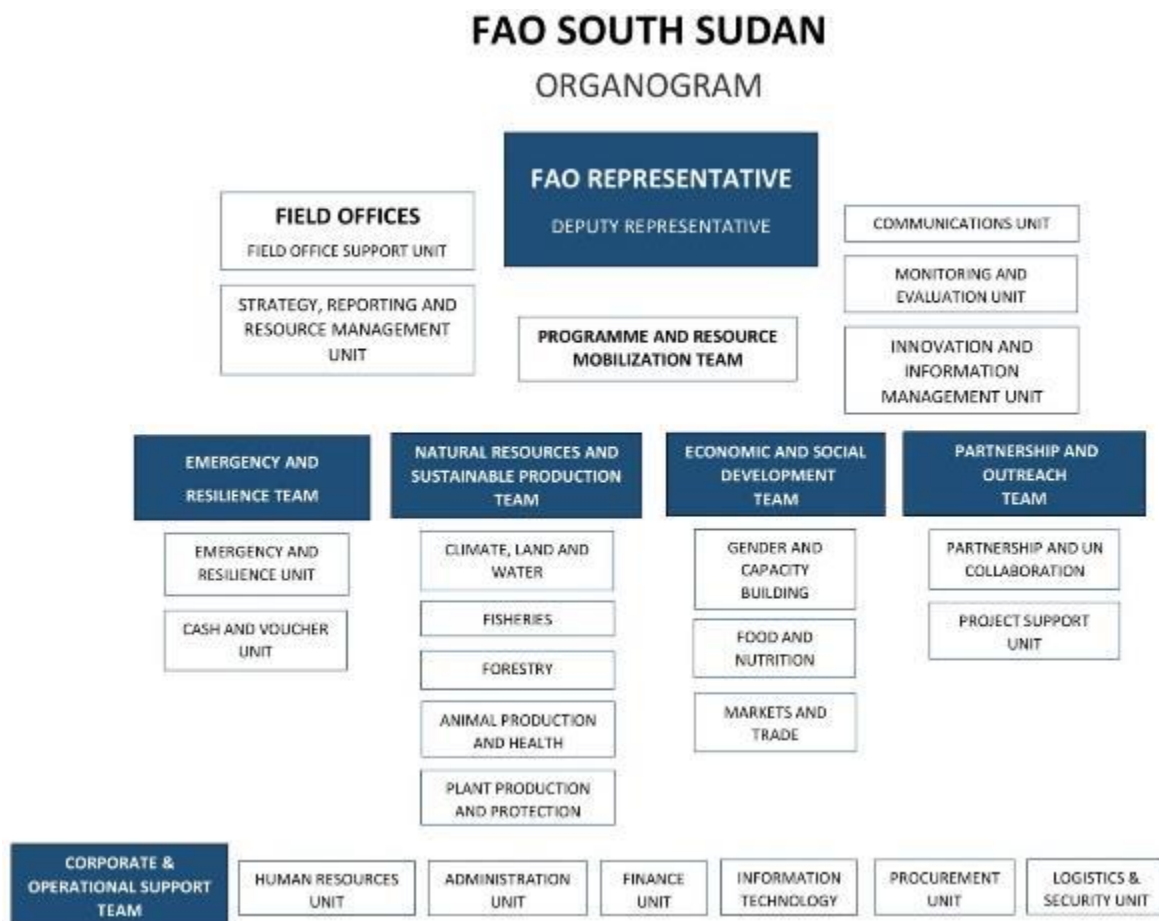
100. The Project Risk Management Framework is primarily structured around the World Bank Environmental and Social Standards (2018). It is considering the on-going FAO Environmental and Social Management Guidelines (2015) and complementary measures defined in the Gap Analysis in Annex.
101. **The FAO Environmental and Social Management Guidelines (2015)** includes nine Environmental and social standards:
- ESS 1: Natural Resource Management
 - ESS 2: Biodiversity, Ecosystems and Natural Habitats
 - ESS3: Plant Genetic Resources for Food and Agriculture
 - ESS 4: Animal - Livestock and Aquatic - Genetic Resources for Food and Agriculture
 - ESS 5: Pest and Pesticide Management
 - ESS 6: Involuntary Resettlement and Displacement
 - ESS 7: Decent Work
 - ESS 8: Gender Equality
 - ESS 9: Indigenous Peoples and Cultural Heritage
102. **Gender objectives and alignment with international goal and standards.** Gender mainstreaming in FAO project is following international goals and declaration.
103. **Given the project focus and to support application of FAO's ESS5,** the FAO Desert Locust Guidelines (2003)¹² will also be followed.

2.4.3 *FAO Institutional Services*

104. **FAO South Sudan Office (FAO SS) and interaction with ELRP.** The FAO South Sudan office is comprised of various units as shown in the organogram below, including 12 field offices spread across the country. The Climate, Land and Water Unit is responsible for the implementation and compliance of environmental and social guidelines. The other units and field offices will provide additional technical and administrative support on various aspects of ELRP to the Project Support Unit (PSU) as necessary. The ELRP team within the PIU will be aligned with key divisions of the National Office, allowing coordination among FAO projects. The close relationship with the overall FAO SS Office is a key element to punctually mobilize experts from other projects or divisions for advice on project implementation on key strategic sectors such as gender and capacity building, land tenure, plant protection and production, etc. This list is not exhaustive. Detailed staffing and institutional arrangements are available in section 6.

¹² <http://www.fao.org/ag/locusts/en/publicat/gl/gl/index.html>

Figure 3: FAO South Sudan Organogram



105. **Other FAO offices and division would be supporting the ELRP, including:**

- FAO Regional Office for Africa (RAF)
- FAO Sub-regional Office for Eastern Africa (SFE)
- FAO Headquarters (HQ)
- FAO Office of the Inspector General (OIG)
- FAO Ethic Office (ETH)

2.5 UN Safeguards Policies

106. The ESMF further follows the UN Common Approach to Environmental and Social Standards in UN Programming, which has recently been developed by the United Nations Environment Management Group (EMG): Moving Towards a Common Approach to Environmental and Social

Standards for UN Programming.¹³ The UN standards are by and large aligned to the World Bank safeguard policies. It includes Guiding principles and a model approach operationalization.

107. **Operationalizing the model approach through procedures and thematic areas.** Procedures include Screening, Assessment and Management of Environmental and Social Risks and stakeholder engagement and accountability. UN Thematic area are:

- UN Thematic Area 1: Biodiversity, Ecosystems and Sustainable Natural Resource Management;
- UN Thematic Area 2: Climate Change and Disaster Risks;
- UN Thematic Area 3: Community Health, Safety and Security;
- UN Thematic Area 4: Cultural Heritage;
- UN Thematic Area 5: Displacement and Involuntary Resettlement;
- UN Thematic Area 6: Indigenous Peoples;
- UN Thematic Area 7: Labour and Working Conditions and;
- UN Thematic Area 8: Pollution Prevention and Resource Efficiency.

2.6 The World Bank Group's Environment, Health and Safety Guidelines (EHSGs)

108. The World Bank Group's Environment, Health, and Safety Guidelines (EHSGs) will be applicable as part of implementation of the proposed depending on activities:

- General EHSG¹⁴.
- EHSG: Occupational Health and Safety.¹⁵
- EHSG: Annual Crop Production.¹⁶
- EHSG: Mammalian Livestock Production.¹⁷
- EHSG: Perennial crop production.¹⁸

¹³ https://unemg.org/wp-content/uploads/2019/07/FINAL_Model_Approach_ES-Standards-1.pdf

¹⁴ WBG General EHS Guidelines:

https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_policy_ehs-general

¹⁵ IFC/World Bank Group. 2007. 2.0 Occupational Health and Safety. Environmental, Health, and Safety (EHS) Guidelines.

<https://www.ifc.org/wps/wcm/connect/1d19c1ab-3ef8-42d4-bd6b-cb79648af3fe/2%2BOccupational%2BHealth%2Band%2BSafety.pdf?MOD=AJPERES&CVID=ls62x8l>;

¹⁶ https://www.ifc.org/wps/wcm/connect/766c4c6e-e4b1-41ef-a980-3610bce404e8/Annual+Crop+Production+EHS+Guidelines_2016+FINAL.pdf?MOD=AJPERES&CVID=lfe82iC

¹⁷ <https://www.ifc.org/wps/wcm/connect/737ca363-552e-4b70-b9e0-c234e7fca120/Final%2B-%2BMammalian%2BLivestock%2BProduction.pdf?MOD=AJPERES&CVID=jkD2BYQ>

¹⁸ https://www.ifc.org/wps/wcm/connect/2db115fe-4842-4a32-86ed-c9d659a0ea38/English_2016_Perennial+Crop+Production_EHS.pdf?MOD=AJPERES&CVID=lffbDhw

2.7 World Bank Environmental and Social Management Framework and Relevant Standards

109. The ESF sets out the World Bank's commitment to sustainable development through a Bank Policy and a set of ESS that are designed to support borrowers' projects with the aim of ending extreme poverty and promoting shared prosperity. The ESSs require borrowers to identify and assess E&S risks and impacts associated with projects supported by the World Bank through Investment Project Financing (IPF). The World Bank believes that applying these standards, focusing on identifying and managing E&S risks, will help borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. The standards will:

- a. support borrowers/clients to achieve good international practice relating to E&S sustainability;
- b. assist borrowers/clients to fulfil their national and international E&S obligations;
- c. enhance nondiscrimination, transparency, participation, accountability and governance;
- d. enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

110. The ten ESSs establish the standards that the borrower and the project will meet through the project life cycle. The outline of the E&S risks and the relevance of standards to the project is provided in the Bank's Environmental and Social Review Summary¹⁹. A gap analysis between national legislation and World Bank ESS, national legislation and UN/FAO standards is presented in Annex 11.

- **ESS 1: Assessment and Management of Environmental and Social Risks and Impacts.** ESS1 defines the client's responsibility to assess, manage, and monitor environmental and social risks and potential impacts associated with each stage of a project supported by the World Bank through IPF, in order to achieve environmental and social outcomes consistent with the ESSs.

This ESS obligates the client to ensure environmental and social assessment is based on current information, including a detailed description of the project and environmental and social baseline data at an appropriate level of detail sufficient to help identify and characterize risks, impacts, and mitigation measures. It requires assessment to evaluate the project's potential E&S risks and impacts, with a particular attention to those that may fall disproportionately on disadvantaged and/or vulnerable social groups; examine project alternatives; identify ways of improving project site selection, planning, design and implementation in order to apply the mitigation hierarchy for adverse environmental and social impacts and seek opportunities to enhance the positive impacts of the project. Stakeholder engagement will be an integral part of the assessment in accordance with ESS10.

The client is therefore expected to manage environmental and social risks and impacts of the project throughout the project life cycle in a systematic manner proportionate to the nature and scale of the project and the potential risks and impacts. The client is also responsible for cascading

¹⁹ Project's ESRS: <https://documents1.worldbank.org/curated/en/356831621505589892/pdf/Appraisal-Environmental-and-Social-Review-Summary-ESRS-Emergency-Locust-Response-Project-P174546.pdf>

compliance with standards along the chain of implementing partners, contractors, and subcontractors.

Comparison with South Sudan Regulation and Other UN/FAO Policies. *The ESS1 requirements are in line with South Sudan Legislation. The Environment Protection & Management Bill, 2013 (Draft) and the National Environment Policy 2015-2025 require proponents of Plans, Programs and projects to carry out Environmental Assessment. Chapter 5 of the bill obligates all project proponents to ensure that a systematic environmental and social assessment is undertaken and relevant permits are obtained. The bill outlines the objectives of the EIA process and sets out guiding principles for the same. Section 19 of the bill further obligates all developers and project proponents to undertake routine environmental monitoring including statutory environmental audits. As such, any person or institution contravening these provisions is contempt in the law. The FAO Environmental and Social Management Guidance 2015 similarly advocates for sound environmental and social management which requires prior E&S assessment and regular monitoring, reporting and disclosure. ELRP will therefore be guided by ESS1 and either FAO or the local legislation provision that is most stringent.*

- **ESS 2 – Labor and Working Conditions.** ESS2 recognizes the importance of employment creation and income generation for poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including full-time, part-time, temporary, seasonal and migrant workers.

In cognizance of this, ELRP is expected to develop and implement written Labor Management Procedures (LMP) applicable to the project, to be supplemented by additional procedures as needed, in order to meet the ESS2 requirements, including respective Occupational Health and Safety provisions.²⁰ The LMP includes procedures in case of risk of violence towards ELRP staff and implementing partners. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law, FAO and UN policies and this ESS. The procedures will address how this ESS will apply to different categories of project workers, including direct workers, and the way in which the MAFS and FAO will require third parties to manage their workers in accordance with ESS2. It also requires ELRP and its implementing partners to put in place a working grievance redress system that allows workers to raise their grievances.

Comparison with South Sudan Regulation and Other UN/FAO Policies. *The ESS2 is partly covered by the national regulatory framework. National regulatory framework recognizes fundamental principles of non-discrimination in Labor Act (2017) section 6, the NGO Act (2016) section 18, the Prohibition of forced labor in Labor Act (2017) section 10, and Health and Safety in Labor act (2017) Chapter XI. Child Labor is defined under the Labor Act (2017) sections 12 and 13 and the Child Act*

²⁰ General WBG EHS guidelines and FAO standards

(2008) and the constitution but is inconsistent with ILO ratified definition of worst form of child labor (N°182). Moreover, enforcement of labor laws is minimal, and many unskilled jobs are filled by immigrant workers without permits. The FAO ESS7 decent work and ESS8 Gender Equality, UN Supplier code of conduct 2017, FAO policies on Sexual Harassment 2019 and whistleblower policy 2019 are aligned with ILO fundamental principles and WB standards. FAO advocates as well for ending child labor in agriculture in all its forms. ELRP-3 will therefore exclude any working contract with children under the age of 18, prevent any corruption or fraud, ensure the absence of forced labour, include in LMP specific measures for SH victim confidentiality, comply with IFC and EHSB and develop a specific GRM for workers as part of the LMP, will not deploy unskilled workers from foreign countries if they can be found locally and monitor actual wages paid. ELRP will therefore be guided by ESS2 and either of the local legislation provision that is most stringent.

- **ESS 3 – Resource Efficiency and Pollution Prevention and Management.** Economic activity and urbanization often generate pollution to air, water, and land, and it consumes finite resources that may threaten people, ecosystem services, and the environment at the local, regional and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention, GHG emission avoidance, and mitigation technologies and practices have become more achievable. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle consistent with good international industry practice (GIIP).

This ESMF includes sections on resource efficiency and pollution prevention and management. Assessment of risks and impacts and proposed mitigation measures related to relevant requirements of ESS3, including pest management techniques, farmers trainings on habitat protection, soil and water conservation practices and sustainable use, renewable energy uses integrated in sub-projects are included within scope of the ESMF, and ESMPs as relevant.

Comparison with South Sudan Regulation and Other UN/FAO Policies. *The national framework underlines through the Constitution of South Sudan 2011 Article 41 the right to clean and healthy environment and the obligation to protect the environment. Moreover, The Water Bill 2013 and the Forest Bill 2009 are reinforcing the principle of protection of natural resources and their sustainable use, as well as the prevention of any pollution. No fertilizer use policy or framework are yet available. FAO ESS1 on Natural Resources Management (NRM) and FAO ESS5 on Pest and Pesticides Management fill the gap and include major features related to NRM, tenure and climate considerations. ELRP will develop an Integrated Pest Management Plan (IPMP) as well as a specific waste management plan for construction activities to be aligned with ESS3 of the World Bank. ELRP-3 will therefore be guided by ESS3 and either of the local legislation provision that is most stringent.*

- **ESS 4 – Community Health and Safety.** Project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, project activities could accelerate or intensify the impacts of climate change in some communities.

ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of borrowers to avoid or minimize such risks and impacts, with attention to people who, because of their particular circumstances, may be vulnerable. While not explicitly mentioned, prevention and mitigation of different forms of gender-based violence, specifically sexual exploitation and abuse (GBV-SEA), is covered by ESS4. The overall country fragility, conflict, and violence context and GBV are the two forms of concern for community health and safety. Women and children bear a disproportionate burden of the violence in a protracted conflict, so, the Borrower has developed a GBV Mitigation & Action Plan with a dedicated Gender Specialist to support ELRP implementation.

Comparison with South Sudan Regulation and Other UN/FAO Policies. *Community Health and Safety is emphasized in the Constitution 2011 Article 39 protecting the family unit, the article 9 on the promotion and respect of human right and article 12 of right to dignity as well as the Public Health Act 2008 providing the prevention of pollution to protect the public health. The fragile and violent context in the country does not guarantee the application of these general statements. FAO is aligned with fundamental prerequisite such as excluding the use of unhealthy products in ESS5 Pest and Pesticide management and applying in fragile context its Accountability to Affected People (AAP) 2014 policy. E&S Cascade responsibilities would be ensured by IPs through UN supplier code of conducts 2017, Official 2019 NGO recruitment guidelines and 2015 Core Humanitarian standards and regular monitoring.*

South Sudan gender priorities remain low, with only the Constitution Article 16 right of Women on “full and equal dignity of the person with men”, the promotion of participation of women in public life at all governmental level, the enactment of a law to combat harmful customs undermining the dignity of women, and the provision of medical care. This is in conflict with the recognition of customary law by the constitution. ELRP will reinforce gender considerations by its ESS8 on Gender Equality, FAO Protection from sexual exploitation and sexual abuse 2013/27, the FAO Accountability to Affected People Policy and the international agreement such as the Convention on the Elimination of all forms of Discrimination against Women (CEDAW). Detailed information is available in the GBV Mitigation & Action Plan. The ESS4 underlines the need for a separate GRM for GBV SEA and SH issues in FCV context, which has been developed under the ELRP GBV Mitigation & Action Plan. ELRP will, therefore, be guided by ESS4 and either of the local legislation provision that is most stringent.

- **ESS 5 – Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.** Project-related land acquisition and restrictions on land use can have adverse impacts on communities and individuals. It can also cause physical displacement (relocation, loss of residential land, or loss of shelter), economic displacement (loss of land, assets or access to assets) leading to loss of income sources or other means of livelihood, or both. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

Experience and research indicate that physical and economic displacement, if unmitigated, may give rise to severe economic, social, and environmental risks: production systems may be dismantled; people face impoverishment if their productive resources or other income sources are lost; people may be relocated to places where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; kinship groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help may be diminished or lost. For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

The ESS does not apply to voluntary land transactions, as will be relevant for ELRP. Voluntary, legally recorded market transactions are those where the seller can retain the land (or refuse to sell it) and is fully informed about their options. ESS5 will apply where a voluntary land transaction may result in the displacement of persons other than the seller, who occupy, use or claim rights to the land in question, including Internally Displaced People (IDPs) claiming land use. ELRP does not anticipate any involuntary land acquisition as it will rehabilitate existing market infrastructures. However, if the need arises for small portion of land, it is expected that voluntary land donation (VLD) guidelines will be prepared to support the process.

Comparison with South Sudan Regulation and Other UN/FAO Policies. *The national Framework consists of the Land Act 2009 giving provision on compensation of occupancy ownership or recognized long standing occupancy and The Local Government Act 2009 that transmit the responsibilities to local government and traditional authorities for the management of land. No statement is made on subsistence mean losses due to resettlement. FAO ESS 6 prohibits forced eviction and proposes plans for physical and economical displacement. It relies on the Voluntary Guidelines on the Responsible Governance of Tenure of Land, fisheries and forests (VGGT). FAO also applies FPIC process through its ESS9 when working with minorities. ELRP will not lead to any involuntary physical or economical displacement. Specific screening will be made, and only Voluntary land consent will be considered using the Voluntary Land Donation Framework and aligned with the WB ESS5 provision.*

- **ESS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources.** Protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. *Biodiversity* is the variability among living organisms from all sources including, *inter alia*, terrestrial, marine, and other aquatic ecosystems and the ecological complexes of which they are part. This includes diversity within species, between species, and of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can often adversely affect the delivery of ecosystem services.

ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Habitat is defined as a terrestrial, freshwater or marine geographical units or airways that supports assemblages of living organisms and their interactions with the non-living environment. All habitats support complexities of living organisms and vary in

terms of species diversity, abundance and importance. This ESS also addresses sustainable management of primary production and harvesting of living natural resources.

ESS6 recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples whose access to or use of biodiversity or living natural resources may be affected by a project. The potential, positive role of project affected parties, including Indigenous Peoples, in biodiversity conservation and sustainable management of living natural resources is also considered.

Comparison with South Sudan Regulation and Other UN/FAO Policies. *The national framework for Biodiversity defining the main principles is in the constitution 2011 article 157, specifying delimitation of protected areas, competent authorities are defined in the Wildlife and National Parks Protection Act 2003 and the creation of a dedicated service in the Draft Wildlife Bill of 2013. FAO is as well aligned with international South Sudan commitment with UNCBD within its ESS2: Biodiversity Ecosystem and Natural Habitats and FAO ESS3: Plant Genetic Resources for Food and Agriculture. ELRP will avoid any encroachment into any sensitive habitat and prohibit the introduction of alien species to preserve genetic resources, in alignment with the WB ESS6. ELRP will therefore be guided by ESS6 and either of the local legislation provision that is most stringent.*

- **ESS7 - Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.** This ESS applies to distinct social and cultural groups. ESS7 uses the term Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPSSAHUTLC), recognizing that groups may be referred to in different countries by different terms. Such terms include “Sub-Saharan African historically underserved traditional local communities,” “indigenous ethnic minorities,” “aboriginals,” “hill tribes,” “vulnerable and marginalized groups,” “minority nationalities,” “scheduled tribes,” “first nations” or “tribal groups.”

ESS7 contributes to poverty reduction and sustainable development by ensuring that projects supported by the World Bank enhance opportunities for IPSSAHUTLC to participate in, and benefit from, the development process in ways that do not threaten their unique cultural identities and well-being.

Key requirements under ESS7 include that the World Bank determines whether indigenous peoples/Sub-Saharan African historically underserved traditional local communities are present in or have collective attachment to the project area. Where it does, the borrower develops a rigorous consultation strategy and identifies means to undertake accessible, culturally appropriate, and inclusive consultation with people identified for the purposes of ESS7. Furthermore, in circumstances where the project has adverse impacts on land, natural resources, and tangible and intangible cultural heritage, causes relocation of indigenous peoples, or has other significant impacts on them, free, prior and informed consent (FPIC) from the affected groups is required. The ESS proposes different methodologies for obtaining such consent.

Comparison with South Sudan Regulation and Other UN/FAO Policies. *South Sudan regulatory framework does not define or census the minorities and indigenous groups. The Social Assessment*

shows a mosaic of ethnicities and cultures within the country. FAO ESS9 Indigenous Peoples and Cultural heritage is aligned with ESS7. While ESS7 applies to most project beneficiaries, a separate and stand-alone IPP is not required and necessary due to the inclusive consultation and targeting of all minorities and vulnerable groups within each ethnicity. Moreover, because of the nature to project activities, it is not expected that FPIC would be applicable. Nevertheless, with respect to cultural specificities, ESS7 will be ensured through sensitization and support of local authorities, especially through grievance and women and children protection related to project activities. ELRP SEP includes local translation services for ESF instruments if needed.

- **ESS 8 – Cultural Heritage.** Cultural heritage provides continuity in tangible and intangible forms between the past, present, and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge, and traditions. Cultural heritage, in its many manifestations, is important as a source of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people’s cultural identity and practice. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

The requirements of ESS8 apply to cultural heritage regardless of whether it has been legally protected or previously identified or disturbed. The requirements of ESS8 apply to intangible cultural heritage only if a physical component of a project will have a material impact on such cultural heritage or if a project intends to use such cultural heritage for commercial purposes.

The borrower will implement globally recognized practices for field-based study, documentation, and protection of cultural heritage in connection with the project, including by contractors and other third parties.

A chance finds procedure is a project-specific procedure that will be followed if previously unknown cultural heritage is encountered during project activities. It will be included in all contracts relating to construction of the project, including excavations, demolition, movement of earth, flooding or other changes in the physical environment. The chance finds procedure will set out how chance finds associated with the project will be managed.

The procedure will include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence-off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of this ESS and national law; and to train ELRP personnel and workers on chance find procedures.

- **Comparison with South Sudan Regulation and Other UN/FAO Policies.** *National Constitution 2011 Article 38 calls for the protection of cultural heritage, monuments and place of national historic or religious importance. FAO is aligned within its ESS9 by protecting cultural heritage. A cultural and chance finding procedure is developed and integrated in ELRP, to comply with the ESS8, in situation where previously unknown cultural heritage is encountered. Moreover, specific consultations are defined in the SEP to ensure tangible cultural heritage.*

- **ESS 9 – Financial Intermediaries (FI).** Strong domestic capital and financial markets and access to finance are important for economic development, growth, and poverty reduction. The World Bank is committed to supporting sustainable financial sector development and enhancing the role of domestic capital and financial markets. ESS9 is the only non-relevant standard for the ELRP.
- **ESS 10 – Stakeholder Engagement and Information Disclosure.** Open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The Borrower will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope, and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks.

In consultation with the Bank, the borrower will develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. The SEP also outlines the establishment of a functioning project-level grievance redress mechanism (GRM) in addition to specific GRMs under ESS2 and the GBV Mitigation and Action Plan.

Comparison with South Sudan Regulation and Other UN/FAO Policies. *The national framework underlines community involvement in decision making in the Constitution Article 166 and Disclosure of environmental information in the Environmental and Protection Bill 2013. The judicial power and its principles are detailed in the Constitution Article 123 and Witnesses protection under the Code of Criminal Procedure Act 2008. The main limits of the application of these articles include: the decision-making process restricted to the promotion of safe and healthy environment; the disclosure of information for Environmental studies, and; the limited functionality of the judiciary system. FAO will enable the application of these statements through its stakeholder engagement process during all project lifecycle and information disclosure (ESMG 2015), GRM systems in the ESGM 2015, FAO AAP 2014 and FAO Whistleblower policy 2019. To comply with ESS10, ELRP has a SEP to ensure inclusive consultation, as well as disclosure according to WB standards on both FAO and WB systems and at local level ELRP-3 will also reinforce its CBCM complaint mechanism and its appeal mechanism through FAO OIG and WB GRS, integrate a Legal Third-Party Monitoring as part of all complaint follow up and a Third-Party Monitoring.*

111. **OP 7.50 Projects in International Waters:** This is not an ESF standard but part of the legal safeguards policies. Its objective is to ensure that Bank financed projects affecting international waterways would not affect: (a) relations between the Bank and its borrowers and among riparian

states (whether members of the Bank or not); and (b) the efficient use and protection of international waterways. The policy applies to:

- a. hydroelectric projects, irrigation, flood control, navigation, drainage, water and sewerage, industrial and similar projects that involve the use or potential pollution of international waterways; and
- b. Projects that support detailed design and engineering studies of projects under (a) above, including those carried out by the World Bank as executing agency or in any other capacity.

112. This policy is triggered if: (a) any river, canal, lake or similar body of water that forms a boundary between, or any river or surface water body that flows through two or more states, whether World Bank members or not; (b) any tributary or other surface water body that is a component of any waterway described under (a); and (c) any bay, gulf strait, or channel bounded by two or more states, or if within one state recognized as a necessary channel of communication between the open sea and other states, and any river flowing into such waters. *This policy is not applicable, as there is no-large-scale new water infrastructure development. ELRP interventions will be limited to small-scale water harvesting infrastructure that focuses on capturing and retaining rainwater.*

113. **OP 7.60 Projects in Disputed Areas:** This is also not an ESF standard but part of the legal safeguards policies. Its objective is to avoid prejudicing the position of either the Bank or the countries concerned, by dealing with any dispute over an area in which a proposed project is located at the earliest possible stage. The Bank may support a project in a disputed area if the governments concerned agree that, pending the settlement of the dispute, the project proposed for country A should go forward without prejudice to the claims of country B.

114. The Project/Program Appraisal Document (PAD) for a project in a disputed area discusses the nature of the dispute and affirms that Bank staff have considered it and are satisfied that either

(a) the other claimants to the disputed area have no objection to the project; or

(b) in all other instances, the special circumstances of the case warrant the Bank's support of the project notwithstanding any objection or lack of approval by the other claimants. Such special circumstances include the following:

(i) that the project is not harmful to the interest of other claimants, or

(ii) that a conflicting claim has not won international recognition or been actively pursued. In all cases, the project documentation bears a disclaimer stating that, by supporting the project, the Bank does not intend to make any judgment on the legal or other status of the territories concerned or to prejudice the final determination of the parties' claims.

This policy is not applicable, as none of the project locations are in disputed areas.

3 Environmental and Socio-economic Baseline

115. This section presents the environmental, climatic and social baseline compiled for the country from a blend of literature, socio-economic surveys, and details from the recently designed RALP project. Key locations of interest have been identified and future screening for more subprojects will involve collection of further environmental and social data if needed.

3.1 Environmental Baseline

116. The following section describes key environmental features of the country as ELRP activities will be carried out over a broad area. The sensitive ecosystems and protected areas have been identified and the screening needed will be carried out before subproject execution is defined. Socio-economic factors and dynamics, such as economics, demographics, technology, cultural norms, governance and conflict, are the root causes that drive physical pressures on the environment. Therefore, the social assessment will support sustainable use and protection of environmental resources.

3.1.1 Geography

117. The DLs first invaded South Sudan on 17 February 2020, with swarms coming from neighboring countries of Uganda and Kenya and settling in Magwi, Torit, and Lopa/Lafon counties in Eastern Equatoria State. Another wave of desert locust swarm was received in March and May in the same counties as well as Ikotos. Subsequent swarms came from the same countries on 2 August 2020 in Kapoeta South County and between 3 and 10 September in Ngauro *payam* in Budi County. This is the first DL invasion to occur in the country after 34 years. The main crops affected were maize and sorghum – most of which were in the vegetative stage. An estimated 137 tons of grain were damaged out of the total estimated 6, 655 tons of grain expected for harvest in the *payams* assessed²¹.

118. South Sudan is a landlocked country that falls almost entirely (96 percent) within the Nile River Basin in East-Central Africa. It is bordered to the north by Sudan, by Ethiopia and Kenya to the east, Uganda and the Democratic Republic of the Congo (DRC) to the south and in the west by the Central African Republic. It occupies an area of 658,842 km². The country is covered by extensive grasslands, wetlands and tropical forests. Its natural assets include significant agricultural, mineral, timber and energy resources. The climate is mostly hot and dry, with seasonal rains that allow for two or three harvests a year in the country's green belt. Apart from oil, however, its natural resources are largely unexploited and only 4.5 per cent of its potential arable land is cultivated.

119. The major geographical features of South Sudan are the White Nile, which flows north from Central Africa's uplands and dominates the center of the country and the vast Sudd swamp, one of the world's largest wetlands. The Sudd swamp is fed by the White Nile and covers over 100,000 km², more than 15 per cent of the country's area. Rising out of the northern and central plains are the southern highlands along the border with Uganda and Kenya. The Ethiopian highlands border the

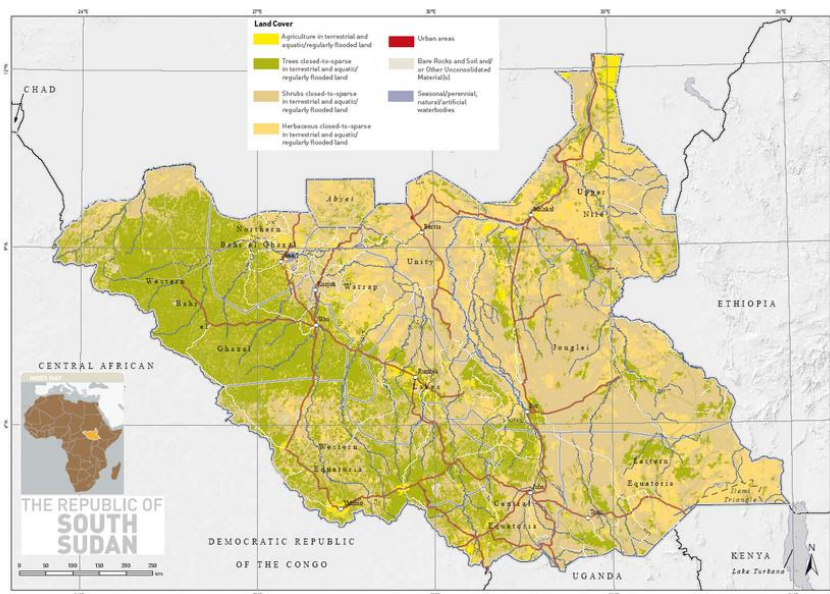
²¹ FAO South Sudan - Desert Locust Impact Assessment In Kapoeta South And Budi Counties, October 2020

country to the east, and the Congo River basin highlands are on the southern and western margins. The land cover of the country is described in the figure below.²²

Figure 4: Land cover classes by states in South Sudan²³

STATES	AG Agriculture in terrestrial and aquatic/regularly flooded land	TCO Trees closed-to-sparse in terrestrial and aquatic/regularly flooded land	SCO Shrubs closed-to-sparse in terrestrial and aquatic/regularly flooded land	HCO Herbaceous closed-to-sparse in terrestrial and aquatic/regularly flooded land	URB Urban areas	BS Bare Rocks and Soil and/or Other Unconsolidated Material(s)	WAT Seasonal/perennial, natural/artificial waterbodies	TOTAL AREA
Central Equatoria	381,319	1,579,928	1,790,141	608,580	8,399	10,191	12,011	4,390,569
Eastern Equatoria	113,470	1,082,624	3,916,006	2,277,351	952	2,874	32,262	7,425,537
Jonglei	318,658	1,554,901	7,546,217	2,837,251	942	864	101,214	12,360,047
Lakes	184,241	1,564,645	1,698,524	920,276	1,766	18,238	20,018	4,407,508
Northern Bahr el Ghazal	242,158	1,577,372	500,125	567,891	1,196	1,764	91,373	2,981,879
Unity	126,871	196,030	1,934,868	1,688,220	6,387	2,310	34,319	3,789,005
Upper Nile	485,833	998,466	3,045,912	3,249,108	7,854	13,180	34,360	7,834,713
Warrap	448,399	754,630	1,922,541	1,295,033	1,412	15,180	8,136	4,445,331
Western Bahr el Ghazal	134,745	7,643,670	1,607,242	803,222	3,525	36,116	112,246	10,340,766
Western Equatoria	341,532	4,373,605	2,077,592	1,021,064	1,757	78,713	17,703	7,911,966
TOTAL	2,777,226	21,325,671	26,039,166	15,067,996	34,190	179,430	463,642	65,887,321

Figure 5: Land cover cartography in South Sudan²⁴



**The boundaries and names shown and the designations used on this map do not imply the expression of any opinion whatsoever on the part of FAO concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers and boundaries.
 **Final status of the Abyei area is not yet determined.

²² FAO, 2011 - Land Cover Atlas of the Republic of South Sudan. <http://www.fao.org/3/a-be895e.pdf>

²³ FAO, 2011 - Land Cover Atlas of the Republic of South Sudan. <http://www.fao.org/3/a-be895e.pdf>

²⁴ FAO, 2011 - Land Cover Atlas of the Republic of South Sudan. <http://www.fao.org/3/a-be895e.pdf>

3.1.2 Forests

120. South Sudan's total forest cover is estimated at almost 20,000,000 ha, or about 30 percent of the total land area. Of this, gazetted forest reserves account for 3.1 percent and plantation forests represent 0.1 percent. Plantations consist mostly of teak forests thought to be the oldest such forests in Africa and the largest plantations of its kind in the world. Acacia plantations for gum Arabic are also important.
121. The main drivers of deforestation are population growth and increased demand for fuelwood and charcoal, and commercial timber development, and illicit timber exploitation. This has led to the degradation or deforestation of parts of the country's natural forest areas and woodlands, localized soil erosion, biodiversity loss, and altered hydrological and nutrient cycles. Fuelwood and charcoal account for over 80 percent of all wood used in South Sudan, with an annual deforestation rate estimated between 1.5 and 2 percent.
122. Sustainable forest management could create jobs and income and maintain ecological goods and services in South Sudan. The government aims to set aside about 20 percent of natural forests as reserves to protect them from deforestation, and it has an ambitious afforestation program. It also has ambitious commitments related to forests under its INDC for climate adaptation and mitigation. However, on-going conflicts prevent forests from being developed and sustainably managed to provide goods and services for future generations.²⁵

3.1.3 Biodiversity and Protected Areas

123. South Sudan is covered in a rich diversity of ecosystems which are dynamic complexes of plant, animal and microorganism communities and their non-living environment, interacting as functional units. South Sudan's large range of ecosystems is most commonly divided into the following categories: lowland forest; mountain forest; savannah woodland; grassland savanna; Sudd swamps and other wetlands, and semi-arid regions.
124. South Sudan's wide range of habitats supports a very rich diversity of both animal and plant species. However, the variety and number of different species is unknown. A glimpse of the richness of species is provided in a 2015 study by biologists who took 105,000 motion-controlled photos in an area of about 7,770 km² of dense forest in former Western Equatoria State. They found a total of 37 species, including four species never before documented in South Sudan: The African golden cat (*Caracal aurata*), water chevrotain (*Hyemoschus aquaticus*), red river hogs (*Potamochoerus porcus*), and giant pangolin (*Manis gigantea*). It also captured chimpanzees, bongos, leopard, forest buffalo, honey badger and the rare forest elephant.²⁶ Forest elephants (*Loxodonta cyclotis*) are smaller than savannah elephants and tend to inhabit densely wooded rain forests. They play a crucial role in the ecosystem because they are voracious fruit eaters whose dung spreads tropical fruit tree seeds

²⁵ RSS, 2016.

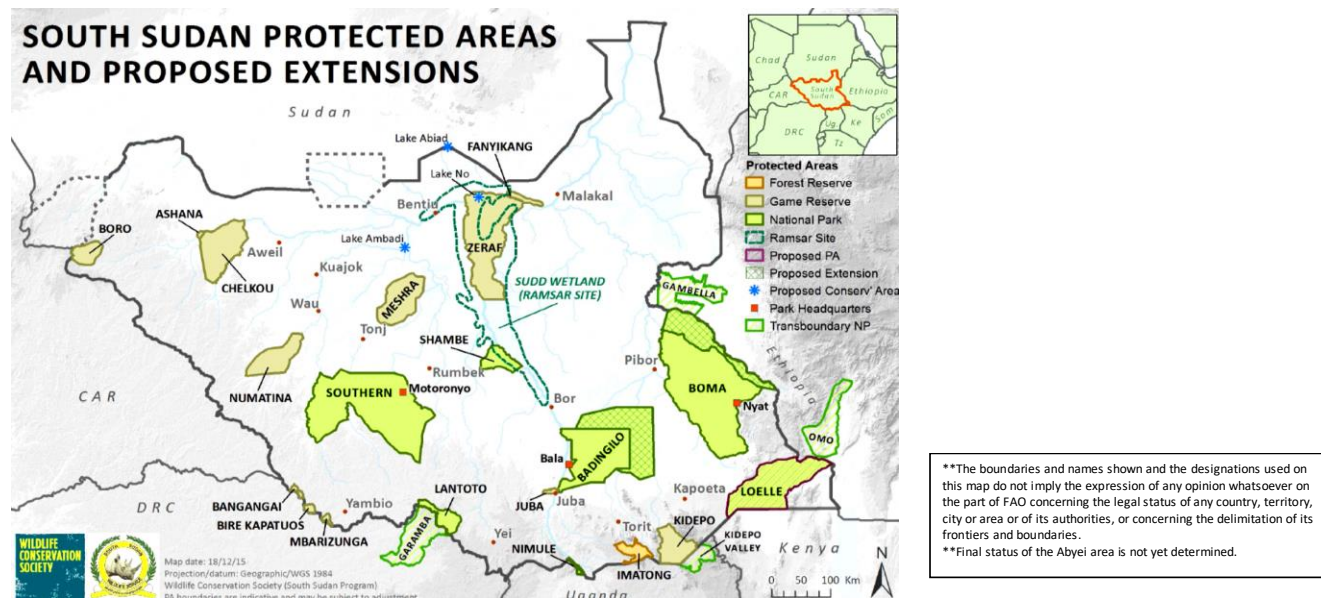
²⁶ Howard, 2015; Patinkin, 2015.

extensively. Numbers have declined dramatically over the last two decades however, primarily due to ivory poaching for international wildlife trafficking, and the species is critically endangered. Their presence in Western Equatoria is far to the north and east of forest elephants' previously known range.²⁷

125. **A decline in the endemic biodiversity.** The IUCN Red List of Threatened Species for South Sudan lists 4 critically endangered species and 11 endangered species. The hooded vulture (*Necrosyrtes monachus*), Rüppell's griffon (*Gyps rueppellii*), white-backed vulture (*Gyps africanus*) and white-headed vulture (*Trigonoceps occipitalis*) are all critically endangered. Endangered species include three mammals: The Cape hunting dog (*Lycaonpictus*), common chimpanzee (*Pan troglodytes*) and the Nile lechwe (*Kobus megaceros*); six birds: Basra reed warbler (*Acrocephalus Griseldis*), Egyptian eagle (*Neophronpercnopterus*), lappet-faced vulture (*Torgostracheliotos*), Natal thrush (*Geokichla guttata*), Saker falcon (*Falco cherrug*) and Steppe eagle (*Aquila nipalensis*). Two plants, *Aloe erensii* and *Aloe macleayi*, while currently not threatened, are restricted to South Sudan.²⁸

126. **Protected areas.** South Sudan has 14 national parks or protected areas and one international recognized Ramsar site, the Sudd swamp, which is one of the world's largest tropical wetlands. The country is home to one of the planet's greatest circular wildlife migrations. Biodiversity is also of extreme national importance since the country's ecosystem goods and services are the foundation of South Sudan's socio-economic development. The protected areas in South Sudan are shown in the following figure.

Figure 6. Protected Areas in South Sudan²⁹ (Source: Ministry of Environment, 2015)



²⁷ Patinkin, 2015.

²⁸ IUCN, 2016

²⁹ Ministry of Environment, 2015. Fifth National Report to the Convention on Biological Diversity, Juba, South Sudan. <https://www.cbd.int/doc/world/ss/ss-nr-05-en.pdf>

127. **Exclusion of ELRP interventions in protected areas.** ELRP interventions will exclude any protected areas or ecological area of interest to avoid any negative and adverse impact on natural habitats. Site specific targeting will occur prior to field visit, through technical FAO analysis and during implementation through the E&S screening form in Annex 1. Protective measures are as well integrated within the ESMF to limit irreversible impact on environment and biodiversity. Closed protected areas in ELRP areas of intervention are:

- Imatong Forest Reserve in Eastern Equatoria
- Badingilo National Park in Central Equatoria and Eastern Equatoria
- Boma National Park in Jonglei and Eastern Equatoria
- Kidepo Game Reserve and Loelle National Park in Eastern Equatoria
- Chelkou Game Reserve in Northern Bahr El Ghazal

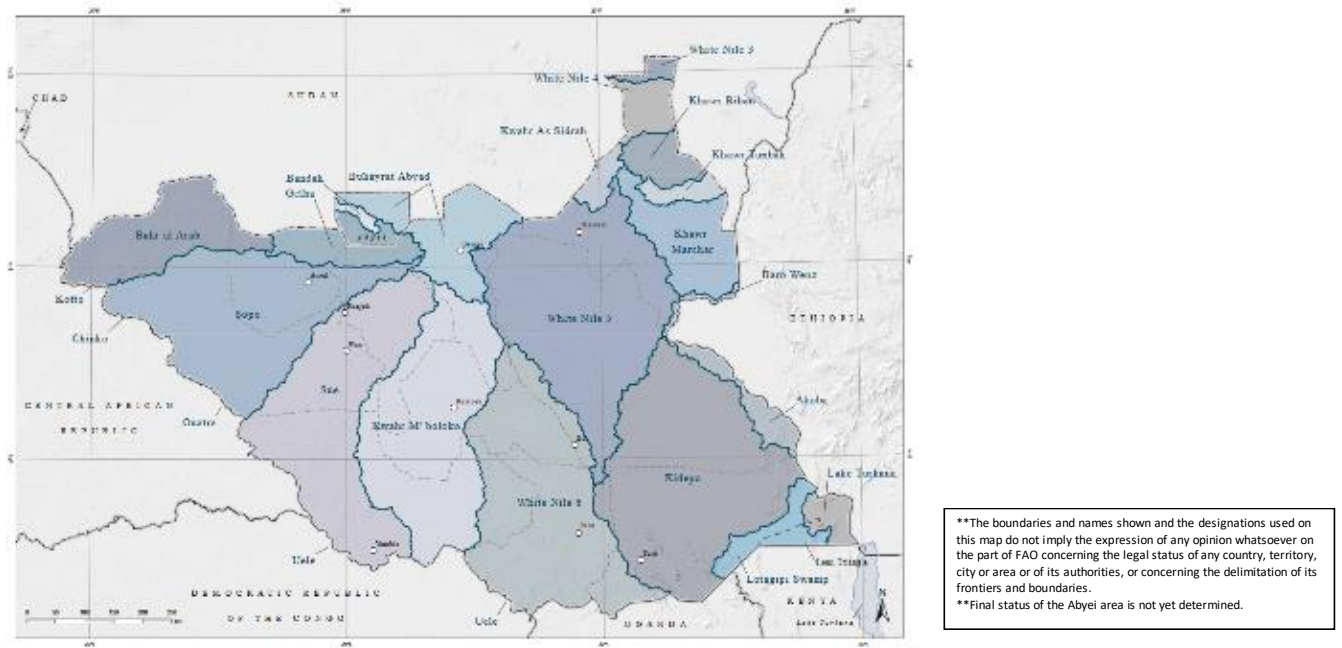
3.1.4 Water Resources and Wetlands

128. South Sudan's water resources are unevenly distributed both spatially across the country, and temporally, since water quantities vary substantially between years depending on periodic major flood and drought events. The Nile River hydrological basin covers most of the country. Water is held in perennial rivers, lakes and wetland areas, in seasonal pools, ponds, rivers, streams and extensive floodplains. Water demand is still low given the country's relatively small population, density and the lack of industrial development but it is expected to increase rapidly in the future with projected population growth and economic development. In 2007, the Ministry of Water Resources and Irrigation reported that the impact of human activities on the availability and quality of water resources was already evident and a growing concern. There is increased pollution, reduced river flows, declining water tables in urban areas and both surface and ground waters are becoming contaminated.³⁰

129. **Water sub-basins and rivers.** Around twenty-four sub-basins fall in the South Sudan area, including five sub-basins of which only a small portion is comprised. They are part of two main hydrological basins: the biggest part of the study area belongs to the Nile basin, while the eastern part of the area belongs to the Rift Valley basin.³¹ About 30 per cent (28 billion m³) of the Nile River's water flow passes through South Sudan on its way to Egypt. Major rivers of the country and respective drainage areas are: (i) White Nile with 1,800,000 km²; (ii) Ghazal with 851,000 km²; (iii) Sobat with 225,000 km²; (iv) Baro with 41,400 km²; (v) Pibor with 10,000 km²; Akobo with 75,900 km²; Bahr el Arab with 60,800 km² and Jur River/Sue.

³⁰ MWRI, 2007.

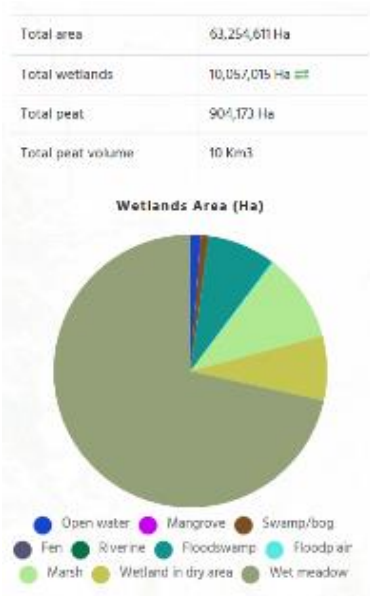
³¹ FAO, 2011 - Land Cover Atlas of the Republic of South Sudan. <http://www.fao.org/3/a-be895e.pdf>

Figure 7: Sub-basin in South Sudan³²

130. **Wetlands.** About 7 per cent of South Sudan is covered by vast expanses of tropical freshwater wetlands that occur at the confluence of the White Nile's main tributaries. They have a significant influence on the Nile's hydrologic regime, storing and releasing water, retaining suspended solids, decreasing dissolved oxygen concentrations, increasing acidity and dissolved carbon dioxide concentrations, reducing sulphate concentrations, increasing total dissolved solids concentrations and losing water to evapotranspiration. The Sudd, an inland delta of the White Nile, is the country's largest wetland, covering about 5 per cent of the country's land area. It is made up of lakes, swamps, marshes and extensive flood plains. It includes the Bahr el Jebel swamps, the Bahr el Ghazal swamps, the wetlands at the Baro-Pibor-Akobo confluence and the Machar marshes.³³

³² FAO, 2011 - Land Cover Atlas of the Republic of South Sudan. <http://www.fao.org/3/a-be895e.pdf>

³³ NBI, 2012.

Figure 8: South Sudan Wetlands localization by categories³⁴

**The boundaries and names shown and the designations used on this map do not imply the expression of any opinion whatsoever on the part of FAO concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers and boundaries.
**Final status of the Abyei area is not yet determined.

131. **Decrease in water flow and impacts.** In 2016, South Sudan's Ministry of Environment and Forestry reported that over the past two decades, water flow in several previously perennial rivers along the border with the Central African Republic had become seasonal. One of the main ecological impacts of decreased water flow is river siltation. A large part of the sediment created in the White Nile headwaters becomes confined in the Equatorial Lakes, held in the Sudd marshes or deposited along the river course downstream of the Sudd; thus, over its low-gradient course, the Nile's flow is very sluggish.³⁵ Other impacts include the congestion of irrigation channels, water-table declines, receding wetland areas and the loss of vegetation due to the lack of water. In turn, the loss of ecosystem goods and services is having adverse effects on the livelihoods of people who depend on wetlands within South Sudan.³⁶

132. **Water quantity and quality in South Sudan have declined in the past two decades.** In several previously perennial rivers, for example, water flow has become seasonal. Lower water flows can lead to siltation. Large quantities of sediment are held in the Sudd marshes or deposited along the river course downstream of the Sudd. With municipal wastewater, sewage and industrial effluents running straight into water sources due to a lack of wastewater and sanitation management, water quality is

³⁴ CIFOR Global Wetland V3. Assessed on 20.11.2020. <https://www2.cifor.org/global-wetlands/>

³⁵ NBI, 2012.

³⁶ MOE, 2016.

declining in urban areas and contaminated water is responsible for recurring incidences of gastrointestinal diseases. Other significant threats to water resources include the construction of large hydroelectric dams and other related development schemes within the Nile Basin, the overuse of agrochemicals and spillage during oil exploration, which risk polluting the Sudd wetlands.

133. **Rich and transboundary groundwater resources.** It is thought that large areas of South Sudan are underlain by rich aquifers that are recharged by seasonal rainfall and river flooding, with some of these underground water reservoirs extending across international boundaries. There is little information on the distribution and hydrology of these underground waters, or about the rates of water extraction and the impacts of human activities, such as potential over-abstraction and pollution. South Sudan shares three transboundary aquifers with neighbouring countries, namely: (i) The Baggara Basin in the North part of the Country and across Sudan; (ii) the Sudd Basin at the East of the Country; (iii) the Karoo-Carbonate Aquifer in the Southwest part of the Country.

3.1.5 *Soil resources*³⁷

134. The soils of South Sudan are heterogeneous and require different regimes of managements and fertilizer application. Most soils of South Sudan are moderately fertile but in the absence of soil amendments and appropriate cultural practices, the soil will rapidly lose the nutritional balance required for efficient and sustainable for crop production. The most common deficient soil nutrients are phosphorus, calcium and potassium. In many areas in South Sudan, both arable and virgin lands are low in availability of phosphorus as well as organic matter. Nutrient imbalance translates into low crop yield even on newly cultivated fields. Low agricultural production results in low income, poor nutrition, low consumption, poor education, poor health, vulnerability to risks and lack of empowerment.

3.2 **Climate baseline**

3.2.1 *Climate profile*

135. The country has distinct climatic areas, which are influenced by the annual movements of the Intertropical Convergence Zone. The climate ranges from hot and dry in the south-east near the border with Kenya and north-east near the border with Sudan to temperate in the southern highlands. The climate is semi-humid, with annual rainfall ranging from 200 mm in the south-east (Eastern Equatoria) to 1,200–2,200 mm in the forest area of Western Equatoria and the highland areas. In South Sudan's northern states, rainfall varies between 700 and 1,300 mm. The rainfall pattern is seasonal, with its wet season lasting from April to October with a short dry spell in June, followed by its dry season from November to March.³⁸

³⁷ Research Unit Soil Scientist, Research Unit Ministry of Agriculture, Forestry, Cooperatives and Rural Development. Status, priorities and needs for sustainable soil management in South Sudan Present by PioKowr Soil Scientist, http://www.fao.org/fileadmin/user_upload/GSP/docs/South_east_partnership/South_Sudan.pdf

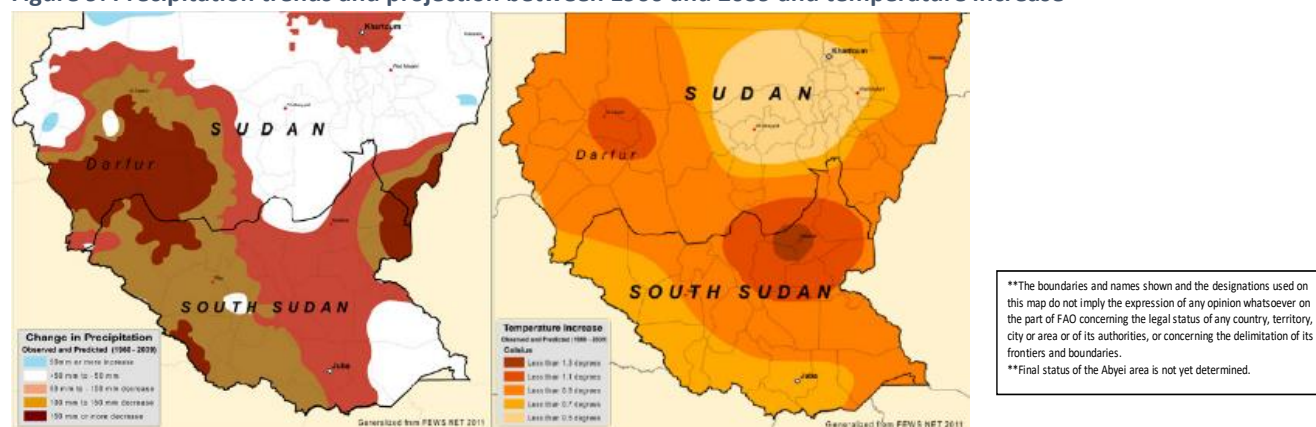
³⁸ MOE, 2019, First National Communication (NC1)

3.2.2 Climate trends and projections

136. **Climate and Environmental Trends:** Although South Sudan contributes very little to global GHGs through human activity and its development trajectory promises to focus on clean energy, a large part of the increase in African emissions between 2010 and 2016 can be attributed to the increasing wetland extent of the Sudd, driven largely by increased water levels in the upstream East African lakes. Emissions from the Sudd wetlands are found to have increased during the study period by 3 Tg yr⁻¹.³⁹ In addition, South Sudan is highly vulnerable to the impacts of rising temperatures and increased rainfall variability due to climate change. Between the 1970s and the 2000s, the country's central and southern regions experienced one of the world's highest increases in temperatures (as much as 0.4°C per decade). This warming trend has already affected the country's rainfall patterns. Since the mid-1970s, South Sudan has experienced a decline of between 10 to 20 per cent in average precipitation as well as increased variability in the amount and timing of rainfall from year to year.⁴⁰ There is also some evidence that the onset of rain now occurs one month later.⁴¹ If the trend continues, by 2025 it is likely that the drying experienced in the north-eastern regions of Upper Nile, Jonglei and Eastern Equatoria will extend across the country, potentially affecting Bahr el Ghazal, Tonj and Unity in the North and Central Equatoria in the South.⁴²

137. **Climate change impact and land use.**⁴³ Model underlines the impact of land use change due to deforestation on local climate. Deforestation will increase the effect of climate change by significant reduction of precipitation. During the rainy season (JJAS) the monthly mean precipitation would decline about 2.1 mm per day.

Figure 9: Precipitation trends and projection between 1960 and 2039 and temperature increase⁴⁴



³⁹ Mark F. Lunt, Paul I. Palmer, Liang Feng, Christopher M. Taylor, Hartmut Boesch, and Robert J. Parker. An increase in methane emissions from tropical Africa between 2010 and 2016 inferred from satellite data. EGU. 2019.

⁴⁰ USAID, 2016.

⁴¹ BRACED, 2016.

⁴² BRACED, 2016.

⁴³ [Abubakr A. M. Salih, Heiner Körnich, Michael Tjernström](#). 2012. Climate impact of deforestation over South Sudan in a regional climate model. <https://doi.org/10.1002/joc.3586>

⁴⁴ FEWSNET, 2011

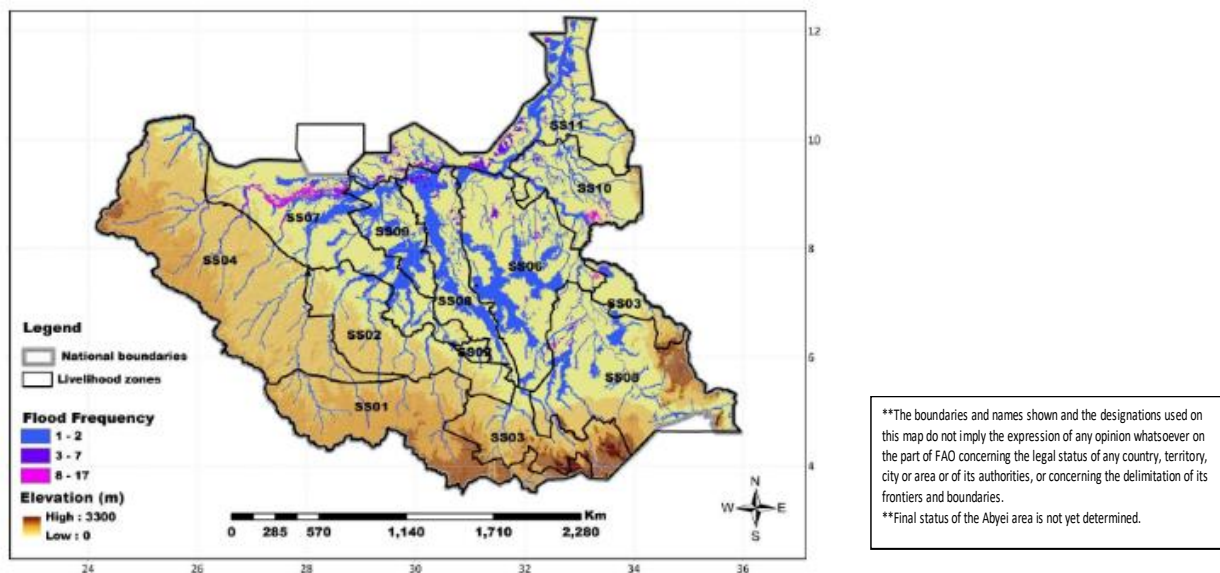
138. **Extreme events.** South Sudan experiences both widespread and localized droughts and floods. Flash floods often occur when the Nile River and its tributaries overflow during the months of August and September. Changing climatic conditions are affecting South Sudan's rainfall and temperature, leading to erratic seasonal precipitation patterns which have a huge impact on the environment:

- an increased incidence of droughts, with notable ones occurring in 1989, 1990, 1997, 1998, 2000, 2008–2009, 2010–2011 and 2014
- increased flooding in recent decades, occurring, for example, from 1962–1965 and 1978–1979, and in 1988, 1994, 1998, 1999, 2006, 2013, 2014, 2015, 2017 and 2020
- increased occurrence of floods and droughts in the same season, with droughts happening earlier in the season around May/June and floods happening later around August/September
- more severe flooding which takes longer to recede, especially in the northern part of the country.

3.2.3 Climate impacts

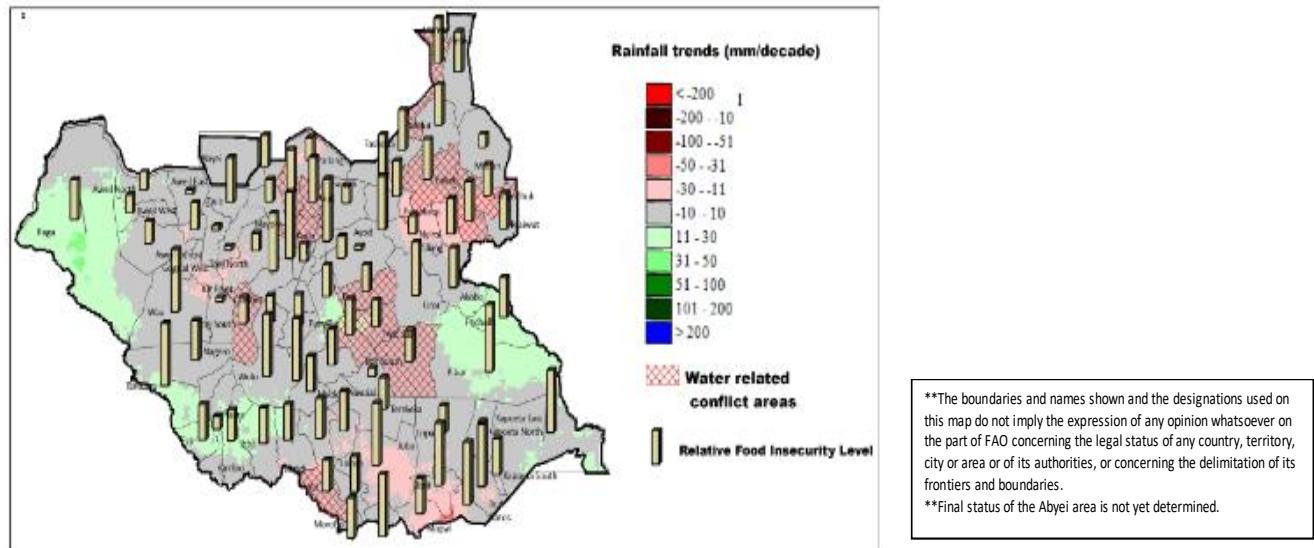
139. **Interrelation between climate, conflicts and food security.** Many conflicts in South Sudan are also attributed to cattle raiding and food scarcity, especially during droughts and flood periods. An analysis of the relationship between rainfall trends, water-related conflict-prone areas and relative food insecurity, depicts drying areas to be in close proximity to conflicts and thus contributing to relative food insecurity. Frequent conflicts affecting states such as Jonglei, Unity and Upper Nile make households perpetually food insecure with weak resilience to climate change impacts

Figure 10: Frequency and flood-prone livelihood zone⁴⁵



⁴⁵ Government of South Sudan, Ministry of Environment and Forestry, 2018. Initial National Communication to the United Nations Framework Convention on Climate Change. <https://unfccc.int/sites/default/files/resource/South%20Sudan%20INC.pdf>

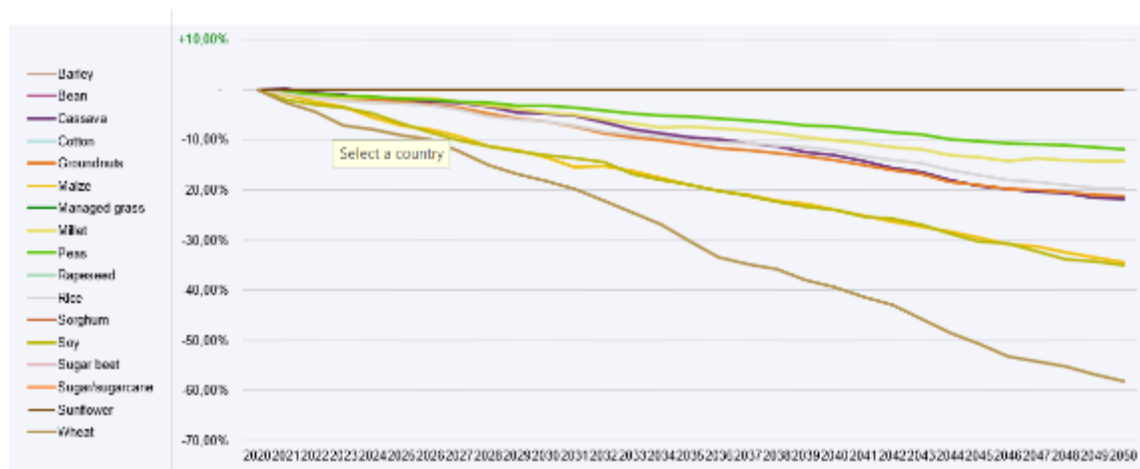
Figure 11: Rainfall trends, water-related conflict-prone areas and relative food insecurity⁴⁶



140. **Epidemic spread.** Increases in temperatures may accelerate and contribute to the spread of epidemics. While South Sudan benefits from the Nile River ecosystem, several disadvantages are associated with it, including the widespread prevalence of diseases such as malaria and bilharzia.

141. **Decrease in yields.** Changing climate with increase in temperature and cultural calendar changes would have continuous negative impact on yield with decrease between 10% to 50% from 2020 to 2050 for rainfed agriculture. Millet and maize would be highly impacted with a 25% yield decrease from 2020 to 2050.

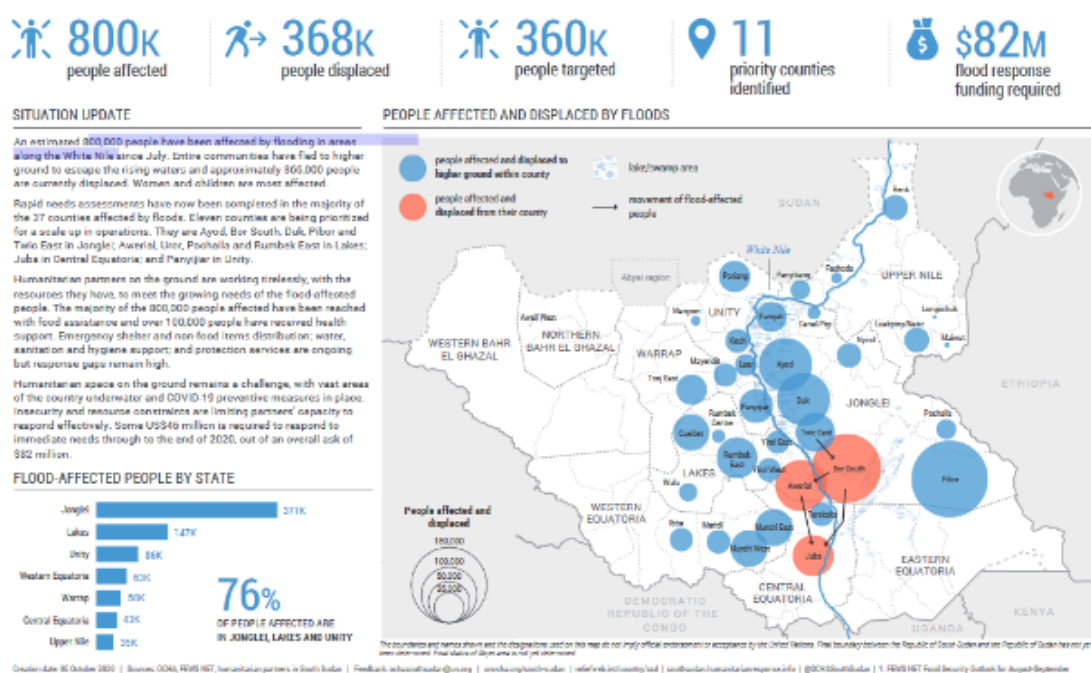
Figure 12: Yield change at national level in South Sudan for rainfed agriculture (IFAD CARD tool)



⁴⁶ Government of South Sudan, Ministry of Environment and Forestry, 2018. Initial National Communication to the United Nations Framework Convention on Climate Change. <https://unfccc.int/sites/default/files/resource/South%20Sudan%20INC.pdf>

142. **Quantitative flooding impacts on livelihoods and agriculture.** Few indicators are emphasizing the impacts of these extreme events: (i) between August and November 2013, floods affected around 150,000 people, destroying crops, property and infrastructure; (ii) The Government declared the country a disaster zone in October 2013, after seven of South Sudan’s 10 states were heavily flooded; (iii) in September 2015, flooding displaced around 2,000–3,000 households; (iv) in 2019, more than 79,000 tons of cereals have been losses by flooding; and (v) During the 2020 flooding, projects areas especially Bor South and Twic East have been severely affected⁴⁷ with respective cereal production losses of 18% and 53%. Floods have as well impacted livestock in several ways, including increased disease outbreaks and alerts, and vulnerability to starvation-related deaths. In the Twic East and Bor South, respectively 162,830 and 429,050 livestock have been affected and respective 26,016 and 15,274 died. The 2020 flood affects more than 800,000 people and displaced 368,000 people.

Figure 13: 2020 flooding snapshot consequences on livelihoods as of 05 October 2020⁴⁸



**The boundaries and names shown and the designations used on this map do not imply the expression of any opinion whatsoever on the part of FAO concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers and boundaries.
 **Final status of the Abyei area is not yet determined.

⁴⁷ FAO note http://climis-southsudan.org/uploads/publications/FAO_South_Sudan_-_Flood_Impact_in_Jonglei_State_-_August_20201.pdf

⁴⁸ UN Office for the Coordination of Humanitarian Affairs (OCHA), 2020. <https://reliefweb.int/report/south-sudan/south-sudan-flooding-snapshot-05-october-2020>

3.2.4 *Climate rationale and synthesis by county*

143. **Exposure on livelihoods zones.** South Sudan is exposed to a number of climate-related hazards, including floods, droughts, land degradation, livestock diseases and crop pests. These hazards have detrimental effects on livelihoods. One of the livelihood zones most exposed to drought, flooding and land degradation is the eastern Arid Pastoral Zone, where dry spells occur more frequently. The Nile and Sobat River Zone is highly exposed to flooding and land degradation. The Western and Eastern Flood Plains are also exposed to flooding, especially during the heavy rains in August and September that cause the Nile River and its tributaries to flood. Settlement in these floodplains increases the severity of flooding and vulnerability. During the wet season, many parts of the country are also prone to flooding, including Jonglei, Unity State, Upper Nile, Warrap, Northern Bahr el Ghazal and parts of Western and Eastern Equatoria.

144. **Overall view of impacts on agricultural sector.** South Sudan is one of the five countries in the world most vulnerable to the impacts of climate change, which are likely to be devastating. Almost 80 per cent of households depend on crop farming or animal husbandry as their primary source of income, and these farmers and pastoralists rely heavily on seasonal rains, but if the current climate change trend continues, rain-fed agriculture may become unsustainable. In turn, loss of livelihoods will increase conflict over rights and access to water and natural resources. South Sudan needs to achieve political stability and legalize and implement its draft policies and plans so that it can act on its climate change adaptation and mitigation priorities.

- Increased temperatures and reduced rainfall could lead to loss of productive agricultural lands and a decline in fish size and diversity.
- Seasonal patterns in South Sudan have become erratic and rain-fed agricultural areas have decreased significantly in the northern and eastern parts of the country as a result of climate change.
- Reduced rainfall in combination with increasing temperatures could make reliance on rain-fed agriculture no longer feasible, with significant impacts on food security.
- Increased rainfall variability – onset and length of rainy season – has led to delayed planting and earlier harvest (i.e., a shortened growing season), leading to reduced yields and/or crop failure.
- Increased incidence of drought and flooding have led to loss of pasture lands and reduced access to water resources for livestock.
- Climate change in general is likely to increase local conflicts over land use, water and other resources between and among pastoralists and farmers.
- Multiple stressors faced by livestock will interact with climate change and variability to amplify the vulnerability of livestock-keeping communities. In other words, pest and disease pressure on livestock is expected to increase as a result of climate change.
- Rapid population growth and the expansion of farming and pastoralism under a more variable climate regime could dramatically increase the number of at-risk people in South Sudan over the coming years and exacerbate tensions and conflicts.

Table 1: Summary of livelihood climate risks and resilience in South Sudan⁴⁹

LIVELIHOOD ZONE	CLIMATE CHANGE RISK EXPOSURE TO DROUGHT, FLOODING AND LAND DEGRADATION	RESILIENCE PROFILE
GREEN BELT ZONE	The main hazards are prolonged dry spells, crop pests, livestock diseases, localized seasonal floods and limited access to market because of poor road infrastructure. Generally, the zone's exposure to floods is low, with low to medium exposure to drought and land degradation.	This livelihood zone is considered to have high resilience due to its moderate exposure to hazards and its low food insecurity level. Although most households' income is highly climate-sensitive, seasonal rains rarely fail. Poorer households subsist from their own crop and livestock production supplemented by food obtained from hunting, fishing and foraging, and food purchased using income from agricultural and casual labour. The better off are largely self-sufficient in food, with saleable surpluses in years of good rainfall, and they do not purchase staples from the market.
IRONSTONE PLATEAU	This livelihood zone has low exposure to floods and land degradation. Some areas are exposed to droughts. Crop pests and diseases are common.	This zone can be categorized as a medium-resilience livelihood zone. Although a large part of this zone is regarded as a food-sufficient area, the reliance on rain-fed crop production, the low level of income diversification and restricted access to reliable markets mean that there is a risk of food insecurity in years of low production, especially during droughts.
HILLS AND MOUNTAINS	The main areas of this livelihood zone are categorized as having medium exposure to floods and land degradation but high exposure to droughts. Common hazards include dry spells, mudslides and floods causing crop failure. There is no seasonal livestock movement in this highland zone leading to minimal animal diseases, however, livestock-keeping households face continuous conflicts over cattle and associated resources.	This livelihood zone has low resilience due to its over-reliance on rain-fed crop farming and sedentary cultivation, with less reliance on livestock. Due to favourable climatic conditions, this zone usually has good harvests, but lacks access to local markets that have good trade linkages with neighbouring zones.
PASTORAL / ARID ZONE	The livelihood zone is categorized as having high exposure to drought, low exposure to floods and moderate land degradation. This is a high-risk food security area, due to semi-arid conditions, livestock diseases and periodic conflicts with other pastoral groups. Inter-communal conflicts and cattle raiding occur during dry seasons and livestock diseases are endemic across the zone.	Resilience in this livelihood zone is low. Income is highly climate-sensitive, with many poorer households unable to secure steady income due to periodic conflicts with other pastoral groups making seasonal movements in search of water and pasture. Cattle raiding and poor relations with neighbouring zones, civil insecurity and the unreliability of markets contribute to the low resilience.
NILE AND SOBAT RIVERS	This zone is exposed to multiple hazards but mainly floods, which tend to limit fishing activities and reduce crop, livestock and wild food production leading to loss of income, putting poor households at greater risk of food insecurity. Inter-communal conflicts/ cattle raiding occur annually during the dry season.	This livelihood zone is considered to have low resilience due to its vulnerability to multiple hazards and civil unrest. The zone is predominantly occupied by agro-pastoralists, while crop production is rain-fed. It has moderate diversification into other livelihood activities such as fishing. During good years, this is a food-secure zone with surplus maize production sold in external markets.
WESTERN FLOOD PLAINS	This zone is affected by floods, livestock diseases, dry spells, inter-communal conflicts and cattle raiding during the dry season. High-risk food insecurity is caused by recurring floods and drought hazards.	This livelihood zone is considered to have low to moderate resilience due to vulnerability to typical flood and drought hazards and because survival options have become increasingly dependent on fish

⁴⁹ Government of South Sudan, Ministry of Environment and Forestry, 2018. Initial National Communication to the United Nations Framework Convention on Climate Change. <https://unfccc.int/sites/default/files/resource/South%20Sudan%20INC.pdf>

LIVELIHOOD ZONE	CLIMATE CHANGE RISK EXPOSURE TO DROUGHT, FLOODING AND LAND DEGRADATION	RESILIENCE PROFILE
		<p>and wild foods due to the impact of prolonged conflict. The zone is characterized by small holder rain-fed agriculture, with high diversification into other livelihood activities.</p> <p>The northern part of this zone has low resilience due to high-risk food insecurity, with semi-arid conditions and frequent flooding in every rainfall season. Seasonal movements are the source of frequent conflict over pastures, water and cattle raiding.</p>
EASTERN FLOOD PLAINS	<p>Hazards are from inter-communal conflicts and cattle raiding, floods, livestock diseases, pests and drought. These reduce crop and livestock production and chiefly affect the poor, who are least resilient. Flooding occurs on an annual basis during the seasonal rainfall period. Livestock diseases and crop pests and diseases are common during the rainy season.</p>	<p>This is one of the zones with relatively poor resilience. The poor resilience stems from being highly exposed to hazards, high food insecurity with low livelihood diversity. Livelihood activities are adversely affected by inter-communal conflicts.</p>

145. **ELRP climate rationale measures.** The ELRP aims to face major challenge from climate change that might continuously reinforce the interrelation between conflicts, food insecurity and natural resources access. ELRP is aligned with the recommendation of the NC1: (i) diversify sources of income and livelihood (ii) improve access to improved agricultural inputs and techniques through extension-services support; (iii) establish and build capacity on early warning systems; (iv) improve access to markets and value chain development; (v) promote traditional conflict management systems; (vi) encourage traditional crop and livestock production mechanisms; (vii) promote sustainable land management practices and (viii) enhance knowledge and technical skills.

3.3 Socioeconomic Baseline

146. According to the 2008 Sudan Census, the population of South Sudan was 8.26 million in the 2008 Census, of which 3.97 million are male and, 4.29 million are female. The population is very young, with 16% under the age of 5, 32% under the age of 10, 51% under the age of 18 and 72% of the population under the age of 30. The population is largely rural with 83% residing in rural areas. South Sudan is highly diverse, both ethnically and linguistically. The South Sudan Interim Constitution tentatively listed 64 ethnic groups, speaking at least 50 different indigenous languages, though the current official working language is English. The largest 10 ethnic groups constitute approximately 80% of the population. Tribal affiliations are strong and many South Sudanese still identify more strongly with their ethnic and linguistic background than with a national identity.

147. Within the project area, the average population is 189,823 people (1.6% of the overall population) with Juba, Pibor, Bor South, and Aweil North Counties having higher populations, whilst Melut ranked lowest with 80,481 people (see Table 2 for further details). Project area households are 25,967, 1.4% of the total national households, while project area farming households are 44.5% of the national total with Lafon having the highest percentage (85%) and Juba the lowest (30%). Further, on average,

cereal cultivated area is 0.69 hectares (78%) of the overall area with Magwi (1.25 hectare) and Renk (1.2 hectare) rated highest. Pibor ranked lowest at 0.6 hectare. The average project cereal area is 12,925, 1.3% of the overall cereal area.

Table 2: Estimated settled population, farming households, and harvested cereal area across project area, 2020⁵⁰

County	Population (mid-2020)	Households (mid-2020)	Farming Households (%)	Average cereal area (ha/hh)	Total cereal area (ha)
Juba	419,542	65,834	30	1.00	19,750
Magwi	197,763	30,596	75	1.25	28,684
Lafon	109,570	17,750	85	0.90	13,579
Torit	165,643	32,919	75	0.75	18,517
Kapoeta East	174,632	31,350	54	0.70	11,850
Pibor	204,437	31,312	40	0.60	7,515
Bor South	255,793	36,273	50	0.70	12,696
Aweil North	299,576	57,750	80	0.85	39,270
Renk	135,815	22,175	40	1.20	10,644
Melut	80,481	11,617	50	0.95	5,518
Project area (Average)	189,823	25,967	44.5	0.69	12,925
All Counties (Average)	11,810,488	1,883,212	60	0.88	987,497
	1.6%	1.4%	74%	78%	1.3%

148. There are multiple customary tenure systems, as well as formal legislation regulating access and ownership to land. The Land Act of 2009 lists customary tenure as a legal form of land tenure. It allows communities to register their collective interests in the land. The situation has been under duress through the militarization of South Sudan, the outside investment that needs clarity on land ownership, the returning diaspora, frequent land grabbing and the drawing of administrative boundaries. Disputes over land are becoming widespread and increasingly difficult to resolve as individuals and communities with different connections to customary and statutory authorities try to gain control over land. Additionally, there are often disputes arise between returnees and host communities' access to and control of community land and between government authorities and communities or individuals over the government's control and management of rural land for investment. Competing claims to ownership or use of the same piece of land from communities or ethnic groups, as opposed to individuals, have also significantly intensified the risk of larger-scale violent conflict.

149. South Sudan ranks 186 out of 189 countries on the Human Development Index, with a score of 0.413. With that it is below the average of countries in Sub-Saharan Africa (0.541) and countries in the low human development group (0.507).⁵¹ 261,424 children are estimated to be severely malnourished.⁵² 7 million people in South Sudan are in need of humanitarian assistance, and 1.74

⁵⁰ FAO. 2021. Special Report - 2020 FAO/WFP Crop and Food Security Assessment Mission (CFSAM) to the Republic of South Sudan. Rome. Accessed at <http://www.fao.org/documents/card/en/c/cb4498en/>

⁵¹ UNDP, Human Development Report 2019, Inequalities in Human Development in the 21st Century. Briefing Note for countries on the 2019 Human Development Report: South Sudan, 2019, p.3.

⁵² World Health Organization, Situation Report issue #25, 9-15 July 2018, accessed at: https://www.afro.who.int/sites/default/files/2018-07/South%20Sudan%20Situation%20Report%20Issue%20%23%2025_8-15%20July%202018%20.pdf?ua=1

million are internally displaced, with 2.47 million refugees. The country is severely lacking in infrastructure in water supply and sanitation facilities. The conflict situation further undermines any attempts of establishing sustainable services or simply delivering health and other services.

150. Education in South Sudan has been similarly undermined by displacement, hyperinflation, civil conflict and food insecurity. The average duration of schooling is 4.8 years.⁵³ Gender disparity in enrolment is still wide. Male students represented the greatest number of enrolled students with a total of 812,672 (58 percent). Females represented 594,604 (42 percent) of enrolled students. According to a UNICEF report, 2.2 million school-aged children across the country do not attend school and 70% of primary teachers are untrained or underqualified, impacting the quality of learning. In conflict-affected areas, schools remain largely closed or school buildings are often occupied by armed groups or IDPs.⁵⁴
151. South Sudan has a health system structured with three tiers: Primary Health Care Units (PHCU), Primary Health Care Centers (PHCC) and Hospitals (which exist as either state, county, police or military). The health services are meant to be free and accessible to the majority of the population at the primary and secondary levels. The national Ministry of Health (MoH) have a decentralized health services at Central, state, county and the community level. The limited accessibility to health care is directly affected by the lack of infrastructure and poor state of the existing health facilities. There is a critical shortage of qualified medical practitioners. According to WHO and the MoH, there are a total of 189 physicians in South Sudan—or one doctor for every 39,088 persons. Central Equatoria State accounts for the highest concentration of physicians in South Sudan (51%), while Western Equatoria and Jonglei do possess few qualified South Sudanese physicians⁵⁵.
152. While recent political developments following the 2018 peace agreement have reduced the conflict between the main actors in South Sudan, it has not increased security. 2020, has seen an increase in criminal and localized violence as the proliferation of weapons and the use of cattle raiding by armed groups and political elite has led to cattle raiding becoming another tool of war, often used to fuel ethnic rivalries. The causes of conflict are complex, including historical tensions and a tendency to resolve these through violent means; the proliferation of arms; increasing competition for access to grazing land and water; extreme poverty and uneven distribution of wealth and declining influence of traditional authorities. Other causes include, weak state institutions; a culture of impunity; heightened demand and competition for land and appropriation of large tracts of land for agricultural expansion; inflation in the “bride price”; and concepts of masculinity⁵⁶.

⁵³ The World Bank, South Sudan, Linking the Agriculture and Food Sector to Job Creation Agenda, Sustainable Development Group World Bank, June 2019, p. 1

⁵⁴ UNICEF, Education, South Sudan Country Office, 2019, p. 1, accessed at: <https://www.unicef.org/southsudan/media/2056/file/UNICEF-South-Sudan-Education-Briefing-Note-Dec-2019.pdf>

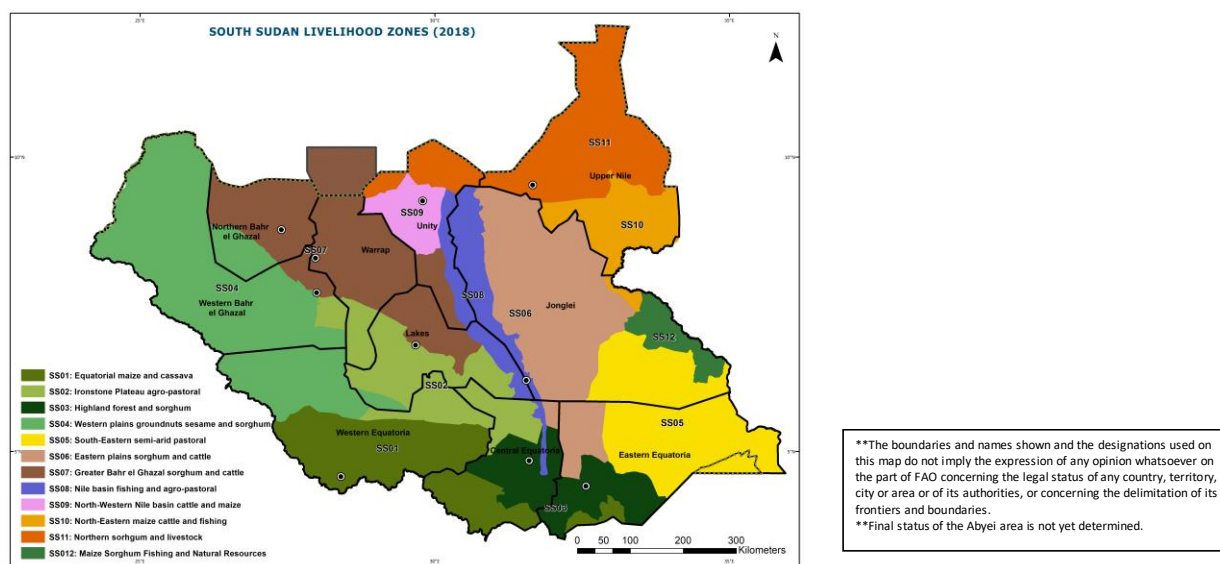
⁵⁵ South Sudan Medical Journal (2012).

⁵⁶ OXFAM. 2013. Challenges to Security, Livelihoods, and Gender Justice in South Sudan: The situation of Dinka agro-pastoralist communities in Lakes and Warrap States INGRID KIRCHER Senior Researcher, Intermón Oxfam and Oxfam GB.

153. Sexual and Gender-Based Violence (SGBV) in the country has ranked South Sudan among the highest in the world. About 96 percent of the reported cases on GBV report on sexual violence, and 65 percent report on experiencing physical violence. In addition, increasing levels of intimate partner violence have been recorded, as well as sexual exploitation and abuse, harassment and early child marriages. Additionally, girls have been reportedly forced into marriage as compensation for inter-clan killings, where they are further subjected to slavery and servitude.⁵⁷ The gender gap in South Sudan continues to widen because of the customs and traditions of the South Sudanese people. Women's access to education, health and participation in governance systems is still weak. The gender gap in agriculture is found mainly on many assets, inputs and services such as land, livestock, labour, education, information services, and technology, all affecting their capacity to protect their communities from crises.

154. As presented in Table 3, the project area is located within several livelihood zones (see Figure 14 for an overview of all livelihoods zones across the country) which determine type of crop cultivated and economic activities practices by inhabitant residing in the zone, as such households typically rely not on a single income source but rather on a combination that varies across zones, as well as throughout the year. In rural areas, households are typically involved in agriculture and pastoralism (often combined) as well as other livelihood activities including casual labour, sale of natural resources and skilled or salaried labour.

Figure 14: South Sudan Livelihood Zones⁵⁸



⁵⁷ The Roméo Dallaire Child Soldiers Initiative: "South Sudan Country Report: Children & Security", 2018, accessed: 31.07.2019.

⁵⁸ FEWS NET. 2018. *Livelihoods Zone Map and Descriptions for the Republic of South Sudan*. Washington, DC: FEWS NET <https://fews.net/sites/default/files/documents/reports/Livelihoods%20Zone%20Map%20and%20Descriptions%20for%20South%20Sudan.pdf>

Table 3: Project areas and economic activities⁵⁹

Project areas	Zone	Livelihood and Economic Activities
Magwi	Equatoria maize and cassava zone (SS01)	Households rely exclusively on agriculture. Smallholder rural and urban/peri-urban livestock keeping focused on poultry and goats - few cattle. Traditional and modern beekeeping and wild gathering of honey are additional sources of income. Major cultivated crops are maize, beans, sorghum, groundnut, cassava and sweet potato. Dependence on non-timber forest products such as shea butter and honey is also common.
Juba, Lafon, Torit, Magwi	Highland forest and sorghum zone (SS03)	Households practice both farming and keeping livestock. Main crops are sorghum and maize, with the latter growing mainly in the eastern parts. Other crops cultivated include millet, sesame, cowpeas/green grams, sweet potatoes, cassava and groundnut. Livestock kept are mainly goats, a few sheep and poultry with relatively few cattle mainly owned by the better-off groups.
Kapoeta East, Pibor	South-eastern semi-arid pastoral zone (SS05)	Households mainly practice pastoralism with livestock kept including cattle, camels, goats, and sheep and, to lesser extent, poultry (mainly for household consumption). There is very limited crop production which is supplemented with wild food consumption and sales.
Bor South	Eastern plains sorghum and cattle zone (SS06)	Households practice both farming, keeping livestock and fishing. The major crops grown include sorghum, groundnut and maize in addition to cowpeas, sesame, green yams and groundnuts.
Aweil North	Western flood plain sorghum and cattle zone (SS07)	Households practice both farming and keep livestock and the most commonly grown crops being sorghum, millet and groundnuts. Cowpeas, green grams and sesame are also, grown on limited scale.
Renk Melut	Northern sorghum, sesame and livestock (SS011)	Households practice farming and keep livestock and farmers grow sorghum and sesame in large acreages (Renk Mechanized Agriculture) ranging from 100 to 1 000 feddans. ⁶⁰ Other crops grown by farmers are maize, groundnuts and cowpeas.

155. Crop production is mostly on hand-cultivated small plots farmed by large family aggregations usually polygamous in nature. The area cultivated typically depends on (a) the size of the household labour force and/or the ability of households to provide in-kind payment (typically food/beer) for traditional working groups (nafeer) and (b) security of access to land, often compromised by competition between different groups and interests. 71% of households in South Sudan are female

⁵⁹ FEWS NET. 2018. *Livelihoods Zone Map and Descriptions for the Republic of South Sudan*. Washington, DC: FEWS NET <https://fews.net/sites/default/files/documents/reports/Livelihoods%20Zone%20Map%20and%20Descriptions%20for%20South%20Sudan.pdf>

⁶⁰ A feddan= 4200 m², Approximately 1 acre

headed.⁶¹ Female-headed households are more prevalent in rural than in urban areas where the male members of the household have left in search for economic opportunities or to join the armed groups.⁶²

156. For the majority of farmers, the main obstacle affecting crop yield and livestock activities are the prevalence of pests and diseases. This is exacerbated by the fact that they do not have the tools, means, or know-how to be able to address these pesticides or diseases. Commercial pesticides or herbicides are rarely used by small scale farmers. However, there has been an increase in herbicides in large scale mechanized farms, especially in the Upper Nile. Majority of pests and diseases are not treated, and farmers tend to approach the losses yielded from them as unavoidable or predestined. Some farmers opt to tackle pests and diseases with more traditional methods such as ashes and peppers mixed with lime. However, this is not always effective. Currently there is no regulatory framework for the importation and use of pesticides in South Sudan. The Proposed Pesticide Control Bill for South Sudan (2021) addresses all stages of the pesticide life cycle from the manufacture, import, packaging, to the storage, use and final disposal of pesticides, to ensure their quality, efficacy and safety.

157. South Sudan experiences periods of seasonal food insecurity due to overreliance on rain-fed agriculture, among other factors. The 'hunger season' varies from region to region, and households can be stretched to their limits during these times of scarcity. These periods are also exacerbated by other shocks such as droughts, floods, conflict, human and animal disease and pest infestations. Women and the elderly are particularly affected, as meals are often given first to children. Women bear the burden of foraging for increasingly scarce indigenous wild food plants (IWFPs) in forests, arduous terrain and dangerous conditions. Some IWFPs are particularly nutritious and could potentially play a significant role in creating a sustainable source of much needed nutrients in South Sudan. Most households will add some wild foods to their diets before and for the full duration of the lean season while other wild foods such as lily roots, *guan* and *lew* are usually only eaten in June or July.⁶³

158. Acute and chronic food insecurity is both gendered and generational. The combination of poverty combined with conflict generated stressors, lack of access to basic health services, water and sanitation have the worst impact on children, lactating mothers, the disabled and the elderly. Mothers can stop breastfeeding children and reduce their intake and proportion of food, further compromising

⁶¹ ACAPS: "Country Profile South Sudan", 2015, [https://reliefweb.int/sites/reliefweb.int/files/resources/s-c-acaps_country_profile_southsudan_august2015.pdf], accessed: 31.07.2019.

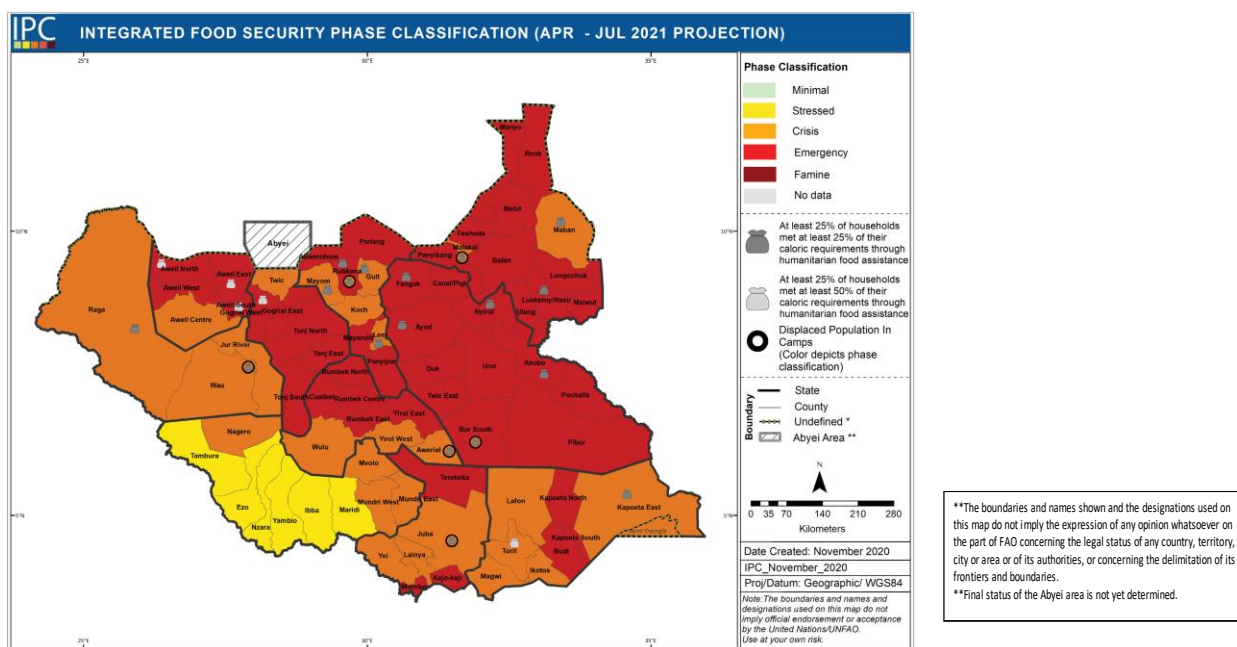
⁶² World Bank: "Strengthening Gender Outcomes in Social Protection and Poverty Focused Programs in South Sudan (English)", 2019b, [<http://documents.worldbank.org/curated/en/823291562245185167/Strengthening-Gender-Outcomes-in-Social-Protection-and-Poverty-Focused-Programs-in-South-Sudan>], accessed: 31.07.2019.

⁶³ Oxfam: EVERYTHING EXCEPT THE SOIL - Understanding wild food consumption during the lean season in South Sudan, 2017 [<https://oxfamilibrary.openrepository.com/bitstream/handle/10546/620360/rr-south-sudan-wild-foods-lean-season-301017-en.pdf?sequence=3&isAllowed=y>]

their health status. There is still an unprecedented level of acute malnutrition in South Sudan especially among children aged six to nine months and women aged 15 to 49 years.

According to the latest IPC results released in December 2020, the 2021 lean season is projected to be the worst ever in terms of severity, with approximately 7.24 million people (60% of the population) will be facing severe acute food insecurity (IPC Phase 3+) by July 2021.

Figure 15: South Sudan IPC Classification April-July 2021 (Source: IPC)⁶⁴



159. Despite contentions on IPC Phase 5 populations, there was consensus that:

- **7.2 million** people would likely be in Crisis (IPC Phase 3) or worse acute food insecurity by July 2021.
- **2.4 million** people would likely be in Emergency (IPC Phase 4), where very high acute malnutrition and excess mortality is prevalent when households have run out of coping strategies.
- **26 counties would likely be in Crisis (IPC Phase 3) and 47 counties would likely be in Emergency (IPC Phase 4)** at the peak of the lean season (April-July) in 2021.
- 1.4 million children (under 5) will likely suffer from acute malnutrition in 2021 and will be in urgent need of treatment.
- Immediate and sustained scale-up of multi-sectoral humanitarian assistance is needed to save lives and avert total collapse of livelihoods.

⁶⁴ IPC: Integrated Food Security Phase Classification – South Sudan Technical Working Group Key Messages October 2020-July 2021

- In line with the potential increase in returnees, plan for multi-sectoral response that will support their protection, reintegration and resettlement.
Support local production in order to improve livelihoods as well as create labour and income opportunities.

160. A detailed social assessment is available as an attachment (Annex 12) of this ESMF and is presented as a separate document due to the length and complexity.

4 Environmental and Social Risk Classification

161. The ELRP project is expected to have a substantial positive impact from economic, social and environmental point of views. Nonetheless, the project is classified as high risk at the time of its approval due to the complexity of the fragile country context and the inability of the World Bank to conduct on-the-ground supervision, coupled with the country's weak legal and institutional arrangements to manage, supervise, and enforce ESF compliance during implementation – a gap the lead technical partners (FAO and UNOPS) and a third-party monitoring agent are expected to bridge. Specifically, both environmental and social risk ratings for the Multi-phase Programmatic Approach (MPA) to which ELRP belong are high, thus the ELRP is also classified as a high-risk project.
162. The project is expected to contribute to restoring livelihoods and production abilities to communities experiencing or at risk of experiencing Desert Locust invasions in South Sudan. The ELRP is likely to benefit and improve longer term resilience to future invasions, improved food security, and livelihoods resilience. However, potential negative environmental and social impacts and risks remain. The ELRP will coordinate closely with and complement the Resilient Agricultural Livelihoods Project (RALP), which is also being financed by the WB and implemented by FAO. In areas where the projects overlap, this will provide a more integrated package of services by combining shorter-term locust controls and livelihood interventions, with larger-scale and longer-term resilient agricultural practices and infrastructure aimed at broader service delivery, supporting sustainable livelihoods linked to food production.
163. The main anticipated effects of the ELRP include: (i) Potential pollution of ecologically sensitive habitats such as wetlands, national parks and water bodies due to the application of pesticides through ground and aerial spraying; (ii) Temporary contamination of pasture, local water sources, and cropping areas; (iii) Potential contamination and poisoning of the pesticides control teams; (iv) Potential exposure and poisoning of communities in areas where spraying takes place; (v) Potential contamination of soil and water through poor handling of pesticides during transport and storage; (vi) Short term localised soil erosion and pollution; dust emissions; generation of solid waste; and occupational health and safety risks related to construction works for pesticide storage facilities and entomology lab.
164. The primary product to be used for DL control by the project - the biopesticide *Metarhizium acridum*- has low toxicity with no leaching or bio-concentration potential⁶⁵, and is highly specific in acting on DL and therefore has little impact on humans, livestock or the environment. Several risk assessments carried out in Africa, the US, and Australia are available and the toxicity is negligible to almost all receptors, with toxicity negligible to humans, but with potential allergic reaction (i.e., asthma) with repeated exposure⁶⁶. The alternative synthetic chemicals already in South Sudan -

⁶⁵ USAID - Desert Locust Surveillance and Control Programmatic Environmental Assessment October 2020 - https://www.usaid.gov/sites/default/files/documents/USAID_EAFR_Locust_PEA_FAO_11-10-20_508_Compliant.pdf

⁶⁶ USAID - Desert Locust Surveillance and Control Programmatic Environmental Assessment October 2020 - https://www.usaid.gov/sites/default/files/documents/USAID_EAFR_Locust_PEA_FAO_11-10-20_508_Compliant.pdf

Malathion and Chlorpyrifos - are both non-persistent and moderately hazardous. However, these will only be used as a last resort in the unlikely event that *Metarhizium acridum* is unavailable.

165. The above risks will be managed through: (i) Avoiding spraying of pesticides in sensitive ecological and agronomical areas which will be identified and mapped out; (ii) Prudent choice of pesticides in line with SOPs to be established and adhered to particularly in or near potentially sensitive areas; (iii) Ecological monitoring and residue sampling to assess environmental impacts of any control activities, and allow for early remedial action where necessary; (iv) Training of control teams on appropriate use of pesticides, provision of adequate PPEs and medical examinations and monitoring for and pesticides residues and effects for timely action where needed; (v) timely consultation with communities prior, during and after spraying activities for appropriate precautions and monitoring; (vi) Strict adherence to the ESMP and C-ESMPs developed to manage potential negative impacts of construction activities.
166. The No-action Alternative is defined as no project on DL surveillance or control. This alternative does not meet the needs of the affected communities in South Sudan, and could lead to worse outcomes for populations that are already significantly food insecure, resulting in higher demand for food aid and emergency humanitarian interventions. With the above measures and rationale, it is believed that the positive impacts of ELRP largely outweigh its adverse risks, allowing for affected communities to benefit from DL invasions being brought under control effectively, and their food security and livelihoods restored and sustained in a timely manner. A more detailed description of the anticipated risks and mitigation measures is available in the sections below.

4.1 Social Risk Rating

167. The overall social risk rating for the project is high due to concerns for the health and safety of community members from labor influx to support spraying activities, GBV risk through activities in Component 1 and Component 2, and security management issues while working in areas of the country that are still subject to localized conflict. The principal social risks associated with the project fall broadly into two main categories i) risks to the community and workers from the locust control measures under Component 1, and ii) the social risks associated with the livelihood restoration and enhancement measures under Component 2.
168. Primary risks under Component 1 include risks to community and workers health through proximity to locust control measures as well as potential livelihood impacts through control measures impacting livestock and crops. In addition, labor influx associated with these control measures may impact upon the community through SEA of vulnerable communities or spreading disease (including COVID-19) to otherwise isolated rural communities with limited access to health services.
169. The primary social risks under Component 2 include the risks of exclusion of vulnerable people and groups most in need of assistance, risk of exacerbating social tension through pastoralist migrations to avoid the impacts of DL on forage, presence of internally displaced peoples (IDPs) or refugees and/or labor risks associated with cash for work (CFW) projects.

170. **Consequently, the social risk mitigation measures will focus on:** (i) communication, stakeholder engagement, and grievance redress with affected communities; (ii) ensuring effective engagement with Sub-Saharan African historically underserved traditional local communities where they are present; (iii) mitigating social tensions through community involvement and engagement; (iv) addressing gender dimensions of the operation including GBV; and (v) labor aspects including worker safety.
171. Negative impacts related to Occupational Health and Safety (OHS) as a result of the extensive use of pesticides in desert locust control activities and associated waste management, constructions activities for workers and consumption of treated seeds are addressed through: (i) strict compliance with the comprehensive Integrated Pest Management Plan; (ii) marking of treated seeds as “Not for Consumption”; (iii) continuous stakeholders’ training and awareness; (iv) applying the C-ESMP; and (v) ensuring the use of PPE.

4.2 Environmental Risk Rating

172. The project’s overall environmental risks are considered high even though the application of the pesticides will be limited and most likely confined to a few locations in Eastern Equatoria – the primary location of previous and projected DL invasions. This high rating is, as mentioned before, due to the complexity of the fragile country context and the inability of the World Bank to conduct on-the-ground supervision, coupled with the country’s weak legal and institutional arrangements to manage, supervise, and enforce ESF compliance during implementation. The application of the pesticides to be used under this project poses a risk of potentially negative impacts on local populations dependent on natural resources for their livelihoods such as pasture and crop fields. Given the large areas to be covered, the quantity of pesticides to be used is large and there is risk of accumulation of obsolete stocks. The use and application of pesticides through ground and aerial spraying could impact sensitive ecological areas such as water bodies, wetlands, national parks and reserves, forests, soils, pasture grasslands, standing crops, etc.
173. More specifically, for component 1, the main potential environmental risks and impacts relate to the DL control operations and include: (a) transport, handling, storage of the pesticides, dosage (that is, proper calibration of the spraying equipment to get the right dose of active ingredient per hectare) during the treatment and disposal of used pesticide containers; (b) risk of polluting ecologically sensitive habitats such as wetlands, national parks and water bodies; (c) risks that pasture, local water sources and cropping areas may be contaminated; (d) potential contamination and poisoning of the pesticides control teams; (e) risk of diversion of pesticides for other uses; (f) inappropriate use of pesticides; and (g) potential high risk of accumulation of obsolete stocks. For component 2, the potential environmental risks and impacts include: (a) potential soil erosion and pollution; (b) dust emissions; (c) generation of solid waste; (d) occupational health and safety risks related to minor construction works for the proposed construction of storage facilities; (e) potential degradation of the rangelands; and (f) potential contamination and poisoning by farmers handling farming pesticides.
174. **This potential impact will be mitigated by** identifying and mapping out sensitive ecological and agronomical areas, establishing and respecting SOPs and a judicious choice of pesticides (i.e.,

biopesticides could be used in/near potentially sensitive areas). Also, use and application of the pesticides will pose adverse effects on the health of the workers on field control teams and on local communities where both ground and aerial spraying operations may take place. The DL control activities will integrate environmental monitoring during and post-campaign, these activities will include: (i) training of monitoring teams; (ii) pre and post medical examinations of the control teams; (iii) procurement of monitoring equipment; (iv) ecological monitoring; (v) occupational health monitoring; (vi) residue sampling; and (vii) evaluating the health and environmental impacts post the campaign.

5 Project Risks, Potential Impacts, and Proposed Mitigation Measures

5.1 Potential Positive Impacts of the South Sudan ELRP

175. The positive impacts of the ELRP greatly outweigh the risks. The project is expected to contribute to livelihood restoration and production abilities to communities experiencing or at risk of experiencing Desert Locust invasions in South Sudan. Specifically, it will help build longer term resilience to future invasions, improve food security, and increase livelihoods resilience. Specific benefits include:

- Surveillance control and monitoring will build capacity and preparedness for future desert locust invasions, in addition to accurately identifying areas for targeted control interventions;
- Controlled spraying will address the DL infestation, reducing the economic damage – including damage to livelihoods when crops were lost;
- Livelihood activities (for example, those supported under Component 2) will bring positive impact in terms of socio-economic empowerment for those households during a time when their regular livelihood has been disturbed by the DL invasion.
- Cash-for-Work and unconditional cash transfers will provide immediate relief to those most in need and will help to establish food security at household level by providing the money required to meet basic food needs.
- Poverty reduction as a result of jobs brought about by increased agricultural production. ELRP will help farming and livestock households return to production for improved food security and restore the biodiversity of the affected areas by investing in land use systems that integrate crops, trees, and livestock to restore lost biodiversity caused by DLs and the measures to control the swarms.
- Improved nutrition as a result of increased and diversified crop productivity (particularly for subsistence crops).
- Enhanced adoption of Climate Smart Agriculture (CSA) and IPM practices and technologies for greater resilience.
- Increased institutional capacities and establishment of the Desert Locust and Transboundary Pests Response Coordination Unit (DLRCU) for more coordinated.
- Improved integrated pesticide management processes which will protect both humans and the environment from health hazards and pollution.
- Shared infrastructure facilities to enable better, quicker responses to future DL invasions.

5.2 Inherent Risks and Potential Negative Impacts

176. Project activities of ELRP are expected to carry minimal, temporary, and localized impacts and risks which can be managed at the subproject level.

177. Physical activities that may have negative environmental impacts include: (i) construction and/or refurbishment of pesticide storage facilities; (ii) spraying of pesticides during DL control activities; (iii) use of fertilizer or pesticides during crop cultivation by farming households; (iv) construction of irrigation infrastructure; and (v) construction of an entomology lab.

178. A breakdown of the social and environmental risks, by component, is provided below.

Social Risks & Impacts:

179. **Component 1:** Primary social risks and potential negative impacts under Component 1 include:

- a. Health risks for both community members and project workers due to proximity to locust control measures;
- b. Potential livelihood impacts due to control measures suspending crop production and/or affecting livestock;
- c. GBV/SEA risks and communicable disease risks (including COVID-19) due to the labour influx associated with these control measures.

180. **Component 2:** The primary social risks and potential negative impacts under Component 2 include:

- a. Risk of exclusion of vulnerable people and groups most in need of assistance;
- b. Exacerbating social tensions if/when pastoralist migrate to avoid the impacts of DL on forage;
- c. Labour risks associated with cash-for-work (CFW) / labour-intensive public works (LIPW) projects; and/or
- d. Internally displaced peoples (IDPs) or refugees as an inherent risk within project areas.

Environmental Risks & Impacts:

181. **Component 1:** Primary environmental risks and potential negative impacts include:

- a. Risk of accumulation of obsolete stocks of pesticides;
- b. Pollution of ecologically sensitive habitats such as wetlands, national parks and water bodies due to the application of pesticides through ground and aerial spraying;
- c. Temporary contamination of pasture, local water sources, and cropping areas;
- d. Potential contamination and poisoning of the pesticides control teams;
- e. Diversion of pesticides for other uses and/or inappropriate use of pesticides;
- f. Improper transport, handling, storage of the pesticides; and
- g. Incorrect dosage of pesticides (e.g., improper calibration of the spraying equipment to get the right dose of active ingredient per hectare) during the treatment and disposal of used pesticide containers.

182. **Component 2:** Primary environmental risks and potential negative impacts include:

- a. Soil erosion and pollution;
- b. Dust emissions;
- c. Generation of solid waste;
- d. Occupational health and safety risks related to minor construction works for the proposed construction of storage facilities;
- e. Potential degradation of the rangelands; and
- f. Potential contamination and poisoning by farmers handling farming pesticides.

5.3 Environmental and Social Risk & Impact Mitigation Measures

183. **Table 4** provides an overview of cross-cutting risks which the project must consider. **Table 5** provides an overview of the identified environmental and social risks/impacts by project activities, along with proposed mitigation measures and reference tools for further guidance/action. A narrative summary of the mitigation measures can also be found below. The table serves to highlight the initial risks and impacts which may be found in subproject areas, based on the project component under implementation. It is not meant to be exhaustive, as the subproject-level screening will identify the site-specific risks.

184. **Social risk & impact mitigation measures for the project are predominantly focused on:** (i) communication, stakeholder engagement, and grievance redress with affected communities; (ii) ensuring effective engagement with Sub-Saharan African historically underserved traditional local communities where they are present; (iii) mitigating social tensions through community involvement and engagement; (iv) addressing gender dimensions of the operation including GBV; and (v) labor aspects including worker safety. Negative impacts related to Occupational Health and Safety (OHS) as a result of the extensive use of pesticides in desert locust control activities and associated waste management, constructions activities for workers and consumption of treated seeds are addressed through: (i) strict compliance with the comprehensive Integrated Pest Management Plan; (ii) marking of treated seeds as “Not for Consumption”; (iii) continuous stakeholders’ training and awareness; (iv) applying the C-ESMP; and (v) ensuring the use of PPE.

185. **Environmental risk & impact mitigation measures for the project are focused predominantly on avoiding ecological harm and minimizing disturbances from construction.** Risk to ecologically sensitive areas will be mitigated by identifying and mapping out sensitive ecological and agronomical areas within the subproject site (reference can be made to the Environmental Baseline in this ESMF, which identifies protected areas). Moreover, the project will establish and respect SOPs and a judicious choice of pesticides (i.e., biopesticides which *could* be used in/near potentially sensitive areas), all of which will be included within the Integrated Pest & Pesticide Management Plan.

186. Specifically, the project uses an Integrated Pest Management Plan (IPMP) approach. South Sudan has a stock of synthetic chemical pesticides and will purchase metarhizium acridum biopesticide, if needed, for DL control activities. The pesticides are in ultra-low volume (ULV) formulations. The synthetic chemicals owned by South Sudan are Malathion and Chlorpyrifos, which are both

organophosphates, and can be used for both aerial and ground spraying for locust control activities as they are fast-acting, effective, non-persistent, moderately hazardous. FAO will provide guidance on the method of treatment dependent on the phase of the locust populations. These organophosphates are World Health Organization (WHO) Class II and they have been approved for use by the Bank. The biopesticide is the preferred treatment for hoppers and for spraying near or around ecologically sensitive areas and cropping areas; synthetic chemicals work better for adult swarms. South Sudan, through component 3 will investigate additional botanical control methods—such as neem—to limit the use of synthetic pesticides as much as possible.

187. To ensure health and safety of the communities and project workers involved, the DL control activities will integrate environmental monitoring during and post-campaign, which include: (i) training of monitoring teams; (ii) pre and post medical examinations of the control teams; (iii) procurement of monitoring equipment; (iv) ecological monitoring; (v) occupational health monitoring; (vi) residue sampling; and (vii) evaluating the health and environmental impacts post the campaign.

Table 4: Cross-cutting risks and impacts

ESS	Potential Risk or Impact	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
ESS2 ESS4	Existing risk of Unexploded Ordinances (UXOs) / landmines if the activities are conducted in previously unexplored/unutilized areas	High but with mitigation Low (as most activities will occur in areas already explored/known)	<ul style="list-style-type: none"> ▪ Liaise with Government of South Sudan ▪ Prior to commencement of activities in a new area, FAO must consult the latest reports from United Nations Mine Action Service (UNMAS) to determine likelihood of UXOs in the area, and contact both UNMAS and the government agency responsible for UXO clearance to assess the risk and provide confirmation on UXO safety before any work is conducted (this involves conducting a UXO risk assessment and obtaining UXO clearance). ▪ Avoid areas with UXOs / landmines and, if needed, only proceed in an area only when UNMAS confirms safe removal. 	Subproject ESMPs, UNMAS guidance	MAFS / Implementing Partners (IP)
ESS1 ESS4	Possible increase of spreading COVID-19 and emerging pandemic	M	<ul style="list-style-type: none"> ▪ Follow the WB guidance and regulations on Covid-19, as the (i) WHO guidance on prevention of the spread of the COVID-19 virus, (ii) the Governmental instruction; (iii) the UN Inter-Agency Guidance Note on Indigenous Peoples and COVID-19⁶⁷ while (iv) seeking also international good-practice on consultations under COVID-19 	LMP SMP SEP Subproject ESMPs	MAFS/ IPs

⁶⁷ https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2020/04/Indigenous-peoples-and-COVID_IASG_23.04.2020-EN.pdf

ESS	Potential Risk or Impact	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
			<p>and innovative approaches established by World Bank, UN, and other development agencies.</p> <ul style="list-style-type: none"> ▪ Continuous Good practices consideration, as TalkingBooks, radio programs combined with call-in-feedback, small-group discussions once allowed with provision of PPE, etc. ▪ Ensure COVID-19 mitigation measure within ESMP and especially with regard to Health and Safety issues raised 		
ESS10	Conflict over selection of beneficiaries, resource allocation in financing purchases through farmer organisations and distribution of inputs to members	M	<ul style="list-style-type: none"> ▪ Ensure that the selection of beneficiary counties and <i>payams</i> is highly inclusive and covers a broad array of different clans, ethnic groups, Internally Displaced Persons (IDPs), returnees and other groups. Vulnerable groups and criteria analysis will be set up in the SEP once all exact locations are known. ▪ Ensure that women, particularly female heads of households, are included in the identification of beneficiaries and locations ▪ Ensure that the selection of beneficiary locations, modes of selection, and decision making are publicly disseminated 	GRM Subprojects ESMPs & SEP	MAFS / Implementing Partner /local authority – local government at the state and county level.

ESS	Potential Risk or Impact	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
			<ul style="list-style-type: none"> ▪ The formation and/or utilization of <i>Boma</i> and <i>Payam</i> Development Committees (BDCs and PDCs) with the same core representation as those in the Safety Net Project (SSNP) and Enhancing Community Resilience and Local Governance Project (ECRP) will help to leverage the opportunities presented by their synergies for better buy-in of project goals and activities ▪ Implement Grievance Redress Mechanism (GRM) ▪ Conduct proper consultation with the communities prior to commencement of subprojects as per the SEP 		
ESS10	Elite capture and/or manipulation of subprojects by political, ethnic, or military factions. This may include inequitable sharing of subproject benefits due to domination by some political/ ethnic groups or leaders.	L	<ul style="list-style-type: none"> ▪ Conduct a Political Economy Analysis (PEA), with gender specific local consultations, as part of the contextual analysis prior to entering new project locations to understand and avoid possible elite capture ▪ Ensure that selection of beneficiary locations and beneficiaries, modes of selection and decision making are widely disseminated among the public – as per SEP. Beneficiary selection criteria should be transparent and well communicated as per the subproject’s SEP. ▪ More in-depth monitoring, evaluation, and management 	ESMF; SEP Subproject ESMPs & SEP	MAFS/ IPs

ESS	Potential Risk or Impact	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
			<p>arrangements for areas deemed to be highest risk, based on the subproject ESMP</p> <ul style="list-style-type: none"> ▪ Public disclosure of information and setting functional GRMs ▪ Communicate and implement the GRM ▪ Have a communication plan 		
ESS4	Resurgence of violence that places inputs, equipment and structures at risk of damage or complete destruction	M	<ul style="list-style-type: none"> ▪ Conduct in-depth contextual analysis, incorporating feedback from separate consultations with men and women, before entering new communities with project investments, including a detailed analysis of potential conflict lines ▪ Only implement activities in communities which are predictably stable, or receive prior agreement from potential conflict groups expressing the joined interest in a subproject and committing to implement / maintain the outcomes jointly ▪ Continuously monitor the situation in project areas to enable early detection, as much as possible, of conflict to enable necessary adjustments 	SMP	MAFS/ IPs
ESS2	Security and health risks for local staff	M	<ul style="list-style-type: none"> ▪ Implement the Security Management Plan, taking into account local considerations at county level, including the mapping of local staff, their 	SMP	MAFS/ IPs/ Contractor

ESS	Potential Risk or Impact	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
			potential security risks and means of protection		
ESS2 ESS4 ESS7 ESS10	Conflicts over provision of employment or contracts	H	<ul style="list-style-type: none"> ▪ Ensure that the selection of local staff, contractors and other service providers or local implementers is highly inclusive and covers a broad array of different clans, ethnic groups, pastoralists, agriculturalists and IDPs and develop a map demonstrating inclusiveness per state/county, including specific measures to ensure non-discrimination in recruitment and employment, in particular in relation to women and persons with disabilities ▪ Ensure that job advertisements and calls for proposals are widely disseminated, including in minority languages, and selection processes are made as public as possible ▪ Communicate and implement the general GRM for the project and the GRM established for project workers under ESS2 	SEP LMP	MAFS / IP/ Contractor
ESS10	Cancellation of programming due to conflict escalation and insecurity can	M	<ul style="list-style-type: none"> ▪ Ensure that changes to project processes and possible cancellations of project activities are adequately communicated to the beneficiaries and the public, as per the Stakeholder Engagement Plan (SEP) 	SEP GRM	MAFS / Implementing Partner

ESS	Potential Risk or Impact	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
	reduce the trust of beneficiaries		<ul style="list-style-type: none"> Ensure the general GRM is easy to access and use so that complaints can be received and responded to in a timely fashion. 		
ESS10	Conflict resulting from attraction of returnee/IDP populations to communities that have improved production systems and social infrastructure	L	<ul style="list-style-type: none"> Communicate and Implement SEP to enable the integration of new concerns into project implementation Communicate and implement the general GRM 	SEP GRM	MAFS / Implementing Partner
ESS5 ESS6 ESS10	Disputes over use of land and property for project activities where ownership and access rights are contested (for both public and private property, as well as protected areas), based on historical and current large-scale displacement	L	<ul style="list-style-type: none"> Carry out due diligence to get a comprehensive picture of local perceptions of legitimate housing, land and property rights when identifying beneficiary areas – including perceptions of current, previous (IDP) and seasonal occupants (pastoralists), as well as local authorities, in order to establish the viability of those locations. Conduct a complementary in-depth contextual analysis, when previous and recent context analysis are not enough relevant, before entering new communities with activities investments, including a detailed analysis of customary land tenure 	ESMF & exclusion list (Annex 1) SEP GBV Mitigation & Action Plan GRM Coherence of ES documents with the FAO VGGT	MAFS / Implementing Partner

ESS	Potential Risk or Impact	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
	and seasonal migration due to conflict, ethnic / political affiliations, or cultural norms and customary land tenure laws (which discriminate against women)		<p>systems and potential conflict lines</p> <ul style="list-style-type: none"> ▪ Ensure that selection of beneficiary locations, modes of selection and decision making are widely disseminated among the public – as per SEP – and follow, to the best extent possible, the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries, and Forests in the Context of National Food Security (VGGT)⁶⁸ ▪ Implement the GRM and the GBV Mitigation & Action Plan for instances related to gender-discrimination within the land tenure arrangements. ▪ Avoid implementation of the activities in protected areas and/or their buffer zones, as per the exclusion list (see Annex 1) ▪ Consider involuntary resettlement to be excluded from activities as referred in the subproject exclusion list. 		
ESS1	Inadequate implementation of E&S safeguards tools due to lack of capacity amongst the	H	<ul style="list-style-type: none"> ▪ Theoretical Training of FAO & UNOPS staff, CAD, IPs and relevant stakeholder on World Bank ESS and development and use of safeguards tools ▪ Full-time dedicated Environmental (one) and Social 	ESMF Environmental Audit (required by law for all subprojects with an EIA)	WB/ FAO/ UNOPS

⁶⁸ www.fao.org/3/i2801e/i2801e.pdf

ESS	Potential Risk or Impact	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
	implementing partners (IPs)		<p>(one) Risk Management Officers in PSU for the implementation and monitoring of E&S tools</p> <ul style="list-style-type: none"> ▪ Full-time dedicated gender specialist in the PSU for the implementation and monitoring of Gender related safeguards tools ▪ AAP staff implementing E&S tools and measures. ▪ Designate E&S risk management focal points for IPs at county level ▪ Third-party monitoring and an environmental audit (required by law) 		
ESS1	Losses of relevancy of safeguard tools due to changing context(s)	M	<ul style="list-style-type: none"> ▪ Annual review and update of safeguard tools, if necessary 	All	MAFS/ FAO / UNOPS

Table 5: Mitigation Measures for Environmental and Social Risks and Impacts by Project Activities

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
ESS3	Construction/ rehabilitation of premises to serve as pesticide storage facilities	Localised and short-term soil erosion, resulting in gullies, washing away soil, bare rock/soils, silting, blocking channels and carrying away property	M	<ul style="list-style-type: none"> ▪ Only select sites suitable for construction, based on the screening and exclusion criteria (Annex 1) ▪ Only clear areas earmarked for construction and which would not dramatically change the hydrology of the area (determined by the site-specific EIA); moreover, clearing will be limited to the excavation area (murrum barrow sites) ▪ Consider the use of temporary storm water control devices and associated cut-off drains/bunds to minimize sediment transport into watercourses ▪ Reuse or Dispose of the excavated soils immediately after excavation completion based on the waste management plan (WMP) and avoiding protected areas/wetlands/sites of ecological importance ▪ Integrate the World Soil Charter guiding principles (see reference URL: 	ESMF Subprojects ESMPs & C-ESMP with WMP	MAFS / Implementing Partner / Contractor

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
				https://www.fao.org/3/i4965e/i4965e.pdf) as appropriate, to ensure sustainable soil management and to restore degraded soils		
ESS2 ESS4		Localised and short-term dust emission and noise pollution from earth moving activities by excavators and trucks plus other machinery such as concrete mixers, dumpers, etc. Noise from workers is also anticipated.	M	<ul style="list-style-type: none"> ▪ Restrict activities that create lots of noise— e.g., vibrations, heavy equipment moving earth, excavations, to normal working hours (7h00-17h00) ▪ Require contractor(s) to use equipment and automobiles that are in good working condition to reduce noise or exhaust fumes. ▪ Require contractor(s) to spray water regularly when clearing land to reduce the dust. Further suppress dust on construction roads during use. ▪ Encourage use of silencers on generators. ▪ Require contractors to keep construction machinery, generators and vehicles in good working condition ▪ Carry out community consultations before commencing the construction activities, informing the nearby population regarding the construction 	LMP Subprojects C-ESMP	MAFS / Implementing Partner / Contractor

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
				<p>activities and possible impacts of noise and dust</p> <ul style="list-style-type: none"> ▪ GRM will be established in the area to address the public complaints regarding issues such as noise from the construction sites ▪ Provide workers and visitors with the right noise and dust personal protection i.e., dust masks and ear muffs/buds for workers exposed to noisy environments 		
ESS3 ESS6		Localised loss of biodiversity and associated benefits during site clearing prior to construction. Invasive species may also be introduced into the area through construction machines or the labour force.	M	<ul style="list-style-type: none"> ▪ Screen out proposed sites in protected areas or sites of natural/cultural importance within the broader region or landscape ▪ Re-align sites away from dense vegetation, wetlands and other known environmental receptors. ▪ Limit clearing of trees or grass to the construction site. ▪ Avoid introduction of invasive species in the area should be avoided. ▪ Plan for biodiversity offset by planting of trees or grass to replace lost plant species. 	ESMF Subprojects ESMPs & C-ESMP	MAFS / FAO/ Implementing Partners/ Contractor

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
ESS3		Water pollution from cement and muddy waters or soil movement	L	<ul style="list-style-type: none"> ▪ Any spoils shall be placed or stored away from water bodies and areas predisposed to flooding or surface run off. ▪ Construct retention ditches downstream of the construction area, utilizing the excavated soil when applicable, to control water pollution from sediment/soil erosion and cement Avail suitable storm water management options such as sediment capture controls at civil works sites ▪ Avoid the addition of solid wastes in runoffs Empty/drain all areas that may hold standing water 	ESMF; Subprojects ESMPs & C-ESMP	MAFS / Implementing Partner / Contractor
ESS3		Solid and liquid wastes generated from the influx of temporary/migrant community workers	M	<ul style="list-style-type: none"> ▪ WMP shall be developed as part of the C-ESMP before civil works begin to guide both solid and liquid waste management. ▪ Collection, treatment, and disposal of solid and liquid wastes based on the WMP. 	Subprojects C-ESMP with WMP	MAFS / Implementing Partner / Contractor
ESS2 ESS4		Safety and nuisance hazards such as noise, congestion and increased accidents and	M	<ul style="list-style-type: none"> ▪ Prepare a traffic management plan (TMP) as part of the C-ESMP depending on the traffic volume and the condition/nature of local routes 	SEF, County level SEP, Subprojects SEP LMP TMP	MAFS / Implementing Partner / Contractor

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
		incidents from higher vehicular traffic around construction sites		<ul style="list-style-type: none"> ▪ Carry out community consultations before public works commence (as per SEF and futures SEPs) ▪ Carry out sensitization on road safety in schools and child friendly spaces in order to ensure children are taught about the use of the road and how to avoid accidents ▪ Erect safety signage at appropriate places ▪ Promote safe driving practices among drivers through driving license checks, speed controls, avoiding dangerous routes and times of day to reduce the risk of accidents, regular vehicle maintenance with records ▪ Implement GRM 		
ESS2		Increased occupational accidents and incidents such as injuries and illnesses caused by eminent construction and mechanized processing hazards like handling of	M	<ul style="list-style-type: none"> ▪ Prior to construction, ensure EHS risk assessment is conducted by the contractor and confirmed by MAFS/IPs, all hazards identified, management controls are documented in the C-ESMP or occupational Health and Safety Management Plan 	LMP	MAFS / Implementing Partner / Contractor

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
		construction or farm equipment or stepping on or using sharp objects, spills and leakage of hazardous materials as a result of higher labour demands during construction, etc.		<ul style="list-style-type: none"> ▪ Ensure the OHS plan or the C-ESMP is implemented by all implementing parties ▪ Take all safety precautions to address hazards for workers and visitors and the nearby community including safety/warning signage, safety barrier around the construction site, establish clear, unimpeded escape routes, provide emergency lighting, provide manual portable extinguishers, minimizing pedestrian interaction with construction vehicles. FAO EHS will be complied with, as will the WBG General EHS Guidelines ▪ Provide protective equipment to workers (helmets, boots, masks, etc.) as well as training on Occupational Health and Safety measures and adequate use of PPE, as detailed in the Labour Management Procedure (LMP) ▪ Ensure integrity of workplace structures, 		

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
				workspace and exit, fire precautions, potable water supply, clean eating area, lighting, safe access, lavatories and showers, first aid, etc. <ul style="list-style-type: none"> ▪ Implement GRM for workers as per ESS2 		
ESS2 ESS4		Increased incidences of communicable diseases like tuberculosis, malaria, diarrhea, etc. due to an influx of workers at construction sites	L	<ul style="list-style-type: none"> ▪ Provide proper sanitation and waste disposal facilities based on a site-specific Waste Management Plan (WMP) ▪ Carry out awareness campaigns for the prevention of AIDS/HIV, sexually transmitted diseases and other communicable diseases ▪ Monitor for areas with standing water and empty/drain all areas that may hold standing water 	LMP; Subprojects C-ESMP with WMP	MAFS / Implementing Partner / Contractor
ESS2 ESS4		Increased incidence of GBV-SEA due to an influx of workers at construction sites	L	<ul style="list-style-type: none"> ▪ Enforce total adherence to ethical code of conduct ▪ Training and strong communication of zero tolerance to sexual violence ▪ Implementation of the Framework for Addressing Gender-Based and Child Violence, Sexual Exploitation and Harassment against 	LMP FGBCV-SEH- WC	MAFS / Implementing Partner / Contractor

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
				<p>Women and Children and related GBV Action Plans</p> <ul style="list-style-type: none"> Communication and implementation of GRM with specific inclusion of anonymous reporting 		
ESS5 ESS10		Obstruction of installations by persons or for uses not foreseen in the project document	L	<ul style="list-style-type: none"> Ensure that tenure rights as well as the recipient of improvements to his/her/ their land and his/her/their responsibilities are clear through multi-stakeholder local group. Communication and implementation of GRM with specific inclusion of anonymous reporting 	LMP SEF	MAFS / Implementing Partner / Contractor
ESS1, ESS3	Desert locust control spraying (aerial and ground)	Risk of accumulation of obsolete stocks of pesticides	M	<ul style="list-style-type: none"> Refer to WMP within the IPMP on pesticide disposal and waste management, addressing issues of obsolete stocks 	IPMP	MAFS / FAO
ESS6		Pollution of ecologically sensitive habitats	M	<ul style="list-style-type: none"> Map out and then avoid DL control measures in ecologically sensitive areas (included in the negative list) and utilize biopesticides as much as possible 	ESMF IPMP Subproject ESMPs	MAFS / FAO
ESS4 ESS6		Contamination of pasture, water sources, cropping areas	H	<ul style="list-style-type: none"> DL control measures should occur as far from communities and 	ESMF; IPMP; SEF/SEP	MAFS / FAO

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
				community-used water sources/etc. as possible <ul style="list-style-type: none"> ▪ Ensure clear communication with the communities to prevent utilization of sprayed areas ▪ Environmental monitoring throughout spraying activities to determine residue levels 		
ESS2; ESS4		Contamination and poisoning of Control Teams	M	<ul style="list-style-type: none"> ▪ Pre and post medical examinations of control teams ▪ Training on OHS and adequate use of PPE required for spraying activities 	OHS Guidelines; LMP; ESMF; IPMP	MAFS / FAO
ESS3; ESS2		Improper transport, handling, and storage of the pesticides	M	<ul style="list-style-type: none"> ▪ Training on adequate transport, handling, and storage of pesticides, including the use of PPE 	ESMF; IPMP	MAFS / FAO
ESS1; ESS3		Incorrect dosage of the pesticides (e.g., improper calibration to get the right dose of active ingredient per hectare) during treatment and disposal of used pesticide containers	L	<ul style="list-style-type: none"> ▪ Training with the control teams to ensure dosage is calibrated correctly ▪ Section within the IPMP on correct disposal of used pesticide containers 	IPMP; ESMF	MAFS / FAO
ESS4		Health risks for community members and	M	<ul style="list-style-type: none"> ▪ Iterative consultations with communities and clear delineation of 	SEP; IPMP; ESMP	MAFS/ FAO

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
		project workers due to proximity to locust control measures		<p>areas to be sprayed, along with sensitization training on how long to wait prior to using the area again;</p> <ul style="list-style-type: none"> ▪ Evaluation of health and environmental impacts after the campaign; ▪ Occupational health monitoring 		
ESS5		Temporary disruption to livelihoods due to control operations (e.g., suspended cropping, livestock rearing, etc.)	L	<ul style="list-style-type: none"> ▪ Accounted for with support provided under Component 2 (livelihoods activities, cash-for-work opportunities, and unconditional cash transfers 	PAD ESMF	MAFS/ FAO/ IPs
ESS6		Exacerbating social tensions if/when pastoralists migrate to avoid the impacts of either the DL or the control spray operations on forage	L	<ul style="list-style-type: none"> ▪ Engage with communities, including pastoralists and those who may be affected most by the DL invasion and spray activities, so that they are well aware of their options, including opportunities to express grievances through the project GRM 	GRM ESMF	MAFS / FAO
ESS10	Food production activities and rebuilding of the natural resource	Crop and cultivation techniques may not be suited to the needs and	L	<ul style="list-style-type: none"> ▪ Conduct gender and ethnically sensitive consultations in all project areas to ensure participation and ownership of the 	SEP	MAFS/ FAO

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
	base for crops and livestock	constraints of the target communities		suggested resilient agricultural practices, tailoring the activities interventions to the specific county / <i>payam / boma</i> level		
ESS3 ESS6		Increased pest and disease resistance and dissemination of crop diseases	L	<ul style="list-style-type: none"> ▪ Incorporate IPM approaches ▪ Involve rotational and intercropping practices which preserve greater diversity in habitat thus reducing impact of pest and diseases ▪ Crop varieties used should carefully be selected and tested in order to avoid new diseases and pests 	IPMP	MAFS/ FAO / IP
ESS3		Greenhouse gas (GHG) emissions and water and soil quality pollution and degradation from overuse of fertiliser and/or pesticides	L	<ul style="list-style-type: none"> ▪ Application of Integrated Pest Management (IPM) and the Pest Management Plan (PMP) to provide guidance on the use of organic manure and reduced use of fertilizers (this may include integration of livestock with crops when feasible/beneficial) ▪ Training for farmers on IPM, as well as the correct techniques of agrochemical application in instances where it cannot be avoided (e.g., correct handling, use of 	IPMP ESMP	MAFS/ FAO / IP

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
				<p>personal protective equipment (PPE), labelling, application, and disposal of agro-chemicals under field conditions)</p> <ul style="list-style-type: none"> ▪ Provision of support for farmers by county extension officers employed / seconded by the project ▪ Site ESAs/ESMPs will provide guidance on the proper management of fertilizers 		
ESS3; ESS4		Air pollution and potential health risks due to inappropriate pesticides application	L	<ul style="list-style-type: none"> ▪ Use IPM practices to control pests ▪ Monitor the weather when applying pesticides and avoid very hot or windy days ▪ Follow label directions when using pesticides ▪ Consider staying inside with doors and windows closed when pesticides are being applied near houses/ settlements ▪ Wear adequate personal protective equipment when applying pesticides or nearby application zones of pesticides ▪ Utilize pesticide-related and used PPE waste in a safe manner. 	PMP SMP	MAFS/ FAO / IP

WB ESS	Project Activities	Potential Risks /Impacts	Impact and risk level (H/M/L)	Proposed Mitigation Measures	Reference Tools	Responsible Entity
ESS3; ESS6; ESS4		Misuse of treated seeds	L	<ul style="list-style-type: none"> ▪ Mark treated seeds as “Not for Consumption” ▪ Provide training to beneficiaries so that agricultural inputs are used safely and correctly 	SEP ESMP	MAFS/ FAO/ IPs
ESS2; ESS10	Cash-for-Work and Unconditional Cash Transfers for those in need	Labour risks associated with the cash-for-work (CFW) projects	L	<ul style="list-style-type: none"> ▪ Use IPM practices to control pests ▪ Monitor the weather when applying pesticides and avoid very hot or windy days ▪ Follow label directions when using pesticides ▪ Consider staying inside with doors and windows closed when pesticides are being applied near houses/ settlements ▪ Wear adequate personal protective equipment when applying pesticides or nearby application zones of pesticides 	PMP SMP	MAFS/ FAO/ UNOPS/ IPs
ESS10		Risk of exclusion of vulnerable people and groups most in need of assistance	L	<ul style="list-style-type: none"> ▪ Clear and transparent targeting of beneficiaries as per the ESMF and PAD with eligibility criteria; ▪ Consistent and iterative community consultations to ensure understanding and reduce tensions over benefits distribution 	PAD; ESMF; SEP; ESMP	MAFS/ FAO / UNOPS/ IP

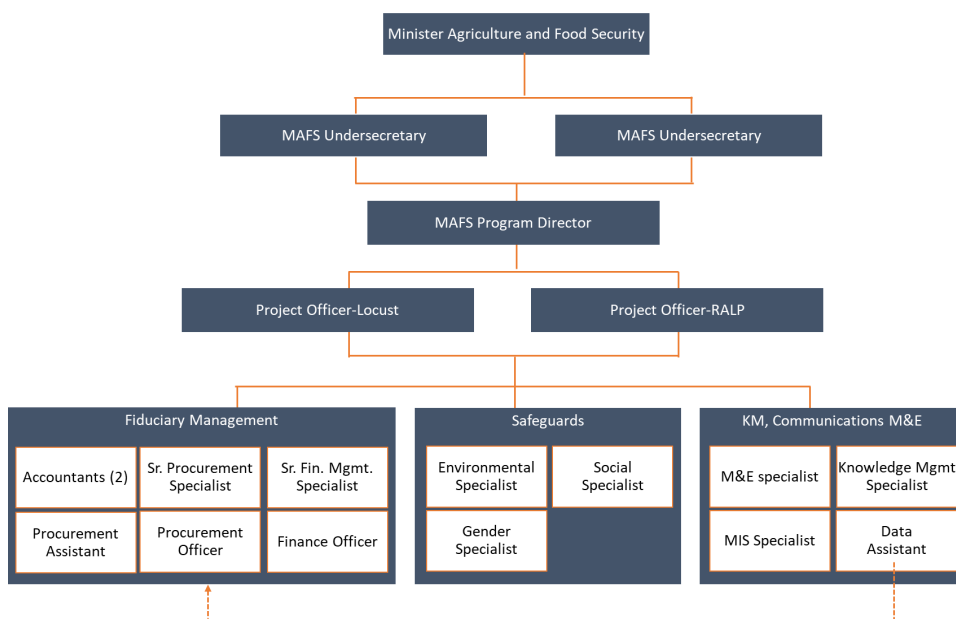
6 Institutional and Implementation Arrangements

189. For Components 1-4, the implementing agency will be MAFS as the lead Ministry for food security and food production systems. MAFS will maintain a PCU, based in Juba, which will be responsible for: (i) fiduciary, Environmental and Social Framework (ESF), and work program management in collaboration with implementing partners; (ii) reporting on implementation progress to the World Bank (WB); (iii) technical guidance for agriculture activities (e.g., nurseries and FMNR); coordination with relevant ministries and stakeholders; and (iv) managing research and policy development activities with partners.

190. As an emergency project, and as described under phase 2 of World Bank portfolio management in South Sudan, the project will use direct contracting for the lead technical partners. For this reason, MAFS has directly contracted FAO for components 1, 2.2, and 3 and technical assistance for implementation of ESF requirements and other management priorities; and UNOPS for sub-component 2.1. As such, the FAO Project Support Unit (PSU) will be the main responsible party for the implementation of the ESMF and all the associated instruments, with the support of the Project Implementation Units (PIUs) in the project locations, and in collaboration with UNOPS for sub-component 2.2.

191. In addition, the two agencies will provide technical assistance and capacity building throughout the project life. To achieve a more efficient use of budget resources and promote increased collaboration, ERLP and RALP will share the PCU. This will maximize the potential for collaboration between the two projects, which together cover a continuum of emergency, recovery, and development activities. The shared PCU will also facilitate policy dialogue across the two projects, provide consistent reinforcement of capacity building activities for the government under RALP, and saves overhead costs by sharing PCU resources. To ensure sufficient support is provided to both projects, each project will have a dedicated Project Officer. The Project Officers will work closely together to ensure that PCU resources are adequately allocated between the two projects. The diagram below provides an overview of the PCU.

MAFS Project Coordination Unit – Structure



192. The PCU has the overall responsibility for the management of the South Sudan ELRP-3. The PCU will be responsible for all technical planning, financial management, procurement, social and environmental risk management, and communications vis-à-vis the World Bank. It will cascade down responsibilities in these areas to implementation partners, contractors and sub-contractors, and will maintain overall monitoring and supervisory responsibility for these activities. For security arrangements, the PCU will be responsible for monitoring security and safety measures by FAO and contractors. Final security-related decisions rest with the respective FAOR (see the project's Security Management Plan).
193. **Safeguards Implementation Arrangements:** Based on these implementation arrangements, FAO will have the overall responsibility for the implementation of the ESMF and other safeguards-related instruments. For that purpose, the PCU includes an Environmental Safeguards Specialist, Social Safeguards Specialist, and Gender Officer. The main task is to offer E&S advice to the PCU, oversee the implementation and monitoring of the ESMF, reporting, and support the preparation of the associated ESMPs and related annexes, e.g., SEF, LMP, GBV/SEA, etc., including the implementation of the GRM. They shall also be responsible for overseeing the preparation and quality controlling of other E&S activities during project implementation. The specialists will work together and report directly to the Project Manager and will participate in management team meetings as well as field missions to PIUs when accessible. They are supported in the PIUs by the Accountability to Affected Populations (AAP) Officers. The E&S team will also be supported by the wider project team from the PCU and the PIUs based on which key standards of the ESF to which they contribute.
194. To conduct their duties, the safeguards specialists in the PCU will:
- a. Receive monthly updates from the implementing teams in the field;
 - b. Receive all screening assessments of site-specific activities and ESMPs, review them for compliance against this ESMF with the support of FAO, and provide its no-objection where applicable prior to the commencement of all activities (see next section for screening process);
 - c. Conduct field supervision visits to FAO implementation sites, as well as at contractor activities and sites;
 - d. Monitor the implementation of the ESMPs by the implementing partners and contractors;
195. Specifically, the PCU is responsible for the guidance on, and clearance of, correctional activities required on the basis of monitoring reports. The safeguards specialists will report such requirements to the PCU Project Manager and will, in an appropriate timely manner, send a request for correction to the respective implementation team. Requests for corrections will then be added by the PCU staff to the monitoring schedule. It is expected that the safeguards officers will regularly, at least every second month, visit project sites on a sample basis. At the same time, FAO will deploy, among others, the AAP Officers and Area Coordinators in the field to ensure the day-to-day implementation of all risk mitigation measures as well as to assume basic monitoring, including of contractors.
196. Field-level implementation teams will monitor all environmental and social issues in their respective activities on a daily basis and according to the monitoring plan. They will report all

ESMF-related activities and monitoring results to the PCU through the safeguards specialists on a monthly basis, as well as in an overall report on a quarterly basis to the World Bank.

197. Implementing partners (FAO and UNOPS) will designate staff in the field to be the main focal points for monitoring the E&S related activities and ensuring their implementation. The PCU will further receive regular reports on E&S issues and will provide inputs to the quarterly reports to the World Bank, as explained in the next section of this ESMF.
198. The Third-Party Monitoring Agency (TPMA) will also retain both an Environmental Specialist and Social Specialist in order to verify the implementation of environmental and social risk mitigation measures. This will be captured in the TOR and contract for the TPMA. Furthermore, FAO appeal mechanisms such as the Office of the Inspector General (OIG) would also require E&S capacity building to align with the World Bank E&S Standards.

Capacity and Coordination of Implementation Partners:

199. **FAO** is the lead international agency on Agriculture and Food Security in general, and specifically on the recent upsurge of DL, it has played a significant role supporting MAFS in DL Control Operations in South Sudan. FAO has developed the standard operating procedures (SOP) for DL management, including for example the equipment and agrichemicals, workforce and community safety protocols, and disposal protocols. FAO also operates the Pesticide Referee Group (PRG), an independent body of experts that advises FAO on the efficacy and environmental impact of different pesticides for locust control. FAO's South Sudan Office is one of the largest FAO operations globally, and it works directly with MAFS on policy, regulatory, and investment issues across the sector. Through its ongoing Emergency Livelihood Response Programme, FAO has developed technical designs and procedures to respond to food insecurity situations with the tools and training for rapid food production from fishing to small scale livestock, to crops. It also has natural resource specialists who can work with MAFS on activities to regenerate pasture and silvopastoral systems by establishing nurseries at the central and community levels. FAO supports line ministries in collecting and analyzing weather, production, food security and nutrition, and market information for informed policy and decision-making
200. **UNOPS** has proven capacity to implement safety net programs globally and in South Sudan. It is the implementing agency for the SSSNP, which falls under the mission of MAFS, and it has extensive experience in managing labor-intensive public works, including under the predecessor to SSSNP (the SNSDP). Through the SNSDP and SSSNP, UNOPS has deepened its understanding of safety net interventions, strengthened its relationship with local authorities and communities in project locations, and enhanced its implementation capacity for community-based delivery mechanisms, all of which can be leveraged for a quick and smooth implementation of ERLP. It has also gained familiarity with the World Bank's fiduciary and safeguards rules and procedures, an added advantage in ensuring accountability and compliance. UNOPS continues operating nationwide regardless of outbreaks of violence and operates successfully in the most remote and conflict-affected areas, demonstrating a proven ability to negotiate access to and implement programs directly using UNOPS-contracted personnel in a cultural and ethnically sensitive manner.
201. **Coordination of Implementation Partners:** To ensure coordination among the PCU and the lead technical partners, MAFS will lead a steering committee to formulate annual work programs for the World Bank's approval, track project progress, and resolve technical design issues. The

existing National Steering Committee (NSC) and National Technical Committee (NTC) structure, which was created to oversee and monitor all donor programs across the government, can be used for this purpose. However, if it is determined that the NSC and NTC are too broad for this type of planning, the PCU can form a separate steering committee comprising the leadership from MAFS, PCU staff, staff from the lead technical partners, and other stakeholders as determined by the core members. This will be recorded in the PIM.

Institutional Structure across Administrative Levels:

202. **For component 1**, MAFS and FAO already have an established institutional structure within the government from the national to the county level that provides strategic and technical oversight. Control activities have been carried out by county rapid response teams (C-RRTs) comprising *payam* agricultural officers, FAO staff, and staff of NGOs as needed. The institutional structures for locust management are:

- a. At the national level, MAFS chairs a High-Level Committee (HLC) comprising representatives from related line ministries, UN agencies, and development partners. A Technical Committee (TC) comprises technical specialists from MAFS, academia, and other line ministries. A national level rapid response team (N-RRT) will engage in field and control operations as needed depending on the intensity of the swarm activity.
- b. At the state level, Desert Locust State Task Forces (DL-STF) comprising technical officers from the SMOA, other line ministries, NGOs, and other stakeholders will coordinate surveillance, control and/or preparedness activities within the state. A state-level rapid response teams (RRTs) comprising representatives of the relevant CAD offices will provide field support to county level RRTs for surveillance and control.
- c. At the county level, CAD officers will coordinate activities for DL management following the standard operating procedures of FAO, especially for control operations. County RRTs comprising *payam* agricultural officers and staff of NGOs as needed will be the frontline response or control operations within the county.

203. The FAO Environmental and Social Risk Management Officers and the Gender Officer will be fully responsible for implementation and monitoring of safeguards under Component 1, with the support of AAP Officers and technical officers in the PIUs. They will work alongside their PCU counterparts for capacity building purposes. Reports will be submitted to the PCU through the project manager, for approval and onward transmission to the WB, accordingly to the project reporting schedule.

204. **Under component 2, sub-component 2.1 will build on the existing institutional arrangements under the SSSNP.** MAFS is already working with UNOPS under that project to establish the systems for a government-led safety net system. At the national level, the government has established a National Advisory Committee and National Technical Committee, chaired by MAFS and the Ministry of Finance and Planning (MoFP) and comprising relevant line ministries. These provide strategic policy, operational and technical guidance and facilitate implementation.

205. The approach used to deliver safety nets also works to strengthen the capacities of local government institutions and community structures to effectively lead safety net implementation, with the expectation that institutional resilience at the local level will be sufficiently strengthened to withstand on-going political risks, with capacities enduring beyond the project. Specifically, the

World Bank funded projects supported local authorities and communities in project locations to establish and strengthen local institutions and community structures, in line with the Local Governance Act (2009) and based on existing decision-making mechanisms, to lead and facilitate the provision of safety nets to the communities. Special effort was made to ensure gender parity within the structures. Engagement of these local institutions in safety net delivery has helped to enhance local capacity to deliver and oversee safety net support in their communities and facilitate the peaceful interaction and dialogue among the diverse ethnic groups.⁶⁹ Since MAFS is the implementing agency for ELRP, it can link to the safety net oversight system to guide and coordinate between the two projects.

206. The UNOPS Health, Safety, Social and Environmental (HSSE) Specialist will be fully responsible for implementation and monitoring of safeguards under sub-component 2.1, with the support of HSSE Assistants in the field offices. Reports will be submitted to the PCU through the project manager, for approval and onward transmission to the WB, accordingly to the project reporting schedule.
207. **Sub-component 2.2**, on livelihood rehabilitation, focuses on stimulating rapid food production and investing in a more sustainable production base moving forward. It will use a participatory approach working with communities to mobilize for immediate food production needs, for the natural resource management activities (for example, nurseries, pasture restoration), and for supporting services (for example, mother nurseries and review and approval of varieties for import). Oversight, communication, and planning can be managed through the same system working to coordinate control activities under component 1; however, instead of the locust rapid response teams, it will work through teams comprising local extension agents, FAO staff, and NGO partners to manage the community engagement. Where labor intensive public works will be used to pay targeted people to work on food production and natural resource management activities, UNOPS staff will join the implementation teams. Since the natural resource management activities will be implemented using labor intensive public works, MAFS will coordinate between FAO and UNOPS to ensure that beneficiaries are captured in the biometric management system and stored in a single catalogue to avoid duplication or confusion.
208. The FAO Environmental and Social Risk Management Officers and the Gender Officer will be fully responsible for implementation and monitoring of safeguards under sub-component 2.2, with the support of AAP Officers and technical officers in the PIUs. This will be done in collaboration with UNOPS with regards to the cash transfer activities. FAO Officers will work alongside their PCU counterparts for capacity building purposes. Reports will be submitted to the PCU through the project manager, for approval and onward transmission to the WB, accordingly to the project reporting schedule.
209. **Component 3** will focus on action research to identify environmentally sound control methods for DL and developing the requisite policy recommendations to ensure their mainstreaming. It will involve collaborative partnerships among MAFS, FAO, Juba University, and various regional and

⁶⁹ Even when the SNSDP was paused due to violence in 2016, these structures remained in the communities, albeit less operational. Once project activities resumed in 2017, they were revitalized fairly easily, indicating that continued support would be needed to further strengthen and embed them within communities so that they endure beyond a project's life. These structures now support the smooth and effective implementation of the SSSNP.

international organizations as well strategic partnerships with other countries and IGAD as appropriate.

210. The FAO Environmental and Social Risk Management Officers and the Gender Officer will be fully responsible for implementation and monitoring of safeguards under Component 3, with the support of AAP Officers and technical officers in the PIUs. They will work alongside their PCU counterparts for capacity building purposes. Reports will be submitted to the PCU through the project manager, for approval and onward transmission to the WB, accordingly to the project reporting schedule.

7 Procedures for Review, Clearance, and Implementation of Subproject E&S Instruments

211. Since some of the project activities and subprojects will be identified during implementation, this ESMF was prepared to apply to all subprojects and activities. The main objective of the ESMF process is to ensure that the subprojects and activities financed by ELRP will not create adverse impacts on the local environment and communities, and the residual and/or unavoidable impacts are mitigated in line with the World Bank's Environmental and Social (E&S) standards in the ESF.

212. During implementation, identified activities/subprojects and technical assistance (TA) support will be screened, confirm eligibility for project financing and if eligible, given a risk classification based on their E&S issues and applicable ESSs, after which any necessary Environmental and Social Impact Assessment (ESIA) and other E&S instruments will be prepared based on the requirements laid out in this ESMF. The assessments, instruments, and mitigation measures will be proportionate to the nature and scale and the potential risks and impacts of the project and consistent with the requirements of the Bank ESF. The safeguards plans prepared for subprojects may include, but are not limited to: Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plans (ESMPs); Stakeholder Engagement Plan (SEP); Labour Management Procedures (LMP); Gender-Based Violence Mitigation & Action Plan; and Environmental Codes of Practice (ECOPs), including health and workers' issues related to sexual exploitation and abuse (SEA). Terms of reference, work plans, and documents defining the scope and outputs of any subproject activities (including TA) will be drafted so that they are consistent with the environmental and social standards (ESS 1-10). Based on the initial screening, any subsequent ESA would cover the requirements established under the relevant ESSs for that subproject and identify the environmental and social risks and impacts including direct, indirect and residual impacts.

7.1 Sub-project definition and exclusions

213. **Subproject definition.** A subproject may be considered as an activity or granted activity which may be implemented either by the PCU or field-level implementation teams, defined most often by its geographical or technical scope (for example, DL swarm spraying activities, or livelihood activities in a given area). Each subproject will be defined in scope and must be consistent in nature with the ESF. Subprojects may be delineated based on geographical communities; specific actors with whom activities are conducted at a given level (e.g., such as intercommunity FO); infrastructure units/construction activities; subproject grant owners; etc.

214. General subproject typologies within the ELRP project can be divided largely by component/subcomponents:

- **(Subcomponent 1.1) Swarm surveillance and monitoring**, which includes the deployment and operation of field teams in locust prone areas to monitor for new swarms entering the country; investigation of sightings by communities; raising awareness among communities about locusts, effective control, safety issues regarding pesticides, and locust identification; and guiding response teams to swarms for control operations.
- **(Subcomponent 1.2) Swarm management measures** which includes direct control operations using agrochemicals and biopesticides, as well as the assessment of losses due to the desert locusts and the impacts of pesticides on human, animals, and environment with necessary safety measure being implemented. As a last resort only, the project will support swarm

control using existing pesticide stocks—upon approval of the World Bank’s leading pest management specialist and under the strong guidance of FAO. The scaling up of integrated pest management (IPM) among affected communities will be supported.

- **(Subcomponent 2.1) Unconditional Cash Transfers to Safeguard Food Security and Protect Human Capital**, where emergency direct income support is provided in the form of unconditional cash transfers to locust-affected households to protect against livelihood and asset loss and meet their urgent food needs, smooth consumption gaps and enhance purchasing power for basic commodities.
- **(Subcomponent 2.2) Food production and building the natural resource base for crops and livestock**, which includes helping farming and livestock households return to production for improved food security and restore the biodiversity of the affected areas by investing in land use systems that integrate crops, trees, and livestock to restore lost biodiversity caused by DLs and the measures to control the swarms.
- **(Component 3): Applied research, training, and technical assistance for National Preparedness and Regional Coordination**, supporting investments in the research/informational, institutional, and strategic elements of desert locust management by the GRSS and its strategic partners.
- **(Component 5): Support to the Intergovernmental Authority on Development (IGAD) in its multi-donor effort to establish an Inter-Regional Platform for the Management of Desert Locusts and other Transboundary Pests**. Through this, the establishment of the Desert Locust and Transboundary Pests Response Coordination Unit (DLRCU) will be financed.

215. **Subproject exclusions.** All activities that may lead to high E&S risk will be excluded, in particular all activities that might involve in Involuntary land acquisition. The list of exclusion criteria is provided in Annex 1 of the ESMF. Few activities that will not be considered within the subproject definition are presented below. Nevertheless, all existing E&S tools apply for these activities.

7.2 Key Steps

216. The E&S safeguards process is comprised of four steps, as depicted in Figure 12. This section briefly describes the key steps:

- **STEP 1:** Screening for eligibility and E&S issues including risks and impacts using screening criteria (see Annex 1), application of ESSs, and identification of, and needs for, preparation and implementation of E&S documents/instruments.
- **STEP 2:** Preparation of E&S documents as required, including the development of mitigation measures, SEP, LMP, Voluntary land donation consent form based on the voluntary land donation framework, and the finalization of either Construction ESMPs (C-ESMPs) (with WMP as relevant) or ECOPs to be incorporated into bidding and contractual documents and subjected to close monitoring of the contractor’s performance. ECOPs or C-ESMPs clearly identify mitigation measures for potential negative impacts during site clearance and construction, including the management of contractors; chance finds; Environmental, Health, and Safety Guidelines (EHS) application; and Codes of Conduct (COC) on SEA.
- **STEP 3:** Clearance and disclosure of E&S documents; and
- **STEP 4:** Implementation, monitoring, and reporting.

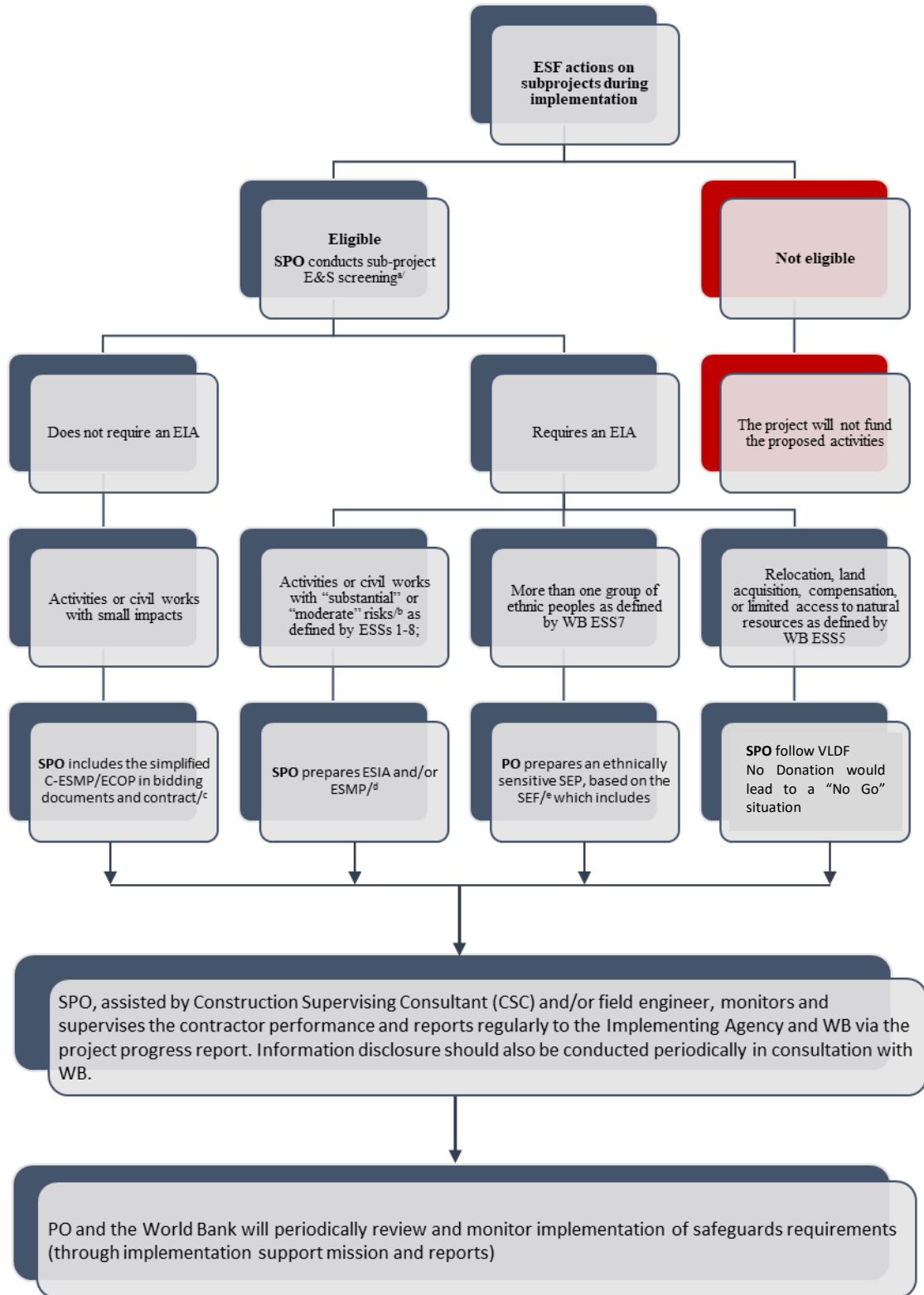
The risk analysis, impact assessment, and preparation of E&S documents for all subprojects will be carried out during implementation. At this point in time, many of the activities carry low to substantial risk and should not require a full ESIA; however, due to existing conflict in South Sudan,

the overall risk rating of ELRP is high. If deemed necessary for certain high/substantial-risk subprojects based on the site-specific screening, then a follow-on ESIA must be done in accordance with the national laws.⁷⁰ Preparation of a subproject ESMP occurs when the subproject activities have been clearly identified and locations are known. During the preparation of the ESMP (abiding by ESS1), due attention will be given to address the other applicable World Bank E&S standards, including: (i) issues of labor and working conditions (ESS2); (ii) resource efficiency and pollution prevention and management (ESS3); (iii) community health and safety (ESS4); (iv) land acquisition, restrictions on land use and involuntary resettlement (ESS5); (v) biodiversity conservation and sustainable management of living natural resources (ESS6); (vi) Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7); (vii) cultural heritage (ESS8); and (viii) stakeholder engagement and information disclosure (ESS10).

⁷⁰ Refer to Chapter 7 of the Environmental Protection Bill (2010)

Figure 1: Flowchart for Safeguard Actions for Subprojects

Legend: "PO" is the project owner (FAO); "SPO" is subproject owner (either FAO, UNOPS, or an implementing partner)



Notes

- a. Subproject screening (i) identifies potential negative impacts (environment and social), mitigation measures and/or next actions using the checklist forms; and (ii) discusses results with the local government and/or communities (apply criteria listed in annexes).
 - b. South Sudan national standards also require an EIA under these conditions.
 - c. Includes consultation and inclusion of C-ESMP/ECOP++ in bidding and contract documents, ensuring that contractors are committed to the obligations; ESMPs and ESIsAs will be submitted for WB clearance and public disclosure by the client in country and by the Bank via the World Bank Open Knowledge Repository.
 - d. Includes consultation with ethnic peoples. The SEP will be submitted to WB for clearance and public disclosure by the client in country and by the Bank via the World Bank Open Knowledge Repository.
 - e. Includes consultation with the affected population. The Voluntary land donation consent form must be submitted to the WB for clearance and public disclosure by the client in country and by the Bank via the World Bank Open Knowledge Repository.
217. Key safeguards actions can be highlighted as follows:
- DL Control measures will strictly adhere to OHS guidelines and the IPMP for the project, with special attention paid to the stakeholder engagement required to adequately forewarn communities of spraying programmes.
 - In the event of any small construction works, be that for storage purposes or otherwise, must incorporate the C-ESMPs/ simplified ECOPs into the bidding documents and consultant contracts, with contractor performance closely monitored by the responsible persons of the implementing agencies (FAO and implementing partners for subprojects).
 - If screening highlights the need for land donation the voluntary land donation framework (VLDF) would apply accordingly to the WB principles of the ESS5. Key inclusive consultations would be needed for insuring the reality of the voluntary consideration. Only temporary effects on land rights use or access might be managed through the voluntary land donation framework and adequate mitigation and compensation measures. In case the subproject might cause adverse negative impacts for owners or users, E&S documentation would be updated to meet the ESS5 requirements by developing a RAP prior to any activities. In particular, screening will ensure that land donor has been informed and consulted about the subproject and knows that refusal is an option. Community land donations can only take place with the consent of individuals using the land and donors are expected to benefit directly from the subproject. The entire process must be carefully documented to ensure that no one is pressured into donating land.
 - All the E&S documents of a given subproject will be submitted for WB clearance before their respective approval and implementation and in accordance with timing required by national law.

Table 2: Applications of ESMF Annexes

ANNEX	CONTENT	APPLICATION
1	E&S Screening, Checklist, and Forms for Subprojects	All subprojects and activities
2	Procedures for managing contractors & UN supplier Code of conduct (2017)	Whole project
3	Environmental & Social reporting format	Whole project
4	Stakeholder Engagement Plan (SEP)	Whole project
5	Labour Management Procedures (LMP)	Whole project
6	Integrated Pest Management Plan (IPMP)	Components 1 and 2
7	Gender-Based Violence Mitigation and Action Plan	Whole project
8	Security Management Plan synthesis	Whole project
9	Voluntary Land Donation Framework (VLDF)	All subprojects with works contracts
10	Cultural and Chance Find Procedure	Whole project
11	Gap Analysis World Bank ESS, FAO Standards, and South Sudan National Legal Framework	n/a (for reference only)
12	Social Assessment (SA)	n/a (for reference only)
13	Terms of Reference for Independent E&S Third Party Monitoring	Whole project

STEP 1: Assess E&S Risk and Impact

218. The first step of the E&S risk and impact assessment will confirm the eligibility of subprojects and/or activities to be financed by the project, identify the potential E&S issues, and assess potential impacts of the subprojects/activities (including the need for E&S documents as required by the ten ESF standards using an E&S screening checklist). The agencies responsible for implementing the subprojects/activities will be responsible for completing and signing the screening forms. As a time-consuming and resource-demanding exercise, additional support from short-term consultants or a firm of experts might be contracted to screen all subprojects. FAO, as implementing agency, will be responsible for the overall activities and ESMF processing and clearance, supervision and monitoring, and reporting. Consultation with the World Bank safeguards specialists will be made if needed, depending on subproject complexity.

219. After screening, the subprojects should be risk rated as low, moderate, substantial or high risk. **Low risk subprojects** that do not have a physical footprint will not require safeguards instruments preparation; however environmental and social clauses in the contract will be recommended. A sample page or template of these clauses need to be prepared and cleared by the bank for adoption across all identified low risk category sub projects. **Subprojects classified as Moderate risk** would require a detailed ESMP in addition to standard E&S clauses in the contract and bidding document. A C-ESMP would be needed by for civil work rehabilitation and renovation subproject. Activity Typology ESMPs and E&S contract clauses would need to be reviewed and cleared by the WB for adoption across the subprojects under the supervision of FAO. The Bank will reserve the right to randomly sample various ESMP to monitor on the quality thresholds and may assume the clearance role should there be need; **Subprojects categorized as Substantial risk** are assumed to trigger environmental or social impacts and risks that are site specific, temporal and reversible in nature. In addition to the environmental and social clauses in the contract, these subprojects will require an environmental and social assessment (ESIA) done for them and this will need to be reviewed and cleared by the Bank. A C-ESMP would be needed by for civil work rehabilitation and renovation subproject. Note for this category all the ESIA need to be reviewed and cleared by the Bank. **Subprojects considered High risk** will need to be screened out and avoided and the exclusion list updated.

Table 3: Risk level, approval and E&S complementary documentation

Risks level	Definition	E&S documentation and application	Approval
Low Risk	Do not have a physical footprint. Do not have environmental or social risks and/or impacts	No further E&S documentation. Environmental and Social Clauses in the contract will be recommended (Annex 2) according to ESMF and related annexes.	PCU and MAFS
Moderate Risk	Moderate or unknown adverse environmental or social risks and/or impacts manageable through adequate and minimal mitigation measure	Detailed ESMP for all subprojects. C-ESMP for civil work rehabilitation and renovation subproject Standard E&S clauses in the contract and bidding document (Annex 2) according to EMSF and related annexes.	PCU, WB and MAFS
Substantial Risk	Substantial adverse environmental or social risks and/or impacts manageable through important mitigation measures	Full ESIA and specific ESMP for all subproject. ESMF and related annexes apply. C-ESMP for civil work rehabilitation and renovation subproject Updated E&S clauses in the contract and bidding document (Annex 2) according to EMSF and related annexes.	PCU, WB and MAFS
High Risk	High adverse and irreversible environmental or social risks and/or impacts	No Go Subprojects are including in the exclusion list	-

STEP 2: Develop the E&S Documents

220. Step 2 focuses on preparing safeguards documents based on the issues identified in Step 1. Guidelines for the preparation of an ESMP are provided in the annexes for main types of subprojects, whereas an initial SEP and LMP have been developed separately. A subproject SEP will be developed based on the main SEF. Separate guidelines for development of land donation consent form are available in the voluntary land donation framework. Subproject owners are responsible for the preparation of E&S documents, in consultation with a WB safeguards specialist for complex subprojects, as needed. It is also necessary that the implementing agencies of the subprojects and activities are responsible for preparation of E&S documents (e.g., full EIA, etc.) required by national regulations,⁷¹ securing approval of the responsible agencies within the nationally mandated timeline.

STEP 3: Review, Approval, and Disclosure of E&S Documents

221. **WB review and clearance:** Before approval and commencement of subproject works, the PCU will submit all E&S documents to the World Bank for review, clearance, and public disclosure. For ELRP the World Bank will conduct reviews of the first three ESMPs prepared and may conduct a post review as needed. The approval process described herein may also be reviewed occasionally. After clearance of the ESMPs, the WB may choose to review ESMPs selected at random.

222. All E&S documents will be posted on the FAO and government websites (at national and provincial level). Hardcopies in local language will be made available at the FAO country office and subproject sites. FAO, UNOPS, and implementing agencies of subprojects must publish a notification of disclosure of information and solicit comments within the month following that disclosure date. The English version of the ESMP will be disclosed on the WB website.

223. **Government approval.** The WB also requires that the responsible government agencies approve the EIA documents as required by national legislation. The EIA, as well as approval conditions, will be provided to the WB for information and will be disclosed to the public. Any E&S document prepared will only be submitted to the Government agencies for approval once they have been cleared by FAO and the Bank where required respectively.

STEP 4: Implementation, Supervision, Monitoring, and Reporting

224. ESMF implementation, supervision, monitoring, and reporting is an integral part of ELRP and subproject implementation. The safeguards officers within the PCU are ultimately responsible for the supervision, monitoring and reporting on all E&S ELRP tools and documents implementation. A Gender Officer will be dedicated to the implementation of the GBV Mitigation & Action Plan. AAP Officers are also directly involved at the State level as focal points for GRM and sensitizing communities and IPs. In all cases, project staff and all partners and contractors will be sensitized to E&S compliance. World Bank E&S specialists will also occasionally supervise and monitor the implementation of E&S activities during the WB implementation support missions. The delegation of responsibilities goes as follows:

⁷¹ National legislation on environmental protection planning, strategic environmental assessment, environmental impact assessment, etc., as per Chapter 2 of this ESMF and Chapter 7 of the Environmental Protection Bill (2010).

- ***E&S monitoring of contractor performance during construction:*** To ensure compliance with the national laws and regulations as well as some specific requirements of the ESSs at subproject level, the subproject owner (FAO or a partner implementing agency) will hire a qualified national consultant to conduct monthly monitoring and reporting while assigning the Construction Supervision Consultant (CSC) or field engineers to be responsible for monitoring and reporting of contractor's compliance to the C-ESMP on a day-to-day basis. For ELRP, FAO will hire an independent consultant to assist in monitoring environmental and social performance by all subproject owners, as well as the construction contractor throughout construction, and report their findings in ELRP E&S monitoring reports for the World Bank (this will be done on a six-month basis, or as agreed with the WB in accordance with the legal agreement, including the ESCP). The FAO country office will also be responsible for monitoring and evaluating implementation of the SEP and LMP, including responding to grievances and/or complaints of the project/subproject affected peoples as well as the project workers (see Chapter 9).
- ***E&S monitoring during implementation of activities/operation of subproject-related infrastructure:*** Specialized training will be provided on more substantial risks inherently associated with subproject activities (e.g., waste management and occupational health and safety training). E&S staff must pay extra attention – proportional to the more substantial risks – to those activities during implementation. In order to ensure sustainability after project closure, the awareness and capacity of machine operators, shared building operators, and government staff must be increased through trainings and during implementation supervision. This will require E&S capacity building consultants (including extension staff). Subproject owners will detail safeguards progress in the subprojects' E&S monitoring reports for submission to the FAO country office. The FAO country office will then aggregate and submit the information to the PCU for onward transmission to the WB.
- ***Third-party monitoring (TPM):*** To ensure compliance with all aspects of the ESMF, MAFS will hire a Third-Party Monitoring Agency (TPMA) for TPM of E&S safeguards implementation and report the results to the WB and other stakeholders every 6 months or as agreed with the WB in accordance with the legal agreement, including the ESCP.

8 Monitoring Plan

8.1 Regular Monitoring and Inspection for Compliance

225. Adequate institutional arrangements, systems and resources will be put in place to monitor the ESMF. The goal of monitoring will be to measure the success rate of the activities, determine whether interventions have handled negative impacts and to determine whether further interventions are required or monitoring is to be extended in some areas. The goal of inspection activities is to ensure that sub-component activities comply with the plans and procedures laid out in the ESMF.
226. The main monitoring responsibilities and inspection activities will be with the PSU, which will administer the overall ELRP-related environmental and social monitoring and implementation as laid out in this ESMF, with oversight by the PCU. The PSU Project Manager will be overall responsible for the implementation of the environmental and social mitigation measures, as well as for monitoring and inspecting for compliance. The E&S Risk Management Officers in the PSU will handle all reporting aspects.
227. The ESMF is the overall document that guides the development of site specific ESMPs. While the ESMF, laying out expectation from FAO, UNOPS, and implementing partners (IPs), will be responsible for their own site/activity specific screening, impact assessments, development of site/activity-specific ESMPs, monitoring of impacts, and administration of mitigation measures in regards to their respective sub-component activities. They further commit to integrate stakeholder inputs into their regular monitoring and reporting activities. As such, FAO and UNOPS will require sufficient personnel with appropriate expertise to conduct these tasks. The number of personnel to be engaged will depend on the workload and the geographical distribution of the subprojects. FAO and UNOPS will allocate adequate financial, logistic and material resources to support the E&S team in the implementation of the ESMF.
228. The IPs are committed to report all screening results, the results of impact assessments, and site/activity-specific ESMPs to the Environmental and Social Specialists in the PSU through their Letters of Agreement (LoAs). The E&S Risk Management Officers will assess the compliance of activities against the ESMF and their subsequent ESMPs and will report possible non-compliance to the PSU Project Manager. Indicators are identified in both documents and used as a baseline for assessing progress on implementation. The PSU will also independently conduct its own monitoring, verification and inspection of the activities to ensure they follow this ESMF. Monitoring indicators will depend on specific activity contexts.
229. The GRM will further help track complaints and effectiveness of interventions, including those with environmental and social impacts and the quarterly monitoring reports will provide summaries and statistics on the GRM. Moreover, a Management Information System will be developed, which in addition to collected necessary information on beneficiaries and projects to track progress, will also include a module to record complaints and the ways in which they were addressed.

8.2 Monitoring and Reporting

230. MAFS is responsible for the overall M&E arrangement of the proposed ELRP. As the lead technical partners contracted to implement the project, FAO and UNOPS will work together to

produce semi-annual progress reports, as well as mid-term and project completion reports, which will be shared with all stakeholders, including relevant Government ministries. Most importantly, overall consolidated M&E reporting from FAO will be submitted to MAFS for approval and onward transmission to the World Bank. The ELRP will follow a semi-annual reporting cycle. Adequate institutional arrangements, systems and financial resources will be put in place to monitor the ESMF. Monitoring results will routinely inform corrective actions and updating of the E&S instruments accordingly.

231. FAO will complete annual environment and social progress reports for the ELRP. The environment and social sections will be part of the overall project reports. Information about the sub-projects and voluntary land donations (VLDs) will be presented as sections of the semi-annual progress report. The format for completion of the environmental and social sections of the semi-annual reports is set out below.
232. Semi-annual progress reports provide brief updates on environmental and social issues in sub-projects, to flag possible challenges and allow for immediate adjustments and assistance in the implementation of the ESMP. Furthermore, sub-project ESMPs and VLD documentation will be subject to post-review by MAFS and the World Bank.
233. The objectives of annual reviews of ESMF implementation are: (a) to assess the project performance in complying with ESMF procedures, learn lessons, and improve future performance; and (b) assess the occurrence of, and potential for, cumulative impacts due to project funded activities. In addition, data from the GRM will be considered. These reports will be the main source of information for the World Bank supervision missions, FAO and national and state authorities, as needed.
234. The World Bank will equally supervise and assess the environmental and social performance through the review of the semi-annual monitoring reports and through regular⁷² site visits. Reporting requirements and outlines are listed in Annex 1.
235. Upon completion of the project, FAO will undertake an assessment of the success of the ESMF and include relevant information in the Implementation Completion Report (ICR) submitted to MAFS. This ICR will be followed by the Bank's own ICR. If either of these assessments reveals that any key objectives of the ESMF were not achieved then follow-up measures will be developed to remedy the situation. This is also applicable for site-specific ESMPs.

8.3 Incident and Accident Reporting

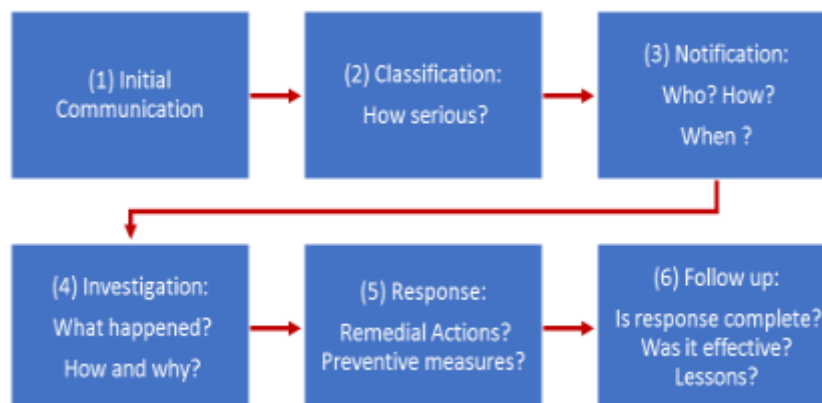
236. For all severe and serious environmental, social, safety and security incidences (an incident that has *significant adverse effect on the environment, the affected communities, the public or workers, e.g., fatality, injuries involving medical treatment, chemical spills into sensitive environmental receptors like rivers, GBV/SEA, forced or child labor, criminal or political physical violence*), PCU staff will report within 48 hours to the World Bank, followed by a detailed investigation report outlining a root cause analysis of the incident and related corrective actions to be undertaken. Incident reports will be captured in an incident form to be developed for the

⁷² Frequency will be determined by the need but expected to be more frequent at early stages of project implementation

project. Other indicative incidents will be recorded in the incident register or log and the Bank notified through semi-annual progress reports.

237. FAO, UNOPS and IPs will report severe incidents to the PCU within 24 hours and the PCU will report to the World Bank within 48 hours. The procedure below for incident management and reporting will be employed for all types of incidents. A detailed report of the incident shall be provided within fifteen (15) days of the incident or accident notification, unless a different timeline is specified by the Bank.

Figure 2: Steps and procedures for incident management and reporting



8.4 Third-Party Monitoring for Smart Implementation

238. ELRP will include Third-Party Monitoring (TPM) to insure a “*smart implementation*” process from the World Bank.⁷³ MAFS will engage a Third-Party Monitoring Agency (TPMA) to provide a review of environmental and social performance of the project, including adherence to all safeguards instrument of the project, with specific attention on gender-based violence and grievance redress mechanism. Third party inspections and audits shall be carried out on a regular basis to identify any non-compliance to ESMF requirements. Corrective actions if proposed shall be recorded, tracked and implemented to the satisfaction of MAFS. Main steps for implementation will be:

- **Competitive identification of TPMA and specificity.** The TOR would be made and agree jointly with the World Bank focusing on environmental and social risks impacts of the project with attention on Gender Based Violence & Sexual Abuse and Exploitation. It will include the assessment of the adherence at all implementation levels to the procedures set out in the Project Implementation Manual, ESMF and other relevant project documents and in verifying outputs of all project activities. The TOR will be partly based on the Annex 2 of the Good Practice Note from the World Bank on Third-Party Monitoring and is available in the Annex 14 of the present ESMF.
- **Selection and contracting of the TPMA.** Selected TPMA would be independent from project preparation with limited previous role in the project as there are limited actors on the field.

⁷³ The World Bank – 2018 – Good Practice Note ESF for IPF Operations. Third Party Monitoring. p.23

Particular attention would be made on ethical, fair, competency and internationally recognition of the TPMA.

- **Managing the TPMA.** Monitoring time schedule might be adapted to event and incident and will be further discuss and detailed in the TOR.

Table 6: Reporting and Transparency

ESS and Related Risk	Indicators	Critical Limit	Responsibility	Time
Major ESMF indicators				
ESS1: Update ESMF document	Semi-annual update/validation of E&S plan (ESMP, VLD, SEP, SEP). Number cleared and disclosed, Number in draft. Number under implementation	Yes	PSU	Semi-annual
ESS10: Conflict over selection of beneficiaries	Inclusive consultation including (IDP, host household, seasonal pastoralists, returnees, women, youth, all ethnicities, etc.) % of female participants % of female heads of households in the community participated	Consultation Report and list of stakeholders with contacts and categories <50 < 80	IPs, Boma and Payam Development Committees and AAP local focal point	Semi-annual
ESS10: Grievance and redress mechanism	Total number of Grievance by channel: traditional authorities / justice / IPs / FAO / OIG / WB GRS % of cases on harassment and violence against women and children % of cases on the same from the same locality	<1000 < 50% 20%	FAO M&E	Semi-annual
ESS10: GRM	Number of on-going and unsolved grievance by type (AAP types including tenure aspects)	<50	FAO M&E	Semi-annual
ESS10: Stakeholder Consultation	% of stakeholders trained on GBV	<70%	PSU	Semi-annual
ESS10: Stakeholder Consultation	Number of awareness sessions on GBV	XX	PSU	Semi-annual
ESS10: GRM	Number of Grievance by IPs	XX	FAO M&E and Procurement Unit	Semi-annual
ESS10: GRM	Number of incidents ⁷⁴	0	PSU/FAO M&E	Semi-annual
ESS10: GRM	Number of GBV-SEA and SH cases related directly or indirectly to the project % of cases on harassment and violence against women and children % of cases on the same from the same locality	0 <50% <20	FAO PSEA M&E	Semi-annual

⁷⁴ Incidents all included: GBV-SEA, SH, death, injuries, near misses, etc.

ESS and Related Risk	Indicators	Critical Limit	Responsibility	Time
ESS7: Elite Capture	Disaggregation of beneficiaries from activities by county (ethnics groups, minorities women, IDPs, Host households, Returnees, children according to SEP and local assessment)	Adequate to local social assessment baseline	PSU	Annual
ESS10: Stakeholder Consultation and information disclosure	Number and percentage of affected households consulted (disaggregated by female-headed households, ethnic minorities, youth)	<50%	PIUs	Semi-annual
ESS2: Poor workers' occupational health & safety	Number of OHS incidents by type (falls, cuts, burns, spills, communicable diseases etc.) and actors (direct workers, IP workers, contractors, community workers) - Disaggregated by gender and age group (adult, youth, children); No. of audits and inspections conducted, No. of work stop orders given or improvement/corrective orders given.	XX	PIUs	Semi-annual
ESS10: Information	Number of communications reports based on SEP and means used at different scale (county, community): Local consultation Radio etc. % of communications tailored to women % of communications tailored to children	XX <30% <30%	PIUs	Annual
ESS4: community health & safety	% community members sensitized to public works activities, HSE, GBV (Harassment and violence against women and children) Disaggregated by gender and age group - adult, youth, children	XX	IPs	Annual
ESS5: land tenure	% Person affected by the project (PAP) related to land donation % of female-headed households % of child-headed households	<XX 0 0	PIU	Annual
ESS5: land tenure & VGGT 3.A.1.1. & 2	Perceptions of legitimate tenure rights assessed with individual groups and validate through multi-stakeholder group	No	PIU	Semi-annual
ESS5: land tenure & VGGT 3.A.1.4 & VGGT 3.A.1.5	Voluntary land donation (ha) and related grievance and redress (ha) % of stakeholders consulted on perceptions of legitimate tenure rights % of grievances on voluntary land donation and tenure	<XXha / Oha XX XX	PIU	Annual
ESS1: partners E&S capacity assessment	Percentage of partners E&S capacities assessed Percentage of capacity building measures implemented	<100% <100%	PSU and PIU	Annual
ESS1: non implementation of E&S requirements	% IPs nonconformity with the E&S commitment plan within contract % of incidents related to harassment and violence against women and children	0% 0	PSU	Semi-annual
ESS1: non implementation	% sub-project non-conformity following C-ESMP (% of mitigation activities non conform)	<20%	PIU	Semi-annual

ESS and Related Risk	Indicators	Critical Limit	Responsibility	Time
of E&S requirements	% of incidents related to harassment and violence against women and children	0		
ESS3: environmental pollution	Tons of inorganic fertilizer supplied Mean use of inorganic fertilizer (kg/ha)	<XX tons <XX kg/ha	PIU	Annual
ESS3 / ESS6: environmental pollution and biodiversity losses	Tons of Phytosanitarian products supplied Mean use of phytosanitarian products (kg/ha) Area of offset created	<XX tons <XX kg/ha < XX ha	PIU	Annual
ESS3: Soil VS FAST	VS-FAST Soil improvement	<0 TBD	NRM Unit	Annual
ESS3 / ESS6: environmental degradation	Number of Local Environmental Entities grievance % reported by female heads of household	0 <20%	PIU PSU	Annual
ESS6: deforestation	Deforestation incidences related to project (agriculture expansion, etc.)	XX	PIU	Annual
ESS3: GHG emission	GHG emission	<ExAct modelling	NRM Unit	Mid-term and Completion
ESS1: audit of field-level IPs	E&S evaluation and audit of IPs	1	PCU and Procurement Unit	Annual
ESS2 / ESS4	Number of security issues (injuries, death) by type and actors: Beneficiaries; IPs; FAO staff % of women and girls % of children	XX <50% <40%	UNDSS UNOPS FAO PCU IPs	Semi-annual
Specific Framework and Plan indicators				
ESS4 / ESS7: Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Action Plan	Implementation of the action plan Refer to the action plan for preventing and responding to sexual exploitation and abuse and sexual harassment indicators.	<100%	PCU	Annual
ESS3: Integrated Pest Management Plan (IPMP)	Implementation of the IPMP Refer to the IPMP Indicators	<100%	PCU	Annual
ESS10: Stakeholder Engagement Plan (SEP)	Implementation of the SEP Refer to the Stakeholder Engagement Plan indicators	<100%	PCU	Annual

9 Grievance Redress Mechanisms

239. Under the new World Bank ESF,⁷⁵ Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.⁷⁶ One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances’.⁷⁷ FAO and UNOPS integrate such concern within their Accountability to Affected Populations (AAP) Policy.

240. This Project GRM should facilitate the project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The ELRP is providing mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redress mechanisms (GRM) for the ELRP based on existing and functional⁷⁸ mechanism and Standard Operating Procedures.⁷⁹

241. As per World Bank standards, the GRM will be operated in addition to a separate GBV Mitigation & Action Plan, which includes reporting and referral guidelines (see Annex 7). Additionally, in line with the provisions of ESS2, a grievance mechanism will be provided to all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. This worker grievance mechanism is included in the project’s LMP (see Annex 5). Given the small-scale nature of works and focus on locally sourced labor, the intake mechanisms of the overall GRM will also allow intake of grievances under ESS2. Note that for Sexual Harassment at the workplace, provisions under the GBV Mitigation & Action Plan apply.

Table 7: Synthesis of GRM system applying and appeal processes

Situation	GRM system	Appeal
All complaints in exception with (GBV/SEA/SH and Labour issues)	Project GRM (including customary authorities GRM and tribunal court GRM)	FAO RAF / OIG / WB GRS
Harassment/violence against women and children	GBV Mitigation & Action Plan GRM	OIG / WB GRS
FAO contracted workers	LMP workers GRM	FAO Appeal Committee or ILOAT / WB GRS
UNOPS contracted workers	LMP workers GRM	UNOPS IAIG/ UN Ombudsman/ WB GRS
IP procurement	LMP Procurement GRM	WB GRS

⁷⁵ World Bank, Environmental and Social Framework, 2018.

⁷⁶ Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which is laid out in the Labour Management Plan (LMP). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’⁷⁶ spells out requirements for a GBV grievance redress mechanism, which is laid out in a separate SEA/SH Prevention and Response Action plans.

⁷⁷ World Bank, 2018, p. 131.

⁷⁸ FAO South Sudan. 2019. Accountability to Affected Population. A report on the feedback and complaints recorded from the period of June-August 2019.

⁷⁹ FAO South Sudan. 2019. Accountability to Affected Population and Prevention of Sexual Exploitation and Abuse. Standard Operating Procedure. 9p.

9.1 Guiding principles

9.1.1 AAP Guiding principles

242. Accountability to Affected Populations guiding principles are:

- Ensuring that AAP is applicable to all of FAO's programmes, whether humanitarian, resilience-building or development, requires FAO work to be guided by the following principles.
- Understanding the context, the conflict and/or power dynamics, gender roles, people's needs, priorities, vulnerabilities, concerns, perspectives, preferences and local capacities where FAO is intervening.⁸⁰
- Maintaining proximity with FAO beneficiaries and members of host communities where FAO is working in.
- Establishing effective two-way communication channels.⁸¹
- Enabling participation throughout the project life-cycle.

9.1.2 GRM Guiding principles

243. Guiding principle of GRM systems are:

- AAP Guiding principles;
- Early information on GRM systems through AAP local focal point and Implementation partners message before any activities;
- Readily accessible for all project-affected parties and does not prevent access to judicial and administrative remedies;
- Designed in a culturally appropriate way and is able to respond to all the needs and concerns of project-affected parties;
- Seeking feedback or complaints from beneficiaries and non-beneficiaries;
- Multiple channels to insure objectivity and triangulation of information;
- System sensitive to women, men, boys and girls, as well as people living with disabilities, with attention to access by the most vulnerable and marginalized;
- Confidentiality and prevention against retaliation;
- Regular information and feedback on the grievance situation to affected parties and main stakeholders.

⁸⁰ FAO. (2020). *The Programme Clinic: Designing conflict-sensitive interventions – Approaches to working in fragile and conflict-affected contexts. Participant's workbook*. FAO

⁸¹ A communication channel is a medium or method used to deliver a message to the intended audience. A variety of communication channels exist, and examples include: Mass media, such as television, radio (including community radio) and newspapers, community engagement, also known as social mobilization with two-way participation that fosters community ownership, such as community dialogues, listening groups or action planning.

9.1.3 GBV-SEA/SH Guiding Principles

244. As part of the measures to protect staff and beneficiaries of assistance and the populations of South Sudan, FAO and UNOPS adhere to the **IASC Accountability to Affected Population Commitments** which aim to translate aspirations into action and results among humanitarian and development actors: **leadership; participation and partnership; information, Prevention of Sexual Exploitation and Abuse, feedback and action; and results**. FAO and UNOPS are already acting to pursue a “zero tolerance” policy towards sexual exploitation and abuse (SEA).

245. FAO SOP on Prevention of sexual exploitation and Abuse (PSEA) defines guiding principle.

- The principles of integrity, professionalism, respect for human rights and the dignity of all peoples underpin FAO’s commitment to preventing and addressing acts of SEA. These principles are enshrined in the FAO Staff Regulations and Rules, as well as in the Standards of Conduct for the International Civil Service,⁸² which require the highest standards of integrity from all employees.
- As stated in Director-General’s Bulletin No.2012/70, FAO has a zero-tolerance policy towards acts of SEA that are committed by its employees or any other personnel associated with the work of FAO⁸³ Such acts constitute serious misconduct and may therefore provide grounds for disciplinary measures, including summary dismissal, or termination of contract.
 - According to FAO, “Employee” refers to all those holding an employment contract with FAO, including Consultants, PSA holders, as well as those performing non-remunerated services such as Volunteers. It also includes Government provided staff.
 - This also includes acts committed by FAO contractors’ employees, or any other person engaged and controlled by the contractor to perform any services agreed upon with FAO. It also includes any entity financed by FAO or involved in the execution of FAO activities, including suppliers and service providers bidding for or contracted in commercial relationships with FAO, or partner organizations receiving, under Letters of Agreement (LoAs), financial or other resources from FAO in respect of its programs and operations.
- Whilst the emphasis of FAO activities in the area of PSEA will be on prevention and protection from SEA, the SOP establishes responsibilities and a formal reporting mechanism for SEA complaints, as well as related procedures for their investigation and subsequent follow-up.⁸⁴

⁸² Standards of Conduct for international civil servant (Manual Section 304).

⁸³ This includes acts committed by FAO contractors’ employees, or any other person engaged and controlled by the contractor to perform any services agreed upon with FAO. It also includes any entity financed by FAO or involved in the execution of FAO activities, including suppliers and service providers bidding for or contracted in commercial relationships with FAO, or partner organizations receiving, under LoAs, financial or other resources from FAO in respect of its programs and operations.

⁸⁴ Where persons specified in Footnote 2 are concerned, who are not subject to FAO Staff Regulations and Rules, investigation and follow-up action will be dealt with in accordance with specific procedures in place for the investigation of third parties involved in programs and operations of the Organization. In addition, specific PSEA clauses have been inserted into all LoAs and procurement of goods and services contracts, allowing FAO to immediately terminate any such LoA or contract in cases of SEA committed by this category (see Manual Sections 502 and 507).

- **Safety:** To avoid any additional harm, the safety of SEA victims will be ensured at all times, and the safety of all parties involved in PSEA must be fully considered.
- **Confidentiality:** The confidentiality of complainants, victims and other relevant parties must be respected at all times.
- **Transparency:** The functioning of reporting mechanisms will remain transparent.
- **Accessibility:** SEA reporting mechanisms are available to anyone who may have reason to allege a SEA incident, including local populations and staff and non-beneficiaries. Establishing women quotas at community-level grievance management to facilitate woman to woman reporting
- **Accountability:** FAO South Sudan is held accountable for their PSEA actions through regular reporting to the FAO Ethics office.

9.2 Traditional Authorities Conflict Management

246. As mentioned in the conflict section, the process of conflict management and resolution is subject to cultural diversity in South Sudan. Each of the major ethnic groups has rules and procedures for conflict resolution. Traditional mechanisms of conflict resolution are similar in Southern Sudan in that they rotate around the concepts of **mediation, compensation and restitution**. ELRP will respect traditional authorities' objectivity, representability and responsibility in grievance and redress management. Therefore, any communitarian grievance might be dealt with by traditional authorities. For a better understanding of traditional authorities, FAO will assess each traditional system in project intervention areas at the beginning of the project including their recognition by the community itself and rules alignment with national laws and World Bank ESF standards. Therefore, **specific rules would be** accordingly defined with traditional authorities and would apply for project related complaint. In case no agreement is made with local authorities to support WB ESF within resolution rules, the Project GRM would apply.

247. Nevertheless, many factors constrain traditional mechanisms. **The absence of codification** is one of the main issues as each ethnic group applies traditional justice in the way it finds appropriate. Regarding the respect of the World Bank ESF, the project will support a sensitization of broader consideration of codification included the ESF. Then **competition over traditional authority** is likely to lead to and aggravate communal conflicts in many parts of post conflict South Sudan. Project will therefore insure a Third-party within each conflict resolution through the AAP focal point and Legal Third-party. Then, **claims of rights is expected to be on the increase** due to the current war, therefore project will particularly focus on vulnerable groups emerging from the actual and precedent situation. Finally, the **lawlessness in the post conflict peace agreement is a limit** for the implementation of traditional resolution. Project reference (AAP Officer or Legal Third-party) will play the role of objective member within conflict resolution.

248. Even if complainants apply for the traditional authorities to manage the grievance, AAP focal point would have priority for being informed during the activity of the necessity to submit a grievance to FAO channel for monitoring of the resolution. The FAO AAP Officer will then be systemically involved in grievance mechanism managed by the traditional authorities and might request to involved a legal third-party to support the process and insure both side rights. If a solution is found and the AAP Officer agrees that the solution is aligned with the most protecting

rules according to the customary rules, national laws and minimum World Bank ESF requirement, the grievance will be closed. In all other cases, the AAP Officer has the responsibility to insure accessibility of the complainant to adequate GRM. **All cases of GBV-SEA and SH should notwithstanding follow the specific mechanism.**

9.3 Main Project GRM.

249. **The main project GRM steps** are summarized in the present paragraph and key actors and conditions will be detailed in the next paragraph. GBV-SEA/SH and Labour related issues are following specific GRM process detailed in respectively the SEA/SH Prevention & Response Action Plan and the LMP. Main project GRM steps are:

- **Step 1:** Collection and access through different channels. AAP Officer and PSU might be informed on any grievance.
- **Step 2:** Acknowledgement to the complainant of the received complaints and immediate measure to be taken by the IP if needed to protect complainants during the grievance redress process.
- **Step 3:** Supporting traditional redress when available with implication, if relevant, of IP representant and key observatory actors as the AAP Officer and the Legal Third Party. A technical background from Technical Officer from the PSU and, whenever relevant, the field-level implementation team, will investigate the grievance and the resolution to ensure WB ESS compliance. A continuously update of the Grievance situation will be managed by the E&S risk management officers.
- **Step 4:** Local Grievance resolution. Acknowledgement of the E&S risk management officers of the adequacy with the WB ESS. Complementary measures taken by PSU and field-level implementation teams to ensure ESS adequacy and Complainant's rights respect. In case of Agreement between parties, the case is closed.
- **Step 5:** If there is no agreement with the Complainant, they will apply for an independent assessment by the OIG.
- **Step 6:** If there is no agreement with the decision from the OIG, the complainant might apply to the WB Grievance Redress Service (GRS).

250. **Inter-Agency Community-Based Complaint Mechanisms (CBCMs).** FAO and UNOPS establish and participate in CBCMs considering their AAP policy. A CBCM is a mechanism for receiving complaints from beneficiaries that is designed based on the input of the affected community and allows reports (including SEA) to be made safely and confidentially. An inter-agency CBCM links the various complaint mechanisms of agencies working in a response to ensure that complaints are safely and efficiently referred to the appropriate agency for follow up and potential investigation, regardless of who receives the complaint.

251. **FAO standard operational procedures for Accountability to Affected Population and Prevention of Sexual Exploitation and Abuse.** While contributing to the CBCMs, FAO reinforced its own GRM system in 2019. FAO has developed standard operational procedures and plays an active role in the Task Team on Accountability to Affected Populations and PSEA. FAO has been training since 2019 community level AAP focal point and specific feedback and complaint

mechanism in response to the risks of unreliability of implementing Partners, where FAO Inputs are diverted and often do not reach in the right quantities to the beneficiaries. It has been instrumental not only in holding actors responsible but also ensuring there is efficiency, representation, participation and timely reporting on crop pest and animal disease outbreaks.

252. **IPs Grievance redress mechanism.** Each IP will define and submit to ELRP its own GRM, including a field-level implementation officer or AAP Officer as third-party and traditional authorities when requested by the complainant. Redress will be adequately managed by the IP according to FAO policies on AAP and GRM. IPs will inform the local help desk line for each grievance received and regularly informed on solutions. The IP's GRM will be assessed⁸⁵ prior to contract and will adequately be supported from FAO will be supplied to reinforce their system to be compliant with ESF standards.

253. **Process of the Community feedback and complaint mechanism.** The process of the Community feedback and complaint mechanism are categorized in to five namely; collecting complaints, Recording, Referring, Responding and closing feedback, the feedback form suggestion boxes (weekly) and complaint desks (daily) are collected by the AAP focal points using a standard reporting template and forwarded to the helpline operator. The helpline operator receives the complaints from the Toll-free hotline and email address at the call center and registers all complaints in to the data base according to category (programmatic or accountability) the programmatic complaints/feedback is analysed by a team comprising of M&E officers, technical officers, Gender/AAP officers, and the project manager. In addition, accountability complaints on fraud and corruption, abusive behaviour and SEA/SH are directed by the head of office to the office of inspector General (OIG).

9.3.1 Assess and Clarify

254. **Accessibility.** The feedback channels currently in use for other FAO projects are accessible: feedback desks, suggestions boxes, toll free hotlines, and community accountability committees managed by AAP personnel. Accountability Committees often give clarity on the feedback channels and sensitize communities on prevention of SEA/SH. The provision of multiple grievance channels allows an aggrieved party to select the most efficient institution, accessibility, circumvent partial stakeholders and creates the ability to bypass channels that are not responsive.

255. **Initial sensitization.** Through information centers, radio, community meetings and other means, information about the project and its sub-component activities will be publicly disclosed. The type of information disclosed includes details about the project structure, activities, budgets, consultation and information disclosure plans (SEP), the ESCP, the ESMF, activity-specific ESIA, activity-specific ESMPs, the GBV/SEA/SH and child protection referral systems, as well as detailed information about the Project GRM. Sensitization and key documents and message will be translated in local languages.

256. **IPs and Community AAP Officers' consultation and sensitization.** For each activity, key messages from AAP Officers to communities includes a description of right and protection of the

⁸⁵ World Bank. 2018. Checklist to accompany the Guidance Note for ESS10 Stakeholder Engagement and Information Disclosure. Grievance Redress Mechanism Checklist.

communities and a presentation of the different grievance mechanisms with detailed on GBV-SEA/SH specific GRM and protection of communities and victims against retaliation.

9.3.2 Intake, Acknowledge and Follow-Up

257. **Intake.** All grievances received are directed to the call center, the helpline operator will follow up internally as per the established procedures and policies. The helpline operator is responsible to ensure the feedback loop is closed by informing the complaint of its rights and the on-going redress process. All cases are treated confidentially. Based on the information made available, aggrieved parties can decide whether they have a case to report or whether the available information clarifies their concern. This will allow the aggrieved party to decide on the appropriate next step in order to report a grievance, comment or provide feedback to the project. PSU in close collaboration with the IPs at the state level will decide whether the grievance can be solved locally, with local authorities, implementers, or contractors and whether an investigation is required, according to early diagnostic of GRM system operationality⁸⁶. The AAP Officer – the first port of call – will have in-depth knowledge of communal socio-political structures and will therefore be able to address the appropriate individuals if the case can be solved at the local level.
258. **Acknowledge.** At all times, the IP will provide feedback promptly to the aggrieved party, for example through the phone or through the AAP Officer. Feedback is also communicated through stakeholder meetings and beneficiary meetings during project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.
259. **Follow-up.** Records of all feedback and grievances reported will be established by either IPs and PIU on their own systems and able triangulation. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person providing feedback as well as the boma, payam and county, cooperating partner (where applicable), the project activity and the nature of feedback or complaint.
260. **Incident reporting.** Severe incidents (defined as an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, for example: fatality, GBV, forced or child labor) will be reported within 48 hours to the PCU and the World Bank.
261. **GBV/SEA/SH or child protection risk.** Where grievances are of sexual nature and can be categorized as GBV/SEA or a child protection risk, FAO/UNOPS has to handle the case appropriately and refer it to the GBV referral system, defined in the SEA/SH Prevention and Response Action Plan.

9.3.3 Verify, Investigate and Act

262. **FAO AAP investigation and redress.** The PSU technical officer will investigate the claim within seven working days and share findings with relevant stakeholders. Where an incident was reported, ELRP will follow the incident management protocol defined in the document. The complaints collected from the FAO complaints and feedback mechanisms are triangulated with the information from the monitoring reports from IPs.

⁸⁶ Customary GRM will be assessed at the beginning of the project as mentioned in section Customary GRM.

263. **IPs investigation and redress.** Where a negotiated grievance solution is required, the IP will invite the aggrieved party (or a representative) to decide on a solution which is acceptable to both parties and allows for the case to be closed, if of both parties agree. Field-level implementation partner officers/staff will be part of the negotiation to ensure that customary rules, national laws and WB ESF considerations are respected within the agreement, and report to FAO for triangulation.
264. **Appeal and further redress.** After deciding a case, the IP must give access to an appeals mechanism to the aggrieved party, which is constituted through the FAO (PSU or OIG). This is important in cases in which the aggrieved party is dissatisfied with the solution provided by the IP. In these instances, the PSU will step in and provide the appeals mechanism. The appeals should be sent to the AAP Multiple channel (phone, suggestion boxes, etc.) where they will be reviewed and decided by the PSU jointly with the FAOR if necessary. If parties disagree on the solution, implementation partners will inform the complainant on the two others appeal process (OIG except for labour consideration, World Bank GRS).
265. **GBV-SEA/SH case investigation.** The OIG FAO is the only stakeholder with the mandate to investigate on cases of GBV-SEA and SH. These considerations are further described in the SEA/SH Prevention & Response Action Plan.

9.3.4 Monitor, Evaluate and Feedback

266. If the case was not filed anonymously, field-level implementation partners will provide first feedback to the aggrieved party within seven working days, through local channel (AAP Officer, IPs, etc.). Further feedback and action will depend on the nature of the case and whether cases are decided upon within the respective IP. The IP will show to the PSU that action has been taken within a reasonable amount of time.
267. Most importantly, all cases filed need to be logged and monitored by the FAO M&E Unit which will analyze all complaints and feedback and share a synthesis report of the analysis semi-annually with the PSU for submission to the PCU.

9.3.5 Monitoring and Reporting of GRM

268. The PCU, specifically the safeguards specialists, will be responsible for monitoring the availability and implementation of the GRM. Monitoring and reporting will be supervised by FAO PSU staff. Members of the community, through their representatives, will have a role to undertake both compliance monitoring and impact monitoring. The PCU will include the GRM into its supervision and monitoring missions to the field and conduct spot checks regarding its implementation. This will also apply to the grievances under LMP and SEA/SH Prevention & Response Action Plan GRMs.
269. The PSU will provide analytical synthesis reports on a semi-annual basis to the PCU for onward transmission to the World Bank, which include the number, status and nature of grievances. The PSU will further provide an excel sheet summary of the feedback and grievances reported, which will be linked to the M&E Results Framework. They will further maintain a documented record of stakeholder engagements, including a description of the stakeholders consulted and a summary of the feedback/grievances received during community consultations. The PSU will further extract lessons learnt from the GRM and implement analysis on the overall grievances and share them with the PCU.

9.3.6 Information Disclosure and Consultation

270. ESS 10 makes it essential to identify and undertake inclusive and ongoing engagement with project stakeholders and to disclose all relevant information to stakeholders, especially those project-affected groups or individuals that are disadvantaged or vulnerable due to their circumstances, and the public. Direct and indirect project stakeholders have been identified in the Stakeholder Engagement Plan (SEP), which will be disclosed on MAFS, FAO, UNOPS and WB websites. Comments and suggestions will be integrated into the Plan. The SEP will be continuously updated, specifically in accordance to the identified needs of each IP and their respective sub-component. All relevant information needs to be made available to stakeholders in a timely manner, including about planned sub-components of the project, management measures and monitoring activities.

9.3.7 OIG – Appeal procedure

271. **Appeal procedure should be done through the OIG complaint system.**⁸⁷ The compliance review processes are detailed in the FAO 2015 Complaints guidelines: (i) Submission; (ii) Preliminary Review for Eligibility and Applications for Participation; (iii) Inspection; (iv) Decision by the Director-General. Complaints containing allegations that there has been a breach of the World Bank environmental and social standards must be made in writing and communicated to OIG by mail, courier, email or fax, directly or via any FAO office. All complaints should ideally provide, as a minimum, the following information: (i) What happened? Describe the events with as much relevant detail as possible. (ii) When did it happen? Dates, time, how many times, etc. (iii) Where did it happen? (iv) Who do you think was involved? Who was implicated? (v) The complainant's name and contact information.

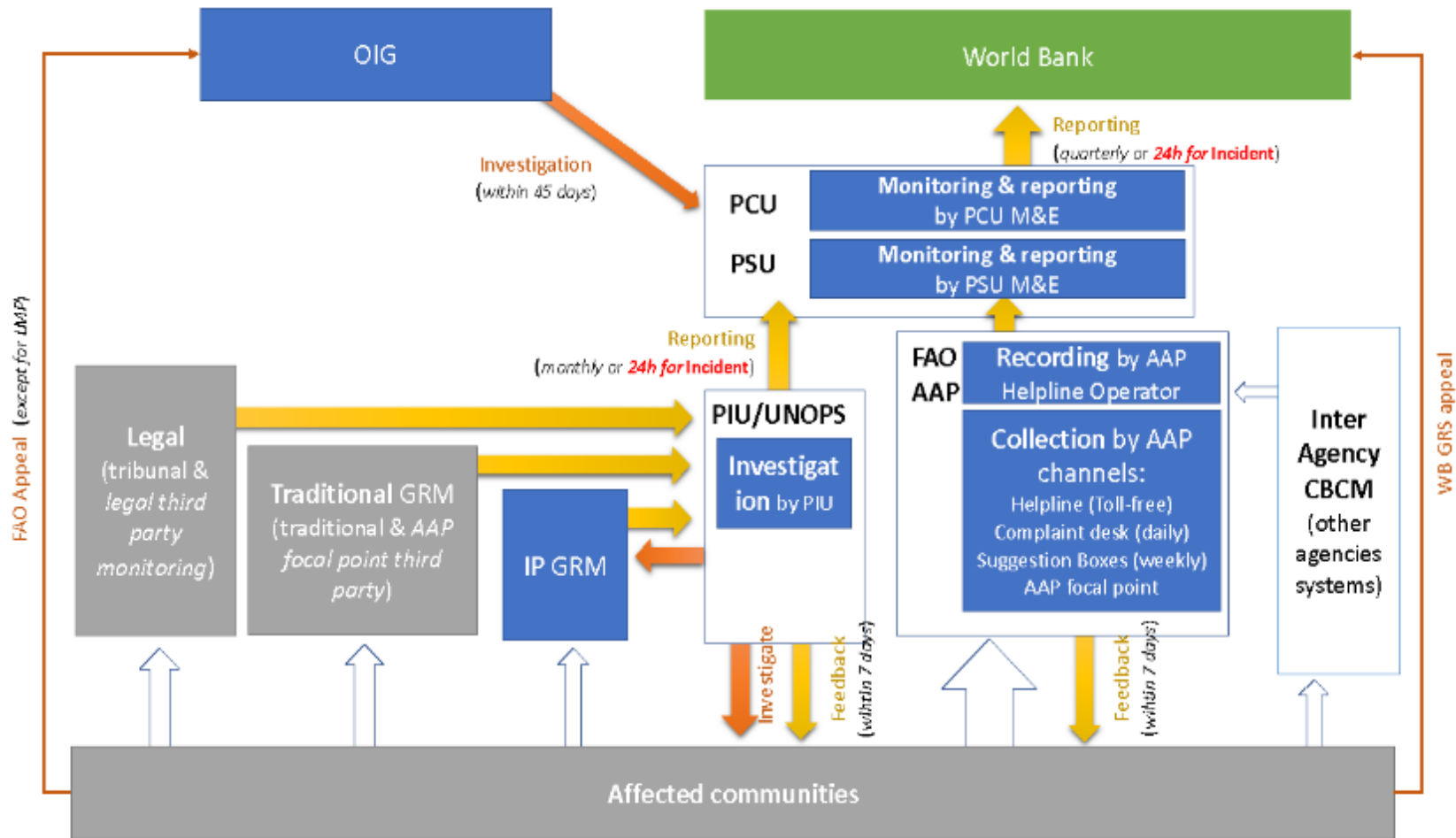
272. The addresses to file a written complaint are:

- By courier or mail: Inspector General, Food and Agricultural Organization, Viale delle Terme di Caracalla, 00153 Rome, Italy
- by confidential fax: (+39) 06 570 55550
- by email: Investigations-hotline@fao.org.

⁸⁷ <http://www.fao.org/aud/>

9.3.8 ELRP Grievance Redress Mechanism Flowchart

Figure 3: ELRP Grievance Redress Mechanism Flowchart



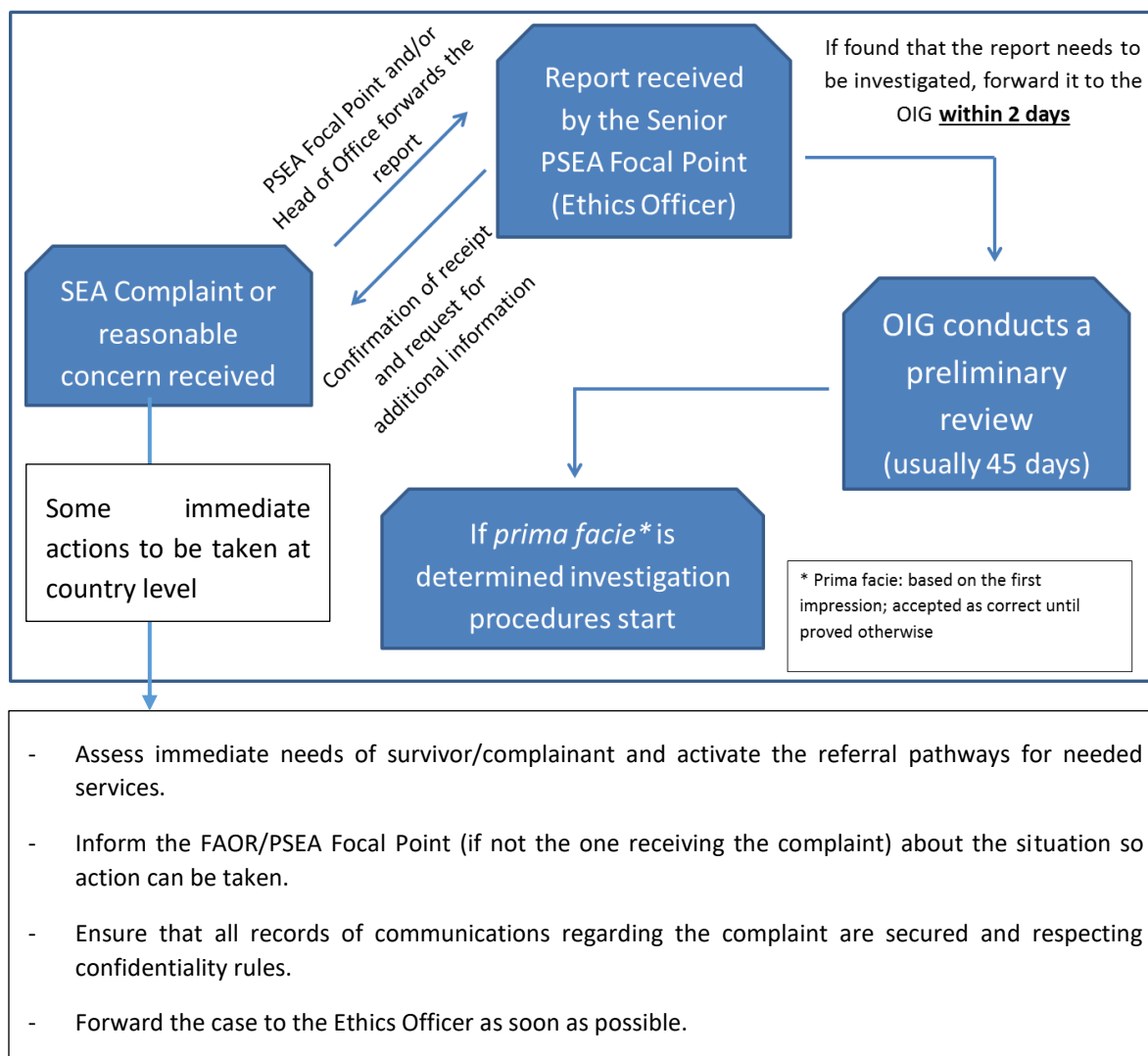
9.4 GBV-SEA/SH GRM

273. Cases of GBV/SEA/SH can be reported through a FAO toll free number (882) solely dedicated for PSEA or through the general Project GRM. The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, etc.⁸⁸ All relevant staff of the PCU, FAO, UNOPS, implementing partners and contractors will receive training on receiving GBV complaints and referral systems including World Bank Good Practice Note on 'Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing', ideally during the project initiation phase and as part of the staff welcome package. The GRM operators will be trained to receive those cases in an appropriate manner and immediately forward them to the GBV/SEA referral system. The GRM operator will ensure appropriate response by i) providing a safe and caring environment and respecting the confidentiality and wishes of the survivor ii) If survivor agrees, obtaining informed consent and making referrals and iii) providing reliable and comprehensive information on the available services and support for survivors of GBV.
274. However, beneficiaries and communities should generally be encouraged to report all GBV/SEA/SH cases through the dedicated GBV/SEA/SH referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions and be a part of the publicly disclosed information. The GBV/SEA/SH referral system will guarantee that survivors receive all necessary services, including medical, legal and counselling, and cases will be reported to the police where applicable.
275. If such cases are reported through the project GRM, the GRM Operator needs to report the case within 24 hours to the PCU, as the PCU is obliged to report any cases of GBV/SEA/SH to the World Bank within 48 hours (provided there is informed agreement from the survivor). Furthermore, cases need to be reported to the respective agency if it concerns a direct worker or a worker from a sub-contractor, NGO partner or even a community worker following a survivor-centered approach. FAO and UNOPS have their organizational PSEA systems in place through which violations by staff will be handled. This may be in addition to criminal prosecution to ensure that sanctions for the violation of Codes of Conduct are implemented. FAO is in charge of checking that the courses for contractors regarding the Code of Conduct obligations and awareness raising activities to the community are in place. The information gathered should be monitored and reported to the PCU and the World Bank. All reporting will limit information to the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis,

⁸⁸ In case the survivor is a child, the consent of parents or guardians should be sought where it is in the best interest of the child and if they are not the perpetrators. However, where parents/guardians refuse to pursue the case in the court of law on the child's behalf, with clear evidence, the Directorate of Gender and Child Welfare should take up the role and pursue the case on the child's behalf to ensure that she/he is protected. Parents/guardians should be counselled first and thereafter, and taken to task by filing a case against them for denying the child her/his rights. All service provider interventions to child survivors must be undertaken with staff trained in child-friendly procedures in regards to the handling of cases. A child survivor should continue to go to school while procedures are ongoing and all efforts should be done to ensure her/his protection. In addition to this, all the above reporting and referral procedures should be applied

avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

Figure 15: GBV-SEA/SH Grievance Redress Mechanism Flowchart



9.5 WB's Grievance Redress Service (GRS)

276. Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information

on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit:

<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

9.6 Labour GRM

277. **Objective.** The objective of this procedure is to settle the grievance between an employer and employee or between employees bilaterally before the intervention of a formal court, except in cases where the grievance constitutes a criminal offense that requires notifying law enforcement. Under the provisions of ESS2, the project will provide a grievance mechanism for all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. The project will put in place measures to make the worker grievance mechanism easily accessible to all project workers.

278. All issues related to GBV/SEA and SH are managed through the Dedicated GBV/SEA GRM of the project.

279. The full Labour GRM is detailed in the Labour Management Procedures (see annex).

280. Contracted workers grievances are managed under the specific Labour GRM comprised of four main channels:

- The FAO staff GRM procedure follows the FAO Manual section and the FAO policies and is aligned with ESS2 requirement. It encourages FAO staff to engage an internal FAO resolution with supervisors and if not resolve country FAO representative. FAO staff may escalate to the jurisdiction cited in its contract, mostly the Jurisdiction of the ILO Administrative Tribunal (ILOAT). In any case situation reports are included within the semi-annual report to the World Bank, except for incidents which are reported within 48h.
- The UNOPS staff GRM procedure follows the United Nations Staff Regulations and Rules, the Standards of Conduct for the International Civil Service and UNOPS Legislative Framework. It encourages UNOPS staff to engage an internal UNOPS resolution with management. Grievances may be escalated to jurisdiction cited in its contract, usually the People and Change Group (PCG), Ethics Officer or the Internal Audit and Investigation Group (IAIG). Situation reports are included within the semi-annual report to the World Bank, except for incidents which are reported within 48h.
- Any contracted workers of the field-level implementing partners will follow an internal GRM system within the IP that have to be validated by ELRP as part of the requisite letter of agreement between FAO and the IPs. When a grievance is raised, the IP must inform the PIU within 24h and provide timely updates of the resolution. Workers may escalate to the national jurisdiction if functional and the Supreme Court's decision is final. Where formal courts are not accessible or

not functional, the matter will be handled by the Project GRM. The PSU will accommodate a fair agreement between the worker and the contractor. During the process of resolution, a Legal Third party⁸⁹ would be involved as an assessor of the functionality of the formal courts and as an observer to ensure respect of each party's rights.

- Community workers will follow the project GRM.

281. The World Bank Grievance and redress Service (GRS) remains available as an appeal process for all workers of the project.

9.7 Project GRM Actors and responsibilities

282. In accordance with the FAO AAP SOP, the roles and responsibilities are defined as follows:

- Managers at all levels demonstrate full commitment to accountability and transparency by being responsive to staff's perspectives, to improve programme quality: i) setting the tone for accountability within the Organization and demonstrating that negative feedback is not a threat and that clear, transparent, and responsive two-way lines of communication are essential for working effectively; ii) identifying a regular method to seek and respond to staff feedback and perspectives, during programme and operations meetings when appropriate and iii) FAO managers establish multiple channels for community and staff feedback, including channels for anonymous provision of information.
- In line with the AAP guidance note, AAP Officers have the overall responsibility for disseminating and **collecting** feedback through the various feedback channels (reactive, pro-active and daily feedback channels including AAP Committees)
- The Helpline operator **records** all complaints/ grievances according to category (programmatic and accountability) in the database. The database allows the helpline operator to track the percentage of feedback received through the hotline, suggestion boxes, email and AAP Committees, complaints acted upon and closed, number of women/men/girls/boys satisfied with the quality and appropriateness of FAO responses.
- The helpline operator has the responsibility of **referring** complaints/ grievances to the various technical officers (fisheries, livestock, Agriculture, NRM etc.), gender, M&E and Project managers for analysis and provision of relevant feedback and action.
- Complaints should be **responded** to, within a period of 7 days especially programmatic complaints.
- All complaints responded to should be closed and unclosed complaints followed up by the helpline operator to ensure the feedback loop is closed.
- The feedback report should be processed and **presented** to the head of office, program and project managers for decision making purposes.

⁸⁹ Among them, ELRP might select the South Sudan Law Society (SSLS) or the South Sudan Women Lawyer's Association (SSWLA).

Table 8: Synthesis of Actors and Responsibilities within the Project GRM

ACTORS	RESPONSIBILITIES WITHIN PROJECT GRM
AAP OFFICERS	<p>Sensitize communities and beneficiaries prior to any activity's implementation on GRM channel and rights</p> <p>Intake of feedback and complaint through AAP Committee (daily) or suggestion boxes (weekly) and report to Helpline Operator</p> <p>Respond and contact with the Complainer</p>
TRADITIONAL AUTHORITIES	<p>Intake of complaint</p> <p>Report to AAP Committee and AAP Officer</p> <p>Solution proposal including the Third Legal Party Monitoring and with agreement of ELRP Project Manager</p>
FAO/ UNOPS/ IP	<p>Intake of feedback and complaint</p> <p>Report and refer to FAO Helpline Operator and E&S Risk Specialists</p> <p>Corrective measures definition and implementation with prior agreement of PCU and implementing partners</p>
FAO/ UNOPS HELPLINE OPERATOR	<p>Record complaints from all channel sources (Inter Agency CBCM), AAP, Hotline, IPs</p> <p>Referring complaint to respective Project Technical Officer</p>
FAO/ UNOPS PIU TECHNICAL OFFICERS	<p>Assess Complaint and Corrective measures definition</p> <p>Report to E&S risk Specialists</p>
FAO PSU/ UNOPS PROJECT MANAGEMENT UNIT E&S RISK SPECIALISTS	<p>Monitoring of Complaints and feedback</p> <p>Triangulation of complaints through different channel (IP, IA-CBCM, etc.)</p> <p>Reporting to Project Coordinator and M&E Officer</p>
PCU E&S AND PROJECT OFFICERS	<p>Report semi-annually to World Bank</p> <p>Report in 24h for incident to World Bank</p> <p>Decision making</p>
THIRD LEGAL PARTY MONITORING	<p>Assess court functionalities and accessibilities</p> <p>Follow Up complaints resolution through courts systems and traditional authorities</p> <p>Report to E&S risk Specialists</p>
FAO - OIG	<p>Independent Investigation</p>
WB - GRS	<p>Appeal and parallel Grievance system</p>

9.8 PSEA GRM Actors and responsibilities

283. The details of PSEA GRM actors and responsibilities are outlined in the GBV Mitigation & Action Plan (see annex).

9.9 Appeal Actors and responsibilities

9.9.1 FAO – Regional Office Level

284. **Cascade mechanism in case of an unclosed feedback loop.** Should the complainant not receive an acknowledgement of receipt within seven working days, they should forward their matter to the following address: FAO-RAF@fao.org. The PSU should ensure accessibility for communities of this appeal process thanks to the third-party monitoring. The Environmental and Social Risk Management Unit will be responsible for providing technical assistance to the programme, country and regional offices to the concerns and complaints raised by beneficiaries regarding compliance with the World Bank ESF, FAO rules and policies and national policies. Regional Office Level will revert back to the PSU and the National Office Level for any follow up.

9.9.2 FAO – Office of the Inspector General (OIG)

285. **Role in ELRP GRM.** The Office of the Inspector-General has the mandate to independently review general complaints that cannot be resolved at project and regional level as an appeal system⁹⁰. It is also the only Office with the mandate to investigate GBV/SEA/SH complaints.

286. **Type of complaints investigated.** OIG is the office with the mandate to investigate: Unlawful acts related to FAO activities, Misrepresentation, forgery, or false certification in connection with any official business, Fraud committed to obtain undue financial benefits or entitlements, Fraud, favouritism, disclosure of confidential bidding information, or misconduct related to contract bids, performance of contract obligations or evaluation, Retaliation, Staff violations of the Standards of Conduct for International Civil Servants, Complaints of workplace harassment pursuant to the Policy on the Prevention of Harassment, Sexual Harassment and Abuse of Authority. For the project, OIG will be the only office with the mandate to investigate GBV/SEA/SH complaints.

287. **Standard compliance and organizational decision.** OIG will utilise in reviewing alleged noncompliance with World Bank ESS, FAO policies and rules and national legislation. If the compliance review process outlined in the Guidelines results in findings of non-compliance, OIG will make recommendations to the Organization directed at bringing the project into compliance with relevant standards. Compliance Reviews under these Guidelines are administrative in nature. In all cases, the Director-General of FAO has the ultimate decision-making authority on remedies in response to Complaints. Complaint Reviews do not create any legally enforceable rights for Complainants, or any liabilities of FAO. Any aspect of the handling of Complaints under this mechanism is without prejudice to the privileges and immunities of FAO and is not open to review by any court of law.

⁹⁰ Excepting the complaints related from working condition which should follow the Labour Management procedure GRM.

10 Capacity Development and Training Schedule

288. The effective implementation of this ESMF will require technical capacity in the human resource base of implementing institutions as well as logistical facilitation. Implementers need to understand inherent social and environmental issues and values to be able to clearly identify their indicators. This includes FAO and UNOPS staff, Implementing Partners and Contractors. Government, and in particular the Ministry of Agriculture and Food Security (MAFS), is a key target for capacity building, as FAO aims to provide support towards strengthening its capacity to manage and implement future development projects, including those supported by the World Bank.

289. The training will adopt a Training of Trainers (TOT) approach so that it can then be cascaded to all implementation partners' staff and any contractors they engage to carry out activities under their respective components/sub-components. The capacity building will cover the following topics:

- Overview of the World Bank ESF and the ESSs
- ELRP E&S safeguards framework, instruments and compliance
- Stakeholder engagement, consultation and partnerships
- Implementation and monitoring the compliance of safeguards throughout the project
- Grievance Redress Mechanisms
- SEA/SH Prevention and Response Action Plan, including GBV aspects
- Security Management Plan
- Reporting, monitoring and follow-up
- E&S Screening checklist
- Environmental & social reporting template
- Integrated Pest Management Plan (IPMP)
- Chance Find Procedures
- Waste Management Procedures
- Traffic Management Procedures
- Occupational Health and Safety Management Plan
- Construction Environmental and Social Management Plans (C-ESMP)

290. **FAO e-learning.** FAO has been developing a wealth of e-learning courses that will be used to raise awareness and strengthen capacities of staff and partners involved in programmes and projects (<https://elearning.fao.org/>) above all on technical considerations among others: (i) Free, Prior and Informed Consent (FPIC), (ii) responsible governance of tenure; (iii) addressing corruption in the tenure of land; (iv) addressing child labour in agricultural programmes; (v) addressing disputes and conflicts over the tenure of natural resources; and (vi) developing gender-sensitive value chains.

291. **World Bank e-learning.** The World Bank also offers a free e-learning course on the Environmental and Social Framework (ESF) – ESF Fundamentals. It is comprised of 8 modules and takes about 8 hours to complete and available on the online learning campus website: (<https://olc.worldbank.org/>).

Table 9: Capacity Building and Sensitization Plan

Objectives	Issues for engagement	Method of engagement	Stakeholders/target population and area	Responsible person	Time frame	Budget in USD
Enhance awareness on World Bank ESF and ESSs	Environmental and Social Risks and how they are addressed through WB ESF and ESSs	E-learning and Week WB ESS Training	FAO - OIG FAO – RAF & IPs	WB	Bi-annually	Included in HR costs
National Institution Capacity building (MAFS, CAD, etc.) on World Bank ESF standards and tools.	Sustainability in World Bank project implementation by government entities	Continuous Training on (i) Conflict analysis and mediation; (ii) Identification environmental hazards; (iii) Grievance mechanisms; (iv) Follow up courses on identified priorities, e.g., water management. (v) Framework and plan development and implementation (vi) Field mission during all project duration on project E&S documents	MAFS CAD County Governmental Entities Local Environment Entities	WB PSU	Quarterly	150,000 USD
Ensure compliance with implementation of ESMF and all annexes (screening forms, reporting format, Waste management plan, traffic management plan, C-ESMP, ECOP, Cultural Change find procedures, Voluntary Land Donation Framework, SEA/SH action Plan) Ensure there is no harm to the environment and people	Environmental and Social Risks and how they are addressed	Focus group discussions, site visits and interviews	Beneficiaries, IP	FAO with support from PIU	Quarterly	50,000 USD

Objectives	Issues for engagement	Method of engagement	Stakeholders/target population and area	Responsible person	Time frame	Budget in USD
Enhance knowledge and awareness on environment						
Enhance awareness and knowledge on grievance structures and how they work Minimize escalation of grievances and violence Provide platform for all to air their grievances	Grievance redress mechanism	Meeting: Plenary discussion with questions and answer	Beneficiaries at place of work and traditional Authorities	Community Mobilizers / PIU	Monthly	40,000 USD
	Grievance redress mechanism	Meeting: Plenary discussion with questions and answer	Local Government leaders	FAO/ PIU	Monthly	
Supporting local conflict resolution through customary entities and sensitization to align decision to WB ESS when differences exist with customary and national laws	National and local Grievance redress mechanism	Initial diagnostic with focal authorities to align decision to fit WB ESS	Local leaders and customary authorities	FAO with support to legal Third party	Continuously	35,000 USD
		AAP focal point and legal third-party monitoring present during local authorities' conflict resolution	Complaints and customary authorities			50,000 USD
Enhance knowledge and awareness of security management plan (SMP)	Security protocols	Meetings	IPs, Contractors	FAO / PIU	Monthly	5,000 USD
SEA/SH Prevention & Response Action Plan	Sensitization on risks to women and children and mitigation measures as per SEA/SH Prevention & Response Action Plan	Meetings and Focus Group Discussions	Beneficiaries, Communities, Contractors, Subcontractors, Primary Suppliers, Workers	FAO and IPs	Monthly	40,000 USD
Labour Management Procedures	Labour risks and procedures	Sensitization of all workers on their rights and obligations as per LMP, Training of all workers on	IPs, Contractors, Subcontractors, Primary Suppliers, Workers	PIU, IPs	-	10,000 USD

Objectives	Issues for engagement	Method of engagement	Stakeholders/target population and area	Responsible person	Time frame	Budget in USD
		health and safety at work, Sensitization and training on implementation of relevant projects safeguards for Direct Workers				
Integrated Pest Management Plan	Pesticide use during DL control; Pest management risk and rationale pesticide use in crop production	IPs training on Plan implementation FFS and Field Demonstration	Beneficiaries, IPs	PIU, IPs	-	5,000 USD
Community Occupational Health and Safety Awareness, including in relation to construction and operation phases of activities undertaken (e.g., operational hazards like cleaning water tanks, protection of wells, road safety, solar panel maintenance and recycling, medical waste and sharps handling, etc.)	OHS risk management	Focus group discussions, site visits and interviews	Beneficiaries, IP	FAO and IPs	Quarterly	10,000 USD

11 Overall E&S Resources and Budget

292. The overall budget for the ESMF and annexes, as well as implementation and capacity building/training, indicates the costs borne by this ELRP project, keeping in mind that other costs are already covered either: (i) within the main budget under the project components; or (ii) within the RALP budget, due to the shared PCU. The total amounts to approximately USD 1,573,103. Detailed costs are presented in the table below.

Input description	Unit	Total Unit Quantity	Unit Cost (USD)	Budget Y1 (USD)	Budget Y2 (USD)	Budget Y3 (USD)	Total Project Budget (USD)
5013 – Consultants							-
International Consultants							-
International Social Risk Management Officer	Month	18	12,000	72,000	72,000	72,000	216,000
International Environmental Risk Management Officer	Month	18	12,000	72,000	72,000	72,000	216,000
International Gender Officer	Month	18	12,000	72,000	72,000	72,000	216,000
National Consultants							-
Security Assistant (4No)	Month	72	1,650	39,600	39,600	39,600	118,800
AAP Field Focal point (5)	Month	144	700	33,600	33,600	33,600	100,800
5014 – LoAs/Contracts							-
Voluntary Land Donation Guidelines	unit	1	15,000	15,000	-	-	15,000
5021 -Travel							-
Assessment travel and missions for M&E Support	Trip	6	6,234	18,702	18,702	-	37,404
Environmental Audit (midterm / completion)	Lump sum	3	5,000	5,000	5,000	5,000	15,000
Initial Social Assessment baseline	Lump sum	2	5,000	10,000	-	-	10,000
Sub-project complementary E&S analysis (ESIA and ESMP)	Lump sum	5	5,000	25,000	-	-	25,000
Grievance Redress Mechanism	Lump sum	9	2,100	6,300	6,300	6,300	18,900
5023 – Training							-
Training in pesticide storage management	Persons	8	300	-	2,400	-	2,400
Labour Management Procedures	Lump sum	3	22,733	22,733	22,733	22,733	68,200

Input description	Unit	Total Unit Quantity	Unit Cost (USD)	Budget Y1 (USD)	Budget Y2 (USD)	Budget Y3 (USD)	Total Project Budget (USD)
Stakeholder Engagement Plan implementation	Lump sum	3	20,000	20,000	20,000	20,000	60,000
GBV Action Plan	Lump sum	15	10,000	50,000	50,000	50,000	150,000
Training on ESF for government and IPs	Lump sum	3	3,500	10,500	-	-	10,500
5024 - Expendable Procurement							-
Pest Management Plan (Environmental monitoring & Human health monitoring)	Lump sum	3	1	40,000	10,000	25,000	75,000
First Aid kits	Kit	20	275	5,500	-	-	5,500
PPE	pcs	1,000	200	200,000	-	-	200,000
5028 - General Operating Expenses							-
Grievance Redress Mechanism	Lump sum	3	1,200	1,200	1,200	1,200	3,600
Security Management Plan (convoys, additional security services)	Lump sum	3	3,000	3,000	3,000	3,000	9,000
Safeguards Budget Unique to ELRP				722,135	428,535	422,433	1,573,103

12 References

- FAO. (2015). Compliance Reviews Following Complaints Related to the Organization's Environmental and Social Standards. Guidelines (p.10). <http://www.fao.org/aud/42564-03173af392b352dc16b6cec72fa7ab27f.pdf>
- FAO. (2015). Environmental and social Management. Guidelines (p.77). <http://www.fao.org/3/a-i4413e.pdf>
- FAO (2020). FAO framework on ending child labour in agriculture. Rome. (p.148) <https://doi.org/10.4060/ca9502en>
- FAO (2020) Special Report – 2019 FAO/WFP Crop and Food Security Assessment Mission to the Republic of South Sudan. CFSAMs Special Reports – May 2020. <https://doi.org/10.4060/ca9282en>
- FAO (2011). Land Cover Atlas of the Republic of South Sudan. <http://www.fao.org/3/a-be895e.pdf>
- MOE (2012). Environmental impact, risks and opportunities assessment. Natural resources management and climate change in South Sudan.
- MOE (2018) South Sudan. First State of Environment and Outlook Report 2018. https://wedocs.unep.org/bitstream/handle/20.500.11822/25528/SouthSudan_SoE2018.pdf?sequence=1&isAllowed=y
- Ministry of Environment (2015), Fifth National Report to the Convention on Biological Diversity, Juba, South Sudan
- MOE. (2016). Republic of South Sudan's National Adaptation Programme of Actions (NAPA) to climate change. Juba: Ministry of Environment (MOE), Republic of South Sudan. https://unfccc.int/files/adaptation/workstreams/national_adaptation_programmes_of_action/application/pdf/south_sudan_final_napa_-_24th_nov-2016.pdf
- UNEP (2007) Sudan. Post-Conflict Environmental Assessment.
- United Nation Environment Management Group EMG (2019). Moving towards a Common Approach to Environmental and Social Standards for UN Programming. (P.90). https://unemg.org/wp-content/uploads/2019/07/FINAL_Model_Approach_ES-Standards-1.pdf
- The World Bank (2019), Good Practice Note. Gender. (P. 33) <http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf>
- The World Bank (2020), Good Practice Note. Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Major Civil Works. (P.71) <http://pubdocs.worldbank.org/en/632511583165318586/ESF-GPN-SEASH-in-major-civil-works.pdf>
- The World Bank (2018), Good Practice Note. Third Party Monitoring. (P.23) <http://pubdocs.worldbank.org/en/265911548951986340/ESF-Good-Practice-Note-Third-Party-Monitoring-french.pdf>
- The World Bank (2018). Good Practice Note. Assessing and Managing the Risks and Impacts of the Use of the Security Personnel. (P.24) <http://documents1.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf>
- The World Bank (2017) Environmental and Social Framework. (P.106) <http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf>

The World Bank Group (2007) Environmental, Health, and Safety Guidelines. General EHS Guidelines introduction. (p.99) <https://www.ifc.org/wps/wcm/connect/29f5137d-6e17-4660-b1f9-02bf561935e5/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES&CVID=jOWim3p>

The World Bank Group (2007) EHS: Occupational Health and Safety. (p.35) <https://www.ifc.org/wps/wcm/connect/1d19c1ab-3ef8-42d4-bd6b-cb79648af3fe/2%2BOccupational%2BHealth%2Band%2BSafety.pdf?MOD=AJPERES&CVID=ls62x8l>;

The World Bank Group (2016) EHS: Annual Crop Production. (p.35) https://www.ifc.org/wps/wcm/connect/766c4c6e-e4b1-41ef-a980-3610bce404e8/Annual+Crop+Production+EHS+Guidelines_2016+FINAL.pdf?MOD=AJPERES&CVID=Ife82iC

The World Bank Group (2007) EHS: Mammalian Livestock Production. (p.35) <https://www.ifc.org/wps/wcm/connect/737ca363-552e-4b70-b9e0-c234e7fca120/Final%2B-%2BMammalian%2BLivestock%2BProduction.pdf?MOD=AJPERES&CVID=jkD2BYQ>

The World Bank Group (2016) EHS: Perennial crop production. (p.36) https://www.ifc.org/wps/wcm/connect/2db115fe-4842-4a32-86ed-c9d659a0ea38/English_2016_Perennial+Crop+Production_EHS.pdf?MOD=AJPERES&CVID=IffbDhw

13 Annexes

Annex 1: Environmental and Social Screening Form

Section A: General Information

	<p>Food and Agriculture Organization of the United Nations</p>	<p>Social and Environmental Screening Report – ELRP</p>
<p>It is important to screen each subproject to see if they will create social and environmental risks to the community. Even if there is a plan to lessen the risk to the community to people within the community, those risks should be listed. regardless of planned mitigation and management measures. It is necessary to identify potential inherent risks if mitigation measures are not implemented or fail. This means that risks should be identified as if no mitigation or management measures were to be put in place.</p>		
<p>SECTION A: General Information</p>		
Date of screening:		
Name of sub-project:		
Main project component (to which sub-project relates):		
Name of applicant (implementing agency):		
Proposed sub-project budget:		
Proposed sub-project duration:		
ES Screening Team Leader and Contact Details:		
ES Screening Team Members:		
Program/Site/Activity location		
<p>Sub-project Description. Briefly describe the sub-project activities, particularly as they interact with the environment and social context</p>		
<p>Categorize sub-project activities into high, substantial, moderate, and low risk activities.</p>		

Section B: Exclusion List

Exclusion activities	Yes	No	I don't know	If yes, provide more information
Relocation and/or demolition of any permanent houses or business.				
Use of the project as an incentive and/or a tool to support and/or implement involuntary resettlement of local people and village consolidation				
Land appropriation				
Land acquisition using eminent domain without FAO-mandated consultation and agreement of the owner				
New settlements or expansion of existing settlements				
Activities that would directly or indirectly support conflicts such as explosive inputs, weapons supply , etc.				
Activities that would likely create adverse increase ethnic groups people's conflicts .				
Activities that would likely have negative impacts on vulnerable (women and child)				
Damage or loss to cultural property , including sites having archaeological (prehistoric), paleontological, historical, religious, cultural and unique natural values				
Resources access restriction (e.g. restricted access to farming land) that could not be mitigated and will result in adverse impacts on the livelihoods of ethnic groups and disadvantage peoples.				
Activities of any kind within natural habitats and existing or proposed protected areas				

Exclusion activities	Yes	No	I don't know	If yes, provide more information
<p>Purchase of banned pesticides, insecticides, herbicides and other unbanned pesticides, unbanned insecticides and unbanned herbicides and dangerous chemicals expired or exceeding the amount required to treat efficiently the infected area. Highly Hazardous Pesticides (HHP) will not be used by the project.</p>				
<p>Purchase of destructive farming gear and other investments detrimental to the environment.</p>				
<p>Unsustainable exploitation of natural resources</p>				
<p>Introduction of non-native species, unless these are already present in the vicinity or known from similar settings to be non-invasive</p>				
<p>Significant conversion or degradation of natural habitat or where the conservation and/or environmental gains do not clearly outweigh any potential losses</p>				
<p>Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (CITES)</p>				
<p>Production or trade in any product or activity deemed illegal under South Sudan laws or regulations or international conventions and agreements, or subject to international bans</p>				
<p>Labor and working conditions involving harmful, exploitative, involuntary or compulsory forms of labor, forced labor, child labor or significant occupational health and safety issues</p>				
<p>Subproject considering: (i) Production or trade in products containing Polychlorinated biphenyls (PCBs); (ii) production or trade in ozone depleting substances; (iii) in alcoholic beverages including country made liquor; (iv) processing of products involving tobacco; (v) production or trade in or use of unbounded asbestos fibres</p>				

Section C: Potential Environmental/Social Risks Impacts of Activities

Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	Don't Know	If these risks ('yes') are present, please refer to:	Comments
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is a full Environmental and/or Social Impact Assessment required for the sub-project based on: (i) its risk rating? (e.g. high or substantial risk sub-projects – see Appendix A for categorization guidance); and/or (ii) national legislation within South Sudan?				ESMF	
Have there been any complaints raised by local affected peoples or groups or NGOs regarding conditions of the sub-project area or, if relevant, facility to be used? <i>If so, will project financing be used to remedy these complaints?</i>				ESMF Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk of diversion of sub-project benefits?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk of lack of monitoring of sub-project activities due to remoteness of location and insecurity?				Security Management Plan (SMP)	
Is there a risk that sub-project benefits may not reach truly vulnerable populations?				Stakeholder Engagement Plan (SEP), Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) Prevention and Response Action Plan	
Is there a risk that sub-projects may be manipulated by different factions?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?				Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
Does the activity pose a security risk for local staff?				Security Management Plan (SMP)	

Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	Don't Know	If these risks ('yes') are present, please refer to:	Comments
Is there a risk that the activity firms up contested local authority structures?				Stakeholder Engagement Plan (SEP)	
Does the sub-project area include land previously unutilized or underutilized? <i>If yes, is there are risk of unexploded ordinances (UXOs) / landmines?</i>				ESMF guidance on UXOs and land use (ESS5)	
ESS 2: Labour and Working Conditions					
Does the activity include any of the known labour rights / ESS 2 non-compliance risks in South Sudan (child and forced labor)?				Labor Management Procedures (LMP)	
Will works financed include construction, reconstruction, or demolition works? <i>If yes, an C-ESMP needs to be prepared</i>				ESMF guidance on C-ESMPs and Waste Management Plan (WMP)	
Does the implementing agency or subcontractor have valid operating permits, licenses, approvals, etc.? If not, please explain. Permits to screen for include: construction permits, operational/use permits, waste management permits, environmental permits, land permits, water management permits... <i>If not, will financing be used to obtain the required permit(s)?</i>				ESMF guidance on national legislation	
Does the IA or subcontractor have any significant outstanding environmental fees, fines or penalties or any other environmental liabilities (e.g. pending legal proceedings involving environmental issues etc.)? <i>If yes, will the financing be used to correct this condition and please explain?</i>				ESMF guidance on procurement and procedures for managing contractors	
Does the activity include labour-intensive production/manufacturing?				Labour Management Plan (LMP) ESMF Occupational Health and Safety Guidelines (OHSG)	
Does the activity include primary agricultural activities?				Labour Management Plan (LMP) ESMF Occupational Health and Safety Guidelines (OHSG)	

Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	Don't Know	If these risks ('yes') are present, please refer to:	Comments
Is there a security risk for (sub) Project Workers?				Security Management Plan (SMP)	
Is there a risk that the operation and maintenance of sub-project facilities cause OHS issues?				OHSG ESMF	
Is there a risk of lacking OHS for workers at the construction site or site of DL control spraying activities?				Develop an Occupational Health and Safety Plan (OHSP) based on the OHSG	
Is there a risk of delayed payment of workers?				Labor Management Procedures (LMP)	
Is there a risk that workers are underpaid?				Labor Management Procedures (LMP)	
Is there a risk that women will be excluded and/or not included in equitable numbers?				Labor Management Procedures (LMP) SEA/SH Prevention and Response Action Plan	
Is there a risk that provision of employment or contracts sparks conflicts?				Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the activity result in the production of solid waste? (directly by the sub-project or by workforce)				Waste Management Plan, based on the ESMF and <i>World Bank Group's Environmental, Health, and Safety General Guidelines</i>	
Will the activity result in the production of toxic or hazardous/biohazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, industrial chemicals, ozone depleting substances, animal remains, blood from slaughter, etc.)				Integrated Pest Management Plan (IPMP) C-ESMP	
Will the activity result in the generation of dust and noise?				C-ESMP	
Will the activity result in soil erosion?				C-ESMP / ESMP (depending on context)	
Will the activity produce effluents (wastewater)?				C-ESMP WMP	
Will the activity result in increased levels of vibration from construction machinery?				C-ESMP	
Will the sub-project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)				C-ESMP / ESMP (depending on context)	

Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	Don't Know	If these risks ('yes') are present, please refer to:	Comments
Will the activity disturb any fauna and flora?				ESMP IPMP	
Will the activity result in irrigation water with high Total Dissolved Solids (TDS) with more than 1,500 ppm?				C-ESMP / ESMP (depending on context) WMP	
Can the sub-project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)				IPMP	
Will the sub-project activities require use of chemicals (e.g. fertilizers, pesticides, paints, etc.), and/or might they prompt others to increase their use of chemicals?					
Is there any risk of accidental spill or leakage of material?					
ESS 4: Community Health and Safety					
Is there a risk of increased GBV/SEA cases due to labour influx?				SEA/SH Prevention and Response Action Plan Labor Management Procedures (LMP)	
Is there a risk of spread of communal diseases due to labour influx?				Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?				Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity expose community members to physical hazards on the sub-project site?				C-ESMP or ESMP (depending on context) IPMP (if physical hazards are due to pesticide use)	
Will the activity pose traffic and road safety hazards?				C-ESMP or ESMP (depending on context)	
Is there a possibility that the activity contaminates open wells, potable water sources, and/or water used for agricultural activities?				WMP C-ESMP or ESMP (depending on context)	
Is there a possibility that the activity spreads pathogens and other pollutants (e.g. latrines)?				WMP C-ESMP or ESMP (depending on context)	

Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	Don't Know	If these risks ('yes') are present, please refer to:	Comments
Can the activity contribute to the spread of disease (e.g. community centres during pandemic situation)?				ESMP WMP	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the proposed activity/sub-project require acquisition of land, e.g.: <ul style="list-style-type: none"> • Encroachment on private property • Relocation of project affected persons • Loss of private lands or assets • Impacts on livelihood incomes This includes displacement of a population, either physically or economically (e.g. relocation for construction purposes, temporary or permanent; activities which may lead to loss of income, assets or means of livelihoods). <i>If yes, a site-specific Resettlement/Livelihood restoration Action Plan must be prepared</i>				ESMF exclusion list and Voluntary Land Donation Framework (VLDF)	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) ESMF VLDF	
Will the activity lead to disputes over land ownership?				ESMF and VLDF Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Will the activity impact sensitive and/or protected areas?				ESMF	
Is there a risk that the sub-project causes ecological disturbances?				ESMF	

Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	Don't Know	If these risks ('yes') are present, please refer to:	Comments
Is there a risk that the sub-project will cause (i) changes to landscapes and habitat; (ii) habitat fragmentation; (iii) blockages to migration routes; (iv) increased water consumption; and/or (v) contamination of natural habitats?				ESMF	
Is there a risk that the activity causes loss of precious ecological assets?				ESMF	
ESS 8: Cultural Heritage					
Will the subproject be located in or close to a site of natural or cultural value?				Chance Find Procedures (ESMF)	
Is the subproject site known to have the potential for the presence of cultural and natural heritage remains?					
ESS 10: Stakeholder Engagement and Information Disclosure					
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?				Stakeholder Engagement Plan (SEP)	
Has there been historical exclusion of disabled persons or other marginalized groups (women, children, ethnic minorities, elderly) in the area?				Stakeholder Engagement Plan (SEP)	
Is there a lack of social baseline data?				ESMF	
Are women likely to participate in decision-making processes regarding the activity?				Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries will lead to grievances?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk that the activity will have poor access to beneficiaries?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the Covid-19 outbreak hamper proper stakeholder engagement?				See FAO, UNOPS, World Bank and Government guidance and regulations on Covid-19	

Section D: Summary of the Screening Process

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	What is the potential risk/impact	Individual Risk/ Impact Rating (Low, Medium, Substantial, High)	Mitigation At the end of the screen process, tabulate the mitigation measures in an ESMP Format (Appendix C)
	<i>e.g. Increased use of pesticides due to increased production OR control spray methods</i>	<i>e.g. Medium</i>	<i>e.g. Pest management plan, along with training on OHS (e.g. how to use personal protective equipment (PPE), etc.)</i>
Is Additional Assessment Necessary? <i>(Evaluate the Risks/Impacts and reflect on options)</i>	Screening Result		Summary of Screening Result Justification
	1. No further ES Assessment required.		<i>e.g. "low risk sub-project"</i>
	2. No further ES Assessment required but requires simple ESMP.		<i>e.g. "low to medium risk sub-project"</i>
	3. Detailed ESMP. Done internally or by the sub-project implementing agency/partner.		<i>e.g. "medium risk sub-project, without need for ESIA, and implemented directly by FAO or an implementation partner"</i>
	4. Detailed ESMP. Contracted to a third party.		<i>e.g. "substantial risk sub-project, without need for ESIA, but with the need for a third party consulting firm in order to avoid conflict of interest"</i>
	5. YES 2. ESIA required. Contracted to a third party.		<i>e.g. "substantial/high risk sub-project"</i>
Is the activity excluded under the project (does	yes		no

appear in the exclusion list of the ESMF)?		
--	--	--

ES Screening Conducted by: _____ / _____ / _____
Printed Name(s) Signature(s) DD/ MM/ YYYY

Recommended by Sub-project Manager: _____ / _____ / _____
Printed Name Signature DD/ MM/ YYYY

Approved by PSU (circle one): YES NO Date (DD/MM/YYYY): _____ / _____ / _____

APPENDIX A: PROJECT CATEGORIZATION

SECTION B: Is the level of Social/Environmental risk already known?

To which category does the project belong?
 Please select the relevant risk level; if the sub-project type is not listed, please specify. The lists are indicative and provide examples of projects that are normally falling into low, moderate, substantial, and high-risk categories.

LOW RISK: Minimal or no adverse environmental or social risks and/or impacts	MODERATE RISK: Moderate or unknown adverse environmental or social risks and/or impacts	SUBSTANTIAL RISK: Substantial adverse environmental or social risks and/or impacts	HIGH RISK: High adverse environmental or social risks and/or impacts
<ul style="list-style-type: none"> - Communication and translations - Small training and workshops - Management of funds and grants under proven supervision/good track record - Management of social protection activities 	<ul style="list-style-type: none"> - Small and medium-scale infrastructure projects (e.g. community centres, rural roads, housing, buildings, etc.) that do not require resettlement or that only involve minor risks/impacts associated with resettlement; -energy provision for small-scale development works; -small works for water supply and sanitation; -management of non-hazardous waste; -small scale agriculture and on-farm irrigation; -technical assistance, support and advice (depending on topic) 	<p>Subprojects which involve:</p> <ul style="list-style-type: none"> -medium-to-substantial scale resettlement (unless the risks or impacts of such resettlement are minor); -projects with adverse risks or impacts on Indigenous Peoples and/or marginalized ethnic/tribal peoples (though not as extensively as a high-risk project) -Significant risks or impacts on the environment, community health and safety, labor and working conditions, biodiversity and/or cultural heritage, but that are not as extensive as a high-risk project -cumulative moderate risks which, together, create substantial risk due to interaction 	<ul style="list-style-type: none"> - Large infrastructure projects - Long distance roads, rail, transmission lines (water, power) - Waste treatment and disposal installations - Projects involving significant quantities of hazardous substances - Activities leading to large-scale resettlement, land acquisition and restrictions to land use - Power stations - Industrial installations (refineries, chemical installations) - River basin or land development - Large-scale irrigation - Subprojects proposed in critical habitats and protect areas

APPENDIX B: POSSIBLE SCREENING OUTCOMES AND REQUIRED ACTIONS

E&S Screening		Results and Recommendation	
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Mitigation	
	<i>E.g. Temporary displacement (physical or economical) of community members near construction site of community centre</i>	<i>e.g. Resettlement Action Plan (and/or livelihoods restoration plan)</i>	
	<i>E.g. Occupational Safety and Health</i>	<i>e.g. Use of appropriate PPE. Training on appropriate workplace conduct.</i>	
	<i>e.g. Increased use of pesticides due to increased production OR specific control-spraying activities</i>	<i>e.g. Pest management plan, along with training on OHS (e.g. how to use personal protective equipment (PPE), etc.)</i>	
Is Additional Assessment Necessary?	Screening Result	Summary of Screening Result Justification	
	6. No 1. No further ES Assessment required.		
	7. No 2. No further ES Assessment required but requires simple ESMP (See Appendix C)		
	8. Yes 1. Detailed ESMP. Done internally or by the sub-project implementing agency/partner.		
	9. Yes 2. Detailed ESMP. Contracted to a third party.		
	10. YES 2. ESIA required. Contracted to a third party.		
Next Steps	Screening Result	Action. Select applicable action consistent with the Summary of Risks. All end results of the screening and follow up tools should be disclosed at the appropriate level.	
	1. No 1. No further ES Assessment required.	Proceed to project implementation in compliance with ESMF.	

E&S Screening	Results and Recommendation	
	2. No 2. No further ES Assessment required but requires simple ESMP.	1. Produce the ESMP and submit it with Screening Form for review and approval by FAO PSU. 2. Proceed to project implementation in compliance with ESMF.
	3. Yes 1. Detailed ESMP. Done internally or by the sub-project implementing agency/partner.	1. Submit the Screening form with the TORs for the ESMP for review and approval by FAO PSU. 2. Produce the ESMP and submit to FAO for review and approval. 3. Ensure the detailed ESMP mainstreams the ESMF. 4. Do not implement works until approval of the ESMP is received by the PCU and World Bank
	5. Yes 2. Detailed ESMP. Contracted to Third Party Consultancy.	1. Submit the Screening form with the TORs for the ESMP for review and approval by FAO. 2. Engage a Registered ESIA Consultant to produce ESMP and submit to FAO first for initial review, then to PCU and World Bank for review and approval. 3. Ensure the ESMP mainstreams the ESMF. 4. Do not implement works until approval of the ESMP by the PCU and World Bank.
	5. YES 2. ESIA required. Contracted to Registered Third Party Consultancy (recognized by national government).	1. Submit the Screening form with the TORs for the ESIA for review and approval by FAO. 2. Engage a Registered ESIA consultant to produce ESIA and ESMP and submit to FAO first for initial review, then to World Bank and South Sudan’s Ministry of Environment and Forestry (MEF) for review and approval. 3. Ensure the detailed ESMP mainstreams the ESMF. 4. Do not implement works until approval of the detailed ESIA and ESMP by PCU, World Bank and South Sudan’s MEF.

APPENDIX C: TEMPLATE FOR SIMPLE ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN

Associated Project Activity	E&S Risks and Impact	Mitigation Measures	Responsibility for implementation	Timing for mitigation	Monitoring Indicators	Mitigation Budget	Monitoring Responsibility	Monitoring Frequency
Gravel borrow area for community centre construction	Land degradation	Rehabilitate all borrow areas	Contractor	Project implementation	Borrow areas rehabilitated	Contractor's Bid	Sub-project implementing agency (FAO or partner); FAO Project Team	On going

Annex 2: Procedures for Managing Contractors & UN Supplier Code of Conduct (2017)

Procedures

Bidders receive key documentation outlining the requirements of the ESMF and all relative documentation annexed. The selected contractor will comply with all FAO Social & Environmental as well as Health & Safety requirements for the duration of the contract, including the provisions outlined in the Project ESMF. These requirements equally apply to sub-contractors. It is the contractor's responsibility to ensure that subcontractors comply and to demonstrate such compliance in submittals and during verification processes by FAO. Contractors' capacity to implement E&S tools will be assessed prior to any activities by FAO. In cases where contractors do not have the capacity and experience to implement all E&S tools, FAO will provide continuous guidance and support.

If pre-bid meetings, site visits and / or contract commencement meetings are carried out, the Social & Environmental and Health & Safety requirements and submittals should be discussed, both for day-to-day work and for Social and Environmentally critical stages or activities.

In the event that security personnel are used for the sub-projects, the contractor will develop and implement measures and actions to assess and manage the risks to human security of project-affected communities and project workers that could arise from the use of security personnel, including compliance with provisions outlined in the Security Management Plan.

Mains E&S Processes:

- UN Supplier code of conducts (2017) and ESHS Codes of conduct are required of contractors and subcontractors and their workers
- A Contractors Environmental and Social Commitment Plan (C-ESCP) will be annexed to the Letter of Agreement
- Preparation of all E&S documentation and tools prior to any activities by the contractors:
 - Detailed contractor ESMP that is costed, with enough budget to mitigate E&S risks and adapted to subprojects and local context, integrating all project consideration (SEP, SEA/SH Prevention and Response Action Plan, IPMP, VLDF)
 - Preparing their Labour Management Procedures (LMP)
 - SMP which includes security of workers and project affected communities according to the Saving Life Together Principle (SLT)
 - GRM to handle the concerns of their employees and project host communities, based on the project's GRM principles;
 - E&S monitoring and reporting in adequacy with the ESMP
- Regular reporting to PSU according to C-ESMP indicators
- Regular reporting of GRM
- Immediate reporting of incidents to PCU

- Monitoring contractor commitment and compliance through C-ESCP and C-ESM. Ensuring contractors provide details on contractor's oversight on environmental, social, health and safety (ESHS) performance
- Annual audit from PCU and TPMA for compliance assessment
- Measures to be taken (renew of contract, end of contract, sanctions)

UN SUPPLIER CODE OF CONDUCT (2017)

United Nations Charter: The values enshrined in the United Nations (UN) Charter, *respect for fundamental human rights, social justice and human dignity, and respect for the equal rights of men and women*, serve as overarching values to which suppliers of goods and services to the UN are expected to adhere.

Global Compact: The Global Compact is a voluntary international corporate citizenship network initiated to support the participation of both the private sector and other social actors to advance responsible corporate citizenship and universal social and environmental principles to meet the challenges of globalization. The UN strongly encourages all suppliers to actively participate in the Global Compact. And to that end, this Code of Conduct has been developed with recognition of the importance of the ten principles of the UN Global Compact and is viewed as an important means of integrating the Compact into the operations of the UN. The Code of Conduct addresses the issues included in the Compact in the areas of human rights, labor, environment and anti-corruption and interpretation of the Code should be undertaken in a manner consistent with the Global Compact. Suppliers interested in supporting the Global Compact and obtaining more information on the ten principles, can visit the Global Compact website at www.unglobalcompact.org.

International Labor Conventions and Recommendations: The International Labor Standards (i.e., Conventions and Recommendations) as established by the tripartite UN specialized agency, the International Labor Organization (ILO), have served as the foundation on which much of this Code of Conduct is based. It is the UN's expectation that any supplier providing products or services to the UN will, in addition to the values of the UN Charter, adhere to the principles concerning International Labor Standards summarized below in paragraphs 4 – 9.

1. Scope of Application:

The UN expects that these principles apply to suppliers and their employees, parent, subsidiary or affiliate entities and subcontractors. The UN expects suppliers to ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all. In order for a supplier to be registered as a UN supplier or to do business with the UN, the supplier is required to read and acknowledge that this Code of Conduct provides the minimum standards expected of UN Suppliers. In addition, suppliers should note that certain provisions of this Code of Conduct will be binding on the supplier in the event the supplier is awarded a contract by the UN pursuant to the terms and conditions of any such contract. Failure to comply with certain provisions may also preclude suppliers from being eligible for a contract award, as reflected in the solicitation documents of one or more organizations in the UN. Prospective suppliers are invited to review the specific terms and conditions of contract and

procurement policies of the organization(s) within the UN with which they would like to do business in order to ascertain their current and future eligibility.

2. Continuous Improvement:

The provisions as set forth in this Code of Conduct provide the minimum standards expected of suppliers to the UN. The UN expects suppliers to strive to exceed both international and industry best practices. The UN also expects that its suppliers encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct. The UN recognizes that reaching some of the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.

3. Management, Monitoring and Evaluation:

It is the expectation of the UN that its suppliers, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. The UN expects that its suppliers will establish and maintain appropriate management systems related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. Supplier participants in the Global Compact are strongly encouraged to operationalize its principles and to communicate their progress annually to stakeholders.

Labour:

4. Freedom of Association and Collective Bargaining: The UN expects its suppliers to recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

5. Forced or Compulsory Labor: The UN expects its suppliers to prohibit forced or compulsory labor in all its forms.

6. Child Labor: The UN expects its suppliers not to employ: (a) children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

7. Discrimination: The UN expects its suppliers to ensure equality of opportunity and treatment in respect to employment and occupation without discrimination on grounds of race, colour, sex, religion, political opinion, national extraction or social origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place. The UN expects its suppliers to take all appropriate measures to ensure that neither themselves nor their parent, subsidiary, affiliate entities or their subcontractors are engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training,

remuneration and benefits.

8. Wages, Working Hours and Other Conditions of Work: The UN expects its suppliers to ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers should be not less favourable than the best conditions prevailing locally (e.g. collective agreements covering a substantial proportion of employers and workers / arbitration awards / applicable laws or regulations) for work of the same character performed in the trade or industry concerned in the area where work is carried out.

9. Health and Safety: The UN expects its suppliers to ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

Human Rights:

10. Human Rights: The UN expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

11. Harassment, Harsh or Inhumane Treatment: The UN expects its suppliers to create and maintain an environment that treats all employees with dignity and respect. The UN further expects that its suppliers, as well as their parent, subsidiary and affiliated entities along with any subcontractors, will neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards and have always been unacceptable behaviour and prohibited conduct for the UN. Prior to entering into agreements with the UN, suppliers are informed of the standards of conduct with respect to the prohibition of sexual exploitation and abuse, expected by the UN. Such standards include, but are not limited to, the prohibition of: (i) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent, (ii) exchanging any money, employment, goods, services, or other things of value, for sex, and/or (iii) engaging in any sexual activity that is exploitive or degrading to any person. The UN expects its suppliers to take all appropriate measures to prohibit their employees or other persons engaged by the suppliers, from engaging in sexual exploitation and abuse. The UN also expects its suppliers to create and maintain an environment that prevents sexual exploitation and abuse. United Nations contracts will contain provisions concerning a supplier's obligation to take appropriate measures to prevent sexual exploitation and abuse. The failure by a supplier to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement with the

United Nations. Moreover, no harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

12. Mines: The UN expects its suppliers not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

Environment:

13. Environmental: The UN expects its suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

14. Chemical and Hazardous Materials: Chemical and other materials posing a hazard if released into the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

15. Wastewater and Solid Waste: Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

16. Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

17. Minimize Waste, Maximize Recycling: Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Ethical conduct:

18. Corruption: The UN expects its suppliers to adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

19. Conflict of Interest: UN suppliers are expected to disclose to the UN any situation that may appear as a conflict of interest, and disclose to the UN if any UN official or professional under contract with the UN may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

20. Gifts and Hospitality: The UN will not accept any invitations to sporting or cultural events, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. The UN expects its suppliers not to offer any benefit such as free goods or services, employment or sales opportunity to a UN staff member in order to facilitate the suppliers' business with the UN.

21. Post-employment restrictions: Post-employment restrictions may apply to UN staff in service and former UN staff members who participated in the procurement process, if such persons had prior professional dealings with suppliers. UN suppliers are expected to refrain from offering employment to

any such person for a period of one year following separation from service.

Environmental and Social Commitment Plan for Contractors

The project will utilize the C-ESCP designed under the RALP sister project to monitor contractors and ensure adequate compliance with E&S cascade responsibilities. It will be using the World Bank ESCP template and will be annexed to the Letter of Agreement.

Annex 3: Environmental & Social Reporting Templates

AAP template for field level feedback and complaints and GBV-SEA reporting

Toll free Number (515) Email: FAOSSDhotline@fao.org

This template is intended to provide guidance on how to record a summary of key feedback or complaints heard while working in the field. Each AAP Focal points should carry this form with them for recording major issues heard from communities each day. If there are, any issues related **to protection, corruption or abuse** should be immediately reported to the Helpline Operator using the AAP GBV REPORTING TEMPLATE.

NB: Please it is important if verbal feedback is recorded. (Ask the beneficiaries for their consent before recording using the Smart Phone provided to you)

FEEDBACK AND COMPLAINTS LOG								
COUNTY:								
LOCATION:								
YOUR NAME:								
N°	Date	Name of complainant	Details of complaint	Telephone number	Immediate action taken	Reported to	Date Resolved	
1								
2								
3								

Annual E&S Monitoring Template

Project Status, E&S Incidents, E&S Changes, E&S Initiatives

Project Status

Provide a brief description of any new developments in relation to operations and facilities over the reporting period.

E&S Incidents

Please provide a summary of all the notifiable E&S incidents, per CTA definitions. Please expand or collapse the table where needed:

DATE	INCIDENT DESCRIPTION	CLASS	REPORTS SENT TO LENDERS	CORRECTIVE ACTION / REMEDIAL PLAN

E&S Changes and ESMF Major Update

Please provide a summary of all the notifiable E&S changes and ESMF major update. Please expand or collapse the table where needed.

DATE	CHANGE DESCRIPTION	REPORTS SENT TO LENDERS	IMPLEMENTATION STATUS

Improvements/initiatives Regarding E&S Performance

Briefly describe improvements/initiatives implemented during the reporting period on the management of E&S aspects (e.g. social approaches, security management, Grievance and redress process changes, policies and rules, contractors monitoring, sustainability reports, waste minimization, etc.)

ESS1: Assessment and Management of Environmental and Social Risks and Impacts

E&S Impact / Risk Assessment

Have any supplemental environmental, social, security, health and safety impact/risk studies been conducted during the reporting period?

E&S Regulatory Reporting, Permits and Supervision

Please list any environmental reports submitted to the South Sudan authorities.

Copies attached with this report Copies available upon request

Please summarize South Sudan authority monitoring and inspections.

Management of FAO, UNOPS and other implementation partners

Please illustrate with a chart or table on the relevant implementation teams' organizational structure to manage environment, health and safety, labour and social aspects during the reporting period. Please name the individuals who hold responsibility for environmental, social, health and safety, human resources, security performance and give their contact information.

Please detailed annual evaluation of IP according to E&S clauses or ESCP in LoA.

Remediation or sanctions taken if any.

Compliance with Environmental and Social Management Plans

The status of the ESMP implementation should be described and any issues that remain outstanding should be detailed.

Attached document:

- Complementary environmental, social, security, health and safety impact/risk studies reports
- Contextual studies made during the year: (i) legal alignment and agreement with customary authorities on rules aligned with ESF and national law for project related activities and grievance; (ii) E&S screening documents
- Updated ESMF if relevant
- IP ESCP or E&S clauses within LoA
- IP ESCP or E&S clauses annual review and evaluation
- Monitoring framework from the ESMF (enclosed in the document)

ESS2. Labor and Working Conditions

Security Management Plan Implementation

Synthesis on security context change and risk over the project implementation partners. Provide information in any update of the security plan.

Human Resources Management

Have the local implementation partners and contractors changed/updated their Human Resource (HR) policy and procedures, HR manual, and Health & Safety (H&S) procedures, during the reporting period?

Yes No

If yes, please provide details.

Provide the following information regarding the workforce:

	# COMMUNITY WORKERS	# DIRECT WORKERS	# FEMALE DIRECT WORKERS	TURNOVER	# CONTRACTED WORKERS ⁹¹
PREVIOUS YEAR					
REPORTING YEAR					

Synthesis of workers grievance and objective consideration from the Legal Third Party. List the worker-related court cases and grievance status describe their status.

Occupational Health and Safety

Describe the main changes implemented in terms of Occupational Health and Safety (OHS) during the reporting period, e.g. revision of the OHS management procedures, action plans for technical improvements, leading/lagging indicators used/introduced, identification of hazards, new controls, etc.

Please attach Health & Safety audit reports available for the reporting period.

Copies attached with this report Copies available upon request Not Available

Accident Statistics Monitoring

Synthesis on accident including: (i) Describe type of accident by IP and type of worker, role, situation; (ii) Describe immediate measure taken for each situation; (iii) Describe corrective measure to prevent reoccurrence.

Synthesis on ESRP and IP Security management plan updates.

Provide details for the non-fatal lost time injuries during this reporting period.

FAO / UNOPS / IP/ CONTRACTOR/ SUBCONTRACTOR EMPLOYEES?	TOTAL WORKDAYS LOST	DESCRIPTION OF INJURY	CAUSE OF ACCIDENT	CORRECTIVE MEASURES TO PREVENT REOCCURRENCE

⁹¹ See ESS2 definitions.

Provide details for fatal accidents during this reporting period, if any, (and provide copies of accident investigation and respective corrective plan).

DATE OF ACCIDENT	TYPE OF ACCIDENT	DESCRIPTION OF ACCIDENT	# OF FATALITIES	OF	OF	PREVENTIVE MEASURES TAKEN AFTER THE INCIDENT

OHS Training

Describe Health and Safety training programs carried out in the reporting period.

DATE	TYPE OF AUDIENCE	DESCRIPTION OF TRAINING	(AND	NUMBER OF ATTENDEES

Workplace Monitoring

Please provide copy of any Workplace Monitoring reports developed for the reporting period.

Attached document:

- *IPs new policy rules if any*
- *LMP GRM report including Legal Third-party report*
- *Update of the ELRP Security management Plan if relevant*
- *Update of the ELRP LMP if relevant*
- *FAO local security plans developed during this period*
- *UNOPS local security plans developed during this period*
- *IPs local security plans developed during this period*
- *OHS reports*

ESS3 Resource Efficiency and Pollution Prevention

Environmental Monitoring

Provide copy of environmental monitoring data reports for this reporting period, collected consistent with the ESMPs for the subprojects. Briefly describe environmental mitigation measures implemented during the reporting period to comply with E&S requirements.

Resources Efficiency: Energy and Water

Provide any relevant information on resources efficiency for sub-project.

Integrated Pest Management Framework

Synthesis on status and actions implemented in terms of integrated pest management with relative indicators from ESMF.

Attached document:

- *Updated IPMP if relevant*

ESS4 Community Health, Safety and Security

Community Health and Safety.

Synthesis integrating (i) list and description any initiatives implemented in relation to community health and safety during the reporting period; (ii) list and description of the actions, the expected or actual dates of implementation, progress/status, results obtained. You can use a tabular format (as below) or provide the information as an attachment of the report.

ISSUES	MITIGATION MEASURES	EXPECTED OR ACTUAL DATE OF IMPLEMENTATION	RESULTS/CURRENT STATUS

During the reporting period, have any emergency drills been conducted with participation of the local authorities, public emergency organizations or local communities? Are the communities aware of the emergency response plans?

SEA/SH Prevention and Response Action Plan

Please provide a synthesis on the status and progress of the actions as defined in the Gender-Based Violence Mitigation and Action Plan with major challenges and activities being implemented.

Attached document:

- *Updated SEA/SH Prevention and Response Action Plan.*
- *SEA/SH Prevention and Response Action Plan. Plan monitoring table.*
- *Anonymous AAP GBV GRM reporting table.*

ESS5 Land Acquisition and Involuntary Resettlement

Provide summary of voluntary land donations, considering as well (i) any activities that have been screened out as a result of potential displacement impacts; (ii) any activities that are using voluntary land donations and assess compliance with the protocol; (iii) any change due to Voluntary land donation framework annual update

Attached document:

- *Updated Voluntary Land Donation Framework*
- *Voluntary Land Donation documents*

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Provide biodiversity management synthesis including (i) mitigation measures included in the ESMF and ESMPs status; (ii) as needed, using the table below describe any new activities, subprojects or expansions that had footprint into new areas of habitat during the reporting period.

NEW ACTIVITY/EXPANSION	TOTAL AREA COVERED	HABITAT TYPE

ESS7 IP/SAHUTLUC

Provide a synthesis on IP/SAHUTLUC process including: (i) List any information dissemination and consultation events vis-à-vis land donors that have been undertaken to fulfil free, prior and informed consent (FPIC) in land donations; (ii) List any cultural issues identified in subprojects, corrective actions, and lessons learned for future projects.

Attached document:

- *FPIC documentation in land donation, if relevant*
- *List of subproject, corrective actions, responsibilities, and actors involved*

ESS8 Cultural Heritage

Report if chance find procedures have been applied if not, please indicate Not Relevant.

ESS 10 Stakeholder Engagement and Information Disclosure

Stakeholder Engagement, Public Consultation and Disclosure

List any stakeholder engagement events, including public hearing, consultation and disclosure, liaison with non-governmental organizations, civil society, local communities on E&S.

DATE	PARTICIPANT(S)	FORMATS OF INTERACTION	ISSUES DISCUSSED	FAO RESPONSE/ AGREEMENT REACHED (ATTACH MINUTES IF ANY)	ACTIONS TAKEN (IF ANY)/ REMARKS

Grievance and Redress Mechanism (GRM)

Synthesis on GRM functionality according to each channel (Customary rules, IPs GRM, Project GRM, GBV GRM, LMP GRM, Appeal process, etc.)

Synthesis on the GRM aspects based on regular reports from FAO AAP GRM, AAP GBV/SEA/SH GRM and Legal Third-Party monitoring.

Attached document:

- *Overall GRM anonymous registered file with detailed on grievance type and situation (closed or open)*
- *IPs GRM annual assessment*

Annex of the Annual Monitoring Report: Monitoring ESMF Table

ESS and Related Risk	Indicators	Critical Limit	Annual Value	Source
Major ESMF indicators				
ESS1: Updated ESMF document	Semi-annual update/validation of E&S plan (ESMP, VLD, SEP) by implementation team. No. cleared and disclosed, No. indraft. No. under implementation.	Yes		
ESS10: Conflict over selection of beneficiaries	Inclusive consultation including (IDP, host household, seasonal pastoralists, returnees, women, youth, all ethnicities, etc.) % of female participants % of female heads of households in the community participated	Consultation Report and list of stakeholders with contacts and categories <50 < 80		
ESS10: Grievance and redress mechanism	Total number of Grievance by channel: traditional authorities / justice / IPs / UNOPS / FAO / OIG / WB GRS % of cases on harassment and violence against women and children % of cases on the same from the same locality	<1000 < 50% 20%		
ESS10: GRM	Number of on-going and unsolved grievance by type (AAP types including tenure aspects)	<50		
ESS10: Stakeholder Consultation	% of stakeholders trained on GBV	<70%		
ESS10: Stakeholder Consultation	Number of awareness sessions on GBV	XX		
ESS10: GRM	Number of Grievance by IPs	XX		
ESS10: GRM	Number of incidents ⁹²	0		

⁹² Incidents all included: GBV-SEA, SH, death, injuries, etc.

ESS10: GRM	Number of GBV-SEA and SH cases related directly or indirectly to the project % of cases on harassment and violence against women and children % of cases on the same from the same locality	0 <50% <20		
ESS7: Elite Capture	Disaggregation of beneficiaries from activities by county (ethnics groups, minorities women, IDPs, Host households, Returnees, children according to SEP and local assessment)	Adequate to local social assessment baseline		
ESS10: Stakeholder Consultation and information disclosure	Number and percentage of affected households consulted (disaggregated by female-headed households, ethnic minorities, youth)	<50%		
ESS2: Poor workers' occupational health & safety	Number of OHS incidents by type (falls, cuts, burns, spills, communicable diseases etc.) and actors (direct workers, IP workers, contractors, community workers) - Disaggregated by gender and age group (adult, youth, children) ; No. of audits and inspections conducted, No. of work stop orders given or improvement/corrective orders given.	XX		
ESS10: Information	Number of communications reports based on SEP and means used at different scale (county, community): Local consultation Radio etc. % of communications tailored to women % of communications tailored to children	XX <30% <30%		
ESS4: Poor community health & safety	Number of project-related incidents, by type (burns, diseases, poisoning, etc.) % community member sensitized to public works activities, HSE, GBV (Harassment and violence against women) Disaggregated by gender and age group - adult, youth, children	XX		
ESS5: land tenure	% Person affected by the project (PAP) related to land donation % of female-headed households	<XX 0		

	% of child-headed households	0		
ESS5: land tenure & VGGT 3.A.1.1. &2	Perceptions of legitimate tenure rights assessed with individual groups and validate through multi-stakeholder group	No		
ESS5: land tenure & VGGT 3.A.1.4 & VGGT 3.A.1.5	Voluntary land donation (ha) and related grievance and redress (ha) % of stakeholders consulted on perceptions of legitimate tenure rights % of grievances on voluntary land donation and tenure	<XXha / Oha XX XX		
ESS1: partners E&S capacity assessment	Percentage of partners E&S capacities assessed Percentage of capacity building measures implemented	<100% <100%		
ESS1: non implementation of E&S requirements	% IPs nonconformity with the E&S commitment plan within contract % of incidents related to harassment and violence against women and children	0% 0		
ESS1: non implementation of E&S requirements	% sub-project non-conformity following C-ESMP (% of mitigation activities non conform) % of incidents related to harassment and violence against women and children	<20% 0		
ESS3: environmental pollution	Tons of inorganic fertilizer supplied Mean use of inorganic fertilizer (kg/ha)	<XX tons <XX kg/ha		
ESS3: Soil VS FAST	VS-FAST Soil improvement	<0 TBD		
ESS3 / ESS6: environmental pollution and biodiversity losses	Tons of Phytosanitarian products supplied Mean use of phytosanitarian products (kg/ha) Area of offset created	<XX tons <XX kg/ha		
ESS3 / ESS6: environmental degradation	Number of Local Environmental Entities grievance % reported by female heads of household	0 <20%		
ESS3	Name/Type of pesticide used in an area Application amount & frequency	See IPMP for guidelines		

ESS6: deforestation	Deforestation incidences related to project (agriculture expansion, etc.)	XX		
ESS3: GHG emission	GHG emission	< ExAct modelling		
ESS1: audit of IPs	E&S evaluation and audit of IPs	1		
ESS2 / ESS4	Number of security issues (injuries, death) by type and actors: Beneficiaries; IPs; FAO staff % of women and girls % of children	XX <50% <40%		
Specific Framework and Plan indicators				
ESS4 / ESS7: SEA/SH	Implementation of the action plan	<100%		
Prevention and Response Action Plan	Refer to the SEA/SH Prevention and Response Action Plan indicators			
ESS3: Integrated Pest Management Plan (IPMP)	Implementation of the IPMP	<100%		
	Refer to the Integrated Pest Management Plan Indicators			
ESS10: Stakeholder Engagement Plan (SEP)	Implementation of the SEP	<100%		
	Refer to the Stakeholder Engagement Plan indicators			

Annex 4: Stakeholder Engagement Plan (SEP)

The World Bank's ESS 10 recognizes the importance of open and transparent engagement with all project stakeholders, based on the recognition that effective stakeholder engagement can improve environmental and social (E&S) sustainability of project activities, enhance project acceptance, and implementation, and allow stakeholders to contribute to project design. The key objectives of stakeholder engagement include an assessment of the level of interest and support of the project by stakeholders to promote effective and inclusive engagement with all project-affected parties and to ensure that project information on E&S risks and impacts is disclosed in a timely and understandable way.

This Stakeholder Engagement Plan (SEP) is based on the guiding principles that stakeholder engagement should:

- Be timely
- Be independent (free of external manipulation, interference, coercion, discrimination, and intimidation)
- Have clear objectives
- Have the capacity to influence the stakeholders
- Obtain feedback
- Trigger provision of resources and other modifications, where needed
- Be properly documented and disclosed by the borrower
- Generate minutes from every meeting/interview
- Generate recordings or photos, if culturally accepted

Based on the above, a detailed SEP has been prepared. **The full document has been provided as a separate attachment.**

Annex 5: Labor Management Procedures

Under the World Bank Environmental and Social Standard 2 (ESS2: Labor and Working Conditions), the Borrower (in this case MAFS as the grant receiver) is required to develop labor management procedures (LMP). The purpose of the LMP is to identify the main labor requirements and risks associated with the project, and help the Borrower to determine the resources necessary to address project labor issues. The LMP will enable different project-related parties such as staff of the project implementing unit, consultants and project workers, to have a clear understanding of what is required on a specific labor issue. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

The objectives of the LMP are to:

- (a) Identify the different types of project workers who are likely to be involved in the project-
- (b) Identify and assess the labor related risks and impacts for project activities.
- (c) Set out procedures to meet the requirements of ESS2, ESS4 and of the applicable national legislation.

The LMP will be applied with due consideration to the requirements of national laws, the interrelatedness of ESS2 with other Environmental and Social Standards in general and ESS4 in particular.

Detailed Labour Management Procedures have been prepared for the project in line with the above. **The full document has been provided as a separate attachment.**

Annex 6: Integrated Pest Management Plan (IPMP)

As this project involves control measures for Desert Locust control, pesticide procurement and use will occur. In addition, it is expected that increased agricultural development may lead to possible increased use of pesticide which may have an impact on the environmental. Given the above, an Integrated Pest Management Plan (IPMP) has been prepared for ELRP in compliance with ESS3 (which guides that *“Where projects involve recourse to pest management measures, the Borrower will give preference to integrated pest management (IPM) or integrated vector management (IVM) approaches using combined or multiple tactics.”*

The purpose of the IPMP is to ensure that the identified impacts related to application of pesticides are mitigated, controlled, or eliminated through planned activities to be implemented throughout the project life. The IPMP also provides opportunities for the enhancement of positive impacts. The IPMP gives details of the mitigation measures to be implemented for the impacts; and the responsible institutions to implement them.

Implementation of the IPMP may be slightly modified to suit changes or emergencies that may occur on site at the time of project implementation. The plan therefore should be considered as the main framework that must be followed to ensure that the key potential negative impacts are kept minimal or under control.

The full document has been provided as a separate attachment.

Annex 7: Sexual Exploitation and Abuse and Sexual Harassment Prevention and Action Plan

This Action Plan has been developed to accompany the implementation of ELRP and ensure that the project does not have any negative impacts or further promote SEA, SH or GBV. It presents operational activities as well as recommendations for SEA/SH/GBV and risk mitigation measures that build on existing mechanisms in South Sudan. The Plan provides general procedures for grievances related to such abuse in project areas. It is based on existing protection, prevention and mitigation strategies and measures developed by FAO, UNOPS, and other implementation partners as well as measures by other key actors in South Sudan, as coordinated through the GBV sub-cluster group.

The full document has been provided as a separate attachment.

Annex 8: Security Management Plan Summary

The purpose of the Security Management Plan is to set out the ways in which MAFS, FAO and UNOPS will ensure security protection and duty of care to staff, implementing partners and other parties involved in the implementation of the proposed project.

Objectives

The objectives of the Security Management Plan are to set out:

- (a) Identification and assessment of security risks
- (b) Processes of identification of different security requirements;
- (c) Decision-making processes and minimum conditions for project implementation
- (d) Standard Operating Procedures and policies
- (e) Duty of Care and the applicability to different parties
- (f) Institutional arrangements for the implementation of the Security Management Plan

Identification of types of workers and project affected parties

The Security Plan will be administered for different types of project workers and project-affected parties;

- **Direct Workers.** People employed directly by MAFS to work specifically in relation to the project. This category includes personnel in the Project Coordination Unit in Juba.
- **Contracted Workers.** People engaged through FAO, UNOPS and their implementation partners (IPs) in Juba and field personnel based in various project sites within the states/counties. Under the ELRP, the majority of project activities on the ground are undertaken by FAO and UNOPS direct workers. Most of these will be South Sudanese nationals and they are – where possible – recruited from the communities in which activities are implemented. Under the ELRP, the contractors anticipated are for the activities to be carried out through IPs including public works, and for the third-party monitoring activities.
- **Community Workers and other project-affected parties.** People engaged by the project to lead the community-based project interventions and people affected by the project, such small holder farmer households.

FAO and UNOPS security approach

FAO and UNOPS fall under the UN Security Management System (UNSMS). The UNSMS operates under a 'Framework of Accountability for the United Nations Security Management System' that provides guidance for the various security actors and mechanisms in a country. FAO and UNOPS are developing a (i) Security assessment and (ii) UN Security Classifications

Protection measures

Protection Measures for Workers and Project-Affected Parties

Saving Lives Together. ‘Saving Lives Together’ (SLT) is a voluntary initiative that responds to the fact that UN entities, international NGOs and International Organizations face similar security challenges in a given environment.

Duty of Care. MAFS will have full duty of care for all direct workers. FAO and UNOPS will have full duty of care for their respective personnel as contracted workers. In regard to workers of other contracted entities (i.e., IPs, construction contractors, and TPMA), SLT principles will be included in the procurement and bidding process.

Protection Measures for FAO and UNOPS Personnel

Specific measures will be implemented for direct workers: (i) Pre-deployment training – SSAFE and BSAFE (ii) Insurance – Malicious Acts Insurance Policy (MAIP) and personal coverage; (iii) Communication Equipment - VHF/HF, Satellite and GSM Phones, Dish/WiFi Internet (iv) Residential Security Measures; (v) TRIP; (vi) Security Clearances / SRM Compliant travel (vii) UN Force Protection and Armed Escort

Protection Measures for Contracted Workers

For Implementing Partners and contractors who are not covered under UNSMS, the PSU will ensure that all risk mitigation measures – trainings, insurances, residential measures and security communication equipment – will be integrated as part of the requirements in the procurement/bidding process. These will be included in the procurement and bidding process and will be subject to monitoring and supervision during project implementation. Within the bidding documents, contractors will also be required to hold sub-contractors to the same standards.

Measures for Community Workers and other Affected Parties

ELRP will focus on strong community mobilization/sensitization and local community buy-in to the project. When requested by the World Bank or in the event violence occurs against any persons associated with the project due to their participation in the project, MAFS, and by extension FAO/UNOPS will halt activities in the relevant area. The project aims to build strong ownership and commitment by communities. This will act as a social deterrent for violence within communities, and will be reinforced by chiefs and elders.

Crisis and Emergency Management Plan for All Workers

The Plan include emergency response plans for (i) major security incident, (ii) medical emergency; (iii) relocation and evacuation; (iv) road traffic accident; (iv) arrest; (vi) hostage incident management.

Annex 9: Voluntary Land Donation Framework (VLDF)

1. Purpose, scope and application of the Voluntary Land Donation Framework (VLDF)

Projects funded by the World Bank require that the borrower (in this case, MAFS as implementing agency) take all reasonable necessary measures to mitigate the project's negative social impacts, including those arising from voluntary land donations. FAO as the lead implementing agency for Component 1, 2.2 and 3, will also borrow from its experience and best practice in handling land issues, particularly in South Sudan, as well as the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT) developed by FAO and the Committee on World Food Security.

- **Scope of foreseen land transfers in the project:** The project foresees no displacement of communities or households. Further the project foresees no procurement of land or transfer of rights to land and/or associated assets and natural resources to MAFS or FAO from beneficiaries. Rather, it is expected that the implementation of project sub-components leads to a transfer of public, communal, family and/or individual rights to a redefined purpose and a redefined set of rights holders.
- **Objective of VLDF:** This VLDF has been included in this ESMF in order to ensure that such transfers of rights, required for project-related activities are provided in a voluntary manner by all affected stakeholders, without coercion or duress, while avoiding corruption and with full understanding of what the donation would entail with regard to personal impacts (positive or negative) in relation to donating the land and the associated assets and/or natural resources, in question.
- **Application of the VLDF:** The VLDF applies in instances where a sub-project involves a transfer of tenure rights to land and associated immovable assets and natural resources through negotiated voluntary land donations from affected persons. The VLDF can only be applied for beneficiary communities and in cases with no involuntary land acquisition and based on community-driven demand. VLD will be accepted when small areas of private land and assets where the affected users of the assets and land have agreed to give their land and other assets as a voluntary contribution to the sub-project.
- **The VLDF avoids cases with high risk factors:** High risk factors include:
 - i.) the presence of significant number of existing or recent disputes or claims involving the land and its associated assets and natural resources, that are unresolved;
 - ii.) areas from which large-scale displacement has taken place and hence adequate consultation of legitimate stakeholders is perceived impossible / unreasonable for the scope of subproject implementation.
- **Due diligence in the VLDF:** The underlying principle of the VLDF is due diligence. Sub-project staff will assure that voluntary contributions are made with the prior knowledge that other options are available, enabling a mechanism and taking due note of any grievance and redress and that the willingness for donation is obtained without coercion or duress.
- **Overall guidance for the VLDF:** The following overall guidance applies to the VLDF:

- i.) Good faith, gender-sensitive consultations according to the principles of free, prior and informed consent should be held with all those whose rights and livelihoods may be affected, before the cut-off date. Such consultations may include the determination of alternative rights and benefits, as a compensation for the obstruction to the realization of rights and livelihood opportunities to the land voluntarily allocated.
 - ii.) Consultations must demonstrate that perceived legitimate tenure right holders and those stakeholders whose livelihoods will be disturbed by the obstruction of access to land and related resources will not be impoverished or economically displaced as a result of the land donation;
 - (i) During the feasibility assessments, FAO will ensure due-diligence documentation of voluntary land donations, including signed forms of written consent. To ensure that documentation is authentic, consent forms require at least two witnesses from within the affected community. The voluntary land donation due diligence information will be verified and updated as necessary.
 - (ii) The land in question should be given voluntarily with the consent of all perceived legitimate tenure right holders and those whose livelihoods will be disturbed by the obstruction of access to land and related resources.
- **Main elements of the VLDF:** Where voluntary land donation is required to implement a sub-project, sub-project managers will, as part of the environmental and social assessment of sub-projects requiring that donation, take reasonable measures to:
 - (i) establish an inventory of perceived legitimate tenure rights to land, assets and associated natural resources and rights holders to be affected by the project⁹³;
 - (ii) hold good faith consultations with those whose rights and/or livelihoods are affected to ensure free, prior and informed consent to this donation, prior to any works being done;
 - (iii) and provide grievance and redress mechanisms.
 - **Principles of implementation of this VLDF:** The following principles, as set out in the VGGT⁹⁴, apply to all steps of this VLDF and its application process:
 - (i) *Human dignity:* recognizing the inherent dignity and the equal and inalienable human rights of all individuals.
 - (ii) *Non-discrimination:* no one should be subject to discrimination under law and policies as well as in practice.
 - (iii) *Equity and justice:* recognizing that equality between individuals may require acknowledging differences between individuals, and taking positive action, including empowerment, in

⁹³ The inventory should include a detailed account, derived through a consultative, impartial and transparent process, of the full range of rights held or asserted by affected people, including those based on custom or practice, secondary rights such as rights of access or use for livelihoods purposes, rights held in common, etc.

⁹⁴ Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security – accessible at <http://www.fao.org/3/i2801e/i2801e.pdf>

order to promote equitable tenure rights and access to land, fisheries and forests, for all, women and men, youth and vulnerable and traditionally marginalized people, within the national context.

- (iv) *Gender equality*: Ensure the equal right of women and men to the enjoyment of all human rights, while acknowledging differences between women and men and taking specific measures aimed at accelerating de facto equality when necessary. States should ensure that women and girls have equal tenure rights and access to land, fisheries and forests independent of their civil and marital status.
- (v) *Holistic and sustainable approach*: recognizing that natural resources and their uses are interconnected and adopting an integrated and sustainable approach to their administration.
- (vi) *Consultation and participation*: engaging with and seeking the support of those who, having legitimate tenure rights, could be affected by decisions, prior to decisions being taken, and responding to their contributions; taking into consideration existing power imbalances between different parties and ensuring active, free, effective, meaningful and informed participation of individuals and groups in associated decision-making processes.
- (vii) *Rule of law*: adopting a rules-based approach through laws that are widely publicized in applicable languages, applicable to all, equally enforced and independently adjudicated, and that are consistent with their existing obligations under national and international law, and with due regard to voluntary commitments under applicable regional and international instruments.
- (viii) *Transparency*: clearly defining and widely publicizing policies, laws and procedures in applicable languages, and widely publicizing decisions in applicable languages and in formats accessible to all.
- (ix) *Accountability*: holding individuals, public agencies and non-state actors responsible for their actions and decisions according to the principles of the rule of law.
- (x) *Continuous improvement*: Mechanisms for monitoring and analysis should be implemented to develop evidence-based programmes and secure ongoing improvements.

Monitoring mechanism: To ensure conformity with the selection criteria, land donation issues during project implementation shall be monitored by project coordination structures at community levels by regularly reviewing the land donation agreement documents. Individuals will be randomly picked from the community for interviews to ascertain conformity with the guidelines for the voluntary land donation.

Grievance and redress Mechanism: In instances where land is allocated under duress and/or the donation constitutes more than 10% of a private land holding, the issue will be addressed by the grievance redress committee (GRC) established for the project. The Voluntary Land Donation Consent Form will be translated into local languages to allow for due recourse, in case of any disputes.

2. Key definition of terms and concepts of the VLDF

The following key definitions of terms and concepts apply to this VLDF, annexed as part of this ESMF.

Key definitions

Affected persons	<p>Refers to all stakeholders who, as a result of land transfers through project activities, would have their:</p> <ul style="list-style-type: none"> i.) Recognized legitimate tenure rights to land and/or associated assets and natural resources affected; ii.) Habitual access and use of land and associated assets and natural resources as a fundamental basis for livelihoods, restricted without alternatives. <p>Stakeholders can include any person, households, communities and /or private or public entity. Recognition can be based on formal law or on customary practices.</p>
Beneficiary	All persons and households from the community who voluntarily seek to avail of and be part of the project.
Cutoff Date	The last date on which it is possible for affected persons to make claims about being eligible to be categorized as affected persons. The cutoff date is established as part of the VLDF.
Improvements	Structures constructed (dwelling unit, fence, waiting sheds, pig pens, utilities, community facilities, stores, warehouses, etc.) and crops/plants planted by the person, household, institution, or organization.
Tenure	Tenure systems define and regulate how people, communities and others gain access to land and other natural resources, whether through formal law or informal arrangements. The rules of tenure determine who can use which resources, for how long, and under what conditions.
Tenure rights	Includes all rights associated to the natural resources including common property rights, use rights, tenancy rights, seasonal rights, rights of passage and hence also overlapping and shared rights. They may be based on written policies and laws, as well as on unwritten customs and practices.
Transfer of rights	The process whereby the right holder loses ownership, use of, or access to, and designates rights and responsibilities to others. Land acquisition can lead to a range of associated impacts, including loss of residence or other fixed assets (fences, wells, tombs, or other structures or improvements that are attached to the land).
Voluntary land donation	In accordance with community customary practices, stakeholders may choose to voluntarily contribute land or assets without compensation, under certain conditions. This may be justified if the sub-project provides a direct benefit to the affected people.

3. National and international legal and context specific considerations of the VLDF

Being the newest nation in the world, the Government of South Sudan had to develop its legal, policy and institutional framework from scratch following the establishment of a regional autonomous government in 2005 and independence in 2011. Since then, the Government of South Sudan has made great strides in developing its legal and policy framework.

With regard to land governance, the Government of South Sudan enacted its Land Act in 2009 and is currently in the process of developing a land policy. The Draft National Land Policy was set to be tabled for adoption in Parliament in 2020 and intended to inform a comprehensive land tenure reform including through the development of new and amendment of existing laws. Next to the 2009 Land Act, current relevant legal instruments include the Local Government Act, the Investment Promotion Act and the Petroleum Act.

In view of the complexity and related time-requirement to develop and implement a responsible, harmonious and effective nationwide institutional, legal and policy framework that governs and clearly demonstrates tenure rights, gaps persist at the time of reporting. As such, stakeholders at decentralized levels, such as in the target locations of ELRP, commonly emphasize existing governance gaps, and more specifically the lack of awareness, clarity, documentation, gaps, monitoring and enforcement of the legal framework, including its rules and regulations. Moreover, in some instances, stark controversies exist between parties at the community level between applicable rules and regulations that provide a potential underlying factor for disputes and conflicts.

The Voluntary Guidelines on Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT), as endorsed by the Committee on World Food Security on 11 May 2012 are the internationally accepted framework for dealing with tenure. The World Bank and FAO have committed to the use of the VGGT as a guiding instrument in addressing land issues within their projects. As such, the provisions of this VLDF build on the provisions of the VGGT and more specifically the corresponding FAO Technical Guide 7: Responsible governance of tenure: a technical guide for investors. FAO 2016.

The VLDF is strictly in line with the national legal framework of the Republic of South Sudan and adds additional procedural considerations, in line with the VGGT, for due diligence and conflict sensitivity purposes.

Relevant national legal provisions

Access to land and other associated natural resources are administered through communal tenure system in most part of South Sudan, including within the target areas of ELRP. Pursuant to Article 171 of the Constitution, communities must be consulted in decisions affecting their land rights. They are furthermore entitled to prompt and equitable compensation on just terms for any acquisition or development of their land in the public interest. The 2009 Land Act further defines the allocation of land as, “the process by which a right to hold and use land is provided for by government or customary institutions to an individual, group or corporate body”. Chapter V, Section 15, of the 2009 Land Act specifically addresses the allocation of customary rights to land including the following relevant provisions:

- (i) The traditional authority of a community may allocate land for agricultural, forestry, and grazing purposes (par. 15.1).
- (ii) The size and boundaries of the allocated land can be determined by the traditional authority, only subject to consultation with other members of the community, in accordance with the customary law and practices (par. 15.2).
- (iii) Prior to allocation of a customary land right, the Traditional Authority should notify the County Land Authority or the Payam Land Council or any other relevant land administration institution and furnish the relevant information pertaining to the allocation for records (par. 15.3).
- (iv) Subject to the conditions of allocation agreed upon, and unless the right is relinquished by the holder, an allocated customary land right may endure for the natural life of the person to whom it is allocated. Such a right may be inherited, subject to encumbrances but cannot be alienated (par. 15.8).

The international framework

The VGGT promote responsible governance of tenure of land, fisheries and forests, with respect to all forms of tenure: public, private, communal, indigenous, customary, and informal.

Their overarching goals are to achieve food security for all and support the progressive realization of the right to adequate food in the context of national food security. While supporting efforts towards the eradication of hunger and poverty, the VGGT are also intended to contribute to achieving sustainable livelihoods, social stability, housing security, rural development, environmental protection, and sustainable social and economic development.

The VGGT serve as a reference and set out principles and internationally accepted standards for practices for the responsible governance of tenure. They provide a framework that States and other stakeholders can use when developing their own strategies, policies, legislation, programmes and activities. They allow governments, civil society, the private sector and citizens to judge whether their proposed actions and the actions of others constitute acceptable practices.

5. Voluntary Land Donation (VLD) Process

All steps described should strictly adhere to the principles of implementation of the VLDF, in accordance with the VGGT, and as described in section 1 of the VLDF. In addition, each step should be accompanied by a briefing on the key definition of terms and concepts of the VLDF, as described in section 2 of this VLDF.

Step 1: First official information and consultation on target locations and beneficiaries (county-level)

This step is to be conducted within the process of selecting project locations and beneficiaries. The selection of project locations and beneficiaries will be informed by given selection criteria and potential benefits for beneficiaries as well as roles and responsibilities of all stakeholders involved within the project, including the VLDF and its process. For the purpose of the VLDF, this dialogue should provide the first overall assessment of the applicability of the VLD. In specific, stakeholders are asked to select target

locations for voluntary land donations, which avoid the following risk areas, as described in section 1 of the VLDF, these include the following:

1. the presence of significant number of existing or recent disputes or claims involving the land and its associated assets and natural resources, that are unresolved;
2. areas from which large-scale displacement has taken place and hence adequate consultation of legitimate stakeholders is perceived impossible / unreasonable for the scope of subproject implementation.

Step 2: First official information and consultation on specific location for VLD (village-leader-level)

This step is to be conducted at the onset of sub-project activities, when informing the communities of project benefits, roles and responsibilities, at the village-level. For the purpose of the VLDF, this dialogue should include the following guiding questions:

1. Where would be the most suitable location in terms of accessibility by those intended to benefit from the renewed use after the VLD?
2. Is the suggested location safe from natural hazards and potential theft and vandalism?

If the answer is no:

- identify another suitable location, which is suitable but safe from natural hazards and theft and vandalism;
 - and / or identify additional measures to make it safe.
3. For the identified location, please identify who uses the land and other assets or natural resources in that location using the template below:

Explain that at this stage you just want to know who that is. It is not important whether they actually have a right to it. This will be determined later on.

The below identification of perceived and actual rights, may lead to stakeholders reconsidering whether there are a number of existing or recent disputes or claims involving the land and its associated assets and natural resources that are unresolved. In this case, ask participants to again identify another suitable location, which is suitable but safe from natural hazards and theft and vandalism.

Step 3: Validation of steps 1 and 2 with respective stakeholders

Demarcate the suggested land on a map and validate the results of steps 1 and 2 with the following groups:

- Representative set of community-level stakeholders
- Chiefs and representative set of community-level stakeholders from potentially adjacent IDP / refugee camp, seasonal pastoralists, any other group that has been mentioned in steps 1 and 2.

Step 4: Establish grievance and redress mechanism, cutoff line and communicate both to all relevant stakeholders

The grievance and redress mechanisms should be available to all stakeholders, with due consideration to the specific needs of women and with the opportunity should be provided to make use of this service without facing negative precautions.

The cutoff line shall be determined with the relevant stakeholders, to allow appropriate time for those having claims to make these.

Both the grievance and redress mechanism as well as the cutoff line shall be appropriately communicated in applicable languages to all stakeholders involved, through means such as signposts, radio or boda-boda talk-talk, as appropriate.

QUESTIONS	YES/ NO?	IF YES	
		Which group / individuals (m/f)	Are there good alternatives for these groups to this location in your opinion and if so which ones?
Do some people live there?			
Do some people plant there?			
Do some people graze their livestock there (at any time of the year)?			
Do some people use water from there?			
Do some people collect firewood, fruits, medicinal herbs, collect firewood from that area?			
Are there burial or other sites which are considered important to anyone there?			
Are there any other uses or groups who use the land that you can identify?			

Voluntary Land Donation Consent Form

State	
County	
Payam	
Boma	
Sub-project ID	

Name of land owner	ID Number	Beneficiary of the project N/Y
Sex:	Age	Occupation:
Address:		

By signing or providing thumb-print on this form, the land user or owner agrees to contribute assets to the sub-project. The contribution is voluntary. If the land user or owner does not want to contribute his/her assets to the project, he or she should refuse to sign or provide thumb print, and ask for compensation instead.

Date:

County Agriculture Department representative's signature:

Date:

Witnesses:

1. _____
2. _____

(Signature or thumb-print, name and address)

Annex 10: Cultural and Chance Find Procedures

This procedure was developed in accordance with the mandate of the Ministry of Youth, Culture and Sports (Directorate of Archives and Antiquities) of protecting and preserving both tangible and intangible cultural heritage records of South Sudan and the requirements of the World Bank's ESS 8 (To protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage, and to promote the equitable sharing of benefits from the cultural heritage).

This procedure is included as a standard provision in the implementation of ELRP activities to ensure the protection of cultural heritage (Archaeological and Historical Sites). All Implementing Partners as well as sub-contractors and implementers will be required to observe this procedure as documented hereafter. Excavation in sites of known archaeological interest will be avoided, including sites where ESS 8 would require FPIC due to impacts on cultural heritage. Where this is unavoidable, prior discussions must be held with the concerned officers from the Ministry of Youth, Culture & Sports to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

- Stop construction activities and delineate the discovered site area;
- Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the responsible authority takes over;
- Notify the responsible foreman/archaeologist, who in turn should notify the responsible authorities, the concerned officers from the Directorate of Archives and Antiquities and local authorities (within less than 24 hours);
- Responsible authorities are in charge of protecting and preserving the site before deciding on the proper procedures to be carried out;
- An evaluation of the finding will be performed by the concerned officers from the Ministry of Youth, Culture & Sports in the Directorate of Archives and Antiquities. The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values;
- Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;
- Implementation of the authority decision concerning the management of the finding;
- Construction work can resume only when permission is given from the concerned officers from the Ministry of Youth, Culture & Sports after the decision concerning the safeguard of the heritage is fully executed;
- In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings works and protections.

Annex 11: Gap Analysis World Bank ESS, FAO Standards, and South Sudan National Legal Framework

FAO Current Policies and Environmental and Social Safeguards

FAO Current Policies

293. **FAO Accountability Policy (2014).** FAO is committed to designing and operating its approach to accountability, based on FAO's core values of commitment, respect for all, integrity and transparency, and according to the following principles:
- Focus on FAO's ***purpose and outcomes*** for beneficiaries and partners. Employees are accountable for the results of their actions, which must contribute to meeting the expectations of stakeholders and beneficiaries in the achievement of agreed results through the efficient provision of high-quality services.
 - Define clear ***roles and responsibilities***. Managers and other employees must set and observe agreed expectations as to results and the measures to achieve those results; clarify the internal and external partnerships required, and how the voice of stakeholders and beneficiaries will be heard; set and observe monitoring and reporting lines and mechanisms; delegate and define authority by clarifying issues and risks that need higher approval and by making available resources, tools and skills; and assume the relevant responsibilities and act within the limits of delegated authority.
 - Take ***informed and transparent decisions and communicate clearly***, providing the basis for acting with a focus on outcomes and within clearly defined roles. Such decisions require relevant, accurate, up-to-date, timely, reliable, accessible and objective information; the assessment of options for action based on a documented, rigorous analysis of background information and risk; and constructively seeking challenge from others to explain and improve decisions.
 - Put ***FAO's values*** into practice through consistent application of a shared ethos and culture in the development of policy and the behaviour of employees. All employees must act in line with FAO's values, including as regards selflessness, honesty, objectivity, openness, and handling promptly ethical issues such as abuses of authority, and actual, potential or perceived conflicts of interest.
 - Engage with ***stakeholders*** to make accountability real, by understanding and responding to their views, in the formulation and implementation of strategies and plans.
 - Establish a culture of ***consequences*** - to be meaningful, accountability must be felt. Applying timely, consistent and predictable performance-based rewards and sanctions discourages unethical behaviour, and creates incentives to improve practices, policies and procedures.
294. **FAO whistleblower protection policy (administrative circular N°2019/06)** applying to any FAO personnel when internal or external reporting according to the consideration of the circular. The OIG and the Ethics Office are the main operators of independent and anonymous inspection and preventative activities. Main consideration of the circular are: (a) reporting wrongdoing through internal or external mechanisms; (b) preventative action; (c) complaints or retaliation; (d) conflict of interest; (e) protective measures; (f) protection of the person who suffered retaliation; (g) recourse through appeals mechanisms; (h) review of a determination by the Ethics Office; (i) Action against FAO personnel who engaged in retaliation; and (j) prohibition of retaliation against outside parties.

295. **FAO Protection from sexual exploitation and sexual abuse (PSAE) N° 2013/27.** The principles of integrity, professionalism, respect for human rights and the dignity of all peoples underpin FAO's commitment to preventing and addressing acts of sexual exploitation and abuse (SEA).
296. **FAO Policy on the prevention of harassment, sexual harassment and abuse of authority N° 2015/03 (2015) and FAO policy on sexual harassment (13 February 2019)** which states Sexual Harassment in all its forms is contrary to the United Nations Charter, the Staff Regulations and Staff Rules of the Organization and the Standards of Conduct for the International Civil Service. It emphasizes that (i) the Organization has the obligation to take all appropriate steps to prevent and respond to sexual harassment in its workplace; (ii) Power and seniority will not confer impunity; (iii) supporting those who report or witness sexual harassment to ensure accountability of those who perpetrate it. It applies at workplace including any place where FAO personnel is present during performance of their official duties, or any place or events outside FAO premises but linked to working for FAO. The main principles are:
- Early intervention and receipt and handling of informal report of sexual harassment (early direct action, managerial intervention, confidential advice, informal resolution)
 - Receipt and handling of formal reports of sexual harassment to the OIG (Inspection, request for appeal, Withdrawal of a formal complaint)
 - Prevention
 - Support to affected individuals of sexual harassment (confidential guidance and support, right to be accompanied by a support person, work performance, interim measures, post-investigation review)
 - Protection against retaliation.
297. **FAO Policy against fraud and other corrupt practices N° 2015/08 (2015)** Fraud and other corrupt practices pose a grave threat to the effective implementation of the Organization's policies and objectives. The organization has adopted a zero-tolerance policy in respect of fraud and other corrupt practices in all their manifestations and is aligned with the principles contained in the United Nations Convention Against Corruption and the United Nations Convention Against Transnational Organized Crime. The policies and procedures outlined herein are:
- Staff Regulations and Rules;
 - Standards of Conduct for the International Civil Service (Appendix A to Manual Section 304);
 - Manual Section 502 - Procurement of Goods, Works and Services;
 - Manual Section 507 - Letters of Agreement;
 - Charter for the Office of the Inspector General (Appendix A to Manual Section 107);
 - Guidelines for Internal Administrative Investigations by the Office of the Inspector General (Administrative Circular 2011/04);
 - FAO Vendor Sanctions Policy (Administrative Circular 2014/27); and
 - Whistleblower Protection Policy (Administrative Circular 2011/05).

FAO Environmental and Social Management Guidelines

298. The Project Risk Management Framework is primarily structured around the World Bank Environmental and Social Standards (2018). It is considering the on-going FAO Environmental and Social Management Guidelines (2015) and complementary measures defined in the Gap analysis in Annex.

299. Management of Risk at Project Level includes Stakeholder engagement that will be developed in the SEF and subsequent SEPs (ii) screening to identifying specific E&S risks and risk classification; (iii) a full Environmental and Social impact assessment (ESIA) according to the risk level which is aligned with the present ESMF; (iv) Environmental and Social Commitment Plan (ESCP); (v) implementing monitoring and reporting; (vi) Capacity building on E&S standards; (vii) Disclosure and (viii) grievance mechanism. The FAO Environmental and Social Management Guidelines (2015) includes nine Environmental and social standards:

- **ESS 1: Natural Resource Management**

- Land-use planning and land resource planning;
- Water resource and small dam planning;
- Land; and
- Climate.

- **ESS 2: Biodiversity, Ecosystems and Natural Habitats**

- Protected areas, buffer zones and natural habitats;
- Conservation of biodiversity;
- Use of exotic or non-indigenous species;
- Living natural resources.

- **ESS3 : Plant Genetic Resources for Food and Agriculture**

- Introduction of new crops and varieties;
- Provision of seeds and other planting materials;
- Modern biotechnology;
- Forest plantations.

- **ESS 4: Animal - Livestock and Aquatic - Genetic Resources for Food and Agriculture**

- **ESS 5: Pest and Pesticide Management**

- Pesticide selection;
- Removal/treatment;
- Responsibility.

- **ESS 6: Involuntary Resettlement and Displacement**

This risk is covered in the assessment and while it is unlikely to affect the Project due to strict requirements on site selection, there is a possibility of land conflict with small numbers of families

claiming customary use rights or with recent migrants. In such case there is a need to choose alternative sites or to peacefully negotiate a solution.

- **ESS 7: Decent Work**

- Creation of better employment opportunities, particularly for women and young people;
- Non-discrimination and equal opportunities;
- Occupational health and safety;
- Prevention of child labor;
- Forced labor;
- Workers' and producers' organizations.

- **ESS 8: Gender Equality**

- The fight against discriminatory practices;
- Equal opportunities for men and women to take part and to benefit;

- **ESS 9: Indigenous Peoples and Cultural Heritage**

- Identification of indigenous peoples;
- Rights to land, territory and natural resources;
- Reference impact analysis on indigenous peoples;
- Free, prior and informed consent;
- Plan for indigenous peoples.

While South Sudan, is characterized by a large number of distinct social and cultural groups for which it is essential that project interventions are accessible, culturally appropriate and inclusive. A Social Assessment is presented in the present contextual analysis leading to a Stakeholder Engagement Plan, which is aligned with the FAO policy on Indigenous and Tribal Peoples, 2010 and the Free, prior and informed consent.

300. **FAO Compliance reviews following complaints related to the organisation environmental and social standards guidelines (2015)** give the tools and standard to manage grievance procedure. It is detailed in the GRM section and the SEF.
301. **Operational Guidelines for stakeholder engagement (2017)**. This guideline includes stakeholder identification, consultation, a grievance mechanism and disclosure. It considers: (i) meaningful, effective and informed participation of identified stakeholders as ongoing process from project identification and formulation and which continues throughout the project cycle to implementation; (ii) disclosure and establishment of a mechanism by which people can make comments on project proposals and performance or raise grievances
302. **Gender objectives and alignment with international goal and standards**. Gender mainstreaming in FAO project is following international goals and declaration: (i) Sustainable Development Goal N°5:

Achieve gender equality and empower all women and girls⁹⁵; (ii) Universal Declaration of Human Rights⁹⁶; (iii) Convention on the Elimination of All Forms of Discrimination Against Women - CEDAW⁹⁷; (iv) UN System-wide Action Plan (UN-SWAP) on Gender Equality and the Empowerment of Women (GEEW)⁹⁸; (v) UN Country team SWAP (UN CT SWAP)⁹⁹; (vi) ESS 8 Gender Equality of the FAO ESMG; (vii) Guidance to Mainstreaming gender in project cycle¹⁰⁰; (viii) General recommendation n°34¹⁰¹; (ix) Beijing Declaration and Platform for Action, Beijing +5 Political Declaration and Outcome¹⁰²

FAO institutional services

303. **FAO South Sudan Office (FAOSS) and interaction with ELRP-3.** The FAO South Sudan office is comprised of various units as shown in the organogram below, including 12 field offices spread across the country. They will provide additional technical and administrative support on various aspects of the project to the PSU and PIUs as necessary. Project team from PSU will be attached across the key division of the national Office allowing coordination among FAO projects. Similar structured would apply for PIUs within Field offices. The close relationship with the overall FAO South Sudan Office is a key element to mobilize punctually experts from other project or division for advice on project implementation on key strategic sectors such as gender and capacity building, land tenure, plant protection and production, market trade, etc. This list is not exhaustive. Detailed staffing and institutional arrangement are available in section 6.

⁹⁵ <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

⁹⁶ <https://www.un.org/en/universal-declaration-human-rights/>

⁹⁷ <https://www.ohchr.org/en/professionalinterest/pages/cedaw.aspx>

⁹⁸ <https://www.unwomen.org/en/how-we-work/un-system-coordination/promoting-un-accountability>

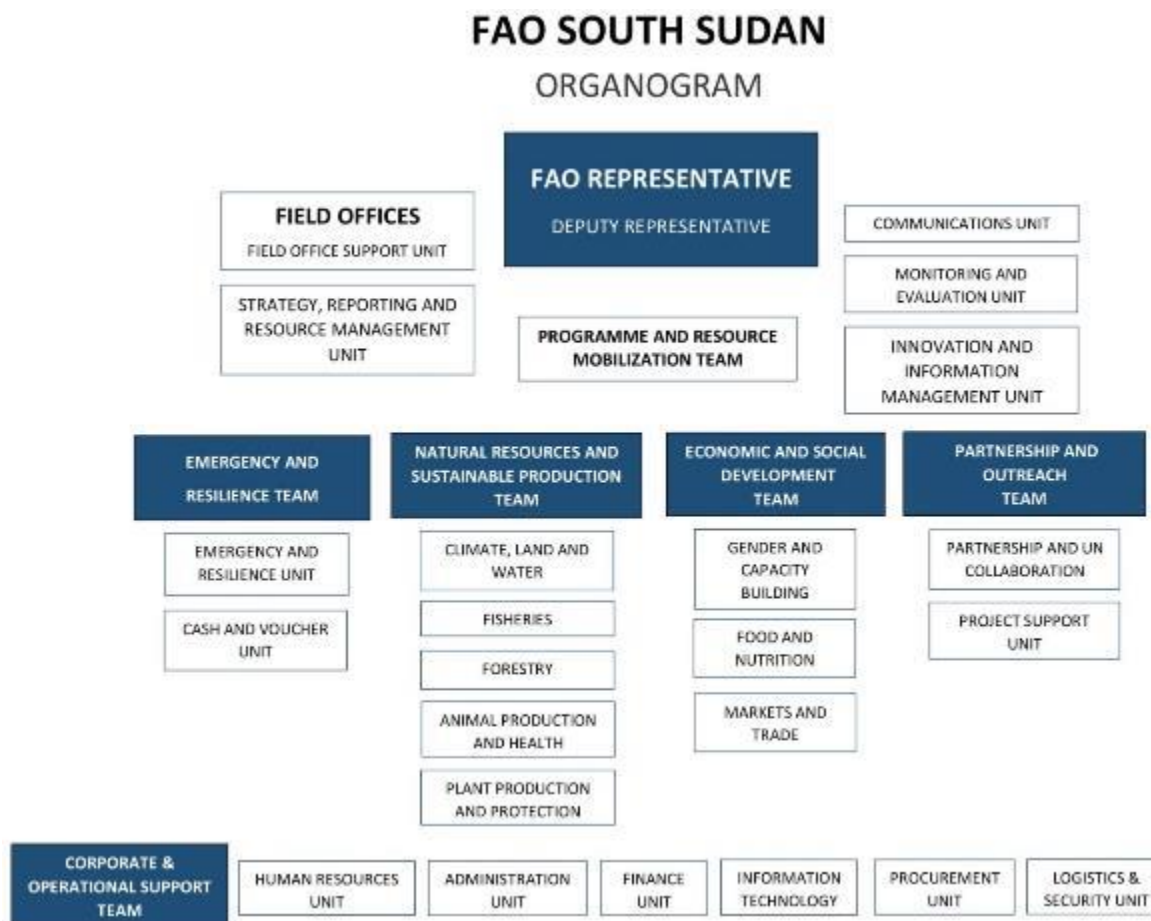
⁹⁹ https://unsdg.un.org/sites/default/files/UNCT-SWAP_Gender-report_Web.pdf

¹⁰⁰ <http://www.fao.org/3/a-i6854e.pdf>

¹⁰¹ https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GC/34&Lang=en

¹⁰² <https://www.unwomen.org/en/digital-library/publications/2015/01/beijing-declaration#view>

Figure 4: FAO South Sudan Organogram



304. **FAO Regional Office for Africa (RAF).** The RAF in Accra, Ghana will provide administrative and operational support for the project, including monitoring of implementation and assistance in resolving any arising challenges.
305. **FAO Sub-regional Office for Eastern Africa (SFE).** The SFE in Addis Ababa, Ethiopia serves as the first site for technical and advisory support for the eight countries in Eastern Africa, including South Sudan. It has a core team of professionals with multi-disciplinary expertise, and is responsible for developing, promoting, overseeing and implementing agreed strategies for addressing sub-regional food security, nutrition, agriculture and rural development priorities. Following FAO new strategic framework and its regional initiatives, the Office will serve as a technical resource base for the project on agricultural policy development on agricultural development; contributing to resilience building in agriculture; enhancing resource mobilization for agriculture; development of agribusiness and agricultural value chains; as well as developing standards and sharing of best practices in agriculture and food security among others.
306. **FAO Head Quarters (HQ).** The main office in Rome disposed of multiple divisions that might backstop the project in case of need either on technical and logistical support. Mains division that might be involved in the project are among others: (i) OCB – Office of Climate change Biodiversity and environment, for institutional analysis and world bank ESS compliance; (ii) OER – Office of Emergency and Resilience for technical support in AAP and new policies applicability; (iii) PSU - Partnerships and UN Collaboration, especially for indigenous people and social approaches such as free prior informed consent

within PSUI division; (iv) ESP - Inclusive Rural Transformation and Gender Equity, for gender consideration; (v) CFIA – FAO Investment center team for supervision mission or support in project reorientation; (vi) CSF - Finance division

307. **FAO Office of the Inspector General (OIG).** The Office of the Inspector General provides oversight of the programmes and operations of the Organization, through internal audit, investigation and inspection. The Office has the mandate to independently review complaints related to non-compliance of the Organization’s obligations under the FAO environmental and social standards. It is the only one with the mandate to investigate independently cases of fraud, corruption, GBV, SEA and SH and is as well an appeal mechanism for complaints.
308. **FAO Ethics Office (ETH).** The FAO Ethics Office was established in December 2009 to assist the Director-General in promoting a culture of ethics, transparency and accountability that enables FAO staff members and associated personnel to perform their functions in accordance with the highest standards of conduct. The Ethics Office also has the objective of ensuring that individuals are able to speak up without fear of retaliation. Responsibility for ethical and professional conduct lies with all members of FAO personnel. The Ethics Officer provides advice and guidance.

UN Safeguard Policies

309. The EMSF further follows the UN Common Approach to Environmental and Social Standards in UN Programming, which has recently been developed by the United Nations Environment Management Group (EMG): Moving Towards a Common Approach to Environmental and Social Standards for UN Programming.¹⁰³ The UN standards are by and large aligned to the World Bank safeguard policies. It includes Guiding principles and a model approach operationalization.

Guiding principles

310. **Guiding principles of the common approach** are (i) to leave no one behind; (ii) Human Rights-Based Approach and Gender Equality and Women’s Empowerment; (iii) Sustainability and resilience (iv) Accountability.

Operationalizing the model approach

311. **Operationalizing the model approach through procedures and thematic areas.** Procedures include Screening, Assessment and Management of Environmental and Social Risks and stakeholder engagement and accountability. UN Thematic area are presented below

- **UN Thematic Area 1: Biodiversity, Ecosystems and Sustainable Natural Resource Management.** The objectives are to: (i) Conserve biodiversity; (ii) Maintain and enhance the benefits of ecosystem services; (iii) Promote sustainable management and use of living natural resources; (iv) Ensure the fair and equitable sharing of the benefits from the utilization of genetic resources; and (v) Respect, preserve, maintain and encourage knowledge, innovations and practices of indigenous peoples and local communities relevant for the conservation and sustainable use of biodiversity and their customary use of biological resources.

¹⁰³ https://unemg.org/wp-content/uploads/2019/07/FINAL_Model_Approach_ES-Standards-1.pdf

- **UN Thematic Area 2: Climate Change and Disaster Risks.** The objectives are to: (i) Strengthen resilience of communities to address risks of climate change impacts and disasters; (ii) Ensure programming integrates climate change adaptation considerations and does not exacerbate vulnerability of communities to climate change impacts or disaster risks; and (iii) Minimize programming-related greenhouse gas (GHG) emissions and intensity and maintain carbon sinks.
- **UN Thematic Area 3: Community Health, Safety and Security.** The objectives are to: (i) Anticipate and avoid adverse impacts on health and safety of affected communities during the programming life cycle, from both routine and non-routine circumstances; (ii) Ensure quality and safety in the design and construction of programming-related infrastructure, preventing and minimizing potential safety risks and accidents; (iii) Avoid or minimize community exposure to disaster risks, diseases and hazardous materials associated with programming activities; (iv) Ensure the safeguarding of personnel and property minimizes risks to communities and is carried out in accordance with international human rights standards and principles; and (v) Have in place effective measures to address emergency events, whether human-made or natural hazards.
- **UN Thematic Area 4: Cultural Heritage.** The objectives are to: (i) Protect cultural heritage from damage, inappropriate alteration, disruption, removal or misuse and support its preservation and safeguarding and protection; (ii) Ensure equitable sharing of benefits generated from integration and utilization of cultural heritage in programming; and (iii) Promote meaningful consultation with stakeholders regarding preservation, protection, utilization and management of cultural heritage.
- **UN Thematic Area 5: Displacement and Involuntary Resettlement.** The objectives are to: (i) Avoid, or where avoidance is not possible, minimize and mitigate adverse impacts from land or resource acquisition or restrictions on land or resource use; (ii) Prohibit forced evictions; (iii) Enhance and restore the livelihoods and living standards of all displaced persons and to improve the living conditions and overall socioeconomic status of displaced poor and persons belonging to marginalized or disadvantaged groups; (iv) Conceive and execute resettlement activities as sustainable development programs, providing sufficient resources to enable displaced persons to benefit directly from programming activities; (v) Ensure that resettlement activities are planned and implemented collaboratively with the meaningful and informed participation of those affected.
- **UN Thematic Area 6: Indigenous Peoples.** The objectives are to: (i) Recognize and foster full respect for indigenous peoples and their human rights, dignity, cultural uniqueness, autonomy, identity, and aspirations; (ii) Promote indigenous peoples' rights to self-determination and development with culture and identity; (iii) Recognize and respect the rights of indigenous peoples to their lands, territories, and resources that they have traditionally owned, occupied, or otherwise used or acquired; (iv) Recognize, respect, protect and preserve indigenous peoples' culture, knowledge, and practices; (v) Promote interventions designed, managed, and implemented by indigenous peoples; (vi) Ensure that programming is designed in partnership with indigenous peoples, with their full effective and meaningful consultation and participation, with the objective of obtaining their free, prior and informed consent (FPIC); (vii) Support countries to respect, protect and fulfill the rights of indigenous peoples; (viii) Avoid adverse impacts on indigenous peoples from supported activities, and minimize, mitigate and remedy adverse impacts where avoidance is not possible; and (ix) Ensure

indigenous peoples obtain fair and equitable benefits and opportunities from supported activities in a culturally appropriate and inclusive manner.

- **UN Thematic Area 7: Labour and Working Conditions.** The objectives are to: (i) Promote, respect and realize fundamental principles and rights at work through: Supporting freedom of association and the effective recognition of the right to collective bargaining; Preventing the use of child labour and forced labour; Preventing discrimination and promoting equal opportunity of workers; (ii) Protect and promote the safety and health of workers; (iii) Ensure projects/programmes comply with national employment and labour laws and international commitments; and (iv) Leave no one behind by protecting and supporting workers in disadvantaged and vulnerable situations, including a special focus, as appropriate, on women workers, young workers, migrant workers and workers with disabilities.
- **UN Thematic Area 8: Pollution Prevention and Resource Efficiency.** The objectives are to: (i) Avoid and minimize adverse impacts on human health and the environment from pollution; (ii) Promote more sustainable and efficient use of resources, including energy, land and water; (iii) Avoid or minimize programming-related emissions of short and long-lived climate pollutants and ozone-depleting substances; (iv) Avoid or minimize generation of hazardous and non-hazardous substances and wastes, and promote a human rights-based approach to the management and disposal of hazardous substances and wastes; and (v) Promote safe, effective, environmentally sound pest management.

Gap analysis for the World Bank ESS, FAO Standards, and South Sudan's National Legal Framework

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
<p>Identify, evaluate and manage the E&S risks and impacts of the project</p> <p>Adopt a mitigation hierarchy approach to:</p> <p>(a) Anticipate and avoid risks and impacts</p> <p>(b) Where avoidance is not possible, minimize risks and impacts to acceptable levels</p> <p>(c) Compensate or offset residual impacts after risk minimization efforts</p> <p>Adopt differentiated measures so the disadvantaged or vulnerable do not face disproportionate adverse impacts or disadvantage in sharing project benefits.</p> <p>Use national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate.</p> <p>Promote improved environmental and social performance that recognizes and enhances borrower capacity.</p>	<p>South Sudan Draft Environmental and Protection Bill (2013):</p> <p>Section 18 calls for EIAs.</p> <p>Section 32, Cap 5, requires Environmental Audits.</p> <p>Section 20, Cap 5, requires for Environmental Monitoring.</p>	<p>Incomplete legal framework (Environmental Bill not endorsed)</p> <p>Environmental policy and legal framework not elaborated at lower administrative levels¹⁰⁴</p> <p>Lack of capacity to monitor development and resource use</p>	<p>FAO ESGM (2015):</p> <p>Management of risk at programme and project levels (screening, risk classification, ESIA, ESCP, implementation, monitoring, reporting, Disclosure and GRM).</p>	<p>Full ESIA is requested by FAO instead of an ESMF with E&S analysis procedures by WB ESF</p>	<p>The project will follow ESS1 in alignment with the national regulation.</p> <p>The ESMF has a screening process for subprojects and activities to assess if activities need an EIA.</p> <p>Capacity building of institutional actors at local level (CBA) to integrate environmental consideration in analysis (audit and screening process at county level)</p> <p>Independent monitoring in FCV will be implemented by a TPMA.</p>
ESS 2: Labor and Working Conditions					

¹⁰⁴ 2012 – Government of the Republic of South Sudan Ministry of Environment. Environmental impacts risks and opportunities assessment. Natural resources management and climate change in South Sudan. P.92 <https://www.undp.org/content/dam/southsudan/library/Reports/southsudanothertools/EIRO%20Report-fr-website.pdf>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
<p>Promote safety and health at work.</p> <p>Promote fair treatment, non-discrimination, and equal opportunity of project workers.</p> <p>Protect project workers, including the vulnerable workers, as appropriate.</p> <p>Prevent all forms of forced labor and child labor.</p> <p>Support the principles of freedom of association and collective bargaining of project workers, consistent with national law.</p> <p>Provide project workers with accessible means to raise workplace concerns.</p>	<p>Labor Act, 2017 (Act No. 64 of 2017). The Act establishes a legal framework for the minimum conditions of employment, labor relations, and labor institutions</p>	<p>South Sudan has no statutory minimum wage.</p> <p>Enforcement of labor laws is minimal.</p> <p>Many unskilled jobs are filled by immigrant workers. These require work permits.</p>	<p>FAO ESS7 Decent work.</p>	<p>n.a.</p>	<p>The project will comply with the Labor Act, but it will monitor wages paid. LMP defines a minimum wage.</p> <p>The PCU and PSU will closely monitor LMP implementation</p> <p>The project will not deploy foreign workers for unskilled labor under contractors and sub-contractors.</p> <p>The project will request work permits</p>
	<p>Labor Act, 2017 (Act No. 64 of 2017) establishes requirement for a dispute resolution mechanism</p>	<p>n/a</p>	<p>FAO ESGM: Grievance redress mechanism at multiple level.</p>	<p>In FCV situation, WB ESS request for a dedicated workers GRM</p>	<p>The LMP for the project spells out a specific workers’ grievance redress mechanism based on FAO system.</p>
	<p>Labor Act, 2017 (Act No. 64 of 2017) chapter XI makes provisions for health and safety at the workplace</p>	<p>n/a</p>	<p>FAO ESS7 Decent work. Occupational Safety and Health (OSH)</p>	<p>n.a.</p>	<p>The project will apply occupational health and safety management system that is consistent with the IFC Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety.</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
	<p>Labor Act, 2017 (Art N° 9 of 2017). support the principles of freedom of association. All employees and employers, without restriction whatsoever, will have the right to establish join trade unions or employers' association</p>	n.a.	<p>FAO ESS7 Decent work Worker's and producer's organizations freedom of association.</p>	n.a.	n.a.
	<p>Labor Act, 2017 (Act No. 64 of 2017) chapter VI says that no person will discriminate, directly or indirectly against an employee or job applicant in any work policy or practice (discrimination is defined on grounds of race, sex, age, religion, etc...)</p> <p>NGO Act, 2016 (Act N° 18 of 2016) says that "Any Non-Governmental Organization so employing will: [...] Not discriminate against any applicant or employee on the ground of region, race, religion, gender and political affiliation".</p>	n.a.	<p>FAO ESS7 Decent work. Non-Discrimination and equal opportunity</p> <p>FAO ESS8 Gender Equality. Combating discriminatory practices.</p> <p>UN Supplier Code of Conduct (2017). No discrimination on grounds of race, colour, sex, religion, political opinion, national extraction or social origin and such other ground recognized by national law</p>	n.a.	n.a.
	<p>Labor Act, 2017 (Act 7 of 2017) Sexual Harassment. No person will sexually harass an employee or an employer</p>	n.a.	<p>FAO policy on sexual Harassment (2019).</p> <p>UN Supplier Code of Conduct (2017)</p>	n.a.	<p>The Project integrate a LMP with specific measures to prevent, and managed confidentially SH at FAO / UNOPS work place and</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
					through implementing partners
	<p>Labor Act, 2017 (Act No. 64 of 2017) section 12 provides protection for children. Minimum age for work is 14, and minimum age for hazardous work is 18</p> <p>The Child Act, 2008 (Act No. 10 of 2008). The child Act regulates the elimination of child labor, protection of children, and young persons, hazardous child labor.</p>	<p>Minimum age for general work is 14, which accords with ILO Convention 138, recognizing the age of 14 as the minimum age for general work for a country whose economy and educational facilities are insufficiently developed.</p> <p>However, in practice children between the age of 10-14 are further employed in agriculture and industry and services, including in rock breaking, construction (building and transporting materials), making bricks.</p>	<p>FAO ESS7 Decent work. Child Labour Prevention and reduction. Based on National regulation.</p>	n.a.	<p>The Project will only allow the deployment of children – in all project worker categories – <u>from the age of 18</u> (see LMP). Rigorous monitoring will ensure the application of the LMP</p>
	<p>The Constitution of South Sudan: Article 13 states freedom from slavery, servitude and Forced Labour</p>	<p>Forced labor takes place, for example in recruitment into the national army</p>	<p>FAO ESS7 Decent work. Prohibition of forced Labour.</p> <p>UN Supplier code of conduct (2017) prohibit</p>	n.a.	<p>The project will not allow any forced labor. It will hold all contractors liable to the implementation of the LMP. The PCU and PSU will have overall responsibility to monitor</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
	<p>The Labor Act (Act No. 64 of 2017) section 10 spells out that forced labor is prohibited.</p>		<p>forced or compulsory labor in all its forms</p>		<p>the implementation of the LMP.</p>
	<p>The Labor Act (Act No. 64 of 2017) Article 12 (2) allows children between the ages 14-18 to engage in labor.</p>	<p>Article 12(2) allows children between the ages 14-18 to engage in general labor</p> <p>The Labor Act lacks clarity on prohibitions on the worst forms of child labor.</p> <p>Compulsory education age (13) is inconsistent with minimum age for work (14).</p> <p>Furthermore, children in South Sudan engage in armed conflict and in cattle herding. The national army continues to recruit, sometimes forcibly, children to fight opposition groups.</p> <p>Children are further engaged in other worst forms of child labor, including in commercial sexual exploitation. Perpetrators have not been brought to justice.</p>	<p>FAO ESS7 Decent work. Child Labour Prevention and reduction. No children of any age engaging in hazardous work.</p> <p>UN Supplier code of conduct (2017) prohibit to employ persons under the age of 18 for work that likely to harm the health, safety or morals of such persons</p> <p>UN Supplier code of conduct (2017) prohibit to employ children bellow 14 years old or national compulsory school age</p>	<p>n.a;</p>	<p>The project will only allow deployment of children – in all project worker categories – from the <u>age of 18</u> (see LMP).</p> <p>Rigorous monitoring by the PCU and PSU will ensure the application of the LMP.</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
	<p>Anti-Corruption Commission Act, 2009. Section 44 insure protection of informers and witnesses in case of a disclosure in good faith of information of corruption.</p>	<p>Perpetrators have not been brought to justice due to fear from retaliation for victims and witnesses.</p>	<p>FAO whistleblower policy (2019).</p> <p>FAO policy on sexual Harassment (2019) protects “who report or witness sexual harassment to ensure accountability of those who perpetrate it”</p>	<p>n.a.</p>	<p>Any corruption or fraud suspicion would be followed according to the ESMF process through the OIG and in relationship with the national commission for all stakeholder</p>
ESS 3: Resource Efficiency and Pollution Prevention and Management					
<p>The Objectives of ESS 3 are:</p> <p>To promote the sustainable use of resources, including energy, water and raw materials.</p> <p>To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.</p> <p>To avoid or minimize project-related emissions of short and long-lived climate pollutants.</p> <p>To avoid or minimize generation of hazardous and non-hazardous waste.</p>	<p>The Constitution of South Sudan: Article 41</p> <p>(1) provides that the people of South Sudan will have a right to a clean and healthy environment.</p> <p>(2) that every person will have the obligation to protect the environment.</p> <p>(3) that future generations will have the right to inherit an environment protected for the benefit of present and future generations.</p> <p>Specific measures to ensure the objectives above include: Prevention of pollution and ecological degradation; promotion of conservation; and securing of ecologically sustainable development and</p>	<p>No legal framework on the use of fertilizer are endorsed</p>	<p>ESS1: Natural Resources Management. promotes efficiency resource use and transition to sustainable practices on soil and land resources, water resources, tenure and climate</p> <p>FAO ESS5: Pest and Pesticides Management: Promotion of Integrated Pest Management Framework and limit use of chemical pollutant.</p>	<p>n/a</p>	<p>The project will promote the sustainable use of resources and avoid or minimize adverse impacts on human health.</p> <p>The project will develop an Integrated Pest Management Plan (IPMP) based on FAO, WHO, and WB standards.</p> <p>The project will not finance the purchase and/or use of chemical pesticides and promote pest management techniques</p> <p>Project will support Draft Fertilizer Policy (2011) strengthen and approval</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
	<p>use of natural resources while promoting rational economic and social development so as to protect the bio-diversity of South Sudan</p> <p>The Water Bill of 2013 provides for the protection of water sources from pollution, erosion or any other adverse effects. aims to conserve available water resources, to manage water quality and to prevent pollution of ground and surface waters</p> <p>The Forest Bill, 2009 provides guidance on sustainable forest resource management.</p>				
ESS 4: Community Health and Safety					
<p>The Objectives of ESS 4 are:</p> <p>To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.</p> <p>To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.</p> <p>To have in place effective measures to address emergency events.</p> <p>To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p>	<p>The Constitution of South Sudan: Article 16 on the Right of Women</p> <p>(i) Full and equal dignity of the person with men</p> <p>(ii) All levels of government will:</p> <p>(a) promote women participation in public life and their representation in the legislative and executive organs by at least 25% as an affirmative action to redress imbalances created by history, customs, and traditions;</p> <p>(b) enact laws to combat harmful customs and traditions which</p>	<p>The Constitution may enter in conflict with customary law on Art.16</p> <p>(ii) (b) on harmful custom or tradition.</p>	<p>FAO ESS8 Gender Equality. Equal opportunities for men and women to participate in and benefit</p> <p>FAO Protection from sexual exploitation and sexual abuse (PSAE) N° 2013/27.</p> <p>FAO: Accountability for Affected People Policy (2014)</p>	<p>GBV-SEA Action plan not integrated in the ESS.</p>	<p>Although the project aims to improve the lives of affected communities, it needs to be ensured that project activities do not pose any unintended negative consequences on communities, for example through increased SEA/SH incidents. A SEA/SH Prevention and Response Action Plan provides steps for the</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
	<p>undermine the dignity and status of women; and (c) provide maternity and child care and medical care for pregnant and lactating women.</p>				<p>implementation of necessary measures.</p>
	<p>The Constitution of South Sudan: Article 39 states Family is the natural and fundamental unit of society and will be protected by law.</p> <p>The Constitution of South Sudan: Article 9 states the Bill of right as a commitment to respect and promote human rights and fundamental freedoms enshrined in this Constitution</p> <p>The Constitution of South Sudan: Article 12. Every person has the inherent right to life, dignity and the integrity of his or her person which will be protected by law; no one will be arbitrarily deprived of his or her life</p>	<p>n.a.</p>	<p>FAO: Accountability for Affected People Policy (2014)</p>	<p>n.a.</p>	<p>Accountability to Affected Populations (AAP) of FAO and operational documentation are aligned with ESS4 and describe in the SEP. UNOPS also follows the AAP framework.</p> <p>AAP for implementing partners will be considered within the LMP including: (I)UN supplier Code of conduct; (ii) Official 2019 NGO recruitment guidelines (including 2015 Core Humanitarian standards);</p>
	<p>The Public Health (Water and Sanitation) Act (2008) emphasizes the prevention of pollution of air and water and encourages improvement in sanitation. Key provisions include the protection of the sanitation of the environment and encompasses the measure to</p>	<p>n.a</p>	<p>FAO ESS5: Pest and Pesticides Management: Promotion of Integrated Pest Management Framework and limit use of chemical pollutant</p>	<p>n.a.</p>	<p>The project will utilize WBG guidelines on waste management in order to be fully compliant with this Act.</p> <p>Several measures will be undertaken, including a IPMP, Health and Safety</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
	<p>address the pollution of water and air.</p> <p>The following are measures geared towards control of pollution of water: Measures to prevent pollution of water for consumption; Measures destined to prevent pollution of potable water; Anyone who offers the public water to drink or human food, and which includes frozen food should ensure that the water conforms to the portability regulations; Management and disposal of hazardous wastes; and storage of wastes on the premises of waste generators.</p> <p>The Public Health Act (2008) also provides the need for the protection of pollution of water through the enforcement of regulations and measures necessary to combat all elements of pollution and protect the natural level of the environment and public health.</p>				<p>Plan and contractors C-ESMP to address the impacts on local communities and manage specific risks and impacts outlined in the ESMF and subsequent ESMPs.</p>
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
<p>The Objectives of ESS 5 are:</p> <p>To avoid involuntary resettlement or, when unavoidable, minimize</p>	<p>The Land Act of 2009 also provides for fair and prompt compensation to any person whose right of occupancy,</p>	<p>No statement on subsistence mean losses</p>	<p>FAO ESS 6 prohibit forced eviction, avoid, mitigate physical and economic displacement</p>	<p>n.a.</p>	<p>Where land is donated by private owners, a land donation agreement process is implemented</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
<p>involuntary resettlement by exploring project design alternatives. To avoid forced eviction. For groups identified under ESS7, free, prior informed consent must be sought</p>	<p>ownership or recognized long standing occupancy of customary use of land is revoked or otherwise interfered with by the Government.</p> <p>The Local Government Act of 2009 define primary responsibilities of local government and traditional authorities in the regulation and management of land</p>		<p>and develop plans for physical or economic displacement.</p> <p>FAO ESS1 and VGGT - Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security</p> <p>FAO ESS9 applying for indigenous people, including FPIC process.</p>		<p>through the VGGT and the Voluntary Land Donation Framework.</p> <p>Any activities that require resettlement of people will be screened out, and all livelihoods will be protected in accordance to ESS 5.</p>
<p>ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>					
<p>The Objectives of ESS 6 are: To protect and conserve biodiversity and habitats. To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.</p>	<p>The Constitution of South Sudan, Art. 157 (6) states Wildlife Service will coordinate and cooperate with the local communities on the protection and management of wildlife within their areas and (7) The Wildlife Service will act to the conservation and protection of the natural ecosystems, bio-diversity and endangered species, will manage wildlife resources in a manner that will ensure the protection of human life and wildlife will be protected and managed in accordance with the international standards and obligations.</p>	<p>n/a</p>	<p>FAO ESS 2: Biodiversity, Ecosystem and Natural Habitats. Discourages financing or execution in protected areas or buffer zones or natural habitats. Living natural resource.</p> <p>FAO ESS3: Plant Genetic Resources for Food and Agriculture. Action should not erode genetic diversity. Action should not introduce new pests and disease</p>	<p>n.a</p>	<p>The project will avoid any encroachment into any sensitive habitat and/or protected areas using the E&S screening tools in ESMF process.</p> <p>Moreover, any agricultural activities involving seed development and/or introduction of new crops and varieties would be prohibited unless they have already been introduced and assessed as non-invasive.</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
	<p>The Wildlife and National Parks Protection Act, 2003 define localization of protected areas, competent authorities, rules and management.</p> <p>The Draft Wildlife bill of 2013 create the South Sudan Wildlife Service (SSWS) and define Authorities competency for protected areas and wetlands.</p>				
<p>ESS 7: Indigenous People/Sub-Saharan African Historically Underserved Traditional Local Communities</p>					
<p>The Objectives of ESS 7 are:</p> <p>To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p> <p>To avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.</p> <p>To promote sustainable development benefits and opportunities for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in a manner that is accessible, culturally appropriate and inclusive.</p> <p>To improve project design and promote local support by establishing and</p>	<p>Nonpolitical defined census of minorities and indigenous groups</p>	<p>Lack of clarity for minorities targeting to insure their rights</p>	<p>FAO ESS9: Indigenous Peoples and Cultural heritage. Preserving rights over land, territories and natural resources, prior assessment and FPIC procedures, creation of Plan, proportionality in response, cultural heritage.</p>	<p>n.a.</p>	<p>South Sudan is characterized by a large number of distinct social and cultural groups, which will ALL be included and targeted by the ELRP.</p> <p>The project’s SEP ensures that consultations will occur with all stakeholders in a manner which is accessible, culturally appropriate, and inclusive.</p> <p>Moreover, sub-project level SEPs may be developed according to cultural specificity of the area to insure inclusion of vulnerable persons.</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
<p>maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities affected by a project throughout the project's life-cycle.</p> <p>To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the three circumstances described in this ESS.</p> <p>To recognize, respect and preserve the culture, knowledge and practices of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.</p>					
<p>ESS 8: Cultural Heritage</p>					
<p>The Objectives of ESS 8 are:</p> <p>To protect tangible and intangible cultural heritage from the adverse impacts of project activities and support its preservation.</p> <p>To address cultural heritage as an integral aspect of sustainable development.</p> <p>To promote meaningful consultation with stakeholders regarding cultural heritage.</p> <p>To promote the equitable sharing of benefits from the use of cultural heritage.</p>	<p>The Constitution of South Sudan, Art. 38 (1e) spells out to protect cultural heritage, monuments, and places of national historic or religious importance from destruction, desecration, unlawful removal or illegal export.</p>	<p>n.a</p>	<p>FAO ESS9: Indigenous Peoples and Cultural heritage. Protecting cultural heritage</p>	<p>n.a</p>	<p>The Project will implement chance find procedures to protect cultural or archeological findings during project activities, as per the annexed Chance Find Procedures.</p> <p>The Project will further conduct community consultations (as per SEP) prior to project activities in order to</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
					ensure protection of other tangible cultural heritage.
ESS 10: Stakeholder Engagement and Information Disclosure					
<p>The Objectives of ESS 10 are:</p> <p>To establish a systematic approach to stakeholder engagement that will help borrowers to identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.</p> <p>To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance.</p> <p>To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.</p> <p>To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.</p> <p>To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond to and manage such grievances.</p>	<p>The Constitution of South Sudan, Article 166 (6) expects local governments to involve communities in decision-making in the promotion of a safe and healthy environment.</p>	<p>Decision making are mostly oriented on safe and healthy environment and not broader issues</p>	<p>ESMG: (2015) Stakeholder engagement with meaningful, effective and informed participation in the formulation and implementation of programme.</p>	<p>No plan is requested, only reporting schedule for consultation.</p>	<p>The Project will develop an SEP and implement stakeholder consultations throughout the lifetime of the project.</p>
	<p>Environmental and Protection bill (2013).</p>	<p>Bill not endorsed.</p>	<p>ESMG (2015) Disclosure information to stakeholder according to national legislation</p>	<p>Legal disclosure framework is not endorsed leading to misunderstanding on requirement national requirement</p>	<p>The project will state disclosure requirements within the ESMF based on World Bank and FAO standards.</p> <p>Disclosure will be done on MAFS, FAO, UNOPS and WB systems</p>
	<p>The Constitution of South Sudan, Article 123 states the judicial power and its principles.</p>	<p>The justice system remains under construction and both legal practitioners and citizens still face great difficulties in making</p>	<p>ESMG (2015) Grievance and Redress mechanism with appeal procedures (Program, regional and OIG levels).</p> <p>FAO Accountability for Affected People (AAP).</p>	<p>FAO guidance lack of clarity in fragile violent conflict context to deal with GBV even if key principles are stated in the AAP</p>	<p>ELRP is supporting the use of the functional inter-agency Community-based complaint mechanism (CBCM),</p> <p>Appeal mechanism through FAO OIG and</p>

ESF Objectives	National Laws and Requirements	National Gaps	FAO Policies and Standards	FAO Gaps	Recommended Actions
		the law work for them ¹⁰⁵ .		While OIG lead independent analysis, it remains a FAO division and is not therefore a full independent structure.	<p>through WB grievance are accessible</p> <p>National system remains always available and might request support through lawyer associations.</p> <p>Third party monitoring is included to insure independent analysis.</p>
	<p>Code of Criminal Procedure Act (2008). .Article 195. The protection of Witnesses state that “The Court will protect them from any language, gestures likely to intimidate them of intimidate them”.</p>	n/a	<p>FAO whistleblower policy (2019). States independency of OIG in treatment of Complaint and protection measure against retaliation of intimidation.</p> <p>FAO Accountability for Affected People (AAP).</p>	n.a.	<p>Legal Third-Party Monitoring to support witnesses and victims and ensure their rights.</p>

¹⁰⁵ 2015 – Justice Africa – Justice in Practice : South Sudan

Annex 12: Social Assessment

312. A detailed social assessment has been carried out for the ELRP. It aims at understanding the key social and livelihood characteristics of the population to be targeted by the project in order to assess the potential impacts of the proposed interventions and to formulate the most effective mitigations measures for negative impacts and enhancement measures for positive impacts. Particular attention was paid to the vulnerable and disadvantaged groups, such as women, Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IP/SSAHUTLC), children and the handicapped. The Assessment is meant to be used in conjunction with this ESMF to inform the interventions under subprojects to be formulated at a later time.
313. **The full document has been provided as a separate attachment.**

Annex 13: Template TORs for Independent E&S Third-Party Monitoring

A. Objectives

314. An introductory section should briefly present the Project, the monitoring goals and objectives, and how it fits in the overall scheme of project implementation.

B. Tasks divided in major project phase, or location or type of activity

315. This section should provide a general outline of the monitoring program and attach the detailed ESCP/ESMPs, as well as Voluntary Donation Land Framework, Stakeholder Engagement Plan, or other relevant documents. The Borrower should highlight any specific incidents/accidents/events/changes in project or project schedule that need to be taken into account. A link should be provided to the environmental and social documents, where available on a website, so that the prospective monitor can understand the complexity of the assignment.

- Planning of monitoring visit: provide proposed parameters (schedule, meetings proposed, locations, any complex travel logistics, and so forth)
- List of initial documents to be reviewed and data to be made available
- Schedule: For single monitoring trips, preferred timing window and duration of visit. For longer monitoring assignments with multiple trips: preferred timing window for first visit, estimate of frequency of visits during each phase (for example, quarterly visits during construction, annual visits during operation, and higher frequency during sensitive phases, etc.), expected duration of each visit. Expectation of initial and close out meetings for Borrower/Project Implementation Unit, as appropriate.
- Scope of discussions with stakeholders: provide some context, locations of communities to be visited (if large-scale project, suggested numbers and locations to be confirmed by selected monitor), and background on key issues and impacts that might be raised (which can influence which specialist is most appropriate to undertake the assignment)
- Methodologies to be used, or request expert/monitoring firm to propose methodology
- Any technology requirements, and any specifications for format and content of output needed in monitoring report, so that the Borrower can access and analyze the information for its own use and/or reporting

C. Reporting/Outputs

316. Clarify the focus/purpose of the reports, how findings should be presented/rated, and how conclusions and recommendations should be presented. Propose changes to ESCP, where appropriate; updates to the Stakeholder Engagement Plan, and so forth. Reports should be sent to the Borrower and the Bank at the same time for feedback on any factual inaccuracy. This allows the Bank to see initial and independent recommendations. To ensure independence and credibility, evidence-based conclusions and recommendations of the third-party-monitor should be maintained

unless there are factual inaccuracies on which the conclusions and recommendations are based. The Borrower should provide the Bank with their comments to the monitor regarding the report. In controversial or complex projects, the draft report may be shared publicly for maximum transparency and to build trust. Clarify expected language of reporting and intended audience.

D. Qualifications

317. The TORs should list the following:

- Expertise needed: minimum or range of number of experts, and specialty areas needed to be covered depending on issues in the scope agreed. These may include: project management and specialists on environmental or social issues, indigenous peoples, public health, biodiversity, resettlement, health and safety, labour, communications and stakeholder engagement, and capacity building.
- Expected level of expertise, such as types of degree or certification (for example, environmental, social, engineering), and acceptable combination of level of education and years of experience
- Experience with/knowledge of international and World Bank standards, the local context, the project sector, applicable regulations
- Language skills needed, and confirmation that the contractor will provide support for setting up logistics locally, such as meetings, clarity on which party will provide translation, and so forth.
- Require CVs of all key personnel and organization's experience and credentials. These are needed to demonstrate to the World Bank that the experts/specialists are appropriate for the required scope of work.
- Once a monitor is accepted, personnel should not be substituted without permission and should have equivalent expertise.

E. Eligibility/independence requirements

318. For example (a) absence of existing contracts with Borrower contractors on the project, and (b) no participation in earlier phases of the project or in the design of environmental or social programs associated with the project. The more complex and controversial the project, the higher the eligibility and independence needed.

F. Duration of contract and minimum commitment

319. Expected minimum and/or maximum duration of contract, as applicable and any minimal commitment expected from the third-party monitoring provider.

G. Excluded costs

320. Logistical support, travel and accommodation that will be provided by Borrower that should not be included in the cost estimate.

H. Conflicts of Interest disclosure

321. Any past or current arrangements that would prevent the third-party from providing advice independent of the Borrower and the project.

I. Confidentiality and proprietary information

322. Any specific arrangements for reports and other outputs to be confidential or proprietary to the Borrower.

J. Format of proposal

The TORs should indicate how the cost estimate should be made for undertaking the monitoring assignment: by task, sub-tasks, expected number of people, and daily rate and/or lump sum. If tasks in the TORs are not fully defined, clarify how the budget should approach these tasks.

Annex 14: Project-Level Waste Management Plan (WMP)

PESTICIDE WASTE MANAGEMENT PLAN FOR EMERGENCY LOCUST RESPONSE PROJECT

Background

This Pesticide Waste Management Plan has been prepared for the Emergency Locust Response Project (ELRP) which will use pesticides to control the locusts. The ELRP is a World Bank financed project to Government of Republic of South Sudan (GRSS), Ministry of Agriculture and Food Security (MAFS). FAO will be contracted to implement Components 1, 2.2 and 3 of the Project. South Sudan has selected to use the chemical pesticides Malathion 95% and Chlorpyrifos 24% both formulated as ULV, and the biopesticide Metarhizium. This annex outlines how pesticide waste from the project is to be managed as part of the Integrated Pest Management Plan (IPMP).

Acknowledging that there are international regulations for management of pesticide wastes including FAO and WHO guidelines, the ELRP will use these regulations as and when needed.

Improper disposal of pesticide waste, such as unused chemicals and empty pesticide containers, can create serious harm to humans and animals; it may also lead to irreversible environmental damage. Six types of pesticide wastes that will be generated by the ELRP and will require proper disposal are:

- Empty pesticide containers,
- Excess pesticide mixture that are left unused after an application,
- Unused pesticide,
- Obsolete pesticide,
- Rinse water from containers and application equipment,
- Material generated from clean-up of spills and leaks, and
- Contaminated personal protective equipment.

1. Empty Containers

Empty containers of pesticide often still have residues of pesticides inside them. So, even after they are used and emptied, they are considered hazardous waste that can cause damage to the environment and to human and animal health. Empty containers, when re-used to store water and food, may lead to poisoning and those left in the environment will generate pesticide contamination in soils and underground water sources.

Mitigation/Disposal Measures

- All used and empty containers should be labelled and have a “used” date on them.
- Empty containers will be decontaminated by either triple rinsing or pressure rinsing. Triple rinsing empty containers is the recommended method by the FAO and involves washing out the container three times. Triple rinsing can remove over 99.99% or more of pesticide residue. Similar result can be achieved with integrated pressure rinsing using specialized spray equipment.

- Triple rinsing or pressure washing should be done immediately after emptying the container to prevent any improper use of the containers.
- Empty paper and plastic bags will be shaken clean and triple rinsed before disposal.
- Holes will be punctured in containers to make sure they cannot be re-used for any other purpose.
- Crushing of the containers is recommended and the Project will purchase crushers for this purpose.
- Unrinsed pesticide containers must be stored separately from properly rinsed containers and must be treated as if they contained pesticide.
- Unrinsed containers must be capped, stored upright in a roofed or covered secure (locked) area and on an impervious surface.
- There should be no visible or noticeable pesticide residue on either the inside or outside of the container.
- All rinsate should be removed from the inside of the container following rinsing procedures.
- Empty containers meeting the above criteria will be stored in locked storage until proper disposal. Such containers will be stored separate from unrinsed pesticide containers.
- Empty drums will never be left open: Evaporation of wastes can create a hazard—drums will be kept closed until they are ready to be cleaned.

How to properly clean empty pesticide containers

Unrinsed pesticide containers can still hold enough material to harm people and the environment. Care should be taken in cleaning such containers.

- Workers should be trained on cleaning the pesticide containers; they should read and understand all safety and environmental precautions on the product label.
- They should wear PPE, such as goggles or face shields, chemical-resistant aprons, gloves and chemical-resistant boots or shoes.
- Ensure different pesticide rinsates are not mixed together.
- Every container that has been rinsed should be labelled clearly with the rinse date.
- Rinsate should not be dumped on the ground or into storm drain.

Triple Rinsing Empty Containers (plastic and metal containers)

- Empty the container's contents into a spray tank, turning the container so that any product trapped in the handle can flow out. Once flow is down to a drip, drain the container an additional 30 seconds.
- Immediately begin rinsing. Do not wait, or the product may become difficult to remove.
- Fill the empty container one-quarter full of clean water.

Replace the cap on the container. With the container opening facing to your left, shake the container about 6 inches left to right. Shake the container about twice per second for 30 seconds.

- Drain rinse water into spray tank as described above.
- Fill the empty container one-quarter full of clean water a second time.

- Recap the container. With the opening of the container pointed toward the ground, shake the container about 6 inches up and down. Then drain the rinse water into the spray tank.
- Finally, fill the empty container one-quarter full for a third time with clean water. Recap the container. With the container in the normal upright position, shake the container about 6 inches up and down. Pour the rinse water into the spray tank.
- Carefully rinse residue from the outside of the container into the spray tank.
- Carefully rinse cap over spray tank opening.
- Look closely at the container inside and out to make sure that all pesticide has been removed; if not, rinse until all pesticide is removed—then allow the containers to dry.
- Store rinsed containers where they will be protected from rain until they can be disposed of properly.
- Puncture the container at least three times with 1-inch holes on the top and bottom and then have the container crushed.

Disposal of Empty Pesticide Container

The final step is to dispose of the rinsed pesticide container properly. Improperly disposed empty pesticide containers can still pose an environmental hazard and is a source of pollution. Disposal options vary and depend on the container construction (metal, plastic, or paper) and the availability of facilities for disposing of or recycling the pesticide containers.

Mitigation/Disposal Measures

- Empty containers will be punctured on the top, side and bottom to prevent future use. They will then be crushed, rendering them incapable of holding any liquid. Crushing is a process that involves compaction and the pressure of the crusher deforms the container. Because the project will use steel drums, aluminium and plastic containers, the containers in this project will be crushed.
- Empty containers should not be burned even when cleaned because the fire may generate environmentally persistent toxic emissions.
- Empty containers should not be buried either. Burying the empty containers potentially uses up scarce land and can be a danger to animals. Furthermore, plastic containers are highly stable and do not biodegrade, so, if buried, they will remain intact indefinitely.
- Clean secondary packaging, such as pallets and outer cardboard cartons, which have not come into direct contact with pesticides can be assumed to be uncontaminated. This can be disposed of as municipal waste.
- Empty containers should be transported by an appropriately equipped vehicle and disposed in designated sites mutually agreed upon with MAFS and the Ministry of Environment and Forestry (MEF).

2. Excess Pesticide Mixture

Excess mixture is diluted pesticide that is leftover in the spray tank after a pesticide application. It is important to properly dispose of any excess mixture. This means getting rid of the chemical so that poses no harmful effect to the environment, as well as people and animals.

Mitigation /Disposal Measures

- Avoid excess mixtures by measuring and calibrating correctly.
- Fill the spray tank with only the amount of pesticide required to do the job.
- Spray excess mixture on a different site if possible.

3. Excess Product

Excess product is unused pesticide that is still good but no longer needed arising from the ~~purchase~~ buying excessive amounts.

Mitigation/Disposal Measures

- Good stock management: buy only pesticide that is needed for one season or single use.
- Determine if you can safely go over the job and use up the amount that may be leftover, particularly if the pesticide is being used on weeds or on insects.
- Determine if there is another party that can use the excess product.
- Check with supplier or manufacturer of product to see if they will take excess product back.
- Check with the relevant government agency if there is a waste collection program where the agency collects excess products.
- If unable to return product, dig a hole 50 cm deep and cover the bottom of the pit with a 25 to 40 mm layer of hydrated lime or charcoal. Then pour the unwanted pesticide into the hole and cover hole with soil.

4. Obsolete Pesticides

Obsolete pesticides are pesticides that cannot be used for the purpose for which they were intended and must be processed for destruction so as to render them harmless. Pesticides become obsolete when they have been banned and it is therefore illegal to use them; because they have deteriorated physically or chemically so that they are no longer in the form they were supplied in; or after they have lost their pesticidal properties and are no longer effective against pests. Obsolete pesticides can be potentially more hazardous than new pesticides. Thus, care should be taken in handling obsolete pesticides.

Mitigation/Disposal Measures

- Ensure comprehensive stock control and inventory: avoid purchasing excess pesticides that cannot be used before they deteriorate.
- Buy the correct pesticide for the project.
- Store pesticide properly to avoid damages to pesticide caused by poor storage or handling.
- Regularly check condition of the pesticides and their storage containers.
- Ensure proper labelling of pesticides so that pesticides are not incorrectly considered to be obsolete.
- Determine if recently purchased pesticide that is not needed can be used in a different

project before it becomes obsolete.

- Check with supplier or manufacturer of product to see if they will take product back
- Check with the relevant government agency if there is a waste collection program where the agency collects excess products.
- If unable to return product, dig a hole 50 cm deep and cover the bottom of the pit with a 25 to 40 mm layer of hydrated lime. Then pour the unwanted pesticide into the hole and cover the hole with soil. This may apply for small quantities of pesticides. For large quantities, the Project will utilize the FAO guidelines for disposal of obsolete pesticides.

5. Rinse Material from Containers and Spray

Improperly disposed rinse water from pesticide application equipment has great potential for causing ground and surface water contamination, as well as harm to humans and animals, because it still contains pesticide residue. Proper procedures should be observed to avoid contamination from pesticide rinse water.

Mitigation/Disposal Measures

- Applicators will minimize rinse water by washing equipment only when necessary.
- Rinse the pesticide container or spray equipment over an impermeable surface and in a way that allows recovery of the rinsate.
- If the rinsate contains no debris, it can be used the same day as part (up to 5%) of the water (or other liquid) portion of the next spray mixture of that chemical.
- Apply rinsate to the original site, provided registered rates are not exceeded and the application is consistent with label directions.
- Apply rinsate to other project areas that need spraying.
- If none of the above conditions applies, dig a hole 50 cm deep and cover the bottom of the pit with a 25 to 40 mm layer of hydrated lime. Then pour the unwanted pesticide into the hole and cover the hole with soil. This will be applicable to small quantities of rinsate.
- Applicators will not discharge rinse water to the ground, roadway, septic system, ditches, streams, toilets, sink, or water bodies to avoid pollution.
- The best way to dispose of the rinsate (rinse water used to remove pesticide residue from a container) is to add it to the spray mixture and apply it according to the label directions. Rinsate can also be collected to use later in a spray mix or for disposal.

6. Pesticide Spill Clean-Up Material

When handling pesticides, accidents happen. When they do, proper clean-up of the spillage is essential to remove all health and environmental hazards created by the spill. But that is not all, the material used to collect and clean up spills and leaks of pesticide must also be properly managed to prevent environmental contamination. Generally, materials such as sawdust, clay, shredded newspaper, absorbent pads, or other absorbents can be used to absorb liquid pesticides and water/detergent mixtures used to clean pesticide-stained surfaces. If improperly disposed, such material can cause harm to humans who come into contact with it, as well as harm to the environment.

Mitigation/Disposal Measures

- Once liquid spills have been absorbed, sweep up and collect the contaminated absorbent materials, and seal them in a heavy-duty plastic bag or metal bucket for disposal.
- Use a plastic dustpan to sweep up spills. Metal dustpans can spark and ignite flammable pesticides.
- Sweep up dry pesticide spills for reuse. It may be applied to a labelled use site or stored for future use if the pesticide has not become wet or contaminated with soil or other debris. Otherwise, collect the dry spill in a heavy-duty plastic bag for disposal.
- Discard any PPEs that may have been contaminated in the clean-up process.

7. Contaminated Personal Protective Equipment

It is not uncommon for personal protective equipment (PPE) such as overalls, goggles, boots, and gloves, to be used in protecting the wearer from dangerous pesticides. Because PPEs are designed to keep dangerous pesticides away from the mouth, nose, and skin of the person wearing it, they end up collecting the contaminants. It is therefore important to take steps to ensure the PPEs are disposed in a manner that ensures that contaminants are not released in an area where they could cause harm.

Mitigation/Disposal Measures

- Keep pesticide-contaminated PPEs away from other clothing or laundry and wash it separately; No handler should take their contaminated PPE home with them.
- If PPE will be reused, clean it before each day of reuse according to the instructions from the PPE manufacturer unless the pesticide labelling specifies otherwise.
- If there are no instructions or requirements, wash PPE meticulously in detergent and hot water.
- Items that cannot be washed by a washer and dryer, such as goggles, boots, and gloves, should be thoroughly handwashed. Wear protective gloves when handling such contaminated items.
- Thoroughly dry the clean PPE before it is stored or put it in a well-ventilated place to dry.
- Store clean PPE separately from personal clothing and away from pesticide-contaminated areas.
- Properly cleaned PPE can then be disposed of as regular garbage.
- If washing of clothing or boots fails to remove the waste, then such material must be destroyed. They should be packed in sturdy bags and returned to the control base where proper destruction should be undertaken. Proper destruction can include burning of the material if it is material that can be burned without excess environmental degradation. Clothing or PPE can also be buried.
- Handler employers must discard coveralls or other absorbent materials that have been drenched or heavily contaminated with an undiluted pesticide that has the signal word "DANGER" or "WARNING" on the labelling. These contaminated items must not be reused.
- PPE that has been damaged or designated as one-time use or has expired or reached its use limit should also be destroyed.

In instances where disposable PPE garments are not contaminated by anything other than normal dirt and dust, it is worth the time and effort to participate in a disposable protective clothing recycling program in order to reduce the rather large environmental impact of all that PPE ending up in landfills where it will never biodegrade.