

ENVIRONMENTAL & SOCIAL SAFEGUARDS (ESS) POLICY & PROCEDURE

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PURPOSE

The purpose of this document is to: **I) Set standards related to Environmental & Social Safeguards (ESS) performance and risk levels (categories)** under the Green Climate Fund's (GCF) and the Foreign, Commonwealth & Development Office (FCDO, formerly DFID¹) projects, adopted from [GCF's Environmental and Social Policy](#), **II) Set a procedure** for implementation of the applicable standards by CRS and its subrecipients under applicable funding/projects.

I. STANDARDS FOR PERFORMANCE AND RISK

I.A. PERFORMANCE STANDARDS

CRS implements Safeguard Screening Procedures to assess, manage and monitor environmental and social risks and impacts associated with projects to ensure that they are environmentally and socially sound and sustainable, and so that any negative impacts can be identified and mitigated.

Performance Standard 1. Labor and Working Conditions

CRS promotes sound worker-management relationships and enhances the development benefits of a project by treating workers in the project fairly, providing safe and healthy working conditions, and supporting the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.

- a) CRS requires fair treatment, nondiscrimination and equal opportunity of project workers through its Equal Employment Opportunity – POL-HRD-EMP-0019 policy and workplace standards as outlined in the General Workplace Conduct – POL-HRD-GEN-0009 policy.
- b) CRS promotes safety and health by preventing and responding to accidents, injury, and disease impacting CRS workers and affected communities arising from or associated with or related to project activities. As outlined in the Emergency Evacuation for Security Reasons Policy (POL-HRD-INT-007) and Security and Staff Safety Guidelines, CRS provides information, guidance and training related to health and safety hazards, risks, protective and preventive measures, and emergency arrangements, that are necessary to maintain safety throughout the project.
- c) [CRS Code of Conduct and Ethics](#) condemns and prohibits abuse and exploitation. In addition, CRS has established protective measures to uphold the dignity of children and vulnerable adults, including gender-related vulnerabilities, and ensure their safety and protection. CRS prohibits the use of forced labor or child labor, and guarantees that no trafficked persons will be employed in connection with the project, as outlined in [CRS Policy on Safeguarding](#) as well as all applicable protective laws and relevant international conventions (treaties).

Performance Standard 2. Resource Efficiency and Pollution Prevention

CRS recognizes that economic activity and urbanization often generate air, water, and land pollution and consume finite resources that may threaten people, ecosystem services, and the environment at the local, regional, and global levels. CRS staff and partners:

- a) Implement technically and financially feasible measures for use of natural resources in a sustainable manner.
- b) Adopt measures, to the extent technically and financially feasible, that avoid or minimize water usage so that the project's water use does not have significant adverse impacts on communities, other users, and the environment. These measures include, but are not limited to, the use of water

¹ Department for International Development (DFID)

conservation measures within CRS' operations, the use of alternative water supplies, water consumption offsets to maintain total demand for water resources within the available supply, and evaluation of alternative project locations.

- c) Ensure that projects avoid the release of pollutants. When avoidance is not feasible, minimize and control the concentration and mass flow of their release using the performance levels and measures specified in national law, if available. This applies to the release of pollutants to air, water and land due to routine, nonroutine, and accidental circumstances, and with the potential for local, regional, and transboundary impacts.
- d) Apply the principles of Integrated Pest Management to every activity that involves or influences pesticide procurement or use.

Performance Standard 3. Community Health, Safety and Security

CRS staff avoid or minimize impacts on human health and the environment due to existing or potential pollution and promote Occupational Health and Safety (OHS) requirements for project workers set out under Performance Standard 2. Labor and Working Conditions. CRS staff and partners:

- a) Take into consideration safety risks to third parties and affected communities during the procurement of project materials and when designing, constructing, operating, and decommissioning the structural elements of projects, such as hand dug wells and boreholes, pit latrines, electric, motorized, and other types of pumping systems, and dams and reservoirs, and the use of construction tools and equipment.
- b) Avoid or minimize community exposure to project-related traffic and road safety risks, diseases, and hazardous materials.
- c) Have in place effective measures to address adverse health and security effects from emergency events.

Performance Standard 4. Land Acquisition and Involuntary Resettlement

CRS staff identify, catalogue and manage the potential adverse socioeconomic, environmental and cultural impacts of resettlement processes and restriction of access to natural resources that some projects might create. CRS staff and partners:

- a) Adopt measures to avoid or minimize involuntary resettlement and forced eviction by exploring project design alternatives.
- b) Assist displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards by mitigating against unavoidable adverse social, environment and economic impacts from land acquisition or restrictions on land use.
- c) Ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.
- d) Implement assistance that improves living conditions of poor or vulnerable displaced persons through provision of adequate housing, in safe location with access to livelihood opportunities, services and facilities, and appropriate level of security of tenure.
- e) Ensure that when community members' livelihoods may be natural resource based, that members continue to have access to natural resources. If access to natural resource must be constrained, CRS assists the parties involved in drafting a Natural Resource Management Plan that identifies measures to restore livelihoods and contains conflict resolution measures where appropriate.

Performance Standard 5. Biodiversity Conservation and Sustainable Management of Living Natural Resources

CRS staff avoid, any significant loss or degradation and support the sustainable management, protection, conservation, maintenance, and rehabilitation of natural habitats and their associated biodiversity and ecosystem functions. Through the ESS Screening & Risk Profiling Form (Document No. POL-ODD-003-A1), CRS staff identify the potential project related risks to and impacts on habitats and the biodiversity that they support.

- a. CRS designs projects to avoid or mitigate threats to biodiversity, such as habitat loss, degradation and fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, pollution, and incidental take, as well as projected climate change impacts.
- b. Where the Environmental and Social Safeguards Assessment has identified potential risks and impacts on biodiversity or habitats, CRS staff:

- a. manage those risks and impacts to protect and conserve biodiversity through sustainable management of living natural resources;
- b. monitors, evaluates and adjusts project activities based on a periodic reassessment of the risks and vulnerabilities of both ecosystems and societies.

Performance Standard 6. Indigenous Peoples

Indigenous Peoples own, occupy, and/or utilize land of high biodiversity and critical ecosystems. CRS staff ensure that the project design and development process demonstrate recognition of, respect for, and efforts to preserve the human rights, dignity, aspirations, identity, culture, knowledge, practice, marginalization, self-identification, separate cultural/economic/social/political institutions, distinct language/dialect and natural resource-based livelihoods of Indigenous Peoples. This policy applies whenever Indigenous Peoples are present in or have collective attachment to a proposed project area. CRS staff and partners:

- a) Conduct a needs assessment that identifies Indigenous Peoples (IPs) that may be affected by the project and the nature of that impact (economic, social, environmental etc.)
- b) Establish and maintain an ongoing relationship based on meaningful consultation with the IPs affected by a project throughout the project’s life cycle.
- c) Obtain Free, Prior, and Informed Consent of any IPs present in, or with a collective attachment to, the proposed project area, using processes that are participatory and inclusive of all voices. Informed consent will be obtained: 1) when IPs will be relocated from land or natural resources, they have traditionally owned/used; 2) the project will impact their critical cultural heritage; or 3) we will use traditional knowledge or cultural heritage of IPs for commercial purposes.
- d) Avoid adverse impacts of projects on IPs, or when avoidance is not possible, develop plans to minimize, mitigate and/or compensate for such impacts.

Performance Standard 7. Cultural Heritage

CRS recognizes that 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. CRS staff and partners:

- a) Promote meaningful consultation with stakeholders regarding cultural heritage.
- b) Set out measures designed to protect, preserve and maintain access to cultural heritage throughout the project.
- c) Promote equitable sharing of cultural heritage benefits.
- d) Protect cultural heritage from the adverse impacts of project activities and support its preservation.

I.B. RISKS CATEGORIES

For the purposes of this policy ESS risk is categorized as following:

Category	Category A	Category B	Category C
Risk Level	High	Medium	Low
Description	Activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented.	Activities with potential limited adverse environmental or social risks and/or impacts that are few, generally site-specific, largely reversible, and readily addressed through mitigation measures.	Activities with minimal or no adverse environmental or social risks and/or impacts.

II. PROCEDURE

II. A. SCREENING

Funding opportunities for potential projects are screened for ESS using ESS Screening & Risk Profiling Form (Document No. POL-ODD-003-A1). The roles and responsibilities for screening must follow the process set in the table below.

Ownership ² ↓	Drafting ³ →	Review ⁴ →	Approval ⁵ →	Distribution ↓
Officer, IDEA Non-USG Donor Engagement	HoP/ Designate	<ul style="list-style-type: none"> - DRD/PQ⁶ - STA⁷ on Climate Change - Agriculture & Livelihoods, (PIQA) - STA for Protection, (PIQA) - STA for Justice & Peacebuilding, (PIQA) - Global STA, Shelter and Settlement, (HRD)⁸ - Human Resource Business Partner - MEAL RTA 	Director IDEA Non-USG	<ul style="list-style-type: none"> - Program Manager - Head of Programming - Country Representative - Officer, Non-USG Donor Engagement Donor

The estimated time for the review is within 10 business days for all Reviewers. If the Reviewer is not available due to scheduled leave (business travel, vacation) or an extended absence (personal, medical and other), the Reviewer is responsible for designating a contact person or providing information on how to proceed during the Reviewer’s absence using “Out of Office” or other means. If a Reviewer does not respond to the Owner within the timeframe set forth in this Policy & Procedure, the supervisor of the reviewer must be contacted, and substitute reviewer identified. The estimated time for facilitation of approval within CRS is 5 business days. Like the Reviewers, if the Approver is not available due to scheduled leave (business travel, vacation) or an extended absence (personal, medical and other), the Approver will delegate this function.

If the screening results demonstrate high or medium ESS risks (category A and B), CRS will not pursue those opportunities, and will consider opportunities with Category C risk only. **The approved ESS Screening & Risk Profiling Form is a prerequisite for applicable proposal submissions.**

II. B. MONITORING

The environmental and social performance standards are mainstreamed in the project MEAL⁹ plan and are deployed in accordance with [CRS’ MEAL Policies & Procedures](#). They cover all aspects of the monitoring and incorporate communication to the Stakeholders (including the public), and staff orientation. For the applicable projects, the MEAL Plan includes but not be limited to the following monitoring activities:



[CRS’ MEAL Policies & Procedures](#) assign the roles and responsibilities for monitoring as follows.

² Ownership is a function carried out by the designated CRS staff member (the “Owner”) responsible for ESS screening & risk profiling process from beginning to end. Designation or appointment of the Owner may vary; however, IDEA Non-USG Donor Engagement Officer is designated to carry this function by default. The Owner is responsible for facilitating, incorporating feedback, adhering to a schedule for review, following-up with other participants in the review process and distributing the related documents at various points in the process. To promote process efficiency and document quality throughout the review and approval process, the Owner maintains the master version of the ESS Screening & Risk Profiling Form.

³ Drafting or Preparation is the part of the process related to the initial completion of the form. It is normally conducted by the HoP or designate, who has immediate knowledge about the environment in which the proposed project will be implemented. The designated personnel work in close collaboration with the Owner and the reviewers.

⁴ Review is the part of the process in which CRS’ SME provide their technical input on a draft screening and risk profiling form received from the Owner.

⁵ Approval is the part of the process of validation of completion of the screening & risk profiling verified by the subject-matter experts. This function is assigned to Director IDEA Non-USG.

⁶ Program Impact and Quality Assurance

⁷ Senior Technical Advisor

⁸ Humanitarian Response Department

⁹ Monitoring, Evaluation, Accountability and Learning

Activity Description	Responsible	Accountable	Consulted	Informed
Develop ESS Monitoring System & Tools	MEAL Manager	Program Manager	Relevant CP technical team, Relevant Regional technical advisors, select field staff and partners, SCM and ICT4D if applicable	Project Staff, partners, Project Stakeholders, Head of Programs
Test ESS Monitoring System & Tools	MEAL Manager	Program Manager	Select project beneficiaries and stakeholders	Head of Programs
Training ESS Monitoring System Users	MEAL Manager Field Agents	Program Manager	Project Staff, partners, project stakeholders, SCM and ICT4D if applicable	Head of Programs
Implement ESS Monitoring Activities	MEAL Manager Field Agents	Program Manager	Project staff, partners, project stakeholders	Project staff, partners, project stakeholders
Communication and ESS Incident Management	Program Manager	Head of Programs	DRD/PQ, STA/RTA on Climate Change, Agriculture & Livelihoods, Protection, Justice & Peacebuilding, Global STA, Shelter and Settlement, (HRD), Human Resource Business Partner	CR, IDEA and Donor
ESS Reporting	MEAL Manager	Program Manager	PIQA SME	Donor

POLICY & PROCEDURE CONTACT PERSON

Questions related to this policy & procedure be directed to CRS as specified here:
<https://www.crs.org/about/contact-crs>.

RELATED POLICIES, PROCEDURES AND DOCUMENTS

- ESS Screening & Risk Profiling Form [POL-OOD-003-A1]
- ESS Institutional Management Process & Structure [POL-OOD-003-A2]
- Impact, Probability and Significance Rating Matrix [POL-OOD-003-A3]
- [CRS Code of Conduct \[POL-HRD-GEN-0017\]](#)
- [CRS Policy on Safeguarding](#)
- [CRS' MEAL Policies & Procedures \[POL-OOD-PRG-008\]](#)
- Emergency Evacuation for Security Reasons Policy [POL-HRD-INT-007]
- Equal Employment Opportunity [POL-HRD-EMP-0019]
- General Workplace Conduct [POL-HRD-GEN-0009 policy]
- Security and Staff Safety Guidelines
- Environmental and Social Performance Standards (PS)
- [GCF's Environmental and Social Policy](#)

AUTHORIZATION HISTORY

APPROVED

Executive Vice President
 Overseas Operations
 Date: 9/28/2018

AUTHORIZED

VP Systems & Operations
 Overseas Operations
 Date: 9/28/2018

CONSULTED

Senior Vice President
 Overseas Operations
 Date: 9/28/2018

CONTRIBUTING AUTHORS

IDEA, HRD, OPEX, PIQA

DISTRIBUTION/ROUTING LIST

All staff, External