Annex 7b

Environmental and Social Management Plan (ESMP)

to the GCF Funding Proposal

Climate-resilient landscapes in Central Asia

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Abbreviations

AE	Accredited Entity
AFOLU	Agriculture, Forestry and Other Land Use
APR	Annual performance report
ARIS	The Community Development and Investment Agency of the Kyrgyz Republic
BMZ	German Federal Ministry for Economic Cooperation and Development
CIIP	Centre for Implementation of Investment Projects
CRLE	Climate-resilient, low-emission
EE	Executing Entities
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Safeguards
ESS-MS	Environmental and social management and monitoring system
EU	European Union
EUR	Euro
FP	Funding Proposal
FS	Feasibility Study
GAP	Gender Action Plan
GCF	Green Climate Fund
GFP	Grievance Focal Point
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation (World Bank Group)
IPM	Integrated pest management
M&E	Monitoring and Evaluation
MoWRAPI	Ministry of Water Resources, Agriculture and Processing Industry
NCECC	National Committee on Ecology and Climate Change
NDA	National Designated Authority (for the GCF)
NGO	Non-governmental organisation
OHS	Operational Health and Safety
PMU	Programme Management Unit
PPE	Personal protection equipment
PS	Performance Standards
KPI	Key Performance Indicator
RbM	Results-Based Monitoring
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
TNA	Training Needs Assessment

1. Introduction

This Environmental and Social Management Plan (ESMP) is for the programme: Climate resilient landscapes in Central Asia. This regional programme directly addresses the critical climate risks impacting the agriculture, forestry, and other land use (AFOLU) sectors in the Kyrgyz Republic, Tajikistan, and Uzbekistan, concentrating on the highly vulnerable and ecologically important Fergana Valley, and Surkhandarya, and Khatlon regions. Ranging from plains dominated by agriculture to pastures and forests widely distributed on foothills and mountain slopes, the selected intervention areas are interconnected, and inseparable elements of continuous and transboundary landscapes characterised by different land uses and natural ecosystems that necessitate an integrated regional approach.

The programme will strengthen climate and land-use decision-support systems; enhance capacities to access and manage climate finance, and promotes the adoption of climate-resilient, low-emission (CRLE) practices and technologies through improved sub-national planning, extension services, and targeted investments in agriculture, forests, and pastures. At the regional level, the programme will reinforce cooperation through foresight processes, regional AFOLU pathways, knowledge exchange, and a climate investment platform to coordinate and mobilize finance for transboundary adaptation actions.

This ESMP aims to provide a practical plan to manage the potential unintended negative environmental and social impacts associated with the programme's activities, maximise the potential co-benefits and facilitate meaningful and inclusive multi-stakeholder consultations and engagement throughout the programme's lifecycle. This considers the circumstances of vulnerable, marginalised individuals and ecosystems that might be affected by the programme's activities. During the programme's preparation and implementation, the ESMP aims to assist the government counterparts, in collaboration with the Programme Management Units (PMU) and GIZ team, in maintaining and/or improving their environmental and social management systems.

The ESMP ensures that the Safeguards Team in the PMU continuously reviews all programme activities and monitors potential undesirable environmental and social impacts, as necessary, during Programme implementation. When impacts and potential impacts are identified, and if they cannot be avoided, appropriate mitigation measures will be planned. This ESMP is made available online by GIZ and program partners for easy access.

Direct feedback from stakeholders on the Programme was gathered through field consultations and results are presented in the SEP provided as Annex 9. The SEP also includes the principles of a Grievance Redress Mechanism (GRM) to collect grievances raised about programme implementation should they occur.

The ESMP documents the programme’s E&S risk management arrangements. It has been developed on the basis of the findings of the ESIA provided in the FP Annex 7a and translates E&S risks and impacts into corresponding mitigation measures, implementation responsibilities, monitoring and reporting arrangements, and other provisions for complying with the requirements of the environmental and social standards. The ESMP also incorporates relevant country- and site-specific requirements and shall be read and implemented together with the ESIA and other applicable safeguards instruments. It will be implemented, monitored and updated, as necessary, throughout programme implementation.

The aims of the ESMP are to:

- Establish measures to mitigate the E&S risks identified in the ESIA.

- Ensure the programme is compliant with the regulatory framework of the Kyrgyz Republic, Tajikistan and Uzbekistan.
- Ensure the programme is compliant with the Environmental and Social requirements of the Green Climate Fund (GCF) and GIZ.
- Ensure adequate human resources and budget have been allocated by the Programme to implement the ESMP.

The ESMP is seamlessly incorporated into the programme design, with its implementation costs fully accounted for within the programme budget.

This ESMP is closely connected to the Environmental and Social Impact Assessment (ESIA), Stakeholder Engagement Plan (SEP), and the Feasibility Study (FS). The ESMP will first identify the programme standards and safeguards it addresses and then distinguishes between the unintended negative impacts and external risks that the ESMP Actions address. The roles and responsibilities for the implementation and monitoring of the Plan are described, and a general budget is provided. This ESMP formulates actions necessary to mitigate identified risks against the applicable environmental and social safeguards, it is complemented by the Stakeholder Engagement Plan (SEP), the Grievance Redress Mechanism (GRM) and ultimately the Gender Action Plan (provided separately).

Programme Standards and Safeguards – Legal and Institutional Framework

The Environmental and Social Safeguards (ESS) here referred to consider the GCF's **Revised Environmental and Social Policy** (GCF, 2021a) (decision B.21/18[1]), which is an overarching policy framework that describes how the GCF integrates environmental and social considerations into its decision-making and operations to effectively manage environmental and social risks and impacts and improve outcomes. Through this policy, GCF ensures that all GCF-financed activities will commit to:

- Avoid, and where avoidance is impossible, mitigate adverse impacts to people and the environment;
- Avoid, and where avoidance is impossible, mitigate the risks of SEAH to people impacted by GCF-financed activities;
- Enhance equitable access to development benefits; and
- Give due consideration to persons in vulnerable positions and situations and marginalised populations, groups, and individuals, including women and girls, local communities, Indigenous peoples (IPs), and other marginalised groups of people and individuals that are affected or potentially affected by GCF-financed activities and are especially vulnerable to exploitation or other potentially harmful unintended programme impacts.

The activities supported by GCF may include programmes, projects, and subprojects.

The Environmental and Social Policy requires that accredited entities (AEs) undertake an assessment of environmental and social risk, including transboundary risks and impacts, to ensure that all activities proposed for GCF financing meet the environmental and social safeguards pursuant to the ESS standards and policy.

[1] https://www.greenclimate.fund/document/revised-environmental-and-social-policy

Currently, GCF uses the International Finance Corporation (IFC) Performance Standards (PS) as its interim ESS Standards, as adopted by the GCF board in 2014[2]. The detailed description of these standards can be found on IFC's website[3].

2. Environmental and social management system of the programme

As required under ESS1, the environmental and social management and monitoring system (ESS-MS) for the programme includes/covers:

- The adoption of an E&S policy for the programme.
- A procedure for identification of new and upcoming risks and impacts.
- Organisational capacity and competency: the definition of staffing and training needs.
- Inclusion of environmental and social monitoring in the programme's Monitoring and Evaluation System (M&E System).
- Updating of the ESMP.
- Implementation of the Gender Action Plan (GAP).
- Disclosure of the E&S documentation.
- Implementation of the programme's stakeholder engagement plan (SEP) and grievance redress mechanism (GRM).

2.1 Programme implementation arrangements

The organisational structure of the GCF programme will consist of the Accredited Entity (AE) and Executing Entities (EE).

In its capacity as an AE, GIZ will bear oversight responsibility of the programme, including ensuring compliance and providing overarching management of the environmental and social safeguards system. The programme will be implemented in cooperation with national Executing Entities, namely the Community Development and Investment Agency (ARIS) and the Ministry of Water Resources, Agriculture and Processing Industry (MoWRAPI) in the Kyrgyz Republic, the Centre for Implementation of Investment Projects (CIIP) in Tajikistan and the National Committee on Ecology and Climate Change (NCECC) in Uzbekistan, as well as the Ministry of Finance of the respective countries. In each country, GIZ and the national EE(s) will form Programme Management Units. The PMUs will be responsible for the implementation and monitoring of the ESMP, GAP, and SEP. Each EE will have adequate resources, including staff and budget, to ensure proper planning, implementation, and monitoring of the ESMP, GAP, and SEP.

Further details of the programme's governance structure and implementation arrangements are outlined in chapter six of the Environment and Social Impact Assessment (ESIA).

3. ESMP implementation

To ensure seamless implementation and accountability, the management lines defined in this ESMP are directly embedded into the programme's overall management structure. The recruited Regional ESS/Gender Advisor (GIZ) and the National Social and Gender ESS Specialists within each Executing Entity (ARIS, MoWRAPI, CIIP,NCECC) hold the operational mandate to enforce

[2] Source: Virtual Stakeholder Consultation on the topic of the development of the GCF's ESS - Stage 1: scoping | Green Climate Fund

[3] Source: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards

compliance. The PMUs will consist of a dedicated team of professionals from each EE, including finance managers, gender, ESS and M&E specialists, and technical advisors.

3.1 Staffing concept

The ESMP requires a team of experts in various fields, e.g., environment, forestry, ecosystem experts and socio-cultural experts for each country, to make up a E&S Safeguards Team that will support the development, capacity building, training, implementation, monitoring, and reporting needed to carry out the actions in this ESMP. The safeguards system is mainstreamed into the programme's operations and is carried out continuously.

The assignments for staff are aimed to focus on both the development of the specified tools and approaches, and its implementation at the national, regional and local level in line with the planned programme activities, and the intervention areas in each country.

GIZ will recruit programme advisors on ESS to serve as main focal points for these areas. Their main responsibility will be to ensure that safeguard measures are effectively implemented and monitored. The advisors will work hand-in-hand with ESS specialists within each EE, who will be primarily responsible for implementing and monitoring the application of safeguards at the programme activity level. Additional ad-hoc specialists will be hired as needed to strengthen ESS capacity, including GRM. Advisors and programme staff supporting the ESS implementation are presented below.

Table 1: Proposed ESS staffing concept

No.	ESS implementation staff	ESS related roles and responsibilities	Quantity
1.	Advisor on ESS at regional level (EE GIZ)	To ensure that the ESMP is implemented in the intervention areas including addressing cross-cutting issues.	One person– Regional
2.	Regional Advisor on Monitoring and Evaluation (EE GIZ)	To monitor and evaluate the programme implementation, including safeguards	One person– Regional
3.	Three advisors on ESS (environmental, social, including gender)/M&E at national level (EE GIZ)	To ensure that the ESMP is implemented in the intervention areas including addressing cross-cutting issues. To monitor and evaluate the implementation of the programme, including safeguards Three Central Asian countries.	One person per country- National
4.	Five National Advisors spend 20% on stakeholder engagement/ liaison and 30% on HCD (EE GIZ)	To ensure that stakeholders engaged with the programme understand social and environment risks Five Central Asian countries	One person per country- National
5.	ESS specialist on environmental issues (EEs: ARIS, MoWRAPI, CIIP, NCECC)	To assess potential environmental risks that might happen due to programme interventions in the targeted programme areas	One person per national EE
6.	ESS specialist on social issues (incl. gender) (EEs: ARIS, MoWRAPI, CIIP, NCECC)	To assess potential social and gender risks that might happen due to programme interventions in the targeted programme areas	One person per national EE

Aimed at ensuring clear responsibility for the day-to-day implementation and effective monitoring

of the ESMP, including a functional GRM, the following overarching tasks fall under the responsibility of the E&S Safeguards Team.

Table 2: Responsibilities of the ESS team

Action Instructions/ Descriptions:	The ESS Team will lead, coordinate, and oversee the integration and implementation of the ESMP throughout the programme life cycle. In each country, the ESS Teams will be responsible for the following tasks: • Developing ESMP implementation schedules that align with the overall programme timeline and ensure that the necessary enabling conditions for specific activities are in place. • Working closely with task-specific consultants to support the monitoring of other ESMP actions, including: (a) establishing databases; (b) supervising data collection; (c) designing capacity-building activities based on training needs assessments; and (d) delivering training workshops, information-sharing sessions, and consultation workshops as required. • Strengthening the capacity of national EE staff to monitor and implement environmental and social safeguards effectively. • Ensuring that relevant Executing Entities (EEs) and district-level agencies, including forestry, environmental, agricultural, and water management institutions, are adequately informed capacitated to implement safeguards within the intervention areas. • Developing checklists and other monitoring and reporting tools to track whether subsequent ESMP activities have been implemented as planned, are ongoing where applicable, and are achieving the intended levels of effectiveness and efficiency. • Preparing annual reports on ESS-related activities and associated challenges for relevant stakeholders, including the PSC, PMU, the GIZ Headquarters and GIZ's GCF Oversight Unit, development partners as appropriate, the GCF, and other relevant stakeholders.

3.2 Establishment of M&E

The programme is guided by a set of safeguard-related documents, including this ESMP and the ESIA. Their integration into programme planning, together with the establishment of an effective monitoring system to track implementation, will help ensure that the programme avoids unintended negative impacts, particularly on vulnerable community members and biodiversity in the intervention areas. The safeguards team will develop a monitoring concept through the following steps:

- Outline a Safeguards Monitoring Concept derived from relevant programme documentation, including the Environmental and Social Management Plan and the Environmental and Social Impact Assessment.
- Design an appropriate Safeguards Monitoring System, preferable integrated into the programmes overall M&E-system.
- Identify and interpret the safeguards indicators.
- Identify programme co-benefits such as for biodiversity
- Give clear suggestions for monitoring tools to measure the safeguards indicators.
- Ensure a good understanding of the functional relationship between the ESIA, SEP, GRM and the ESMP and how they will be taken into account in the safeguards system
- Ensure that potential language constraints are identified and mitigated
- Identify key responsibilities for data collection and data management.

- Include a clear approach for harmonizing and reconciling the safeguards frameworks and the M&E frameworks.

Based on the development of the Safeguards Monitoring system, a consultant or internal expert will need to support the programme staff, and relevant counterparts, to operate the safeguards monitoring system. The consultant's tasks are to facilitate the introduction and operation of this monitoring system, including:

- Initial and ongoing capacity building of the PMU on all levels of safeguards requirements
- Support to PMU on all levels, and to the programme owners to implement safeguards requirements.
- As part of continuous improvement revise the ESMP and GRM annually at the institutional level where needed.
- Ensure the integration of safeguards requirements into the database as established by M&E Team.
- Screen incoming data for necessary quality levels, executing clear plans to improve data quality, accuracy, and relevance, when necessary.

As part of their work to rigorously monitor the programme safeguards according to the required and agreed framework, the ESS team will need to:

- Have a well-developed and conceptualized filing practice.
- Ensure a sound staffing concept so that good filing practices can be implemented.
- Train programme stakeholders in relevant data and knowledge management concepts.

3.3 Grievance Redress Mechanism (GRM)

A GRM will be established for the programme to handle any concerns, complaints or grievances that stakeholders may have during programme implementation. GRM is a key part of ensuring accountability and responsiveness, and it will be designed in a culturally appropriate and gender-responsive manner, complementing GIZ's existing grievance systems and GCF's independent redress mechanism. The main tasks of the ESS team regarding the GRM:

- Establish and operationalise GRM[4].
- Ensure that relevant stakeholders are informed about the GRM, including how to access it, use it, and seek support when needed.

Table 3: GRM Objectives and action instructions

Objective:	The GRM aims to promptly address and resolve any issues that arise from programme activities, thus preventing the escalation of conflicts or adverse impacts. Any stakeholder, whether an individual community member, programme worker or institutional partner, can seek redress through this mechanism. Grievances will be taken seriously and handled expediently, with the goal of resolving complaints as quickly as possible to avoid tension or conflict. The GRM provides a transparent process for resolution and ensures that feedback from stakeholders is incorporated into programme management. It upholds principles of fairness, confidentiality (when requested) and non-retaliation, encouraging stakeholders (including women and vulnerable groups) to voice concerns without fear. • To provide a process by which grievances from communities, groups, individuals, local authorities, NGOs, and other local stakeholders can be

[4] During programme inception, GIZ's standard case management framework will be contextualised for the institutional, linguistic and social conditions of each participating country. A programme-specific GRM procedure and corresponding flowchart will be finalised and disclosed before the commencement of GCF funded activities.

	processed efficiently and constructively. The goal is to resolve grievances amicably and to minimize legal system use.
	• To operate distinct protocols for:
	  ○ Grievances related to SEAH (see sub-section 'SEAH-related grievances' below), and
	  ○ Grievances related to customary communities
	• To offer individuals and community groups a way to express their grievances and problems rationally and transparently and demonstrate the important role of stakeholders in programme design and implementation.
	• To institutionalise a reporting system to take corrective action.
	• To establish a transparent relationship based on mutual respect with the communities and other local stakeholders.
	• To establish programme responsibility regarding grievances and set a course of action to manage the grievances promptly
	• Guarantee the linkage/feeding-in of grievances into the M&E system

Action Instructions/ Descriptions:	The programme will ensure stakeholders are well-informed about how to access and use the GRM. Information about the GRM (procedures, contact points and rights of complainants) will be distributed at all inception workshops and community meetings and in local languages. **GRM access and submission** Grievances may be submitted anonymously. Anonymous submissions will be recorded and investigated; however, feedback cannot be provided to the complainant where contact details are not available. Multiple channels will be available for the submission of grievances. The channels available for submitting grievances are: • In person: stakeholders can submit a complaint verbally or in writing to programme facilitators during consultations or by visiting the programme's local offices. Community facilitators and local NGO partners will be trained to receive and log complaints during their routine interactions with communities. • Telephone hotline: a telephone number will be established in each country (or a central regional hotline with multiple language options) where complainants can call or send text/voice messages. This line will be staffed part-time or connected to voicemail to record grievances. • Email and web: an email address and an online platform (or a section of GIZ's programme webpage) will allow stakeholders to submit grievances electronically. This can be useful for NGOs or stakeholders comfortable with digital communication. **Grievance receipt and registration** All grievances received will be formally recorded in a grievance register (database). A dedicated safeguards officer in the programme team (or within each EE) will be responsible for logging each complaint with details such as date, complainant (if known), complaint summary, and the channel received. Each complaint will be assigned an identification number, and its status will be tracked through resolution. This tracking system will ensure traceability of complaints and accountability for follow-up. **Grievance categorisation** Grievances can take many forms such as complaints, claims, denunciations or suggestions. Possible grievance categories are as follows:

Category	Characteristics
Category 1: Grievance	An expression of dissatisfaction related to:

	• the quality and non-conformity of the services provided by the programme and its staff • the effects or impacts of programme activities on the socio-economic environment of beneficiaries • alleged violations of human rights
Category 2: Claim	A statement indicating that planned actions or programme activities are considered non-compliant with applicable standards, procedures or agreed arrangements, including non-compliance with procurement procedures.
Category 3: Whistleblowing	Reports of suspected misconduct, including but not limited to: • Corruption and bribery • Misappropriation, fraud, and embezzlement • Conflict of interest • Sexual misconduct (harassment) and sexual exploitation • Violations of human rights • Violations of environment-related obligations (violations of environmental law).

Grievance resolution
The GRM will follow a structured process to receive, assess and resolve grievances, as outlined below:

Steps	Details
Step 1: Filing	The GRM may be accessed through multiple channels, including telephone, messaging services, post or in person submission. Grievances may be submitted anonymously. Grievances may be submitted verbally or in writing.
Step 2: Triage	Registered grievances will be screened and assessed by the safeguard specialists or advisor(s). Depending on the nature and complexity of the grievance, the safeguard specialist will ensure coordination and engage with the PMU. Grievances that go beyond the remit of the safeguard specialist (gender-based violence, SEAH, corruption, etc.) will be forwarded to relevant competent bodies
Step 3a: Resolution	Resolution through dialogue, negotiation or mediation will be pursued as the preferred approach. Recourse to the courts is made as a last resort when no agreement is reached or no solution satisfactory to both parties concerned is found. Once agreements have been reached between the parties involved, the file will be closed by the safeguard specialist. The safeguards specialist will ensure formal communication of the outcome to the complainant
Step 3b: Severity or dissent	In cases of extreme severity or where an agreement cannot be reached, Compliance and Integrity Advisory Services at

	GIZ Headquarters should be contacted first, followed by GCF as the next escalation point*.
Step 4: Monitoring, tracking and consolidation of data	In line with European Union's General Data Protection Regulation and applicable national legislation (s): • the programme GRM will have a register for the collection of grievances. This system will be used to collect both written and verbal complaints. • the database will support the tracking and traceability of grievances and the documentation of grievance resolution measures implemented at programme and national levels. • GRM resolution will be part of the M&E system. A KPI will be set to monitor efficient GRM implementation. The KPI is zero open grievances after the set grievance resolution time.

*Contact information:
GIZ Compliance and Integrity Advisory Services: compliance-mailbox@giz.de
GIZ whistleblower portal: https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=26zig7&c=-1&language=eng.
GCF Independence Redress Mechanism, https://irm.greenclimate.fund/.

3.3.1 SEAH- specific survivor-centred reporting and response procedure [5]

Background

GIZ pursues a zero-tolerance policy towards any form of sexual exploitation, abuse and harassment. This commitment is in line with legal and policy frameworks at international[6], national, GIZ corporate[7], and GCF level[8].

SEAH-related grievances follow a different process, as they have the potential to be qualitatively different and potentially more serious than non-SEAH grievances. There may be:

- Potential conflicts of interest: the complaint may relate to the behaviour of a programme stakeholder who might be involved in the consideration of grievances.
- Privacy: a complainant making serious allegations of sexual harassment or abuse may not wish his/her identity to be widely known.
- Gender and cultural sensitivity: a complainant, particularly if traumatized, may wish to discuss a grievance only with someone of their own gender or in a culturally acceptable context.

Accordingly, the programme's GRM incorporates a survivor-centered and gender-responsive protocol for SEAH-related grievances.

Distinct SEAH protocol are to be followed depending on the grievant:

- Programme stakeholders, including beneficiaries, communities, etc.

[5] Note, additional measures to avoid SEAH are outlined in the Programme's Gender Action Plan within Annex 10a.

[6] Universal Declaration of Human Rights, the Convention on the Elimination of All Forms of Discrimination against Women and International Labour Organization (ILO) Conventions: 100 (ILO Convention for Equal Remuneration for Men and Women for Work), 111 (The Discrimination (Employment and Occupation) Convention of 1958), 190 (The Violence and Harassment Convention of 2019).

[7] GIZ Code of Ethics, GIZ Code of Conduct, GIZ Policy of prohibiting sexual harassment and sexual misconduct, GIZ Corporate Gender Strategy, GIZ Diversity Code.

[8] GCF Revised Environmental and Social Policy.

- GIZ staff.

SEAH grievance redress protocol for programme stakeholders

SEAH-related feedback and grievances can be submitted by the same groups that are served under the programme-specific GRM, i.e., individuals or entities directly impacted by the programme, including potential beneficiaries, stakeholders with a vested interest in the programme, and residents or communities influenced by programme activities.

A specific SEAH-protocol will be developed for the GRM to ensure grievances are handled in a survivor-centred and gender-responsive way, in alignment with GCF's Revised Environmental and Social Policy. For handling SEAH-related grievances, individuals will be encouraged to use a dedicated programme phone number and dedicated programme e-mail address distinct from the general GRM contact details. Comprehensive guidance on the SEAH protocol within the GRM will be made available on the programme website and within programme literature, including leaflets and workshop materials.

In case of SEAH-related grievance is inadvertently submitted through non-SEAH channels the responsible Advisor on ESS and Gender will ensure that they are redirected to the SEAH-related grievance track. SEAH-related phone calls and e-mails will be managed separately and distinct from non-SEAH grievances.

SEAH-related grievances will always be considered with compassion, sensitivity and confidentiality. The ESS specialist on social issues will customize a response approach for each SEAH grievance, considering the nature and seriousness of the allegations. If necessary (due to gender or linguistic reasons), a Grievance Focal Point (GFP) will be appointed, adhering to strict confidentiality requirements. The GFP will establish contact with the complainant to understand their preferences and ensure a confidential approach. Based on the details provided, a tailored response approach will be devised, in line with the complainant's wishes and the severity of the grievance.

Possible programme responses to SEAH grievances are diverse and context specific. Examples of responses could, conceivably, include actions such as support to survivors (such as psycho-social support or medical care), education of trainers on gender- and SEAH-related topics to ensure inappropriate behaviour is not repeated; removal of personnel from programme roles, expanded SEAH awareness-raising among programme stakeholders; women-only or ethnic group-only (as appropriate) training workshops, or, in extreme cases, referral of grievances to relevant regulatory or law enforcement authorities.

Should the complainant remain dissatisfied with the proposed actions or the response approach, the grievance can be further escalated to: (i) the respective GIZ Country Office or the Compliance and Integrity Advisory Services of GIZ Headquarters; (ii) the GCF Independent Redress Mechanism; and (iii) legal and administrative remedies outside the programme framework that are available in country.

SEAH grievance redress protocol for GIZ staff

Employees of GIZ country offices who feel that s/he is being sexually harassed are encouraged to reach out to the Risk Management Office (RMO) or the Country Director directly to ensure discretion and confidentiality.

In addition, appointed 'trustees' are put in place as persons of trust with knowledge of the local cultural contexts and the local languages, to whom a staff subject to sexual harassment can confide in and seek support from, and help to report the incident to the RMO or Country Director whenever further urgent action and decisions are required.

An employee who has been found guilty of having breached this policy will be subject to appropriate disciplinary action in accordance with the applicable GIZ internal regulations and the applicable law.

Depending on the severity of the case, consequences may include an apology to the person subjected to sexual harassment, a written reprimand, demotion, dismissal, or unilateral termination of the contract without notice, in accordance with applicable law. In cases of severe or pervasive harassment, the conduct will be assessed from the perspective of a reasonable person. Immediate disciplinary action will be taken against anyone who victimizes or retaliates against a person who has complained of harassment.

If a complaint against non-staff members, including customers, suppliers and partners is rightfully upheld, it could result in termination of a contract, suspension of service or business cooperation. It is also considered a violation of this policy for anyone to make a knowingly false complaint or report of harassment, or to knowingly provide false information regarding a harassment complaint or report.

3.4 Whistleblowing

GIZ provides various reporting channels for whistleblowers (see the GIZ website for more information):

- The online whistleblower portal can be used at any time of day, anywhere in the world, and is available in several languages. It can be used to anonymously report suspected infringements and to communicate in accordance with the highest security standards, without being required to provide an email address or telephone number. Link to the online whistleblower portal: https://www.giz.de/tell-us
- Violations of laws and regulations related to GIZ's work can also be reported to Compliance and Integrity Advisory Services by email: Compliance-mailbox@giz.de
- Information or complaints concerning discrimination and sexual misconduct can be reported in confidence to stop-it@giz.de.
- An external ombudsman is available as a point of contact outside the company. He has a duty of confidentiality vis-à-vis the company by virtue of his role as a lawyer and collects confidential evidence of compliance infringements.

GIZ's Compliance and Integrity Unit[9] investigates all reports of violations of the Code of Conduct, Discrimination, Sexual Misconduct, work harassment (bullying) or serious compliance violations. It ensures that all reports are followed up, including the response, with appropriate consequences.

The protection of whistleblowers and victims is a high priority[10] and GIZ ensures it through a system built around anonymous reporting, confidentiality, independent contact points, non-retaliation commitments, low-threshold access, a central case-management process[11], dedicated sexual-misconduct complaint channels, and survivor-centred and gender-responsive grievance handling in programme contexts.

3.5 Capacity building and training needs

[9] See URL: Compliance | GIZ (last visited on 24.02.2026)https://www.giz.de/en/downloads/Code of ethics.pdf.

[10] See URL: https://www.giz.de/en/downloads/Code%20of%20ethics.pdf (last visited on 24.04.2026).

[11] See URL: Case Management Process Unit Governance, Risk, Compliance (GRC, 0C00) for reports, notifications, human rights complaints and requests for advice. (last visited on 27.06.2026)

Trainings for the representatives of EEs, the PMU and programme staff will be conducted.

The overall goal of ESS capacity building is to ensure that all relevant programme stakeholders have the knowledge and skills required to effectively apply the GCF Environmental and Social Safeguards throughout programme implementation. This includes strengthening understanding of the programme's ESS-MS, including the ESIA, ESMP, SEP, and GRM. Training needs will be assessed during implementation, and targeted training will be provided as required to ensure that E&S risks, impacts, stakeholder engagement requirements, and grievance management procedures are adequately understood, implemented, monitored, and reported.

The programme will establish a knowledge management system and develop capacity at all levels, i.e., individual, institutional, and networks, particularly at regional and local level. As part of the monitoring activities, safeguards data must be collected, analysed, and reported. This will enable identification of additional training needs where necessary.

Table 4: ESS capacity building approach

Objective:	To ensure EEs, NDAs, PMU, including district government staff and relevant stakeholders, effectively understand the programme requirements related to compliance with ESS 1 – 8. The content of trainings should include principles, requirements, and implementation of applicable safeguards.
Action Instructions/ Descriptions:	The ESS Team will develop plans and materials in relation to capacity building for ESMP implementation and integration during the programme duration. The ESS Team will carry out: • Training Needs Assessments (TNAs) • Development of capacity building schedules, including: • Identification of trainings' participants/targeted audiences (based on the results of TNA) such as NDAs, EEs, programme partners, extension services and beneficiaries. o Identification of number of workshops, locations, and estimated duration for training. • Development of capacity building materials, particularly at the regional and local level. The contents of the materials will address the safeguards requirements applicable to the programme and enable the application and reporting. • Delivery of trainings to relevant training audiences or target groups. • Evaluation of ESS trainings based on analysis of safeguards implementation reports and overall implementation monitoring. Insufficient know-how on understanding the implications of the E&S safeguards, their implementation, monitoring and continuous improvement is a risk for the success of the programme. Preventive Measures: • Ensuring TNA conducted including the capacity building schedules provided. • Ensuring ESS trainings delivered to target audiences • Ensuring representation of target audiences participated in the ESS trainings. Training content: • GCF's Environmental and Social Policy and ESS Standards • General overview on the ESIA for the programme • Audience-targeted ESMP measures

	• Stakeholder engagement plan • Grievance Mechanism Timing: • Prior to programme start: o Recruitment of a qualified training specialist (one per country) o Recruitment of ESS specialists (see sub-chapter 3.1 above) • During inception phase (within Year 1): o Training Need Assessment o Capacity Building Plan and Schedule o Workshops (Introduction of ESS trainings to targeted audiences) o Delivery of Trainings to targeted audiences o Capacity Building Report (training implementation and evaluation report) • During Programme Implementation: o Capacity building report will be reviewed on an annual basis. o Additional ESS trainings might be conducted if the capacity of relevant stakeholders need to be improved. The training will be based on the result of the review and spot checks. o Monitoring and evaluation of the implementation of the ESMP requirements

3.6 Programme ESS monitoring and reporting system

Compliance with the ESS and progress in implementing the ESMP will be monitored through annual Results-Based Monitoring (RbM) workshops, as well as through the ESS-MS system itself. Each measure will be assessed to determine whether implementation is progressing according to the plan, for example whether it is delayed, on track, or ahead of schedule. Where delays occur, the reasons must be documented and appropriate corrective actions proposed.

In addition to tracking implementation progress, the programme will monitor the effectiveness of the risk mitigation measures. If certain risk mitigation measures prove unfeasible or ineffective, they should be revised accordingly. Additional monitoring activities and indicators may be established where needed.

Aggregated and anonymised information on SEAH prevention and mitigation measures will be included in the programme's environmental and social monitoring reports. These reports will form part of the annual ESMP progress reporting and will be shared with the Programme Management Unit (PMU), while ensuring that survivor confidentiality is strictly maintained. As outlined in the GAP (Annex 10a), measurable indicators have been included to support the monitoring of SEAH mitigation measures. These include inter alia the number of workers trained on SEAH prevention, the number of awareness sessions conducted, and the functionality of referral pathways to relevant service providers.

SEAH incidents reported through the programme's GRM will be handled in accordance with the survivor-centred procedures outlined in the Stakeholder Engagement Plan. These procedures ensure confidential reporting channels, safe and ethical documentation of cases, and referral to appropriate medical, psychosocial, and legal support services where needed.

The programme will assess the effectiveness of mitigation measures through observations, submitted grievances, and stakeholder consultations. Synergies with the programme's overall monitoring plan will be used wherever possible, including relevant indicators that can help assess the effectiveness of mitigation measures. Annual monitoring should also identify any additional environmental or social risks that may have emerged since the start of the programme

and establish appropriate mitigation measures for any significant new risks. These additional risks and any corresponding mitigation measures will be incorporated into the ESMP and reported as part of the annual performance report (APR).

Annual ESMP progress will be reviewed by the GCF Oversight Unit of GIZ as part of the systematic risk dialogue and periodic programme supervision missions. Overall, E&S monitoring and reporting are integrated into the programme's general monitoring and management approach.

3.7 Environmental and Social Management Plan (ESMP)

The table below provides the E&S risk mitigation measures and organizational responsibilities for implementation.

Table 5: ESMP

#	Programme (sub-)activity	Mitigation measure	Responsibility	Resources
ESS 1. Environmental and social risks (risk rating: medium) • Cross-cutting risks across all components: labour rights concerns, SEAH, weak stakeholder engagement, weak oversight and monitoring of benefit distribution, and limited institutional capacity to monitor, report, and manage environmental and social risks. • Component 2 specific risks: soil degradation, biodiversity loss, and water overuse, with potential maladaptation risks, alongside SEAH in community interactions, elite capture in beneficiary selection, and exclusion of women from planning processes.				
1.1	Crosscutting (all activities)	Recruit one ESS advisor in each country to oversee environmental, social and gender performance during implementation Recruit one social and gender ESS specialist and one environmental ESS specialist for each PMU to oversee performance during implementation Operationalise: • ESMP to manage potential risks and establish a programme Grievance Mechanism (GRM) to handle complaints. • GAP and ensure that the GRM[12] is gender-responsive, train programme staff and launch awareness campaigns on SEAH avoidance. • SEP to ensure meaningful, locally adapted, and gender-responsive engagement with stakeholders.	GIZ MoWRAPI, ARIS, CIIP, NCECC GIZ, MoWRAPI, ARIS, CIIP, NCECC	1 GIZ ESS regional advisor 1 GIZ M&E regional advisor 1 GIZ ESS / M&E advisor per country KG, 1-2 ESS specialists per EE in each country
1.2	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3	Support and fund the implementation of promoted CRLE technologies and practices, ensuring alignment with the programme's risk category and compliance with the ESIA and ESMP.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists Technical advisory & extension staff involved: training and consultancy costs included in activities 2.2.1, 2.2.2, 2.3.1 budgets.
1.3	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 3.3.2	Apply the mandatory SEAH sub-project screening[13] before approval of a sub-project. Identify and incorporate risk-proportionate measures.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists

[12] Please refer to Annex 1 of the ESIA (Annex 7a) for guidelines on developing a GRM, including a protocol for addressing SEAH issues.

[13] The detailed screening procedure, including risk rating and mitigation measures, will be formally agreed and finalised by the programme's ESS experts during the programme inception.

ESS 2. Labour and working conditions (risk rating: medium) • Crosscutting risks across all components: programme implementation could unintentionally contribute to labour rights violations and SEAH. • Component 2 specific risks: activities involving labour-intensive tasks may expose beneficiaries and/or workers to unsafe working conditions, unfair wages, labour rights violatons and risks of forced or child labour, especially during peak agricultural seasons; training and capacity-building activities may also increase exposure to SEAH.				
2.1	Crosscutting (all activities)	Implement: • Gender-responsive GRM to facilitate the timely reporting of complaints and concerns, including conflicts between employees and employers. • GAP, which includes dedicated measures for SEAH risks such as SEAH awareness measures, a survivor-centred and gender-responsive GRM, equipped to handle SEAH issues.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists Staff: EUR 250,000 Training/workshops: EUR 200,000 allocation.
2.2	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3	Cover information on child labour and forced labour implications during ESS training.	EE: MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists Technical advisory & extension staff involved: training and consultancy costs included in 2.2.1, 2.2.2, 2.3.1 budgets.
2.3	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3	Provide training on good occupational health and safety (OHS) practices as necessary. Training topics might be specific to eligible measures but are likely to include provision and proper use of PPE, manual handing, safe installation and operation, development of safe operating procedures, safe use of machinery, safe use of agrochemicals and integrated pest management (IPM).	MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists Technical advisory & extension staff involved: training and consultancy costs included in 2.2.1, 2.2.2, 2.3.1 budgets.
2.4	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3	Carry out risk assessments, document and implement any safety improvements or training requirements to prevent accidents for measures involving use of agricultural or forestry machinery.	MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists Training and consultancy costs included in 2.2.1, 2.2.2, and 2.3.1 budgets.
ESS3. Resource efficiency and pollution prevention (risk rating: medium) Component 2 and 3: • Pollution and infrastructure risk: poor waste and pollution control systems could cause localized pollution from programme activities. • Water resource risk: limited and inefficiently used water resources, especially in Uzbekistan, could increase competition for scarce water resources. • Energy supply risk: aging, vulnerable electricity infrastructure means programme activities could increase demand and divert power from other users.				
3.1	Activity 2.2.1 Activity 2.3.1 Activity 2.3.3	Provide capacity building and training on: • CRLE land use practices for farmers, partners, and extension staff, and conduct training on integrated weed management to reduce the dependence on herbicides. • Good environmental practices (e.g., product selection, storage, handling and disposal) related to environmentally safe agro-chemicals such as seed treatment agents and mineral fertilizers. • Crop rotation based on locally adapted, non-invasive varieties and climate appropriate rotation planning to prevent from increase in fertilizer and irrigation demand.	MoWRAPI, CIIP, NCECC	Technical advisory & extension staff involved: training and consultancy costs included in 2.2.1 and 2.3.1 budgets.

		• Sustainable composting of biodegradable waste, mulch use and waste prevention (where appropriate) • Resource efficiency, pollution prevention, and best practices, with a focus on water, energy, and waste management at local level (for implementing partners, contractors and local authorities).		
3.2	Activity 2.2.1	Promote crop and soil covering practices based on locally appropriate organic materials, non-invasive cover species, and proper residue management to avoid moisture competition, pest harbouring and waste generation	EE: MoWRAPI, CIIP, NCECC	Consultancy and material costs included in 2.2.1 budget.
3.3	Activity 2.2.1 Activity 2.3.1	Ensure the use of, or provision of, durable materials for protective structures, as appropriate (e.g. anti-hail, insect-proof, and shade nets), and provide capacity building on their proper use, storage, and take-back, recycling, or disposal options to reduce waste volumes and impacts and apply the same measures to nursery management.	EE: MoWRAPI, CIIP, NCECC	Consultancy and material costs included in 2.2.1 and 2.3.1 budgets.
3.4	Activity 2.2.1	Optimize water use through professional technical design of water retention and distribution structures, and through construction, maintenance, and standard training related to forest improvements and tree plantations, where programme interventions are planned and appropriate	MoWRAPI, CIIP, NCECC	GIZ civil engineer (1 per country) & Executing Entities' specialists Training, consultancy, and material costs included in 2.2.1 budget
3.5	Activity 2.2.1 Activity 2.3.1 Activity 2.3.3	Require irrigation-related investments to verify water availability in collaboration with Water Users Associations to ensure equitable distribution to all users.	MoWRAPI, CIIP, NCECC	GIZ civil engineer (1 per country) & Executing Entities' specialists Consultancy and material costs included in 2.2.1, 2.3.1, and 2.3.3 budgets.
3.6	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3	Ensure avoidance or minimisation of hazardous materials in all programme activities, prohibit the procurement of banned substances, and comply with applicable national regulations on chemicals, fuels, and waste management.	MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS, procurement, and M&E advisors and specialists.
3.7	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Apply E&S screening tool for potential sub-projects to ensure compliance and robust management.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists Staff costs included in Executing Entities' budgets.
3.8	Activity 2.3.1 Activity 2.3.3	Support lower-cost, labour-saving, and water-efficient technologies for female farmers, considering that women often manage smaller plots with limited access to machinery, in order to improve resource efficiency and reduce environmental and social vulnerability simultaneously.	MoWRAPI, CIIP, NCECC	Consultancy and material costs included in 2.3.1 and 2.3.3 budgets.
ESS 4. Community health and safety (risk rating: medium) Component 2 and 3: • Community health and safety risks: irrigation and construction activities may result in water- and vector-borne disease risks, as well as unsafe use of mineral fertilisers or crop protectants, inadequate waste management, and traffic- or equipment-related incidents.				

• Social risks: tensions over competition for programme resources and disputes linked to misappropriation or theft at beneficiary level, with pest outbreaks potentially compounding livelihood stress and social vulnerability. • Protection and accountability risks: SEAH in training and partner interactions, alongside restricted civic space that may constrain safe and effective grievance reporting.				
4.1	Activity 2.3.1	Prohibit the direct procurement and provision of chemical plant protection products. The programme will not support any purchase of pesticides, herbicides, and synthetic fertilisers. In addition, provide training on safe farming methods and integrated IPM principles to reduce reliance on agrochemicals, including raising awareness on safe use, handling, storage, and disposal of mineral fertilisers, as well as on the potential health and environmental impacts associated with their misuse.	MoWRAPI, CIIP, NCECC	Executing Entities' ESS, procurement, and M&E advisors and specialists. Training and consultancy costs are included in 2.2.1 and 2.3.1 budgets.
4.2	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Ensure all sub-project and beneficiary selection processes are transparent, inclusive, and widely communicated through clear eligibility criteria, open community consultations, and public outreach, with specific measures to include vulnerable groups and prevent SEAH risks in the selection of beneficiaries and participants in community-facing activities.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists. Outreach and consultancy costs included in 2.2.1, 2.2.2, 2.3.1, and 3.3.2 budgets.
4.3	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Ensure all construction activities comply with strict safety standards by maintaining controlled access to work sites, installing clear and visible signage, and providing timely notification to the community before works commence.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	GIZ civil engineer (1 per country) & Executing Entities' specialists Consultancy and material costs included in 2.2.1, 2.2.2, 2.3.1, and 3.3.2 budgets.
4.4	Activity 2.1.2 Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Conduct programme engagements, involving trusted and respected national and local intermediaries, with clear and transparent communication maintained with participating households. Provide any necessary logistical support, including safe transport and suitable accommodation for multi-day training, particularly to enable safe, equitable, and inclusive participation of women.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists. Workshop and consultancy costs are included in 2.1.2, 2.2.1, 2.2.2, 2.3.1, 3.3.2 budgets.
4.5	Activity 2.2.2	Establish and enforce a grazing schedule in coordination with pasture management institutions, using participatory planning and community-based monitoring of vegetation recovery where appropriate, while managing risks linked to access to remote underused pastures through transparent communication and the GRM to minimize potential community disputes.	MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and technical specialists. Workshop and consultancy costs are included in 2.2.2 budget.
ESS 5. Land acquisition, restrictions on land use and involuntary resettlement (risk rating: low) Component 2 and 3: • Temporary access restrictions: minor, temporary restrictions on access to grazing or farming land may occur and grazing patterns may be affected by reforestation or pasture closure; all land use will be voluntary, with no displacement or resettlement. • Perceived unfairness and exclusion: perceptions of unfairness may occur due to poor communication and women may face barriers to finance where land titles are held by male relatives.				
5.1	Activity 2.2.2 Activity 3.3.2	Prohibit involuntary land acquisition and any activities involving physical displacement and ensure that any small subprojects requiring land use only land voluntarily made available by willing owners through a site-specific	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists.

		Voluntary Land Contribution Procedure[14]. Mitigate minor economic impacts, if occurred, through fair procedures as per national laws.		Consultancy costs are included in 2.2.2 and 3.3.2 budgets
5.2	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Provide tailored financial literacy training and targeted outreach to women managing smaller plots to reduce their potential exclusion from larger investment opportunities and to promote equitable access.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Training, technical advisory and extension staff costs are included in 2.2.1, 2.2.2, 2.3.1, 3.3.2 budgets.
ESS 6. Biodiversity conservation and sustainable management of living natural resources (risk rating: medium) Component 2 and 3: • Natural and critical habitats: field-level interventions could generate indirect or induced impacts on biodiversity-sensitive areas, including natural habitats, protected areas, KBAs, and potentially critical habitats, if not properly planned and implemented. • Biodiversity pressure and species risk: habitat degradation and fragmentation from agricultural expansion, increased pressure on protected areas and threatened species, introduction of invasive or non-native species such as Acacia windbreaks, and potential impacts on the critically endangered Fergana Even-toed Gecko (Alsophylax ferganensis) near Shorsu village, Uzbekistan.				
6.1	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Implement a structured capacity-building and awareness program for beneficiaries that combines knowledge exchange, targeted training, field-based guidance, and extension support on biodiversity-sensitive AFOLU practices.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Training, technical advisory and extension staff costs are included in 2.2.1, 2.2.2, 2.3.1, 3.3.2 budgets.
6.2	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Assess biodiversity risks during E&S screening for any field-level interventions involving land-use measures near sensitive habitats or protected areas, using available tools and data, including IBAT where appropriate, and require additional mitigation measures when risks are identified.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists. Consultancy costs are included in 2.2.1, 2.2.2, 2.3.1, 2.3.3, and 3.3.2 budgets.
6.3	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Roll out the programme exclusion list[15], particularly, for financing for activities causing critical habitat conversion or degradation, significant impacts on CR/EN species, or unauthorized actions in protected areas, and require all supported practices to use locally adapted, native, or non-invasive species.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists. Staff costs are included in the Executing Entities' budgets.
ESS 8. Cultural heritage (risk rating: low) Component 2 and 3: • Risk of inadvertent disturbance of previously unknown archaeological remains or damage to sacred sites, burial grounds, and other culturally significant features during small-scale earthworks, including possible temporary access restrictions and related community concerns.				
8.1	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3	Ensure screening and avoidance of culturally sensitive areas during planning and site selection by consulting local authorities, community representatives, and affected communities, with explicit questions on the presence of sacred	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists.

[14] This procedure, including verification of land rights, will be formally agreed and finalised during the programme inception.

[15] The programme's exclusion list can be found in Appendix 1.

	Activity 3.3.2	sites, burial grounds, archaeological remains, and other culturally important features. Exclude any known sites from field-level intervention.		Consultancy costs are included in 2.2.1, 2.2.2, 2.3.1, 2.3.3, and 3.3.2 budgets.
8.2	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Apply the Chance Finds Procedure to all ground-disturbing activities. If any archaeological or cultural remains are encountered, stop works immediately, secure the site, notify the responsible national authority, and resume works only after official clearance.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists. Material and consultancy costs are included in 2.2.1, 2.2.2, 2.3.1, and 3.3.2 budgets.
8.3	Activity 2.2.1 Activity 2.2.2 Activity 2.3.1 Activity 2.3.3 Activity 3.3.2	Train and brief all contractors, local partners, and community workers before works begin on cultural heritage sensitivities, site-specific risks, and the required chance finds response procedures.	GIZ, MoWRAPI, ARIS, CIIP, NCECC	Executing Entities' ESS and M&E advisors and specialists. Training and consultancy costs are included in 2.2.1, 2.2.2, 2.3.1, and 3.3.2 budgets.

The table below provides mitigation measures based on ESIA results (sub-project level):

Table 6: Sub-project mitigation measures

Sub-project activity incl. activity code	GCF ESS category as per ESIA[16]	Mitigation measure	Responsible Executing Entity
Improved plant nutrition and pest management Activity 2.3.1	B	• OHS risks will be avoided through required PPE, training and proper labelling. • Biodiversity and potential pollution risks remain site-specific and reversible with IPM principles, product selection and timing to avoid non-target impacts, and awareness raising and training on storage rules and container management. • Community exposure will be prevented through buffer zones, notification, and application controls.	MoWRAPI, CIIP, NCECC
Assisted natural regeneration and restoration Activity 2.2.1 Activity 2.2.2 Activity 3.3.2	B	• Potential labour risks in field operations will be minimised through safe operating procedures and training. • Community impacts are site-specific and will be avoided through participatory, inclusive planning under sub-activities 2.2.1.3 and 2.2.2.3, transparent communication, and GRM. • The programme will not support any involuntary land acquisition which will be strictly excluded from investment. • Potential economic displacement risk due to temporary exclusion will be managed in line with national policies, with appropriate compensation and consultation processes aligned with national law, supported by the programme's GRM.	GIZ, MoWRAPI, ARIS, CIIP, NCECC

[16] Mandatory for all activities assessed as ESS category B.

		• Biodiversity outcomes are expected to be net positive as the programme will support native a/o site-appropriate species for restoration.	
Improved access to remote, under-used pastures Activity 2.2.2	B	• OHS risks will be minimised through safe operating procedures and training including PPE provision to workers. • Improved access roads will be limited to small-scale bridget to avoid habitat disturbance. • Potential pasture user conflicts will be avoided through participatory planning with pasture users and joint pasture management plans under sub-activity 2.2.2.3.	GIZ, ARIS, CIIP, NCECC
Improved access to water in under-grazed distant pastures Activity 2.2.2	B	• OHS risks are site-specific and will be minimised through safe operating procedures, training and worksite controls. • Pollution and waste risks are localised and will be managed through standard construction and transport management. • Potential community risk and disputes will be avoided through participatory, inclusive planning under sub-activities 2.2.2.3, transparent communication, and GRM.	GIZ, ARIS, CIIP, NCECC

Appendix 1. Exclusion list

The programme must not involve, support, finance, or be associated with any of the following activities, including those falling under the IFC Exclusion list:

- Forms of forced labour, or harmful or exploitative forms of child labour.
- Activities deemed illegal under host country laws or regulations, international conventions and agreements, or subject to international phase-out bans.
- Production of or trade in products containing PCBs.
- Purchase, production of or trade in pharmaceuticals, pesticides, herbicides, or other hazardous substances subject to international phase-outs or bans, including under the Rotterdam Convention and Stockholm Convention.
- Production of or trade in ozone-depleting substances subject to international phase-out under the Montreal Protocol.
- Trade in wildlife or wildlife products regulated under the CITES Convention.
- Transboundary movement of waste prohibited under international law, including under the Basel Convention, exCIIPt for non-hazardous waste destined for recycling.
- Activities prohibited by host country legislation or international conventions relating to the protection of biodiversity resources or cultural heritage.
- Production of, trade in, or use of unbonded asbestos fibres or asbestos-containing products.
- Weapons and munitions.
- Sex work and related infrastructure and services.
- Gambling and related equipment.
- Tobacco production, processing, and distribution.
- Alcohol production, processing, and distribution involving hard liquor.
- Production of or trade in radioactive materials, excluding certain medical and measurement equipment where the radioactive source is trivial or adequately shielded.
- Investments in the search, extraction, production, distribution, processing, or promotion of fossil fuels, including coal, oil, natural gas, and peat.
- Activities that increase the use of fossil fuels and/or prolong the technical or economic lifetime of heat and power production using fossil fuels, exCIIPt for limited back-up generation, household cooking purposes, or processes where feasible alternatives do not exist.
- Biofuel projects meeting any of the following conditions:
    - Based on feedstock grown on land with high carbon content or biodiversity value, including rainforests, wetlands, peat lands, grasslands, reserves, protected lands, or lands with high conservation value.
    - Using feedstock for liquid biofuels where higher climate or development benefits would occur if the feedstock were used unprocessed, such as direct combustion in a co-generation plant.
    - Using solid biomass fuels from forests, whether planted or natural, with a carbon cycle incompatible with the Paris Agreement.
    - First-generation biofuel projects with a production area over 75 hectares.
- Commercial logging operations, or the purchase of logging equipment for use in primary forests or old-growth forests.
- Production of or trade in wood or other forestry products other than from sustainably managed forests

Appendix 2. Chance Finds Procedure

The objective of the Chance Finds Procedure is (a) to protect cultural heritage from adverse impacts of programme activities and support its preservation, and (b) to ensure any discovery of any previously unknown cultural heritage site (e.g. archeological sites, historical sites, remains and objects) are reported on and investigated to ensure no adverse impacts to cultural heritage occur as a result of the programme.

This procedure outlines what will happen if these chance finds are encountered during programme implementation, and how they will be managed.

This procedure applies to all programme personnel, executing entities, implementing partners, contractors and beneficiaries undertaking excavation, trenching, drilling, vegetation clearance, demolition, earthmoving or other activities that may disturb the ground. It shall be incorporated into relevant contracts and explained to workers during induction.

A **chance find** is any previously unknown object, structure, site, burial, human remains, fossil or natural feature that may have archaeological, palaeontological, historical, religious, sacred or other cultural significance.

If a suspected chance find is encountered:

1. **Stop work:** All activities shall cease immediately within the vicinity of the find. Machinery shall be switched off and the find shall not be touched, moved, cleaned, collected or otherwise disturbed.
2. **Protect the site:** Establish an appropriate exclusion zone, restrict access and protect the find from damage, theft, weather exposure or unauthorised removal. The find shall remain in situ.
3. **Notify and document:** Immediately inform the ESS Expert of the Executing Entity. The ESS Expert shall record the date, location, coordinates, description, photographs where appropriate, protective measures taken and persons notified, and shall inform the competent cultural heritage authority within the period required by national law.
4. **Assess the find:** A qualified cultural heritage professional and the competent authority shall assess the significance of the find and determine the required measures. Relevant affected communities, traditional custodians (Indigenous Peoples' representatives, if applicable) shall be consulted where the find may have cultural, spiritual or customary significance.
5. **Special treatment of human remains:** Human remains shall be treated respectfully and shall not be moved. The competent heritage authority and, where required, the police, coroner or other responsible authority shall be notified immediately. Management shall follow national law and relevant cultural and religious customs.
6. **Determine management measures:** Avoidance and preservation in situ shall be prioritised. Where avoidance is not feasible, measures such as redesign, establishment of a protective buffer, controlled investigation, documentation, conservation or lawful removal may be implemented only by qualified professionals and with approval from the competent authority.
7. **Resume work:** Work within the exclusion zone may resume only after the competent authority has issued its instructions, all required measures have been completed, and written clearance has been provided by the ESS Expert.

All chance finds, decisions, consultations, measures and clearances shall be maintained in a **Chance Finds Register** and reported through the programme's environmental and social monitoring system. Failure to comply with this procedure shall constitute a contractual non-compliance and shall be subject to immediate corrective action.