



Environmental & Social Management System





1. Environmental And Social Management Policy

1.1 Mission

Alliance for a Green Revolution in Africa (AGRA) recognises environmental and social (E&S) risk management as a critical issue that requires systems to monitor and control in line with legal and applicable international requirements in its operational sectors. This E&S Policy delineates AGRA's vision and commitment to sustainable development and how it is fully integrated into AGRA's core business processes and lays the foundation of the environmental and social management system (ESMS) that is put in practice.

1.2 Goal

AGRA is committed to promote sustainable agricultural practices in its focus countries. As an environmentally informed and socially responsible organisation, AGRA is committed to avoid or mitigate adverse E&S impacts, if any, of its interventions.

AGRA is committed in promoting the use of an appropriate ESMS in order to improve the management of the E&S implications of all of its funded projects and activities.

1.3 Guiding principles

In implementing this E&S Policy, AGRA shall adhere to a set of guiding principles as listed below:

- Avoid, reduce or limit negative environmental, social and climate impacts and improve the E&S benefits of its initiatives;
- Support the preservation and protection of biodiversity and sustainably manage natural resources;
- Avoid negative impacts on the living conditions, livelihoods and land tenure of communities;
- Ensure the health and safety at work of its own employees and require its subcontractors and partners to implement measures to protect the health and safety of their employees at work;
- Condemn forced labour and child labour, prohibit discrimination, prohibit and combat harassment and support the freedom of association and the right to collective bargaining of workers;
- Comply with all relevant environmental, social, health and safety as well as land acquisition policies, laws and regulations of the countries of intervention and international standards.

1.4 Implementation of E&S policy principles

AGRA will implement its E&S Policy through its ESMS and all other key institutional policies including the Safeguarding of Vulnerable Persons Policy, Ethics Policy and Partners Code of Conduct and ensure compliance with the respective governing laws and regulations as well as international standards specified in the ESMS. AGRA's ESMS is designed to guide its implementation of the E&S commitments contained in this E&S Policy.

In particular, AGRA will establish and maintain the following E&S operational requirements:

- Screen all projects requesting funding and activities by AGRA against AGRA's Exclusion List ;
- Take informed grant-award decisions based on robust categorisation of projects according to E&S risk levels, ascertained through various types of review processing including screening, E&S due diligence (ESDD) and, if and where required commensurate with the scale of the Project and the Project risks, environmental and social impact assessment (ESIA);
- Clearly define roles and responsibilities of implementation of the E&S activities across the entire institution, as well as emphasise on management review and reporting procedures;
- Have measures in place to monitor compliance with all relevant E&S policies, laws, and regulations of the country/-ies of intervention through AGRA's work;
- Continuously develop and improve institutional capacity to understand, assess and manage E&S impacts and risks associated with AGRA's interventions;
- Implement the ESMS to deliver the commitments under this Policy and to monitor compliance with this Policy across its portfolio and periodically report to its management as well as collaborate and share information with development partners and Project/programme beneficiaries.
- Communicate this Policy with employees, partners and other external stakeholders;
- Establish key identified partnerships with external stakeholders to manage E&S risks and work with partners, employees and contractors to raise awareness of E&S management risks and, if identified, to ensure that they are treated appropriately.



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3. Glossary of Terms

Acronym	Term
AGRA	Alliance for a Green Revolution in Africa
APO	Associate Program Officer
EHS	Environment Health and Safety
E&S	Environmental & Social
ESAP	Environmental & Social Action Plan
ESDD	Environmental & Social Due Diligence
ESIA	Environmental & Social Impact Assessment
ESMS	Environmental & Social Management System
H&S	Health and Safety
IFC	International Finance Corporation
ILO	International Labour Organisation
KfW	Kreditanstalt für Wiederaufbau (German Credit Institute for Reconstruction)
PO	Program Officer
PS	Performance Standard of IFC
PS1	Performance Standard 1
SEP	Stakeholder Engagement Plan
WBG	World Bank Group



List of Annexes

Annex 1:	Strategic E&S Risk Assessment
Annex 2:	Capacity Building and Training Plan
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Annex 15:	AGRA's Enterprise Risk Management Framework (ERMF)

Definitions

Term	Meaning
EHS Guidelines	World Bank Group Environmental Health and Safety Guidelines.
Environmental and Social (E&S)	For the sake of simplicity, the acronym E&S is used throughout this document, but the E&S Management System is developed to address all aspects of “sustainability”, as encompassed by the IFC Performance Standards, i.e. environment, social, health and safety, human rights and labour aspects.
Environmental & Social Action Plan (ESAP)	A plan that proposes measures to manage aspects identified in the ESDD to acceptable levels in line with the requirements of AGRA and its funding partners.
Environmental & Social Due Diligence (ESDD)	An assessment and analysis of environmental and social risks and opportunities associated with a Project to ensure that such risks would not present a potential liability to AGRA.
Environmental & Social Impact Assessment (ESIA)	The process of identifying, predicting, evaluating and mitigating the biophysical, social, and other relevant effects of Project proposals prior to major decisions being taken and commitments made.
Environmental & Social Management System (ESMS)	The ESMS is the set of policies, procedures, tools and internal capacity at AGRA to identify and manage the environmental and social risks posed by the funded interventions.
Excluded Activity	Any business or activity listed on the AGRA Exclusion List (cf. Annex 3).
Financial Contribution	AGRA receives financial contributions that are charitable in nature from various institutions/funding partners.
Grant	A financial contribution issued from AGRA to a grantee (either a single organisation or a consortium of organisations) following a Project proposal submitted by the grantee/consortium.
Grantee	An organisation, agency, government institution, non-profit entity, farmer organisation or private company that receives funding from AGRA.
Intervention	Umbrella term to describe activities undertaken by AGRA to achieve its mission to promote inclusive agricultural transformation in Africa and improve the lives of smallholder farmers and their households in Africa.
Legal Register	A compilation of applicable legislations.
Must	Must is used to show that it is necessary or very important that something happens in the present or future
Project	Projects are interventions implemented directly by AGRA or through Grantees and/or consortia of Grantees that are financed through grants provided by AGRA with the aim of achieving AGRA’s mission.
Shall	‘Shall’ is used to indicate a requirement that is contractually binding, meaning it must be implemented, and its implementation verified.



Should	'Should' is used to indicate a goal which must be addressed by the design team but
Will	'Will' is used to indicate a statement of fact. Will statements are not subject to verification.

4. Introduction

4.1 Overview of Alliance For A Green Revolution In Africa (AGRA)

Alliance for a Green Revolution in Africa (AGRA) is an African-led non-for-profit organisation that seeks to promote an inclusive agricultural transformation on the African continent. Founded in 2006, AGRA's mission is to improve the lives of smallholder farmers across Africa by significantly increasing yields and incomes.

AGRA recognises that environmental and social (E&S) sustainability are central to the attainment of development outcomes that are inclusive and equitable, hence the need to be mainstreamed into its core activities. AGRA's ESMS has been developed to underpin its resolve to reduce and/or avoid negative E&S impacts as a result of its work and to ensure sustainable development outcomes.

AGRA uses a range of interventions in differing forms to impact agriculture value chains in focus countries to achieve its objectives. AGRA will therefore screen all its interventions for E&S risks both at a country and grant level; and will define their management and monitoring as outlined within this ESMS. The objective of this ESMS is therefore to:

- Strengthen E&S outcomes
- Avoid negative impacts to people and their environment
- Manage, mitigate and minimise negative impacts
- Develop and strengthen AGRA's and its partners' capacities to manage E&S risks
- Develop and implement an effective stakeholder engagement.

4.2 ESMS structure

AGRA's ESMS is designed to ensure that potential negative E&S impacts are minimised, while positive effects on communities and the environment are enhanced. It follows the guidance of International Finance Corporation (IFC) Performance Standards (PS) on the assessment and management of E&S risks and impacts, in particular, Performance Standard 1 (PS1) and international best practices. Relevant elements of PS1 constitute the main building blocks of this ESMS. This ESMS includes: an E&S Policy and Manual, organisational capacities and competency needed, Stakeholder Engagement Plan (SEP) and a monitoring and review process.

Figure 1.1 shows the structure of AGRA's ESMS, which reflects the integration of E&S assessments into AGRA's interventions. The ESMS Manual is structured along these elements and is focused on the allocation of grants and other programme implementation modalities as AGRA's main instruments to achieve AGRA's mission.

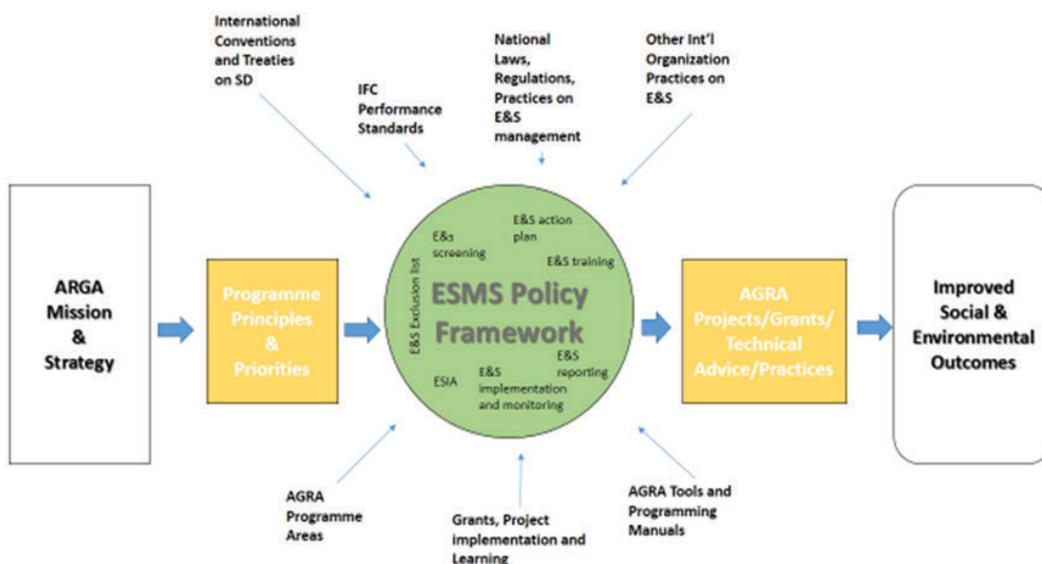


Figure 1.1
ESMS Structure
within AGRA's
three main areas
of intervention



4.3 Applicable environmental and social standards and guidelines

The ESMS is premised on the following requirements:

- National environment, social, health, safety and labor laws and standards in the host countries of AGRA projects, including requirements for public disclosure and engagement established therein.
- Relevant international law including conventions and treaties adopted by host countries.
- AGRA's ESMS also benefits from policies and guidelines that set out international best practice such as:
 - a. Sustainability Guidelines of KfW Development Bank (2019);
 - b. IFC Environmental and Social Performance Standards (2012);
 - c. World Bank Group's General Environmental and Health and Safety (H&S) Guidelines (WBG EHS Guidelines);
 - d. WBG Industry specific guidelines, as applicable (i.e. EHS Guidelines for Annual Crop Production, EHS Guidelines for Perennial Crop Production);
 - e. Core labour standards of the International Labour Organisation (ILO);
 - f. UN Basic principles and guidelines on development-based evictions and displacement;
 - g. IFC Exclusion List for financial intermediaries of KfW;
 - h. Voluntary guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security (VGGT; FAO 2012);
 - i. BMZ Reference framework for development partnerships in the agri-food sector (RFDP); and
 - j. USAID – Pesticide evaluation report & safer use action plan (PERSUAP).

Under the implementation of this ESMS, AGRA will review and evaluate all grant allocations against these standards.

5. Identification of E&S risk and impacts

5.1 Potential e&s risks inherent to AGRA's interventions

AGRA engages in a number of interventions that promote its mission. These interventions have associated E&S risks at an aggregated and/or country and regional level. Such interventions include, but are not limited to support of:

- Promotion of an integrated package and agronomic practices;
- Development and adoption of improved crop varieties;
- Integrated soil fertility management e.g. use of fertilizers;
- Crop protection technologies e.g. pesticides;
- Support of agricultural extension services;
- Promotion of enabling policy environment;
- Promotion of postharvest management technologies;
- Gender equality
- Inclusive finance; and
- Access to markets.

A list of potential E&S risks that result from the above mentioned interventions are identified and are presented in the E&S risk assessment table below (Table.2.1). This E&S risk assessment serves as a reference to be consulted during the assessment of E&S risks which are to be managed at the country level.

An E&S risk assessment shall be in place for each country of operation and updated periodically along with the country plans and their accompanying risk registers. Measures identified to manage these risks shall be reflected within the risk register and implementation monitored through the annual project and country progress review process.

Table 2.1: Key E&S Risks at the grant level

Key risk areas	Description of risk
Overall E&S Management	
E&S Governance and Management Systems	Inadequacy of the approach and experience/ competency of the grantee/ consortium to manage and budget for E&S-related issues can have an impact on the regulatory compliance and E&S performance.
Environment	
Soil Conservation and Management	Physical and chemical degradation of soils (may result from unsuitable management techniques, extensive tillage from use of inappropriate machinery, poor crop/soil cover, etc.). Chemical degradation of soils (may result from insufficient or inappropriate use of mineral fertilizers, etc.). Destruction of soil physico-chemical properties contributes to disruption of soil microorganisms which play an essential role in decomposing organic matter, cycling nutrients and fertilising the soil Soil erosion and generation of sediments can be a significant pollutant dependant on the physical and chemical properties.
Soil Nutrient Management	Nutrient management strategies aimed at maintaining and/or improving soil fertility to optimize crop yield could have off-site environmental impact (e.g., contamination of groundwater resources and eutrophication of surface water resources from surface runoff and leaching of nutrients).

Crop Residue and Solid Waste Management	Poor crop residue management i.e., export/burning vs retention can lead to loss of soil organic matter, soil erosion and overall loss of nutrients. This has a negative impact on crop performance, soil quality and overall soil health.
Poor solid waste management can pollute groundwater	
Water Management	Inadequate water management for crop production could decrease water availability.
Agrochemicals/ Pesticides Use and Management	Agrochemicals/Pesticides use and potential contamination of soils, wildlife, human health, groundwater, or surface water resources caused by accidental spills during the transfer, mixing, storage, and appropriate application of agrochemicals/pesticides.
Genetically Modified Crop	The use of plants, which DNA has been modified using genetic engineering methods, can lead to possible cross-breeding with related crops, giving them advantages over naturally occurring varieties and thus creating the possibility of long-term ecosystem damage by GM crop usage.
Biodiversity	Habitat conversion or degradation, mono-cropping, introduction of invasive species and reduced quality and/or availability of priority ecosystem services.
Improved crop varieties	The use of improved crop varieties may cause a reduction of local crop genetic diversity. This may present negative impacts in the event of an epidemic, new disease or ability to fight back climatic shocks.
Air quality	Atmospheric emissions are primarily associated with emissions of combustion by-products—including carbon dioxide (CO ₂), sulfur dioxide (SO ₂), nitrogen oxide (NO _x), and particulate matter (PM) —resulting from the operation of mechanized equipment or from combustion by-products from the disposal or destruction of crop residues or processing by-products.
Greenhouse gas emissions	Emissions of greenhouse gas emissions resulting from the operation of mechanised equipment, crop production, animal manure, over use of nitrogen-based fertilizers, land-use conversion or from the disposal or destruction of crop residues or processing.
Occupational H&S and Labour Condition	
Physical hazards	Operational and workplace hazards (slips, trips, and falls). Machinery and vehicles accidents (vehicle collisions; vehicle and machinery roll-overs, etc.). Confined and restricted space (entry for processing bins and silos, product storage bins, areas treated with agrochemicals/pesticides,). Exposure to organic dust: (threshing, handling, and storage of grain generate potentially high concentrations of organic dust including particles from grain, fungi, and bacteria, as well as inorganic material).
Risk of fire and explosion	Fires resulting from the combustion of stored oil or crop residues, which can lead to a loss of property or cause possible injury to or fatality people.
Biological hazards	Contact with venomous animals, such as stinging insects, spiders, scorpions, snakes, disease vectors (e.g., mosquitoes, ticks), and with certain wild animals.

Child and forced labour	<p>Child labour, i.e. when someone (a member of the family of the out-grower, or small-business owner) under the legal working age is employed and results in harm to the child by depriving the child of an education, is economically exploitative or is damaging to physical and mental development.</p> <p>Forced labour, i.e. any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty.</p>
Vulnerable or disadvantaged Persons	There are individuals or groups that will be disproportionately disadvantaged by the intervention e.g. women, youth, disabled, ethnic groups, gender identity, sexual orientation etc.
Community H&S	
H&S Management	<p>Land use changes or to the loss of natural buffer areas/ecosystem services (such as wetlands, mangroves, and upland forests that mitigate the effects of natural hazards, such as flooding, landslides, and fire) due to expansion of agricultural land into natural areas and/ or land degradation through poor farming practice.</p> <p>Potential exposure to agrochemicals/pesticides.</p> <p>Increased risk of vehicle or machinery injuries on roads.</p>
Land acquisition	
Land acquisition and Involuntary resettlement	<p>Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (access to resources for income generation or means of livelihood) due to land acquisition (including rights-of-way) associated with a Project's operations.</p> <p>Inadequacy and appropriateness of the grantees' approach to land acquisition and to the extent relevant, stakeholder engagement (including grievance management) on this issue, livelihood restoration and compensation may result in long-term hardship and impoverishment for Affected Communities and persons, as well as environmental damage and adverse socio-economic impacts in areas to which they have been displaced.</p>
Stakeholder Engagement	
Stakeholder engagement and grievance management	<p>Lack of effective stakeholder engagement and grievance management. Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a Project's E&S impacts. Inadequate stakeholder engagement may not fully address E&S impacts in a Project.</p> <p>If grievances are not addressed and recorded as part of the grantees stakeholder engagement activities, these grievances could be related to issues that could escalate into legal claims if unresolved.</p>

5.2 E&S risks in AGRA's grant management process

Grants awarded by AGRA vary in nature, number of partners, geographical coverage and amount. Potential AGRA Grantees include among others:

- Governments and public sector organisations e.g. the Ministry of Agriculture; Ministry of Policy & Planning, regulatory bodies (seed, fertilizers and market), regional and continental institutions etc.;



- Not for Profit Organisations;
- Private sector organisations e.g. seed companies; processing companies; consulting companies;
- Universities and other educational institutions;
- Agro-dealers;
- Financial institutions;
- Farmers' organisations;
- Marketing and farmer produce board e.g. grain councils; and
- Research institutions.

This ESMS describes a streamlined process of identification, assessment, management and monitoring of E&S risks across the various types of grants and programme delivery mechanisms.

An overview of the key E&S risks associated with AGRA's activities at grant level are provided in Table 1. Although these E&S risks are not applicable to all grant activities they provide an overview of potential risks that may result from AGRA's current Grants and other programme activities.

6. ESMS management & organisation

6.1 Overview of AGRA’s E&S organisational structure

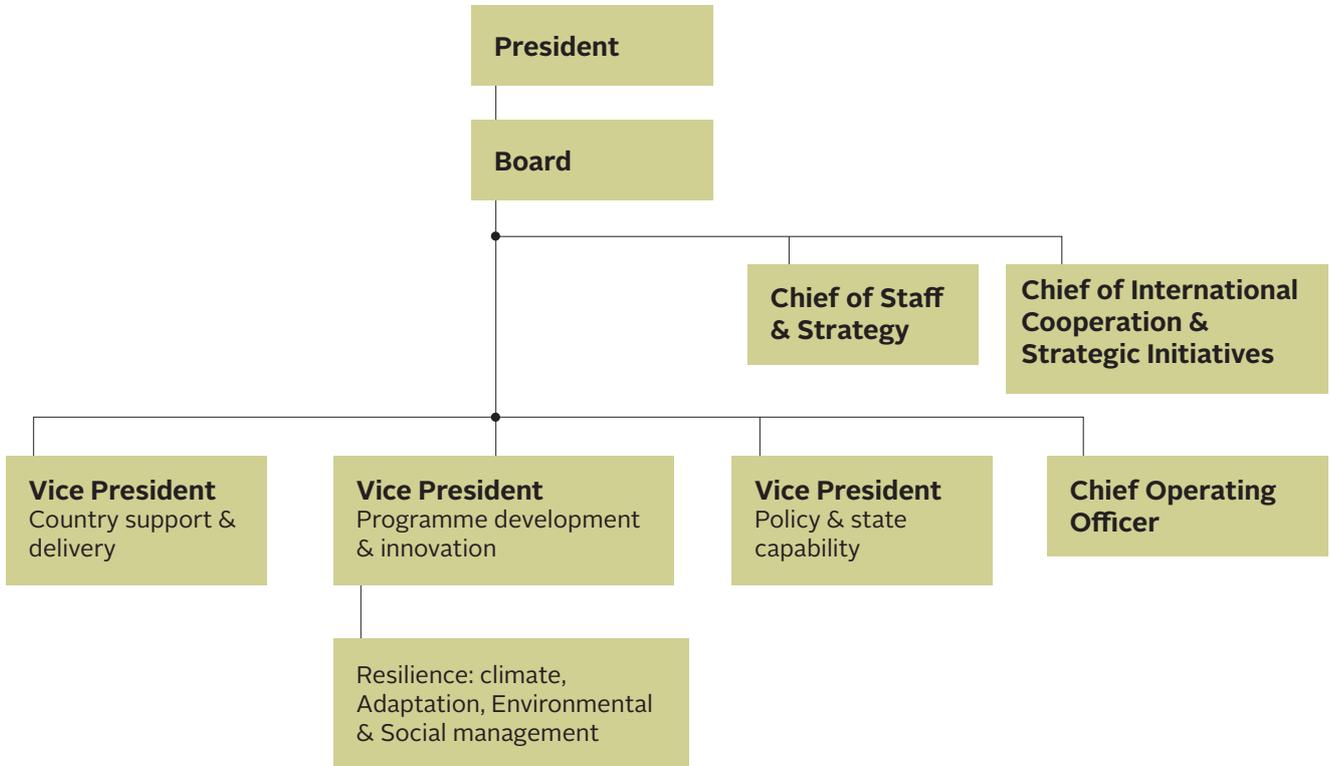


Figure 3.1: ESMS within AGRA Structure (01.2019)

The Program Development and Innovation (PDI) Division will be responsible for managing all ESMS aspects across the organisation through a designated E&S Officer. The implementation and management of the ESMS will follow existing/approved operational and management structures, processes and procedures, accountability and reporting as stipulated in AGRA’s governance and operational manuals.

6.2 E&S roles and responsibilities

This section presents an outline of the roles and responsibilities within AGRA to successfully implement the ESMS. As the ESMS evolves, AGRA will continuously assess required capacities within the organisation for effective implementation. Table 3.1 provides an overview of the ESMS roles and responsibilities.

Table 3.1: AGRA Staff Roles and Responsibilities for the Implementation of the ESMS

Role/Title	Responsibility related to E&S Management
Board of Directors	AGRA’s overall managing & governing organ, responsible for the overall operationalisation of the ESMS.



Management	
President	<p>Accountability for ensuring ESMS implementation, monitoring and reporting throughout AGRA operations.</p> <p>Responsible for ensuring that country and regional operations have sufficient capacities and resources to implement the requirements of this ESMS.</p> <p>Responsible for monitoring performance at a country level, and compliance of all activities with ESMS requirements.</p>
Vice President Program Development and Innovation (PDI)	<p>Responsible for ensuring the integration and compliance of ESMS across AGRA's interventions.</p> <p>Responsible for the implementation of the ESMS, SEP and grievance mechanism in AGRA.</p>
Programmes	
E&S Officer (headquarter-based; 1 person)	<p>Overall responsibility for ensuring compliance and management of E&S issues/risks across AGRA.</p> <p>Manage resources (budget and staff) for E&S risk management procedures</p> <p>Lead, monitor and provide ongoing feedback to Country Managers on E&S topics.</p> <p>Ensure the coordination and integration of E&S risk management procedures with AGRA's Grant Cycle.</p> <p>Report any major E&S issues to the President and/or the Vice President Program Development and Innovation (PDI) and secure the support and approval of E&S risk management issues by the President and/or the Vice President Program Development and Innovation (PDI)</p> <p>Development/quality control of training materials for internal staff and for grantees & Delivery of training on E&S to internal staff and grantees and maintaining training records.</p> <p>Development/quality control of training materials for internal staff and for grantees & Delivery of training on E&S to internal staff and grantees and maintaining training records.</p> <p>Overall endorsements of E&S screening and assessments related to grantee applications and proposals.</p> <p>Review and approval of AGRA's annual E&S performance report to stakeholders (including lenders), E&S country assessments and action plans.</p>
Country Managers	

<p>(Regional/country level; 2 persons per country)</p>	<p>Overall responsibility for ensuring compliance and management of E&S issues/risks on a regional/country level.</p> <p>Directly report and provide feedback on regional/country level best practices to the E&S Officer.</p> <p>E&S country risk assessments and update of the strategic risk assessment for the countries within the respective region.</p> <p>Reporting 'red flag' E&S issues to the E&S Officer.</p> <p>Lead, monitor and provide ongoing feedback to Program Officers (PO) and Associate Program Officers (APO).</p> <p>Responsible for E&S assessments for grantee applications and proposals.</p> <p>Responsible for monitoring and evaluation of grantees on E&S performance (including review of monitoring reports).</p> <p>Support to the E&S Officer in delivering E&S training regionally and at country level to internal staff and externally to grantees.</p>
<p>Program Officers (PO)/ Associate Program Officers (APO)</p>	
<p>(Regional/country level)</p>	<p>Conduct E&S assessments for grantee applications and proposals, including initial risk screening, review of concept notes and proposals, site visits, and E&S monitoring requirements in the grant agreement letter.</p> <p>Ensure that appropriate environmental representations, warranties, and covenants are incorporated in each grant agreement</p> <p>Supervise portfolio grantees on-going compliance with the applicable requirements on a regular basis, which may include:</p> <p>Conducting site visits, monitoring the implementation of E&S action plan (if any) by the grantees, reviewing grantees' annual reports, and recording grantees' E&S ongoing performance</p> <p>Resolving E&S issues in case of non-compliance, and where needed, preparing a time-bound corrective action plan with specific follow-up procedures</p> <p>Support to grantees in identifying E&S risks and developing mitigation measures</p> <p>Support to the E&S Officer and Country and Deputy Country Managers in delivering E&S training regionally and at country level to internal staff and externally to grantees.</p>
<p>Heads of Unit and Programs</p>	<p>Ensure that ESMS is integrated and implemented within their Interventions.</p>
<p>Grants</p>	
<p>Head of Grants</p>	<p>Ensure that E&S risk screening and assessments are included in the grants making process.</p> <p>Ensure that E&S risk documentation is part of the grant review package and being considered in grant review processes and decisions.</p>
<p>Grants Committee</p>	<p>Discuss and ensure that E&S risk assessment is included in the grants making process.</p> <p>Determine the need for an Environmental and Social Impact Assessment (ESIA) subsequent to receiving the screening report.</p>



Monitoring and Evaluation

Head of M&E Unit	Responsible for ensuring that E&S risk monitoring is being undertaken in accordance with the monitoring schedule.
	Provide oversight on country E&S risk assessments and monitoring. Support review of the ESMS policy as required.
AGRA Staff	Support the implementation of ESMS in their various functions.

6.3 Developing E&S capacity within AGRA

AGRA will undertake ongoing awareness raising and training across the organisation, particularly for those responsible and/or accountable for the implementation of the ESMS in order to enhance and maintain the capacities of staff and to raise awareness of the E&S risks in the organisation.

7. ESMS management & monitoring

7.1 Management of potential E&S risks at country level

At country level, E&S risk assessments will be undertaken within the context of AGRA's enterprise risk management (ERM) framework and using the E&S Risk Assessment, respective country's legal register and exclusion list. Monitoring will be conducted on an ongoing basis and the risk register will be updated periodically, as necessary and in accordance with AGRA's ERM Framework. Mitigation measures, if any, will be implemented at country level with support of the E&S Officer and operational oversight provided by the risk and compliance function as per enterprise risk management framework. Programme and technical monitoring will be undertaken by the relevant program and M&E function and responsible officers. Annex 15 provides AGRA's E&S risk assessment framework that will be managed at the country level.

The assessment at this level will also identify mitigation measures. Such mitigation measures will typically include:

- ▶ Engagement with external partners (such as research organisations and NGOs) to ensure adequate evaluation of project E&S risks and to benefit from external guidance;
- ▶ Regular project internal audits and monitoring visits;
- ▶ Tracking of NGO sentiments;
- ▶ Definition of clear selection criteria for Grantees and partners; and
- ▶ Training of Grantees and partners in the management of E&S risks.

7.2 Management of E&S risks at grant level

The identification of strategic risks at the country level as described in Section 4.1 forms the basis for the management of E&S risks and needs to be considered for the E&S risk assessment of each individual grant. AGRA's ESMS is operationalised through a sequence of review steps which are explained below and summarised in Table 4-1. These steps are integrated into AGRA's grant management cycle established under AGRA grants manual; these include:

1. Project/Grant conception (includes Grantee identification);
2. Proposal development;
3. Grant award;
4. Post-award monitoring; and
5. Close out

AGRA's ESMS implementation involves the following key steps that are related to the respective phases in AGRA's grant management cycle:

ESMS implementation key steps	Related grant management cycle steps
I. ESMS Review Procedures 1. ESMS Screening a. Environmental and Social Due Diligence (ESDD) b. Environmental and Social Impact Assessment (ESIA)	Step 1: Project/Grant Conception Step 2: Proposal Development
II. Implementation and monitoring	Step 4: Post-Award Monitoring
III. Reporting	Step 4: Post-Award Monitoring Step 5: Close Out

The ESMS implementation key steps are described in detail in the following section.

8. ESMS screening

Proposed projects must comply with AGRA's E&S Policy. For this purpose, screening of a project for possible E&S risks will be realised at the project development phase and prior to its approval by the grants committee.

8.1 Purpose of the ESMS Screening

The purpose of the screening is:

- to avoid, reduce or limit environmental pollution and environmental damage including climate-damaging emissions and pollution;
- to consider probable and foreseeable impacts of climate change including utilising the potential to adapt to climate change. In this context climate change is understood as
- climate variability and long-term climate change;
- to understand whether a project could lead to any negative social and environmental impacts;
- to determine the E&S risk level i.e. low, medium and high; and
- where risks have been identified, to determine the appropriate type and level of assessment needed to ascertain the extent of the risks.

8.2 Procedure for screening

Following development of the project idea, an initial E&S and Climate Mitigation and Adaptation Screening (preliminary assessment) will be conducted as part of the development of a project idea into a project concept note. This screening, is a desktop assessment of expected E&S impacts undertaken by the relevant Country Manager, Program Officers (PO), Associate Program Officers (APO) using the Exclusion List (Annex 3) and Initial E&S Screening Checklist (Annex 4).

8.3 Climate mitigation and adaptation screening

AGRA subjects relevant Grantees/Projects to a systematic climate assessment within the ESMS Screening. It determines what effects climate change could have on the success of the Grantee/Project and what quantities of greenhouse gases will be emitted. On that basis it examines measures that can better adapt the Grantee/Project to climate change and reduce its emission of greenhouse gases. The objective of the climate assessment is also to recognise climate impacts that may impair the achievement of objectives in due time so that, if applicable, required adaptation measures can be taken into consideration in the conception of the Project. This applies equally to the early identification of potential to adapt to climate change in order to leverage this potential.

Climate relevance is assessed by examining the relevance with regard to reducing greenhouse gas emissions (climate protection relevance) and the relevance with regard to adapting to climate change (climate change adaptation relevance). In terms of climate change protection relevance, checks are carried out to establish whether a Grantee/Project can make a significant contribution towards the reduction of greenhouse gas emissions and/or the sequestration of carbon in soils or vegetation. Furthermore, the climate relevance assessment considers if positive impacts of climate change could be enhanced (potentials) for the Grantee/Project goals, where appropriate. If it was found that the Grantee/Project has climate relevance or it is still unclear whether or not, an in-depth climate assessment must be carried out. If, during the screening, the climate relevance was evaluated for just one of the two aspects of climate protection or adaptation, an in-depth climate assessment only needs to be performed for the aspect classified as relevant (see ESIA, Step 2). The results of the climate mitigation and adaptation screening are documented internally.

Results of the E&S and Climate Mitigation and Adaptation Screening will be used to determine the preliminary category of the proposed project in line with the requirements of the IFC PS following the criteria defined in the categorisation guideline (Annex 5). The following table provides an understanding of the Project categories:

High Risk	Medium Risk	Low Risk
<p>High Risk projects are those that are likely to have significant adverse impacts and risks on the environment and/or the social conditions of the affected population. Impacts and risks may potentially be significantly adverse because the complex nature of the project, the scale (large to very large), and the sensitivity of the location of the project or the impacts and risks are irreversible or unprecedented.</p>	<p>Medium Risk projects are those that are likely to have potentially adverse risks and impacts upon the environment and on the social conditions of those concerned. These impacts are likely to be less adverse than those of the High Risk projects. Typically, the potential impacts and risks of Medium Risk projects are limited to a local area, are in most cases reversible and are easier to mitigate through appropriate measures.</p>	<p>Low Risk projects are those that are likely to have no or only minor adverse environmental and social impacts or risks.</p>

In some cases, further consultation and engagement with potential Grantees will be carried out to obtain additional information on potential E&S risks and impacts; and to evaluate the organisational capacity of the Grantees to successfully manage E&S risks.

The E&S Officer, or the designated alternate, will review each screening checklist to verify the level of the risk and significance of the impact based on the following criteria:

- Sensitivity of the existing bio-physical and social environment (i.e. people, social groups, vulnerable persons, species, ecosystems etc.)
- Magnitude of potential impact considering severity, duration, scale and reversibility;
- Possibility of the impact occurring;
- Risk of non-compliance with E&S laws;
- Potential reputational risk for AGRA;

Site visits will be performed to verify information as provided by the Grantee/consortium on the ground and to obtain additional information. Site visits will be conducted by the responsible PO/APO with support by the E&S Officer, or designated alternate, as necessary, at project development phase. A pre-funding site checklist (Annex 8) will be used should the site visit be needed. The checklist will be reviewed and approved by the E&S Officer.

Where there is any information missing following this screening that is deemed critical to determining the level of E&S risks, or where there is any doubt about the significance of the identified potential impacts, the E&S Officer will request for additional information. This could take the form of a general request for information, a specific study or an Environmental and Social Impact Assessment (ESIA). However, in consideration of the costs of an ESIA, the decision to assign a higher risk level should not be formed on hypothetical impacts but on the basis of a certain degree of probability using evidence generated.

The screening results for each project will be endorsed by the E&S Officer and included in the grant submission documents that shall be submitted to the grants committee.

9. Environmental and social impact assessment (ESIA)

If the ESMS screening classifies a project as E&S medium or high risk, additional assessments varying in comprehensiveness shall be required. Low risk projects shall not require any additional assessments.

In consideration of the costs of such an ESIA and the high level of E&S risk involved, the Grants Committee may determine whether to proceed with the project or not. The E&S Officer shall participate in Grants Committee meetings where deliberations regarding a project's E&S risks (high and medium) are ongoing.

The scope of the ESIA process is proportionate to the nature and impact of the risks as follows:

High Risk Projects – Full ESIA: a comprehensive analysis of E&S impacts with all the elements described under section 2 (b) (ii) below will be undertaken. Refer to Annex 9;

Medium Risk Projects – Partial ESIA: projects that are categorised here will only require an Environmental and Social Due Diligence (ESDD) as described below and which forms the first step of the ESIA and an Environmental and Social Action Plan (ESAP). Refer to Annex 9.

9.1 Purpose of an ESIA

The purpose of an ESIA is to:

1. predict and assess the type and scale of potential impacts to communities, vulnerable persons, livelihoods and well-being and/or the physical, natural, social economic or cultural environment;
2. identify, analyse and compare feasible alternatives;
3. develop suitable mitigation measures documented in an ESAP; and
4. develop a sound project strategy in which adverse impacts are avoided or minimised to acceptable levels.

9.2 Procedure for conducting ESIA

9.2.1.1 Step 1 – E&S Due Diligence (ESDD) & Report

The ESIA process shall commence with the E&S Officer conducting an ESDD and preparing the ESDD Report using information collected from the **Project Proposal**, the Grantee's **Organisational Capacity Assessment (OCA)** and the **Site Visit Checklist**.

The site visits will be performed by the responsible PO/APO (with support of the E&S Officer, or a designated alternate, as necessary) to verify information as provided by the Grantee/consortium and to obtain additional information.

The due diligence assessment for high risk projects may require external technical support and assistance, in line with the specific potential E&S risks. The need for specialised technical support and assistance will be referred to management approval due to the cost implications related to it. It will therefore only be undertaken if approved by management. Medium risk Projects will be assessed by the E&S Officer or may require external assistance, subject to management approval and availability of resources.

The ESDD will identify any gaps of the information provided by the Grantee/consortium within applicable national legislation and other international requirements. Specific actions needed to close these gaps will be documented through the final project ESAP which is prepared by the E&S Officer in collaboration with the Grantee and responsible PO/APO.

The ESDD and ESAP shall form part of the conditions incorporated into the grant award letter and may form conditions precedent to disbursement of Project funds.

9.2.1.2 Step 2 – Environmental and Social Impact Assessment (ESIA)

The information gathered during the ESDD will be used to conduct the substantive ESIA for high risk projects. The key elements of the ESIA are provided below:

ELEMENT	OBJECTIVE
Project Description	To define the Project, its major components, and its areas of influence, geographic, ecological, social, and temporal context.
Policy, Legal and Administrative Analysis	To clarify the framework within which the ESIA is carried out and applicable compliance requirements.
Environmental and Social Baseline	To understand the prevailing physical, biological and socioeconomic conditions with the Project's area of influence.
Environmental and Social Impact Assessment (ESIA)	To analyse E&S risks and predict and assess the Project's potential positive and negative direct and indirect impacts.
In-depth Climate Assessment	To determine what effects climate change could have on the success of the Grantee/Project and what quantities of greenhouse gases will be emitted
Analyses of Alternatives	To identify other options to achieve project objectives and compare impact, including alternative of not implementing the Project.
Information Disclosure, Consultation and Participation	To identify stakeholders, particularly groups that may be affected by the project. To describe the process for engagement and information disclosure (including the type of information to be disseminated and the method of dissemination) and the process for carrying out consultation with affected people and facilitating their participation during Project implementation. To highlight comments and concerns of affected groups and how these have been addressed in the Project design.
Grievance Mechanism	To provide an avenue for handling grievances (both informal and formal channels), setting out the time frame and mechanisms for resolving complaints regarding E&S performance.

Projects marked for full ESIA may be approved for award by the Grant Committee or Grants Review Committee, depending on the investment amount, on condition that the ESIA is completed within a defined timeframe and form conditions precedent to disbursement of the project funds either at the beginning of the project or during implementation as ESAP targets are met.

9.2.1.3 In-depth Climate Assessment

The in-depth climate assessment analyses the greenhouse-gas reduction potential, adaptive capacity of the Grantees and ecosystems as well as the use of the positive impacts of the climate change for smallholder development, associated with the Project. The in-depth climate assessment is carried out with the following relevant aspects, respective for each case:

- The in-depth climate adaptation assessment and consideration of the aspects related to climate change adaptation (climate resilience) should ensure that despite the forecasted effects of climate change, the desired developmental impacts of the Project are not threatened. Furthermore, the assessment should analyse whether the Grantee's climate adaptation capacity can be further increased within the scope of the Project. In this regard the expected climate changes and their consequences for the Project will be analysed. This includes both direct effects (e.g. more frequent flooding or drying out of agricultural areas) and indirect effects of climate change (e.g. revenue losses in crop production). The analysis examines the longer targeted period of impacts beyond the formal implementation period

of the Projects. On this basis, options, compatible with the climate strategy of the country, e.g. the National Adaptation Plan as part of the United Nations Framework Convention on Climate Change, will be developed and implemented to increase the climate adaption capacity of the target groups or ecosystems.

- The in-depth climate mitigation assessment to consider the potential for greenhouse gas reduction (emission saving) serves to avoid substantial greenhouse gas emissions and to identify potential for reducing greenhouse gases. First, the greenhouse gas emissions associated with the Project region and/ or specific product/crop type is described, and whether the planned Project contributes to increasing or decreasing greenhouse gas emissions, is compatible with the climate strategy of the country, e.g. the Nationally Determined Contribution as part of the United Nations Framework Convention on Climate Change and, where necessary, if there is potential for reducing greenhouse gas emissions. On this basis, options to contribute to greenhouse gas reduction will be developed and if applicable – taking into consideration the developmental impacts and costs – integrated into the Project.

Box 1 - Project Categories and subsequent E&S studies

High Risk Projects: In addition to ensuring applicable E&S legislation (for a template of a Legal Register see Annex 9) are complied with, High Risk projects require additional relevant E&S studies to be conducted by the grantee/consortium. These additional E&S studies should include a comprehensive ESIA and ESMP and in case of physical or economic displacement, a Resettlement Action Plan (RAP) respectively a Livelihood Restoration Plan (LRP). Also, where there is considerable climate relevance, an in-depth assessment of the potential for greenhouse gas reduction or the need for climate adaptation will be needed. Suggested outlines for an ESIA are available in Annex 9. Guidelines for land acquisition and resettlement are provided in Annex 9. During the process of relevant E&S studies preparation, it would be expected that consultation with Project stakeholders be carried out. Relevant documents on public consultations should be provided. Grantees/consortia should be encouraged to consider seeking support from experienced environmental and/or social specialists for undertaking these E&S studies.

Medium Risk Projects: Medium Risk project risks and impacts are less significant compared to High Risk projects and can usually be mitigated through comprehensive mitigation measures or standard solutions.

The need for and the scope, of priorities and in-depth of appraisal required by a Medium Risk project should be determined on a case by case evaluation of the E&S risks, while considering the applicable national legislations. Simple appraisal (e.g. review of the Project E&S risks) can be conducted to identify potential E&S gaps in lower-risk Medium Risk projects. The applicable IFC PS would depend on the project type and aspects specific to the project, but they are likely to be limited to PS 1-2 for the lower-risk Medium Risk Projects. In-depth E&S appraisal would be needed for Medium Risk projects that anticipate higher E&S risks. The due diligence process for the higher-risk Medium Risk projects will be similar to that for the High Risk projects, which involves the detailed review of project E&S assessments and a site visit to verify the level of E&S risks as necessary.

Low Risk Projects: Low Risk projects are projects with minimal or no impacts to E&S aspects. The Low Risk projects will need to comply with the local laws and regulations related to E&S at minimum but would not be expected to have additional or detailed E&S assessments in place. Nevertheless, the E&S Officer would have identified E&S issues or gaps based on the outcome from the internal project screening process and have discussions with the shortlisted grantee/consortium. Mitigation actions of the identified E&S issues will be prioritised and documented into an ESMP or similar document prepared by the grantee/consortium and implemented over the project lifecycle.

All Projects will need to consider **Emergency Preparedness and Response Planning**. If significant risk are identified during the due diligence, an Emergency Preparedness and Response Plan will be developed by the grantee/consortium. This is important for AGRA and its grantees, to be prepared to respond to accidental and emergency situations associated with the Project in a manner appropriate to prevent and mitigate any harm to people and/or the environment. This preparation will include the identification of areas where accidents and emergency situations may occur, communities and individuals that may be impacted, response procedures, provision of equipment and resources, designation of responsibilities, communication, including that with potentially Affected Communities and periodic training to ensure effective response. The emergency preparedness and response activities will be periodically reviewed and revised, as necessary, to reflect changing conditions. Where applicable, AGRA will also assist and collaborate with the potentially Affected Communities and the local government agencies in their preparations to respond effectively to emergency situations, especially when their participation and collaboration are necessary to ensure effective response. If local government agencies have little or no capacity to respond effectively, AGRA will play an active role in preparing for and responding to emergencies associated with the Project. AGRA will document its emergency preparedness and response activities, resources, and responsibilities, and will provide appropriate information to potentially Affected Community and relevant government agencies.



10. Implementation and monitoring

10.1 Implementation

Implementation of ESMS will be done primarily through its various components – E&S risk assessments, ESDD, ESIA, and the ESAPs throughout the project life cycle. The ESAPs will be the main instrument for providing a strategy for managing risks and mitigating impacts and will form an integral part of the project proposal and the grant award letter. The details of the ESAP may vary depending on the E&S risk level and complexity. Such details may include mitigation measures and their timeframes, required resources (where applicable), responsibilities and monitoring indicators.

10.2 monitoring and reporting

Monitoring of E&S aspects, following implementation of actions and mitigations, are fundamental elements of an adequate management system. **The E&S Monitoring Checklist (Annex 12)** will be used as a guide for monitoring E&S risks through the life cycle of a project and may be used for projects of any risk level. AGRA will conduct the monitoring, depending on risk levels of a project and through either random spot-checks and/or pre-scheduled monitoring of projects and interventions for the identification of potential new 'red flags' which may arise during project implementation.

Under the ESMS, E&S reports will be submitted along with the other project reports by the Grantee/consortium at the frequency as specified in the Grant Agreement Letter (technical reports, financial reports, project implementation plan report, risk matrix report, milestone report). An E&S Monitoring Checklist that serves as a basic template for E&S reporting during project implementation is provided in Annex 12 and will be annexed to the Indicator Performance Tracking Table. The checklist, where necessary, will be adapted to the specific requirements of the ESAP.

In addition to the review of the submitted E&S Monitoring Checklist, periodic site visits, performed by the PO/APO and/or the E&S Officer, will be conducted to monitor the implementation of the ESAP and other E&S studies and their recommendations.

Further, in addition to application of the **E&S Monitoring Checklist and Reporting**, periodic site visits will be performed by the responsible PO/APO (and/or the E&S Officer) with support of M&E Officers to monitor E&S indicators and implementation of ESAP (where applicable). The site visits will ensure the correct implementation of all requirements as listed in the ESAP (where applicable).

In the event that there are any significant E&S deficiencies that are detected from the monitoring process, the responsible PO/APO will discuss the issues with the responsible Grantee/consortium in order to clarify uncertainties and define improvement actions, including introduction of new conditions, where needed, precedent into the Grant Award Letter.

Should external factors (e.g. natural hazards, pests, political changes) influence the E&S performance of the project, grant modifications can be considered to reflect these changes. This process may include the modification of goals/objectives linked to E&S performance as outlined in the ESAP and the E&S Monitoring Checklist. All modifications of E&S goals/objectives must be in line with AGRA policy on the modifications of the Grant Agreement.

In the event of significant non-compliance with the E&S requirements of the project that could lead to negative E&S impacts, the responsible APO/PO with support of the E&S Officer should escalate the potential risks to management, who may at their discretion determine to terminate the project in accordance with terms of the Grant Award Letter.

E&S implementation and monitoring will be mainstreamed into the overall project monitoring and reporting as per AGRA grant management requirements. Where identified, all negative effects resulting from AGRA's interventions must have mitigation actions attached to them. Reports on E&S issues will, as much as possible, take a learning approach. The M&E unit will review E&S risks monitoring indicators in collaboration with the E&S Officer.

10.3 Final reporting and close out

Along with the final reporting on the project, the E&S Officer must approve and provide a Final E&S Report in line with the Template as outlined in Annex 13. The final report must reference the close-out of all ESAP items and requirements. Should open items remain, these need to be clearly assigned to the responsible Grantee to ensure that they will be completed after grant termination. In this case, outstanding items need to be included in the final closeout letter along with best-practice E&S management measures.

E&S information will be documented in line with the general AGRA filing system for a period of five years after closeout of the last grant to the Grantee.

Table 4.1: Summary of ESMS Review Steps along AGRA's Grant Cycle

AGRA Grant Cycle	ESMS Review Steps		Responsible	Involved Parties	ESMS Tool
Project Development Phase	ESMS Screening and risk classification		PO/APO	E&S Officer	Screening Checklist
	Medium Risk Projects ESDD	ESDD	E&S Officer	PO/APO/Grantee	Organisation Capacity Assessment (OCA) Site Visit Checklist ESDD Report
		ESAP	E&S Officer	PO/APO/Grantee	ESAP
	Low Risk Projects ESDD	ESDD	E&S Officer/ External Expert	PO/APO/Grantee	OCA Site Visit Checklist ESDD Report
		Full ESIA	E&S Officer/ External Expert	PO/APO/Grantee/ E&S Officer/ Project Stakeholders	E&S Risk Assessment Toolkit
		ESAP	E&S Officer/ External Expert	PO/APO/Grantee/ E&S Officer/ Project Stakeholders	ESAP
Implementation & Monitoring	Implement mitigation measures (where applicable)		Grantee	APO/PO/E&S Officer	Project Proposal and/or ESAP (as applicable)
	Monitor E&S indicators		APO/PO	E&S Officer/M&E Unit/ Grantee	Project Proposal and/or ESAP and or ESIA (as applicable)
Closeout and reporting	Closeout reporting		Country manager/APO/PO	E&S Officer	E&S Closeout report



11. Stakeholder engagement

11.1 stakeholder engagement plan (SEP)

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. They can include affected communities located near a project, particularly those subject to actual or potential project-related risk and/or adverse impacts on their physical environment, health or livelihoods.

AGRA will ensure stakeholders are engaged in a meaningful manner and will put in place systems and processes to support stakeholder engagement at Grantee level and for all projects.

A SEP is required to be developed and implemented for medium and high risk projects on an appropriate scale. A SEP should be scaled to the project risks and be tailored to the characteristics of the affected persons or communities. A template of a SEP can be found in Annex 9.

The outcomes of the overall and country level strategic risk assessments should be formally taken into consideration in the updating and planning of AGRA's overall guidelines and strategy for engagement and documented through minutes, and in any engagement guideline or programme plan updates.

11.2 Grievance mechanism

Stakeholder engagement measures will work pro-actively towards identifying and addressing issues before they become grievances. However, when grievances are reported they need to be addressed in a consistent and verifiable manner. The purpose of the Grievance Mechanism is to implement a formalised process (identification, tracking and redress) to manage project-related complaints from communities, workers and other stakeholders. A Grievance Mechanism needs to ensure that stakeholder comments, suggestions and objections are captured and considered. The Grievance Mechanism is designed to be a transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the stakeholders at no costs and without retribution. The Grievance Mechanism will be available at AGRA at both corporate and country level; and at Grantee level. The Mechanism that is guided by the principles detailed in this chapter (see also Figure 5-1).

A grievance is defined as an issue, concern, problem or claim (perceived or actual) that an individual or community group wants the Grantee, its contractor or AGRA to address and resolve, e.g.

- Specific complaint about impacts, damages or harm caused by the project;
- Concerns about project activities during construction or operation, or perceived incidents or impacts.

The Grievance Mechanism should also consider positive feedback and suggestions. The Grievance Mechanism is required to be:

1. **Systematic:** All forms of complaints related to the project need to be considered;
2. **Transparent:** Stakeholders must be informed that a grievance mechanism is in place, grievances must be documented and registered;
3. **Appropriate:** Tailored to the Project scope, adapted to local conditions and culturally acceptable; and
4. **Lead to corrective actions:** Grievances must be answered as relevant and the answers must be documented. Timely resolution of grievances is vital to ensure successful implementation of the project.

The Grantee is responsible to implement a formal grievance mechanism that addresses the requirements described and that can be accessed at any moment by AGRA. In the event of serious complaints or those that cannot be resolved promptly, the Grantees are obligated to inform AGRA of the details. In addition, AGRA maintains a separate channel of communication both at corporate and country level open to local stakeholders in the event that issues are not being properly addressed by the Grantees.

The Grievance Mechanism at AGRA level will be managed by AGRA's Legal Offices using the following address:

- Email: transparency@agra.org;
- Mailing:
Office of the General Counsel
Alliance for a Green Revolution in Africa
P. O. Box 66773-00800 Waiyaki Way
Nairobi, Kenya

As per AGRA's Whistleblower and Ethics Policies, the Legal Office will be responsible for recording and bringing issues raised/reported to the attention of the Board of Directors for action. They will also be responsible for the report compilation of the incidents reported. At AGRA country level the Grievance Mechanism organisation will be replicated through the Country Manager. AGRA's grievance mechanism aims to safeguard ethical standards captured across various institutional policies and procedures. including the following:

- **Environmental and Social Management Policy**
- **Partner Code of Conduct**
- **Safeguarding Policy**
- **Staff Code of Conduct**
- **Whistleblower Policy**

AGRA encourages all staff, partners and vendors to report any suspected or observed wrongdoing under its Whistleblower Policy, which sets out the Grievance Mechanism procedure and principles.

At Grantee Grievance Mechanism level, the Grantees should appoint one person as grievance mechanism manager (usually the implementation supervisor) who will inform colleagues and contractors about grievance mechanism procedures, gather grievance forms, report them to the grievance register and provide input to the Project reporting to AGRA. The stakeholders must be informed on the existence of such grievance mechanism and the Grantees must ensure that the process is considered by stakeholders to be culturally appropriate, trustworthy and effective.

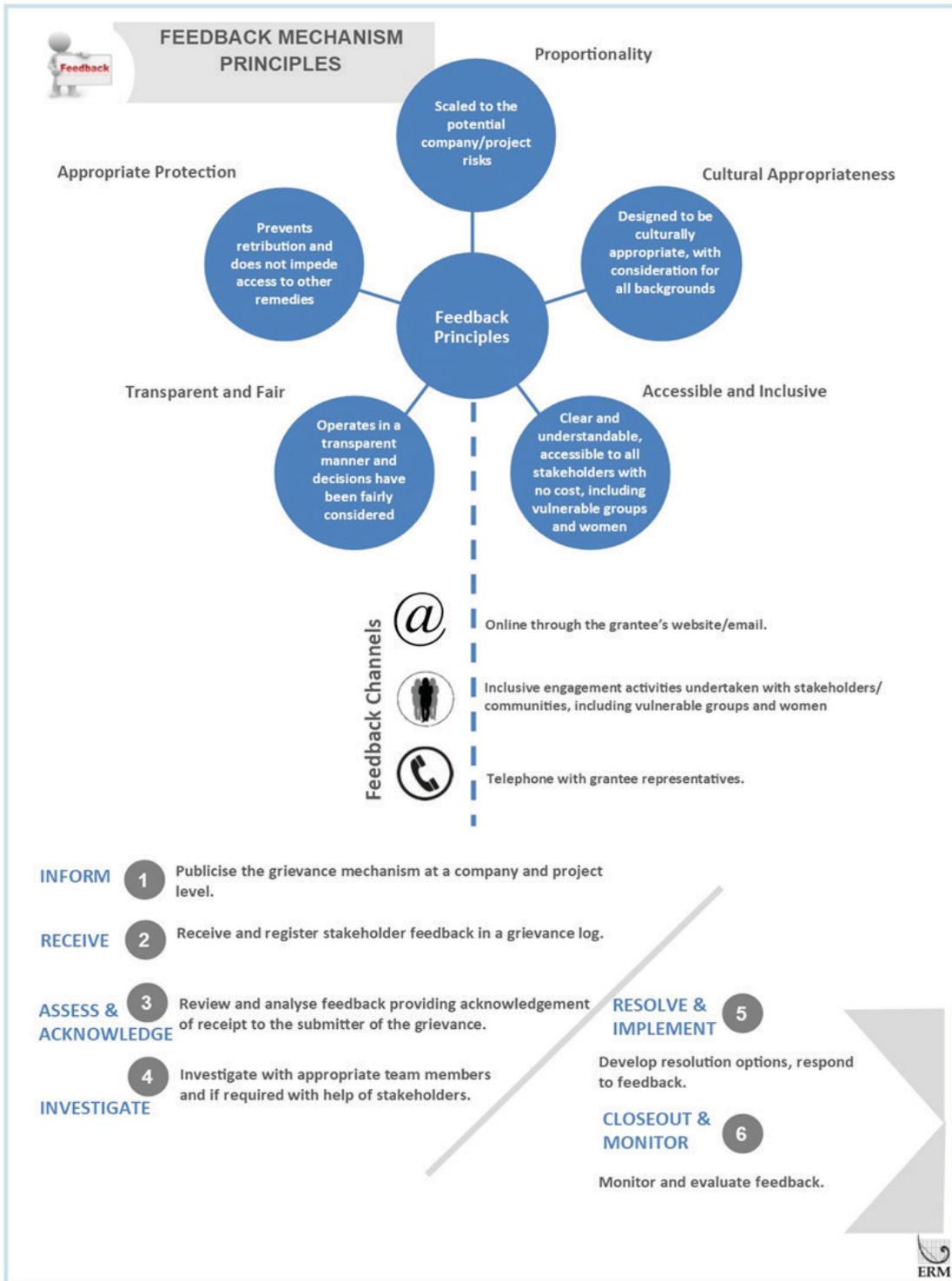
Grievances might be formulated in an informal way (not necessarily written complaint) during a conversation, therefore Grantee's employees need to be sensitized on this system. All grievances must be documented by the Grantee's employees and sent to the grievance mechanism manager and consigned within a grievance log (paper or electronic).

The grievance log should at least include the following categories:

- Name and contact details of contact (unless requested to remain anonymous);
- Date and description of grievance;
- Response made to the grievance / corrective action implemented.



Figure 5.1: Grievance Mechanism Principles



12. Collaboration, information sharing and reporting

AGRA strives for maximum transparency and invites collaboration from its development partners on effectively managing E&S risks and mitigating negative impacts. In this regard, AGRA will aim to continually be informed by its Grantees and keep its development partners informed of E&S issues arising from implementation of its Projects. The information comprises the following elements:

1. Incident and regular reporting of E&S performance from Grantees to AGRA (semi-annually)
2. External and incident reporting of AGRA to financing organisations (annually)
3. External audit of the ESMS by an independent company (annually). The external audit ensures that the practicability is up to date with the ongoing development of AGRA's strategy and portfolio (Annex 15 Audit Checklist will be used through the audit).

In addition, where any of AGRA's development partners wish to conduct ad-hoc visits to projects to understand their potential E&S risks, AGRA shall cooperate with such partner accordingly.

AGRA will prepare an E&S Performance Report on a periodic basis and will share this report with its funding partners, annually, where required.



13. ESMS review

The ESMS will be reviewed on a regular basis, at least every two (2) years, and updated if necessary to reflect any changes in legislation, international standards as well as changes within the AGRA organisation. The review will be done by the E&S Officer who will work with the AGRA management to assess the effectiveness of the system and decide if any changes are necessary. The E&S Officer will also ensure that changes do not result in deviation from international best practice and applicable legislation.

14. Annexes

ANNEXES



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