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**PROGRESS REPORT ON
THE IMPLEMENTATION OF THE GEF
POLICY ON ENVIRONMENTAL AND SOCIAL SAFEGUARDS**

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EXECUTIVE SUMMARY

1. This sixth Progress Report on the implementation of the GEF Policy on Environmental and Social Safeguards (ESS Policy) ¹ provides an overview of progress made since the Policy took effect in July 2019. It presents findings from a comprehensive review of GEF projects and programs across the project cycle, highlighting advancements by GEF Agencies in applying the ESS Policy and enhancing the quality of GEF-finance operations.

2. As of June 30, 2025, a total of 928 projects and programs are being reviewed and implemented under the updated ESS Policy.² This report covers:

- 55 projects and programs with Project Identification Form (PIF) or Program Framework Document (PFD) approved in the December 2024 and June 2025 Work Programs³;
- 344 projects (CEO Endorsed) and 209 projects (CEO Approved) that apply the updated ESS Policy; and,
- 29 projects reporting at Mid-term Review (MTR) and 13 projects reporting at Terminal Evaluation (TE) that apply the updated ESS Policy.

3. As of May 2025, all 18 GEF Agencies were in full compliance with the ESS Policy,⁴ marking a significant milestone. Since the issuance of the *Guidelines for the GEF ESS Policy*⁵ in December 2019, the GEF Secretariat has systematically reviewed all PIFs, PFDs, CEO Endorsements and Approvals for Policy compliance. The ESS Policy remains a core tool to enhance the quality, impact, and durability of GEF investments. All projects and programs undergo environmental and social screening against the nine Minimum Standards, are assigned an ESS risk category, and provide detailed risk assessments and mitigation plans at the CEO Endorsement and Approvals stages. Many projects have integrated these measures directly into project design, indicators, and implementation arrangements. Agencies have also strengthened their institutional ESS systems, dedicating staff and processes to embed ESS review in project preparation and oversight.

¹ The first Progress Report (GEF/C.59/Inf.15) is available [here](#), the second Progress Report (GEF/C.61/Inf.09) is available [here](#), the third Progress Report (GEF/C.63/Inf.10) is available [here](#), the fourth Progress Report (GEF/C.66/Inf.09) is available [here](#), and the fifth Progress Report (GEF/C.68/Inf.08) is available [here](#).

² These 928 projects and programs are all active portfolio and excluded the projects and programs completed.

³ This report includes progress of ESS Policy regarding GBFF projects in the CEO Endorsement/Approval section. These 55 projects in Work Programs do not include Global Biodiversity Framework Fund (GBFF) projects since these three projects are CEO Endorsement stage (All the other projects and programs in Work Programs are PIF or PFD stage).

⁴ GEF/C.69/Inf.06 (May 4, 2025) available at [here](#).

⁵ Guidelines on GEF Policy on Environmental and Social Standards: SD/GN/03 (December 2019): https://www.thegef.org/sites/default/files/documents/guidelines_gef_policy_environmental_social_safeguards.pdf

4. Across the portfolio reviewed at CEO Endorsement step, 26 percent of projects are classified as High or Substantial ESS risk, while 59 percent are rated Moderate risk. High-risk projects are more common in the Chemical and Waste Focal Area and in Asia region. Projects rated High or Substantial ESS risk are required to provide specialized risk management instruments and engage independent expertise, in line with the ESS Policy Guidelines.⁶ For example, a High-risk ecosystem-based management initiative in the Black Sea anticipates potential social impacts on coastal resource users and is preparing a Strategic Environmental and Social Assessment and developing an Environmental and Social Management Framework with expert support.⁷ The most frequently identified risk types include Biodiversity Conservation (Minimum Standard 3), flagged in 69 percent of projects and programs in the December 2024 and June 2025 Work Programs, and Resource Efficiency and Pollution Prevention (Minimum Standard 7), identified in 58 percent of projects.

5. Good practices of ESS risk screening, assessment and management are increasingly evident. These include systematic consideration of conflict or post-conflict contexts in Fragile and Conflict-Affected Situations (FCS), attention to impacts on vulnerable groups, application of Free, Prior, and Informed Consent (FPIC) with Indigenous Peoples, and careful analysis of livelihood and natural resource access issues. Many projects have established dedicated budgets, timelines, and responsibilities for ESS risk management, contributing to more inclusive project design and more consistent quality at entry.⁸ However, ESS capacities and systems still vary across Agencies, underscoring the value of greater exchange of good practices in risk identification, classification, assessment, and management across the GEF partnership.

6. The GEF Risk Appetite and Framework has strengthened the rigor of environmental and social risk assessment, particularly where risks relate to political and governance issues, implementation capacity, or stakeholder engagement.⁹ The GEF Guidance Note on FCS and the

⁶ GUIDELINES ON GEF'S POLICY ON ENVIRONMENTAL AND SOCIAL SAFEGUARDS (SD/GN/03, December 19, 2019) (page 7, para 14 and 15), available [here](#).

⁷ "Implementing Ecosystem Based Management approaches in the Black Sea Large Marine Ecosystem" (GEF ID 10725, Regional, IW, GET, UNDP, GEF-7).

⁸ "CAR Inclusive and Resilient Cities Project" (GEF ID 11676, Central African Republic, LDCF, World Bank), "Excelling Protected Area Management Effectiveness for Biodiversity Conservation through Landscape Based Approach (ENABLE)" (GEF ID 11861, Indonesia, BD, UNDP), "Madagascar Science-based management of Biodiversity and Natural Resources for Economic Development Project" (GEF ID 11694, Madagascar, BD/CCA, World Bank, MTF), "Global Elimination Program for PCB" (GEF ID 11749, Global, Multi, World Bank), "Green Mobility Financing Facility for Africa" (GEF ID 11671, Regional, AfDB, CC, GEF-8), "Rwanda Wildlife Conservation Bond (WCB) Operation" (GEF ID 11514, BD, Rwanda, World Bank), "Hazardous Waste Management and Policy Development Project for Ukraine (HWM-PDU)" (GEF ID 11712, Ukraine, CW, World Bank), "Mex30x30: Conserving Mexican biodiversity through communities and their protected areas" (GEF ID 11510, Mexico, GBFF, CI, GEF-8), "Adaptive Agriculture and Rangeland Rehabilitation Project (A2R2) - Somalia" (GEF ID 10792, Somalia, Multi, MTF, IFAD, GEF-7).

⁹ GEF/C.66/13 (January 4, 2024) "GEF Risk Appetite" available at [here](#).

related webinar series has further supported agencies in improving risk management and monitoring in fragile contexts, complementing the ESS Policy.

7. An assessment of High or Substantial risk projects at the MTR stage highlights both progress and ongoing challenges. Several MTRs include dedicated sections on environmental and social risk management, documenting improvements such as increased social inclusion of migrants, women, and persons with disabilities, strengthened grievance redress mechanisms – including confidential handling of sexual harassment cases – and progress in implementing risk mitigation instruments. At the same time, some MTRs, including for High- or Substantial-risk projects, lack sufficient analysis of ESS implementation. This inconsistency highlights the need for standardized ESS reporting across all MTRs. Common challenges include delays in preparing or executing Environmental and Social Management Frameworks and related action plans. These delays pose ongoing risks and potential reputational concerns for both implementing agencies and the GEF. To mitigate such risks, updated ESS information needs to be included in Project Implementation Reports prior to the MTR stage. Findings from ten MTRs of High or Substantial risk projects provide important lessons for improving ESS preparation at the CEO Endorsement stage. Strengthening the monitoring of environmental and social risks management during implementation would help better address gaps that arise after approval. MTRs could also benefit from systematically incorporating the nine categories of the GEF Risk Appetite Framework, including environmental and social risk and political and governance risk (including FCS-related risk).

8. All 13 TEs reviewed under the updated ESS Policy are medium-sized projects (MSPs) without on-the-ground activities and rated Low risk.¹⁰ Nonetheless, each TE includes a specific section evaluating ESS implementation. More systematic assessment of MTRs and TEs will help identify opportunities to further strengthen environmental and social risk management, ensure benefit for vulnerable groups, and enhance the durability of global environmental benefits.

9. Finally, findings from the Independent Evaluation Office (IEO) *Evaluation of Institutional Policies and Engagement of the GEF*¹¹ underscore the importance of knowledge sharing for effective ESS implementation. The GEF Secretariat remains committed to its role as a knowledge broker, consistent with the GEF Strategy for Knowledge Management and Learning,¹² and will continue facilitating learning across the Partnership to improve the consistent and high-quality application of the ESS Policy.

¹⁰ Since two TEs' CEO Approval were approved on July 30, 2019, before the ESS Guideline was approved in December 2019, these projects were not classified as their overall ESS risk at the CEO Approval stage (GEF ID 10296, 10309).

¹¹ GEF/E/C.60/06 (May 25, 2021) "Evaluation of Institutional Policies and Engagement of the GEF" (para 44, 412, 413) available at [here](#).

¹² GEF/C.66/03/Rev.01 (October 10, 2023) available at [here](#).

INTRODUCTION

1. The GEF Council approved the Policy on Environmental and Social Safeguards (ESS Policy)¹³ at the 55th meeting in December 2018 and requested the Secretariat to report annually on its implementation. This report presents an overview of the environmental and social risks and impacts identified in GEF-financed projects and programs, along with the measures taken to manage these risks throughout the project cycle - from concept development to completion.¹⁴ The ESS Policy, through its minimum requirements and procedures, serves as a core instrument for identifying, minimizing, and mitigating potential adverse impacts. Consistent with the GEF- 8 Policy Recommendations for inclusion and engagement in fragile and conflict-affected situations, the ESS Policy continues to strengthen the quality, impact, and long-term durability of GEF investments.

2. The latest *Progress Report on GEF Agencies' Compliance with GEF Minimum Standards* confirms that all 18 Agencies are now fully compliant with the ESS Policy.¹⁵ This finding is reinforced by the most recent *Third Party Review of Agency Compliance with GEF Minimum Standards*,¹⁶ which verified Agencies' institutional capacity and adherence to the ESS Policy. Since the issuance of the *Guidelines for the GEF Policy on Environmental and Social Safeguards*¹⁷ in December 2019, GEF Secretariat has consistently reviewed all PIFs, PFDs, CEO Endorsements and Approvals for compliance with the Policy.

3. The ESS Guidelines support effective documentation and reporting at the project and program level, complementing the Policy's mandatory requirements.¹⁸ The ESS Policy also requires the timely publication of any grievance cases related to environmental and social safeguards that are reported by GEF Agencies, with a summary report on such grievances available separately. Non-confidential cases are disclosed on the GEF website, and a consolidated summary of such cases is provided in a separate report.¹⁹

ESS CONSIDERATIONS IN GEF PROJECTS AND PROGRAMS

4. The ESS Policy has been systematically applied to all GEF projects and programs approved since July 1, 2019. These account for 38 percent of the 2,446 projects and programs with a

¹³ [GEF/C.55/07/Rev.01](#)

¹⁴ Para 17 of [GEF/C.55/07/Rev.01](#)

¹⁵ GEF/C.69/Inf.06 (May 4, 2025) available at [here](#).

¹⁶ [GEF/C.64/Inf.09](#) (May 08, 2023)

¹⁷ Guidelines on GEF Policy on Environmental and Social Standards: SD/GN/03 (December 2019):

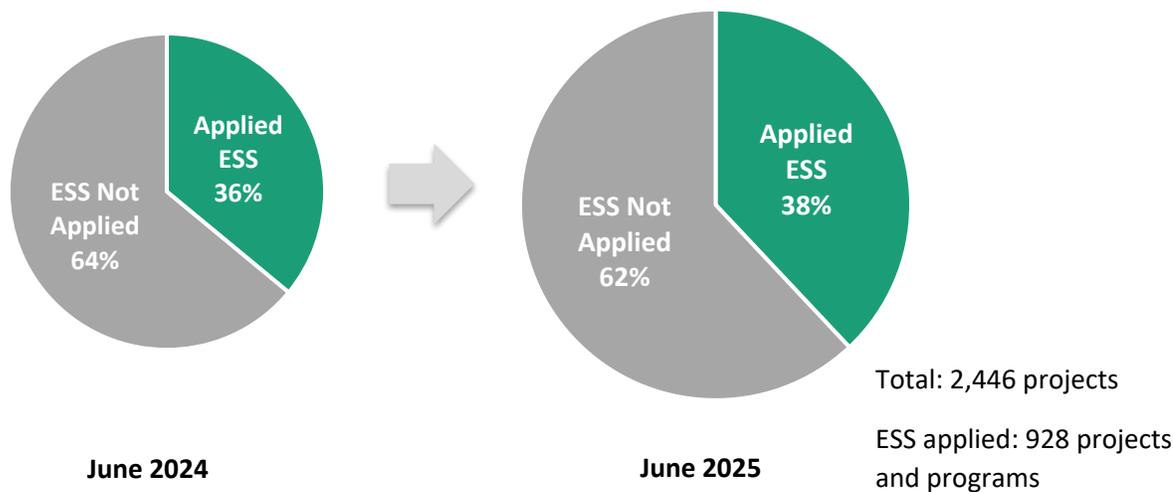
https://www.thegef.org/sites/default/files/documents/guidelines_gef_policy_environmental_social_safeguards.pdf

¹⁸ The [GEF Risk Appetite](#) (GEF/C.66/13, January 4, 2024) includes provisions for how environmental and social risks will be assessed, managed and monitored at PIF/PFD, CEO Endorsement/Approval, MTR and TE stage.

¹⁹ Annual Report on Grievance Cases Involving GEF-Funded Projects (Forthcoming)

Council-approved concept or program framework that were under implementation as of June 30, 2025 (see Figure 1). Out of these, 928 projects and programs are required to comply with the updated ESS Policy.

Figure 1: Application of updated ESS Policy in GEF investments (as of June 30, 2025)



ESS Risk Screening at the PIF and PFD Stage

5. Analysis of PIFs and PFDs shows continued improvement in compliance with the ESS Policy’s requirement for early-stage environmental and social risk screening.²⁰ This report reviews 55 PIFs and PFDs approved in the December 2024 and June 2025 Work Programs, including nine PFDs and five Non-Grant Instrument (NGI) projects.²¹ Across the February, June, and December 2024, and June 2025 Work Programs, all reviewed PIFs and PFDs included initial ESS risk screening, demonstrating steady and consistent application of the ESS Guidelines since their introduction.

6. Early screening against the ESS Policy’s nine Minimum Standards is essential for identifying potential risks and guiding the depth of analysis during the project preparation. It ensures that environmental and social risks are recognized early enough to be integrated into project design, including measures related to stakeholder engagement, resource access, and livelihood impacts. Early screening is also crucial for planning Free, Prior and Informed Consent (FPIC) processes with Indigenous Peoples and for developing conflict-sensitive assessments and

²⁰ Minimum Standard 1 of the ESS Policy (para 4a) requires Agency systems and procedures to ensure that projects and programs are screened as early as possible to identify environmental and social risks and potential impacts considering the type of risks and potential impacts contained in the Policy.

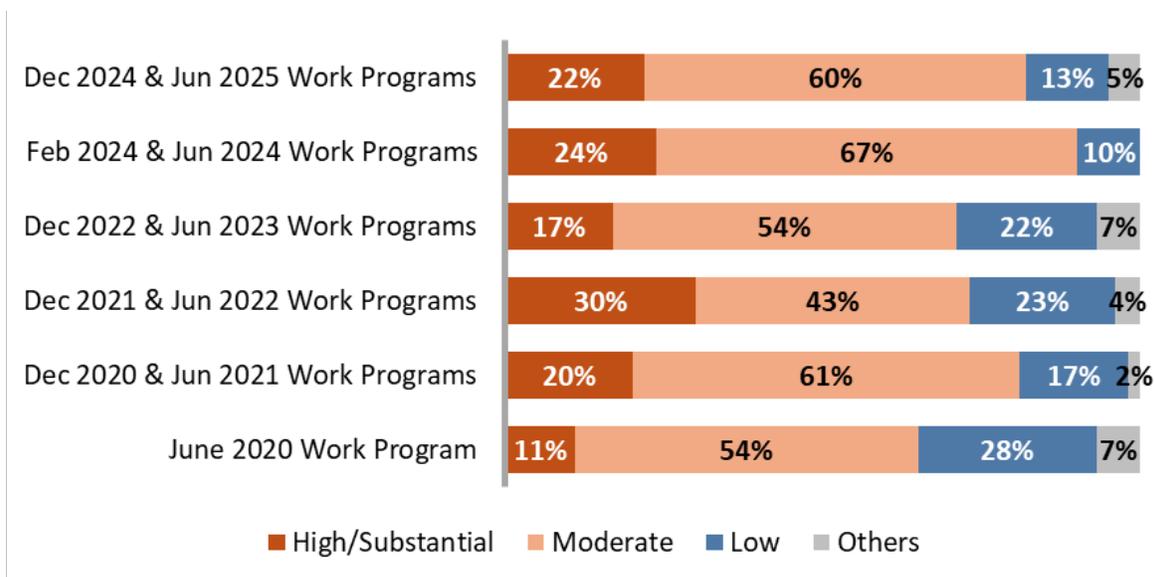
²¹ It also includes ten of the Least Developed Countries Fund (LDCF) and Special Climate Change Fund (SCCF) projects and programs. All three of the Global Biodiversity Framework Fund (GBFF) projects in December 2024, and June 2025 Work Programs are in the CEO Endorsement stage. Thus, the analysis of GBFF is included in the CEO Endorsement and CEO Approval Stage section.

appropriate risk management strategies in fragile and conflict-affected setting. The increasing consistency and quality in early screening underscores Agencies’ strengthened internal capacities and improved alignment with ESS Policy requirements.

Overall Project ESS Risk Ratings at PIF and PFD Stage

7. All PIFs and PFDs submitted in the December 2024 and June 2025 Work Programs provided initial overall ESS risk classifications. Over the past six years, more than half of the projects and programs reviewed at this stage have been rated Moderate risk. In the most recent Work Programs, 60 percent of projects and programs were assessed as Moderate risk and 22 percent as High or Substantial risk (see Figure 3).

**Figure 3. Initial Overall Risk classification of PIFs and PFDs by FY
(% of total WP number of projects)**



8. Risk ratings continue to vary by focal area and region. More than 40 percent of Biodiversity Focal Area projects and about 25 percent of Chemical and Waste Focal Area projects were classified as High or Substantial risk (see Figure 4). High-risk classifications were most common in the Africa region, where more than 50 percent of reviewed projects were rated High or Substantial (see Figure 5). Risk ratings also differ across Agencies due to variation in internal methodologies and assessment procedures. In the December 2024 and June 2025 Work Programs, only four Agencies – AfDB, Conservation International (CI), UNDP, and the World Bank – assigned a High or Substantial risk rating at entry, with World Bank classifying more than 60 percent of its submissions in this category (see Figure 6).²²

²² There is no PIF or PFD in December 2024 and June 2025 Work Programs from three Agencies: BOAD, DBSA, and FECO.

9. Differences among Agency procedures, technical resources, and institutional safeguards systems contribute to variation in initial classification of ESS risks.²³ Sharing best practices in risk assessment, classification, and management has helped strengthen consistency and improve quality at entry across the GEF Partnership. The GEF Secretariat will continue facilitating such exchanges to support effective and harmonized implementation of the ESS Policy.

Figure 4. Initial Overall Risk Classification of PIFs and PFDs by Focal Areas (number of projects or programs in December 2024 and June 2025 Work Programs)

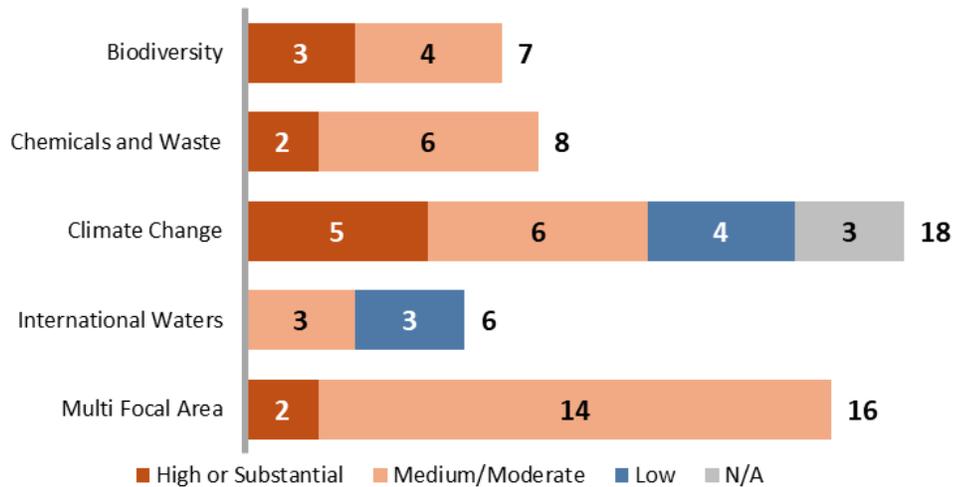
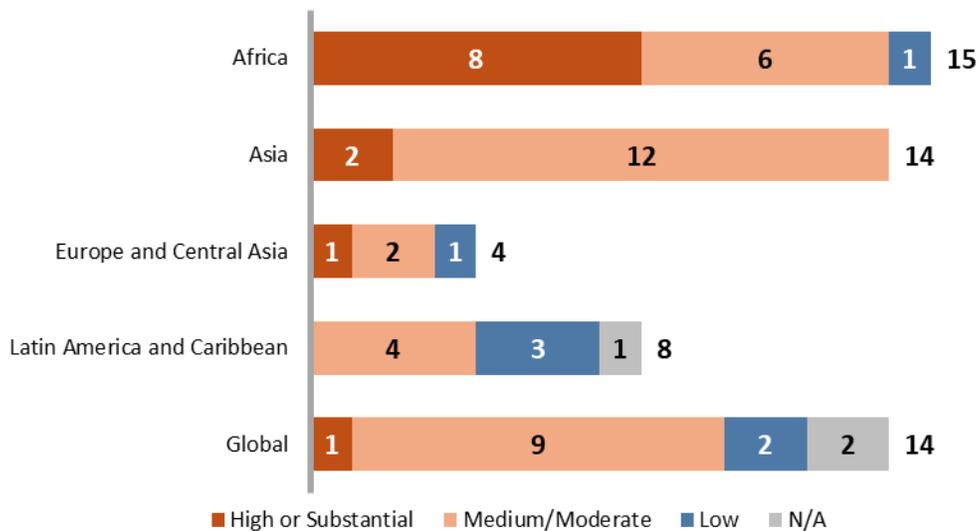
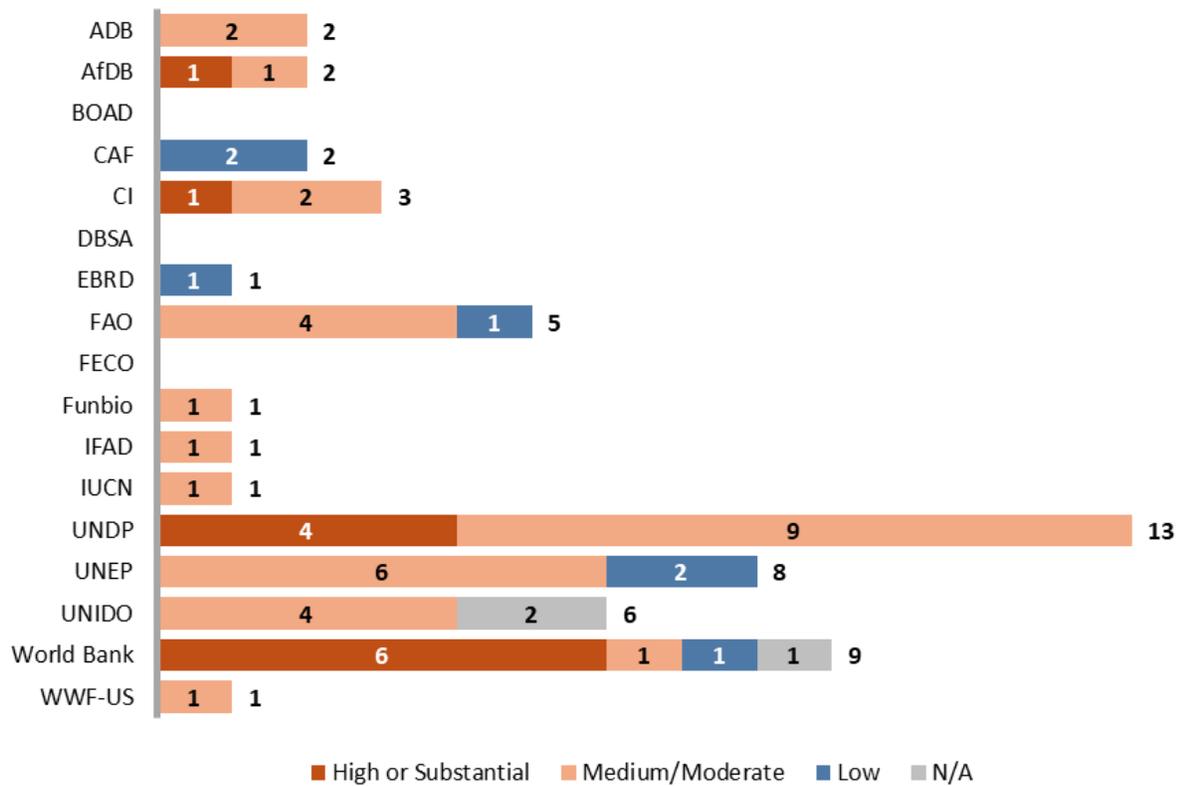


Figure 5. Initial Overall Risk Classification of PIFs and PFDs by Regions (number of projects or programs in December 2024 and June 2025 Work Programs)



²³ The GEF Secretariat reviewed seventeen Agencies' ESS screening processes at PIF and PFD stage by June 30, 2025. As of June 30, 2025, there is no PIF or PFD submitted by one Agency: FECO since the effective date of the new ESS policy.

**Figure 6. Initial Overall Risk Classification of PIFs and PFDs by Agencies
(number of projects and programs in December 2024 and June 2025 Work Programs)**



Types of ESS Risks at PIF and PFD Stage

10. Early-stage ESS screening is essential because the types and severity of risks vary significantly by project theme, scope, and location. The ESS Policy outlines the minimum standards (See Annex I.A) and corresponding risk categories that must be assessed during project preparation (see in Box 1).

11. An analysis of 55 PIFs and PFDs approved in the December 2024, and June 2025 Work Programs reveals consistent trends in risk identification. Biodiversity Conservation and the Sustainable Management of Living Natural Resources (MS3) remain the most frequently cited risks, appearing in 69 percent of reviewed submissions. Resource Efficiency and Pollution Prevention (MS7), Climate Change and Disaster (MS1-1), Labor and Working Conditions (MS8)

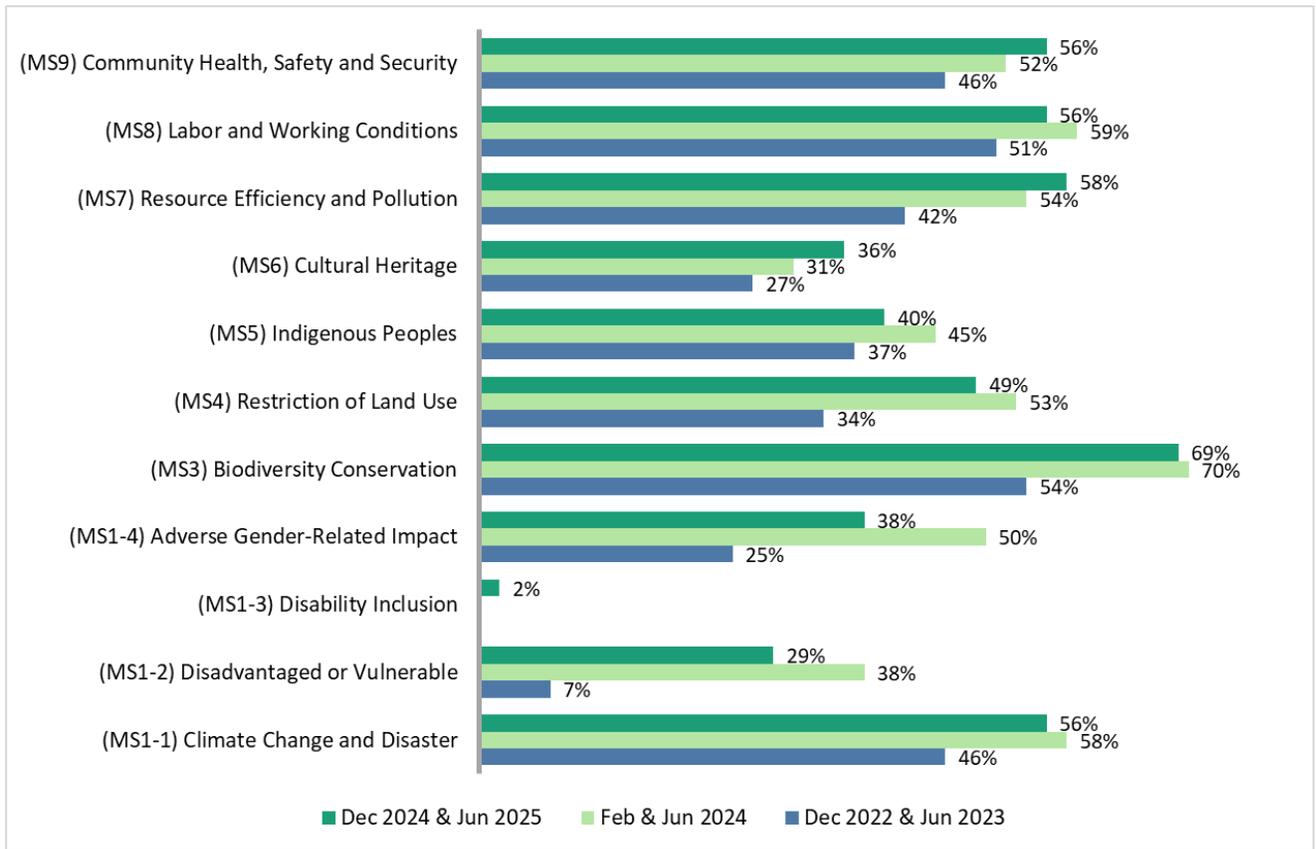
and Community Health, Safety and Security (MS9) are also common, each identified in 56-58 percent of projects and programs (see Figure 7). Other recurrent risks include Restrictions of land use (MS4) in 49 percent of projects and programs, Indigenous Peoples (MS5) in 40 percent, Adverse Gender-Related Impact (MS1-4) in 38 percent, and Cultural Heritage (MS6) in 36 percent. These patterns are broadly consistent with trends observed since the ESS Policy took effect.

12. Risks related to Disability Inclusion (MS1-3) were identified for the first time in the Work Programs in December 2024 and June 2025, notably in the Central African Republic Inclusive and Resilient Cities Project. Similar risks have also emerged in several child projects under the GEF-8 Sustainable Cities Integrated Program at the CEO Endorsement stage.

Box 1. Types of Risks and Potential Impacts to be screened and assessed in GEF Projects & Programs

- (MS1-1) Climate Change and Disaster**
- (MS1-2) Disadvantaged or Vulnerable Individuals or Groups**
- (MS1-3) Disability Inclusion**
- (MS1-4) Adverse Gender-related impact, including Gender-Based Violence and Sexual Exploitation**
- (MS3) Biodiversity Conservation and the Sustainable Management of Living Natural Resources**
- (MS4) Restrictions on Land Use and Involuntary Resettlement**
- (MS5) Indigenous Peoples**
- (MS6) Cultural Heritage**
- (MS7) Resource Efficiency and Pollution Prevention**
- (MS8) Labor and Working Conditions**
- (MS9) Community Health, Safety and Security**

Figure 7: Types of Risks at PIF and PFD stage in FY25
(% of total number of projects or programs)



ESS Risk Management at PIF and PFD Stage

13. GEF-financed projects and programs are designed to deliver Global Environmental Benefits and strengthen climate change adaptation, yet many interventions operate in complex contexts where environmental and social risks are inherent. Effective risk management therefore depends on early identification of potential adverse impacts and the integration of appropriate mitigation measures into project design. At the PIF and PFD stage, Agencies assess the nature and magnitude of risks and outline additional analytical work to be undertaken during project preparation. For projects and programs rated High, Substantial or Moderate risk, Agencies plan to conduct detailed environmental, social, and climate assessments; develop environmental and social management plans or frameworks; and prepare instruments such as stakeholder engagement plans and Indigenous Peoples Plans. At these early stages, many projects also demonstrate an intention to engage Indigenous Peoples and Local Communities (IPLCs), women, youth, and other vulnerable groups, not only as beneficiaries but also as partners during design and implementation.

14. A High-risk project in the Central African Republic (CAR) demonstrates typical risks identified during PIF preparation. The inclusive and resilient cities project highlights significant risks associated with urban infrastructure rehabilitation – including roads, bridges, and drainage systems – in a fragile setting. Potential impacts are expected to fall disproportionately on **vulnerable groups** including women, youth, refugees, internally displaced populations (IDPs), returnees, refugees, persons with disabilities, and host communities (**MS1**). Broader **insecurity and political instability (MS9)** beyond its borders in Cameroon, Chad, Sudan, South Sudan, the Democratic Republic of Congo and the Republic of Congo, heighten risks for projects in CAR, alongside **limited capacity of national executing entities (MS1)** to manage environmental and social impacts. Mitigation measures include a flexible implementation approach allowing alternative city selection if security conditions deteriorate; strong attention to labor-intensive public works to expand livelihood opportunities; and contractual requirements for construction firms to directly and transparently pay beneficiaries. Priority will be given to community members living close to civil works and to those facing barriers to participation.²⁴

15. A High-risk protected area management project in Indonesia identifies risks linked to **land tenure disputes (MS4)** and potential impacts on **Indigenous Peoples (MS5)**.²⁵ Field visits during PIF preparation documented community dependency on the forest, existing pressures on natural resources, and social vulnerabilities. Strengthened protected area management may unintentionally intensify disputes between land users or restrict access to forest resources. Because specific sites are not yet finalized, grassroots-level Free, Prior and Informed Consent (FPIC) processes will be undertaken during project preparation. The project intends to support co-management with IPLCs and emphasize traditional knowledge in protected area governance.

16. A Substantial-risk project in Madagascar aimed at science-based management of biodiversity and natural resources illustrates both environmental and social risks. Environmental impacts – such as **vegetation loss, erosion (MS3), pollution (MS7)** during civil works, and **waste generation (MS9)** – are predictable, temporary and reversible. However, efforts to improve sustainable management of mangroves and natural forests may require changes in local **livelihood practices, creating short-term economic impact (MS4)**. While long-term benefits are expected through improved resource governance and enhanced rural income, strong community engagement will be necessary. The project plans intensive consultations and coordination with local partners to ensure social inclusion and smooth transitions to sustainable resource use.²⁶

²⁴ “CAR Inclusive and Resilient Cities Project” (GEF ID 11676, Central African Republic, LDCF, World Bank)

²⁵ “Excelling Protected Area Management Effectiveness for Biodiversity Conservation through Landscape Based Approach (ENABLE)” (GEF ID 11861, Indonesia, BD, UNDP)

²⁶ “Madagascar Science-based management of Biodiversity and Natural Resources for Economic Development Project” (GEF ID 11694, Madagascar, BD/CCA, World Bank, MTF)

17. The Global Elimination Program for PC²⁷ is rated High risk at PFD stage due to hazards associated with handling, storage, transport, and disposal of PCBs. Exposure during implementation may **affect workers (MS8)** and **nearby communities (MS9)**, and accidental spills can **contaminate soil and water (MS7)**. Although the social risk classification is Moderate, the overall program qualifies as High risk because child projects may involve high-risk PCB removal activities.

18. Distinct screening approaches are applied in the NGI portfolio, yet several NGI projects are similarly classified as High or Substantial risk at PIF stage. The Green Mobility Financing Facility for Africa²⁸ involves construction of green mobility infrastructure and management of end-of-life electric vehicle components, such as batteries and motors, some of which pose hazardous waste risks. This leads to a High-risk rating, especially where country capacities to manage such materials are limited. Another NGI project, the Rwanda Wildlife Conservation Bond Operation²⁹, carries High or Substantial social risk. Although significant land acquisition impacts are not expected, the demarcation of park boundaries and buffer zones in the Gishwati-Mukura National Park may affect local livelihoods and potentially heighten tensions. Risk of social exclusion and elite capture are also noted, particularly regarding benefit-sharing with women-headed households, elderly persons, and persons with disability. Both NGI projects demonstrate early risk identification and detailed plans for further assessment and mitigation during preparation.

ESS Risk in Fragility and Conflict-Affected Situations Countries

19. Identifying environmental and social risks in Fragile and Conflict-affected Situation (FCS) is essential for ensuring conflict-sensitive GEF programming. Under the Minimum Standard on Community Health, Safety and Security (MS9), Agencies should assess risk arising in conflict and post-conflict setting (para 17, ESS Policy 2019).³⁰ To strengthen this work, the Secretariat presented a “Gap Analysis of GEF-Funded Activity and Engagement in Fragility, Conflict, and Violence-Affected States”³¹ at the 66th GEF Council meeting and, following Council [Decision 11/2024](#)³², issued the Guidance Note on Fragile and Conflict-Affected Situations³³ in November

²⁷ (GEF ID 11749, Global, Multi, World Bank)

²⁸ “Green Mobility Financing Facility for Africa” (GEF ID 11671, Regional, AfDB, CC, GEF-8)

²⁹ “Rwanda Wildlife Conservation Bond (WCB) Operation” (GEF ID 11514, BD, Rwanda, World Bank)

³⁰ Minimum Standard 9: Community Health, Safety and Security (MS9) states that “Agencies demonstrate that they have in place the necessary policies, procedures, systems and capabilities to ensure that: (a) Where the screening or assessment processes described under Minimum Standard 1 identify *risks or potential impacts to the health, safety and security of project- or program-affected communities, further assessments are carried out, considering: [...] (iii) The particular risks that may be present in a conflict or post-conflict context* (para 17, ESS Policy 2019)”.

³¹ GEF/C.66/09, (January 4, 2024) available [here](#).

³² [Joint Summary of the GEF Council Co-Chairs](#) (Decision 11/2024)

³³ GEF Guidance Note on Fragile and Conflict-Affected Situations (November 12, 2024) is available [here](#).

2024. In addition, four FCS-focused webinars – with over 400 participants – highlighted case studies on project design, implementation, monitoring and evaluation, and nature-based solutions.³⁴ These case studies will be compiled as good practices for working in FCS contexts.

20. In the December 2024 and June 2025 Work Programs, nine percent (or 5 projects and programs) are situated in FCS countries listed on the World Bank Group’s “FY25 List of Fragile and Conflict-affected Situations”³⁵ (See Table 1 and 2). These projects show substantially higher ESS risk levels than those in non-FCS contexts. Sixty percent are classified as High risk, and 40 percent are Moderate risk, with no Low-risk classification - an unprecedented trend in recent Work Programs (See Figure 8). By comparison, only 10 percent of projects in non-FCS contexts are rated High or Substantial risk. Notably, three of the five FCS projects (60 percent) are financed through the Least Developed Countries Fund (LDCF).³⁶

21. High-risk projects in FCS settings illustrate effective approaches to identify and mitigate conflict-related risks. For example, a hazardous waste management and policy development project in Ukraine highlights significant risks associated with handling toxic materials in an active conflict context, including worker and community health and safety and heightened social tensions. To address these extreme risks, the project will undertake a Strategic Environmental and Social Assessment, full Environmental and Social Impact Assessment, Emergency Preparedness and Response Planning, a Hazard Risk Assessment, Labor Management Procedure and Stakeholder Engagement Framework implementing full risk management procedures under the Agency’s requirements. Site-specific activities will be designed considering security conditions, land availability, and required safety buffers.³⁷

22. Including regional and global projects and programs that include FCS countries, 18 percent (or 10 projects and programs) of PIFs and PFDs approved in December 2024 and June 2025 Work Programs operate in or include FCS contexts. One-third are classified as High or Substantial risk, and two-thirds as Moderate risk. Five are PFDs, underscoring the need for child projects in FCS contexts to incorporate conflict-sensitive risk assessments and mitigation measures by CEO Endorsement or Approval (See Table 3).

³⁴ Four series of FCS webinars are available here, [Integrating Conflict Sensitivity into Project Design in Fragile and Conflict-affected Situations](#) (April 9, 2025), [Adaptive Management of Projects in Fragile and Conflict-affected Situations](#) (April 23, 2025), [Monitoring and Evaluation of Projects in Fragile and Conflict-affected Situations](#) (May 8, 2025), and [Nature-based Solutions in Fragile and Conflict-affected Situations](#) (June 12, 2025).

³⁵ World Bank Group’s “FY25 List of Fragile and Conflict-affected Situations” (available [here](#), viewed on October 22, 2025)

³⁶ These three LDCF projects include one multi trust fund (MTF) project.

³⁷ “Hazardous Waste Management and Policy Development Project for Ukraine (HWM-PDU)” (GEF ID 11712, Ukraine, CW, World Bank).

23. Recognizing this growing need, twelve GEF Agencies are actively developing additional tools and guidance for managing risks in FCS contexts.³⁸ The GEF Secretariat’s new FCS Guidance Note builds on these efforts, promoting shared learning and strengthened implementation across the GEF Partnership.

Table 1: FY25 List of Fragile and Conflict-affected Situations (WBG 2025)

CONFLICT	INSTITUTIONAL AND SOCIAL FRAGILITY
Afghanistan	Burundi
Burkina Faso	Chad
Cameroon	Comoros
Central African Republic	Congo, Republic of
Congo, Democratic Republic of	Eritrea
Ethiopia	Guinea-Bissau
Haiti	Kiribati
Iraq	Kosovo
Lebanon	Libya
Mali	Marshall Islands
Mozambique	Micronesia, Federated States of
Myanmar	Papua New Guinea
Niger	São Tomé and Príncipe
Nigeria	Solomon Islands
Somalia	Timor-Leste
South Sudan	Tuvalu
Sudan	Venezuela, RB
Syrian Arab Republic	Zimbabwe
Ukraine	
West Bank and Gaza (territory)	
Yemen, Republic of	

³⁸ These are ADB, AfDB, CI, DBSA, FAO, IDB, IFAD, IUCN, UNDP, UNEP, the World Bank, and WWF-US (updated based on [“Gap Analysis of GEF-Funded Activity and Engagement in Fragility, Conflict, and Violence-Affected States”](#) (GEF/C.66/09, January 4, 2024), page 4, para 18)).

Figure 8: Overall ESS risk in projects in FCS countries
(% of projects and programs in December 2024 and June 2025 Work Programs)

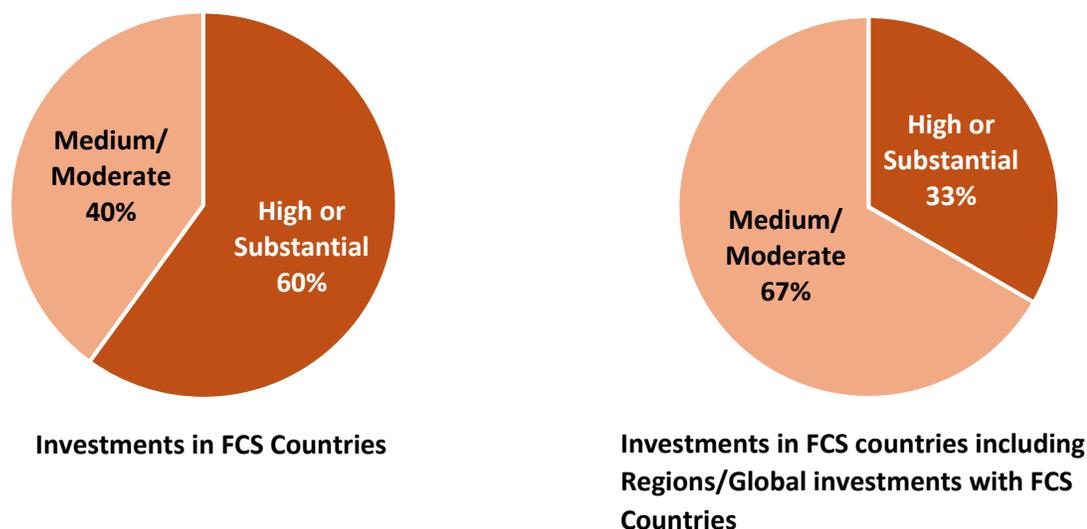


Table 2: Overall ESS risk in projects in FCS countries and application of MS9
(December 2024 and June 2025 Work Programs)

ESS risk level	Agencies	Conflict	Institutional and Social Fragility	ESS MS9	Focal Area	Fund
High/ Substantial	UNDP		Burundi	✓	CCA	GET
	WB	Ukraine		✓	CW	GET
	WB	Central African Republic		✓	CCA	LDCF
Moderate	UNDP	Yemen		✓	Multi	MTF
	FAO		Solomon Islands	-	CCA	LDCF

Table 3: Overall ESS risk in Regional/Global projects and programs including FCS countries
(December 2024 and June 2025 Work Programs)

ESS risk level	Agencies	Regional/Global	Conflict	Institutional and Social Fragility	ESS MS9	Focal Area	Project Type
High/ Substantial	WB	Global	Cameroon, Niger, Nigeria		✓	CW	PFD
	WB	Regional	Mali	Chad	✓	CCA	PFD
Moderate	AfDB	Regional	Central African Republic, Congo DR	Congo	-	IW	PIF (FSP)
	WB	Global	Niger, Nigeria		✓	Multi	PFD

UNIDO	Regional	Ukraine		✓	CW	PIF (FSP)
UNEP	Regional	Burkina Faso, Ethiopia, Niger, Nigeria	Comoros	✓	CW	PIF (FSP)
UNDP	Global	Afghanistan, Burkina Faso, Cameroon, Central African Republic, Congo DR, Ethiopia, Haiti, Lebanon, Mali, Mozambique, Niger, Nigeria, Somalia, Ukraine, Yemen	Burundi, Chad, Comoros, Congo, Eritrea, Guinea-Bissau, Kiribati, Micronesia, Papua New Guinea, Sao Tome and Principe, Solomon Islands, Timor Leste, Tuvalu, Zimbabwe	✓	Multi	PIF (FSP)
ADB	Regional		Micronesia	-	CCA	PFD
FAO	Global	South Sudan, Sudan	Marshall Islands, Venezuela	-	Multi	PIF (FSP)
UNDP	Global	Niger, Nigeria		✓	Multi	PFD

ESS Risk Management at the CEO Endorsement and CEO Approval Stage

24. Environmental and social risks and impacts are more fully identified at the CEO Endorsement and Approval stage. Since the ESS Policy took effect on July 1, 2019, all CEO Endorsements for Full-Sized Projects (FSPs) (344 FSPs)³⁹ and CEO Approvals for Medium-sized Projects (MSPs)(209 MSPs)⁴⁰ approved by June 30, 2025, have included overall ESS risk classifications along with detailed risk screening, assessment and risk management documentation. By this stage, most projects have refined their ESS risk screening based on confirmed activities and geographic locations and prepared comprehensive risk mitigation instruments – such as Environmental and Social Management Frameworks or Plans, gender analysis and action plans, stakeholder engagement plans, and Indigenous Peoples Plans-complete with staffing, timelines, and budget, especially for High and Moderate risk projects.

25. Portfolio analysis at the CEO Endorsement stage shows that 59 percent of FSPs are classified as Moderate ESS risk, while 25 percent fall under High or Substantial risk, similar to patterns observed at the PIF stage (see Figure 3 and 9). As in previous reporting cycles, the Chemicals and Waste Focal Area continues to have a higher share of High or Substantial risk projects (37 percent), and the Asia region also reflects a greater concentration of such projects

³⁹ Out of 344 CEO Endorsement, five of them are GBFF projects (GEF ID 11508, 11509, 11510, 11512, and 11595)

⁴⁰ Out of 209 CEO Approvals, 23 percent or 49 CEO Approvals are the Capacity-building Initiative for Transparency (CBIT).

(34 percent) (See Figure 10 and Figure 11). FCS contexts remain a key driver of risk; among 64 CEO Endorsement projects implemented in FCS countries (19 percent of the portfolio), 39 percent are classified as High or Substantial risk.⁴¹

26. Projects and programs with High or Substantial risk classifications must provide the relevant risk management documents and engage independent experts, as required under the ESS Policy Guidelines.⁴² For example, an ecosystem-based management project in the Black Sea has been classified as High-risk due to potential social impacts on coastal communities reliant on fishing, aquaculture, shipping and tourism, as well as risk linked to the ongoing conflict in Ukraine.⁴³ To manage these risks, the project will require a Strategic Environmental and Social Assessment and an Environmental and Social Management Framework, drawing on specialized expertise to guide policy reform. The project will also consider likely post-war economic and trade scenarios in shaping Blue Economy strategies.

27. Risk classification practices continue to vary among Agencies. UNDP and the World Bank, for instance, classify nearly half of their CEO Endorsements as High or Substantial risk- a trend consistent with earlier stage (See Figure 6 and 12).⁴⁴

28. At the CEO Approval stage, MSPs generally present Low-risk profile. Sixty percent are rated Low risk, and only four percent are classified as High ESS risk (see Figure 13). This pattern mirrors previous years, with all 49 Capacity-building Initiative for Transparency (CBIT) projects assigned Low risk or not applicable risk ratings.⁴⁵

⁴¹ Almost half (or 53 percent, 34 projects) of CEO Endorsed projects in FCS contexts were classified as Moderate risk.

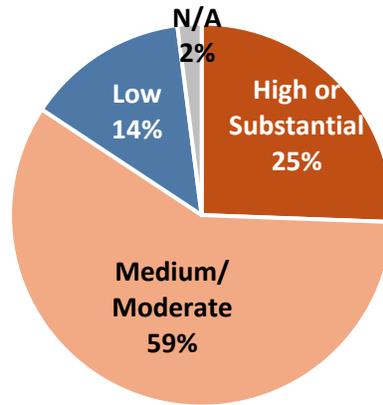
⁴² GUIDELINES ON GEF'S POLICY ON ENVIRONMENTAL AND SOCIAL SAFEGUARDS (SD/GN/03, December 19, 2019) (page 7, para 14 and 15), available [here](#).

⁴³ "Implementing Ecosystem Based Management approaches in the Black Sea Large Marine Ecosystem" (GEF ID 10725, Regional, IW, GET, UNDP, GEF-7).

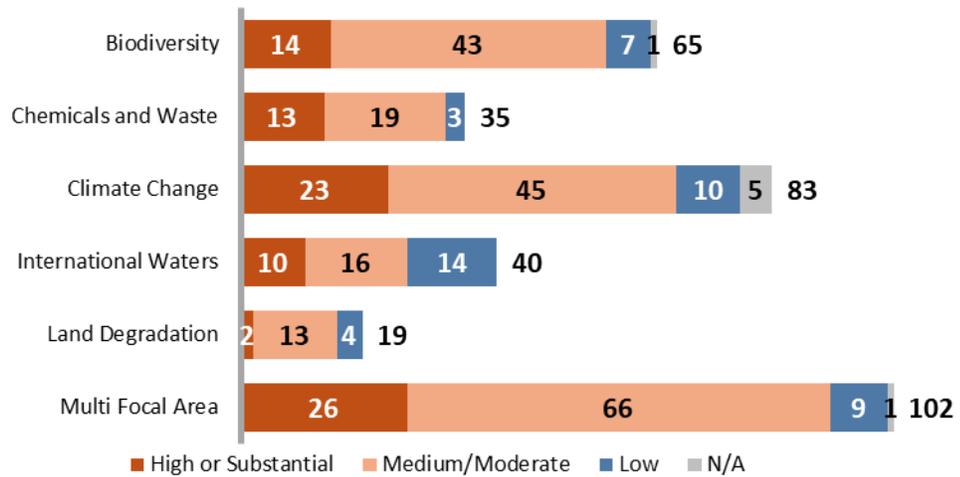
⁴⁴ As of June 30, 2025, there is no CEO Endorsement applying to updated ESS Policy submitted by three Agencies namely BOAD, DBSA and FECO.

⁴⁵ Three of the CBIT projects implemented by UNDP were exempt from UNDP's screening requirement due to the nature of the projects i.e. consisting solely of preparation and dissemination of a report, documents and communication materials; organization of an event, workshop, training; and strengthening capacities of partners to participate in international negotiations and conferences.

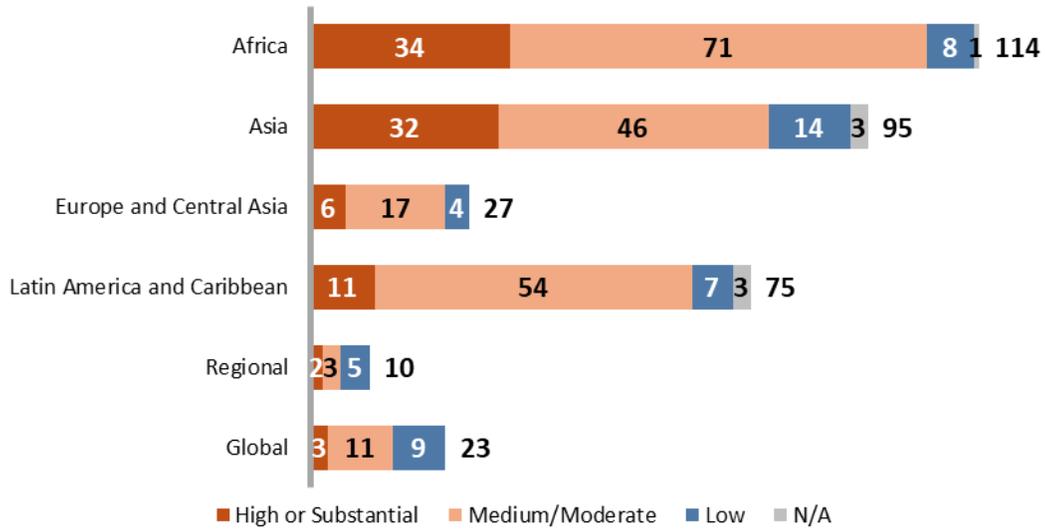
**Figure 9: Overall ESS risk at the CEO Endorsement stage (FSP)
(% of the total number of FSPs from July 2019 to June 2025)**



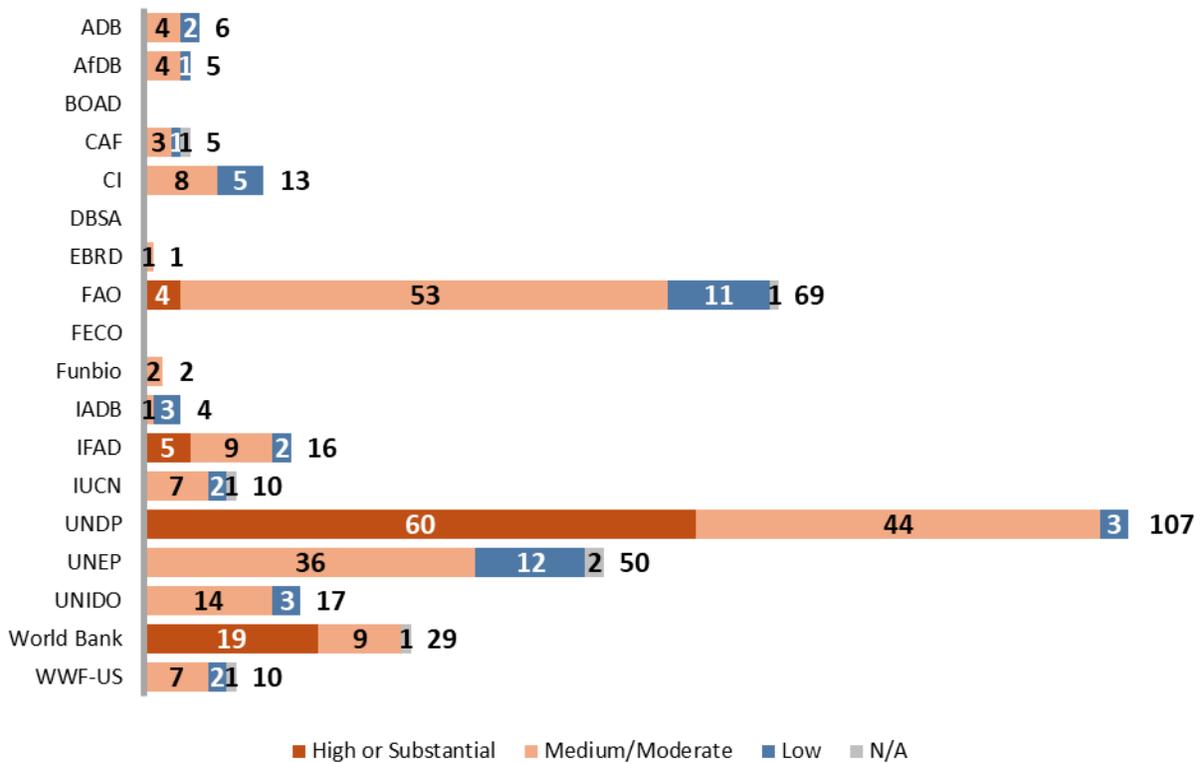
**Figure 10: Overall ESS risk by Focal Areas at the CEO Endorsement stage (FSP)
(Number of projects from July 2019 to June 2025)**



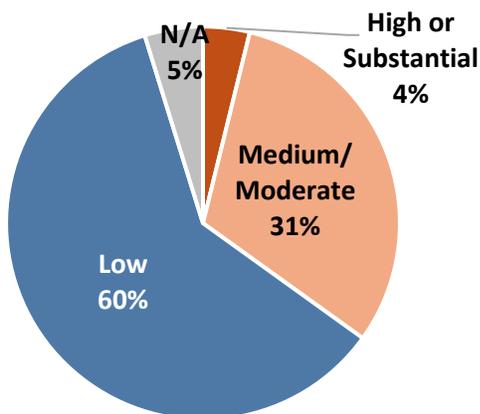
**Figure 11: Overall ESS risk by Regions at the CEO Endorsement stage (FSP)
(Number of projects from July 2019 to June 2025)**



**Figure 12: Overall ESS risk by Agencies at the CEO Endorsement stage (FSP)
(Number of projects from July 2019 to June 2025)**



**Figure 13: Overall ESS risks at the CEO Approval stage (MSP)
(% of the number of MSPs from July 2019 to June 2025)**



29. Effective environmental and social risk management is a cornerstone of GEF project preparation and approval. At CEO Endorsement stage, projects routinely employ tools such as Environmental and Social Impact Assessment (ESIA), Strategic Environmental and Social Assessment (SESA), Indigenous Peoples’ Plan (IPP), environmental and social management framework (ESMF), and Stakeholder Engagement Plan (SEP). These instruments help identify, assess, and mitigate risks, while facilitating meaningful engagement with stakeholders, especially vulnerable groups. Integrating risk mitigation measures into project design and systematically tracking their implementation through sub-indicators are recognized best practices.

30. A biodiversity conservation project in Mexico exemplifies this approach. The project developed an ESMF, IPP and robust SEP to address the complex land tenure issues and the dependence of Indigenous Peoples on natural resources.⁴⁶ Risk such as the use of non-native species and unresolved territorial claims were proactively managed. The Executing Agency, Mexican Fund for the Conservation of Nature (FMCN), demonstrated strong institutional capacity by conducting field visits and securing Free, Prior and Informed Consent (FPIC) from Indigenous Peoples. The project design incorporated Indigenous governance mechanisms and traditional knowledge, fostering trust and partnership. Ongoing FPIC process continued alignment with community priorities. This approach aligns with the GBFF’s criteria for “engagement with and support to Indigenous Peoples and local communities (IPLCs)”, and serves as a model for inclusive project design.

31. Similarly, an adaptive agriculture and rangeland rehabilitation project in Somalia addressed High or Substantial risks, including habitats disruption, culture disruption, and potential conflict.⁴⁷ Through ESIA and conflict-sensitive design, the project enhanced water

⁴⁶ “Mex30x30: Conserving Mexican biodiversity through communities and their protected areas” (GEF ID 11510, Mexico, GBFF, CI, GEF-8).

⁴⁷ “Adaptive Agriculture and Rangeland Rehabilitation Project (A2R2) - Somalia” (GEF ID 10792, Somalia, Multi, MTF, IFAD, GEF-7).

access, improved livelihoods, and promoted peace among pastoralists and farmers. Extensive consultations with Indigenous Peoples, women, and youth ensured broad stakeholder engagement and responsiveness to local needs.

32. These cases demonstrate that early identification of risks and proactive integration of mitigation measures into project design are critical. Strengthened management plans, conflict-sensitive approaches, enforcement of environmental regulations, and support for land tenure and vulnerable groups have enabled projects to navigate complex contexts and deliver environmental and socio-economic benefits.

ESS Information in Mid-term Review and Terminal Evaluation

33. As of June 30, 2025, a total of 29 Mid-term Reviews (MTRs) and 13 Terminal Evaluations (TEs) requiring compliance with new ESS Policy have been submitted. Among the MTRs, ten projects were initially rated as High or Substantial risk at CEO Endorsement stage and all retained this risk rating at MTR stage.⁴⁸ While some MTRs include a dedicated section reviewing the progress of environmental and social risk management and identifying implementation gaps, others lack specific reporting on ESS progress, even for projects with elevated risk profiles. This inconsistency highlights the need for standardized ESS reporting across all MTRs.

34. All 13 TEs pertain to MSPs, and nine of them were rated Low risk⁴⁹ at CEO Approval due to their focus on technical assistance rather than on-the-ground activities.⁵⁰ Nevertheless, every TE included an evaluation of Environmental and Social Safeguards, demonstrating a commitment to comprehensive risk assessment regardless of initial risk rating.

35. Strengthening the monitoring of environmental and social risks management at the MTR stage is essential to address shortcomings that may arise during project implementation. Incorporating the nine categories of the Risk Appetite Framework – including environmental and social risk and political and governance risk (with attention to FCS) – into MTRs would provide a more holistic assessment and facilitate proactive risk mitigation under the new Risk Framework.

36. Illustrative examples from recent MTRs underscore both progress and challenges. In South Africa, the wildlife conservation bond project, classified as High or Substantial risk,

⁴⁸ Ten of MTRs with High or Substantial risk projects are all FSP implemented by UNDP, UNIDO, and World Bank.

⁴⁹ Since two TEs' CEO Approval were approved on July 30, 2019, before the ESS Guideline was approved in December 2019, these projects were not classified as their overall ESS risk at the CEO Approval stage (GEF ID 10296, 10309).

⁵⁰ Two projects are rated as Moderate risk. One is "Transforming the Fashion Sector to Drive Positive Outcomes for Biodiversity, Climate, and Oceans" (GEF ID 10658, Global, MFA, GET, CI, GEF-7) previously reviewed in December 2024 report. The other one is "Seventh Operational Phase of the GEF Small Grants Program in Ecuador" (GEF ID 10147, Ecuador, GET, UNDP, GEF-7) approved on July 30, 2019, before the ESS Guideline was approved in December 2019, and does not include any ESS related information in TE.

provided a detailed update on ESS Safeguards.⁵¹ The MTR documented the effective functioning of incident response mechanisms, particularly in managing two sexual harassment cases, ensuring survivor support and procedural fairness. Additionally, a comprehensive Grievance Redress Mechanism was established and publicly disclosed, in alignment with the Stakeholder Engagement Plan.⁵²

37. In Lebanon, the sustainable transport systems project⁵³ demonstrated adaptive management in response to regional security challenges. The MTR highlighted the project's focus on social inclusion, with specific measures for refugees, migrant (including displaced Syrians), and persons with disabilities. Accessibility requirements were integrated into infrastructure design, and further engagement with disability rights organizations was recommended. However, implementation of these features remains pending due to operational delays and shifting priorities amid the security crisis. The project also showed flexibility in adjusting implementation timelines in response to regional security challenges.

38. MTRs from Ghana, Lao PDR, Rwanda and regional projects revealed gaps in ESS implementation, such as delay in preparing Environmental and Social Management Frameworks, hiring specialists, conducting impact assessments, and operationalizing management plans.⁵⁴ These delays pose ongoing risks and potential reputational concerns for both implementing agencies and the GEF. To mitigate such risks, updated ESS information needs to be included in Project Implementation Reports prior to the MTR stage.

39. Finally, despite Low risk rating, all TE maintained rigorous ESS evaluation. Projects often developed Indigenous Peoples Plans, stakeholder engagement plans with grievance mechanisms, and gender action plans, alongside training on Environmental and Social Safeguards and stakeholder engagement, ensuring inclusivity and equity throughout implementation.

CONCLUSION AND NEXT STEPS

40. Over the past six years, the implementation of the ESS policy has improved markedly. All projects now undergo rigorous screening against the nine Minimum Standards, resulting in

⁵¹ "Wildlife Conservation Bond" (GEF ID 10330, South Africa, BD, NCI, WB, GEF-7)

⁵² Addo Elephant National Park has not had any direct E&S grievances, but communities have raised issues related to benefit sharing, issues that have been adequately addressed through increasing public awareness about opportunities, including for procurement which is targeted to small business community from the vicinity of the park.

⁵³ "Lebanon Sustainable Low-emission Transport Systems" (GEF ID 10358, Lebanon, CCM, UNDP, GEF-7)

⁵⁴ "Establishing a circular economy framework for the plastics sector in Ghana" (GEF ID 10401, Ghana, Multi, UNIDO, GEF-7), "Integrated Water Resource Management and Ecosystem-based Adaptation (EbA) in the Xe Bang Hieng River Basin and Luang Prabang City" (GEF ID 10514, Lao PDR, CCA, UNDP, GEF-7), "Supporting a Green Economy - Decoupling Hazardous Waste Generation from Economic Growth in Rwanda" (GEF ID 10373, Rwanda, CW, UNDP, GEF-7) and "Mainstreaming climate change and ecosystem-based approaches into the sustainable management of the living marine resources of the WCPFC" (GEF ID 10394, Regional, IW, UNDP, GEF-7).

comprehensive risk classification and detailed mitigation plans at the CEO Endorsement and Approval stage. Agencies have established dedicated ESS systems and internal resources, streamlining the integration of safeguards into project design and development.

41. Best practices of ESS risk management are increasingly evident, including conflict-sensitive approaches in Fragile and Conflict-Affected Situations (FCS), early engagement with Indigenous Peoples and local communities, recognition of customary rights, and attention to vulnerable groups and local livelihoods. Many projects now feature ESS risk management plans as core components, supported by dedicated budgets and timelines, which enhance inclusiveness and project quality.

42. While most information on ESS Policy application is drawn from early project stages, PIFs, PFDs, and CEO Endorsements and Approvals, available MTRs and TEs highlight both opportunities and challenges in managing environmental and social risks. This inconsistency highlights the need for standardized ESS reporting across all MTRs. Continued assessment of these reviews will help refine risk management approaches, strengthen support for vulnerable populations, and maximize global environmental benefits.

43. Common challenges in MTRs include delays in preparing or executing Environmental and Social Management Frameworks and related action plans. These delays pose ongoing risks and potential reputational concerns for both implementing agencies and the GEF. To mitigate such risks, updated ESS information needs be included in Project Implementation Reports prior to the MTR stage. While some MTRs include dedicated sections reviewing the progress of environmental and social risk management and identifying implementation gaps, others lack specific reporting on ESS progress, even for projects with elevated risk profiles. This inconsistency highlights the need for standardized ESS reporting across all MTRs.

44. Finally, knowledge sharing remains essential.⁵⁵ The GEF Secretariat will continue to serve as a knowledge hub, promoting the exchange of lessons learned and supporting capacity building in ESS implementation, in alignment with the GEF Strategy for Knowledge Management and Learning.⁵⁶

⁵⁵ GEF/E/C.60/06 (May 25, 2021) “Evaluation of Institutional Policies and Engagement of the GEF” (para 44, 412, 413) available at [here](#)

⁵⁶ GEF/C.66/03/Rev.01 (October 10, 2023) available at [here](#).