



GEF/C.69/Inf.06

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Washington, DC

## **PROGRESS REPORT ON GEF AGENCIES' COMPLIANCE WITH GEF MINIMUM STANDARDS**

## I. Introduction

1. This Progress Report provides information on the implementation of Action Plans by those Agencies found not to be fully compliant with GEF minimum standards during the most recent compliance review exercise: i.e. the *Updated Third Party Review of Agency Compliance with GEF Minimum Standards* and Agency Action Plans, approved by Council in [Decision 5/23](#) on May 8, 2023.<sup>1</sup> This is the fifth progress report following Council approval of Agency Action Plans and follows the Information Note submitted to C.64 in June 2023<sup>2</sup>, C.66 in January 2024<sup>3</sup>, C.67 in June 2024<sup>4</sup>, and C.68 in December 2024<sup>5</sup>. It reflects information available to the Secretariat as of May 1, 2025.

## II. Background

2. At the completion of the GEF-7 phase, all GEF Agencies undertook a self-assessment of their adherence to the four key GEF minimum standards: i.e. fiduciary, environmental and social safeguards, gender equality and stakeholder engagement. The independent Third Party Review of these self-assessments concluded that six of the eighteen GEF Agencies were not fully compliant with all standards and were therefore required to develop Action Plans to address identified gaps, in accordance with GEF policy. The Council, in Decision 5/2023, noted the Action Plans submitted by the Agencies addressing the issues identified in the self-assessment and review process. The decision included a request for the Agencies to report on progress and the Secretariat to report such information to each Council meeting until the respective Action Plans are completed and all agencies are in full compliance.

## III. Summary of Action Plan Implementation

3. Of the 18 GEF Agencies, 17 are now fully compliant with all four minimum standards. ADB reports that its Environmental and Social Framework (ESF)<sup>6</sup> was approved by the ADB Board on 22 November 2024. The GEF Secretariat confirmed that all the partial gaps in ADB's policy compared to the GEF Minimum Standards have been addressed in the ESF. AfDB also confirmed that its "Borrower Guidance Note for E&S Operational Safeguard 10 - Stakeholders Engagement and Information Disclosure"<sup>7</sup> addressed confidential and safe reporting for sexual exploitation, abuse and harassment (SEAH) and gender-based violence (GBV). BOAD has yet to provide additional information to show full compliance with the Minimum Fiduciary Standards as at the date of this report.

4. Table 1 provides a summary of the implementation status of Action Plans by Agencies and Section IV provides additional details on AfDB, ADB, and BOAD. The Secretariat will continue to monitor the implementation of the Action Plan and report progress at future Council meetings.

5. As of May 1, 2025, BOAD has not provided additional responses and supporting documents to show evidence of progress on pending items as detailed in Section IV. This is an ongoing process while

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<sup>1</sup> [GEF/C.64/Inf.09](#): Updated Third Party Review of Agency Compliance with GEF Minimum Standards, May 8, 2023

<sup>2</sup> [GEF/C.64/Inf. 10](#): Progress Report on GEF Agencies' Compliance with GEF Minimum Standards, June 5, 2023.

<sup>3</sup> [GEF/C.66/Inf. 10](#): Progress Report on GEF Agencies' Compliance with GEF Minimum Standards, January 19, 2024.

<sup>4</sup> [GEF/C.67/Inf.08](#): Progress Report on GEF Agencies' Compliance with GEF Minimum Standards, June 4, 2024.

<sup>5</sup> [GEF/C.68/Inf.10](#): Progress Report on GEF Agencies' Compliance with GEF Minimum Standards, November 20, 2024.

<sup>6</sup> Available [here](#).

<sup>7</sup> Borrower Guidance Note for E&S Operational Safeguard 10 -Stakeholders Engagement and Information Disclosure (May 2024). Available [here](#).

BOAD continues to adapt and refine their fiduciary standards and related policies and procedures to meet GEF requirements as well as those of the Adaptation Fund and Green Climate Fund, where BOAD is an accredited agency.

**Table 1. Status of Action Plan Implementation at May 1, 2025**

Agency	Areas of Partial or Non- Compliance per Third Party Review	Action Plan	Status as of November 5, 2024	Status as of May 1, 2025
ADB	<p><b>ESS:</b> 1.4 (l, o), 3.8 (c, f), 5.10 (a, c), 5.11 (j), 6.12 (a-b, e, f, g), 7.14 (d), 9.17 (f)</p>	<p>ESS: Update the Safeguard Policy Statements (SPS) and secure approval by the ADB Board (originally expected in late 2023).</p>	<p><b>MFS: Fully Compliant</b></p> <p>ESS: Action Plan implementation ongoing:</p> <ul style="list-style-type: none"> <li>• ADB completed formal consultation on the revised policy in May 2024 and a revised draft policy was published in September 2024.</li> <li>• ADB is in the process of completing final consultations and expect to submit the final version for ADB Board approval in November 2024.</li> <li>• The new policy, referred to as the Environmental and Social Framework is expected to be fully aligned with the GEF and with other MDBs.</li> </ul>	<p><b>MFS: Fully Compliant</b></p> <p><b>ESS Fully Compliant:</b></p> <ul style="list-style-type: none"> <li>- The Environmental and Social Framework (ESF) was approved by the ADB Board on 22 November 2024.</li> <li>- All the partial gaps in ADB’s policy compared to the GEF Minimum Standards have been addressed in the ESF. <ul style="list-style-type: none"> <li>• The ESF will become effective 1 January 2026, or a later date as determined by Management after confirming the readiness to implement the ESF and following Board consultations on the same.</li> <li>• The draft guidance notes for the 10 Environmental and Social Standards will be disclosed in the 3rd Quarter of 2025 and finalized in the 4th Quarter of the same year.</li> </ul> </li> </ul>
AfDB	<p><b>MFS:</b> II.8 (f)</p> <p><b>ESS:</b> 1.4 (d, f, l, m, o), 2.5(f), 3.8(e), 4.9(i), 5.11(i-j), 6.12(f-g), 9</p> <p><b>SE:</b> 16(b)</p>	<p>MFS: Update and approve the whistle blower policy. Implementation and roll-out of the policy to governance and staff members.</p> <p>ESS: Finalise revisions in the updated Integrated Safeguards System (ISS)</p>	<p><b>MFS: Fully Compliant</b></p> <p>ESS: Fully Compliant (pending confirmation)</p> <ul style="list-style-type: none"> <li>• Confirmation pending on provisions for confidential reporting for GBV</li> </ul>	<p><b>MFS: Fully Compliant</b></p> <p><b>ESS: Fully Compliant</b></p> <ul style="list-style-type: none"> <li>• AfDB’s “Borrower Guidance Note for E&amp;S Operational Safeguard 10 - Stakeholders Engagement and Information Disclosure” addressed confidential and safe</li> </ul>

Agency	Areas of Partial or Non- Compliance per Third Party Review	Action Plan	Status as of November 5, 2024	Status as of May 1, 2025
		and secure approval by the AfDB Board.		reporting for SEAH/GBV.
BOAD	<p><b>MFS:</b> I.1(a-d), I.2(a-i), I.3(a-e), I.4(a-b), I.5(a-d), II.1(e), II.2(d, g), II.3(a, c), II.5(a-c), II.6(d-i), II.7(a, c, d), II.8(a-f)</p>	<p><b>MFS:</b> Develop an action plan to address all partial compliance with 2020 policy assessment. Develop an action plan to document and evidence the implementation of remedial actions to address all findings stemming from internal and external audit and evaluation reports.</p>	<p><b>MFS:</b> Areas of divergence between BOAD self-assessment and Third Party Review findings have been reviewed.</p> <ul style="list-style-type: none"> <li>• Audit issues resolved. Public Audit Reports now on BOAD website here: <a href="#">Le fond pour l'environnement mondial - La BOAD</a></li> <li>• Other issues remain under review - see Section IV for detail</li> </ul> <p><b>ESS: Fully Compliant</b></p>	<p><b>MFS:</b> Areas of divergence between BOAD self-assessment and Third Party Review findings have been reviewed. Some issues remain outstanding. - see Section IV for detail</p> <p><b>ESS: Fully Compliant</b></p>

**IV. Additional detail on Outstanding Issues**

**i. Asian Development Bank**

6. The Environmental and Social Framework (ESF) was approved by the ADB Board on 22 November 2024. The Environmental and Social Framework (ESF) comprises:

- (i) Vision, which sets out the aspirations of ADB regarding environmental and social (E&S) sustainability;
- (ii) Environmental and Social Policy (E&S Policy), which sets out the mandatory responsibilities that apply to ADB;
- (iii) Environmental and Social Standards (ESSs), which set out the mandatory requirements that apply to borrowers/clients;
- (iv) Requirements for Financing Modalities and Products, which set out the mandatory responsibilities that apply to ADB and mandatory requirements that apply to borrowers/clients for different financing modalities and products; and
- (v) Prohibited Investment Activities List.

7. The ESF will become effective 1 January 2026, or a later date as determined by ADB Management after confirming the readiness to implement the ESF and following Board consultations on the same. It will supersede the SPS, subject to the following transitional arrangements: (i) for projects that have been approved or have a concept note approved by ADB prior to the effective date of the ESF, the SPS will continue to apply; and (ii) for new projects for which a concept note is approved by ADB on or after the effective date of the ESF, the E&S Policy, ESSs, the requirements for financing modalities and products, and the prohibited investment activities list will apply.

8. The draft guidance notes for the ten Environmental and Social Standards will be disclosed in the third quarter of 2025 and finalized in the final quarter of the same year. The Annex I table shows the partial gaps in ADB's policy compared to the GEF Minimum Standards have been addressed in the ESF.

**ii. African Development Bank (AfDB):**

9. AfDB has completed its action plan and provided relevant information confirming it has addressed identified gaps related to confidential reporting on gender-based violence. AfDB's updated Integrated Safeguards System (ISS)<sup>8</sup> provides a structured and effective approach to managing environmental and social (E&S) risks in development projects.

10. **On SEAH and GBV:** AfDB's updated ISS includes multiple provisions regarding identification of sexual exploitation, abuse and harassment (SEAH) and gender-based violence (GBV) and aligns with the GEF requirements. AfDB also developed the Borrower Guidance Note for E&S Operational Safeguard 10 - Stakeholders Engagement and Information Disclosure in 2024. This Borrower Guidance Note addressed confidential and safe reporting in the case of sexual exploitation, abuse and harassment (SEAH) and gender-based violence (GBV). It includes: *"Where the risks of SEAH/GBV occurring be high, the project grievance mechanism could incorporate specific procedures for reporting SEAH/GBV, which are confidential and safe, minimize the reporting burden on survivors, and provide services in a gender-sensitive manner that minimize reprisal risk."* (page 18, para 31). With this clarification, AfDB has closed the final gap in its Action Plan.

11. AfDB also has developed a comprehensive Environmental and Social (E&S) training programme for both internal and external stakeholders. Internally, within AfDB, online E&S courses on the AfDB's Operations Academy have been developed to help Bank staff involved in operations understand the key E&S requirements at each stage of the project cycle and critically the technical E&S support that AfDB provides to borrowers/clients during project preparation and implementation. In addition, on demand E&S training to Sector staff is always delivered at departmental meetings and workshops. Externally, E&S training occurs during project implementation support missions. Furthermore, a dedicated training course has been developed for project implementation units (PIUs), line ministries, consultants, NGOs/CSOs, contractors and all stakeholders involved in the preparation of E&S studies and the implementation of E&S measures. More recently in 2024, and with the roll out of the updated ISS, the E&S course is being rolled out as a 5-day course across number of countries: 8 in 2024, 12 planned for 2025 and further countries to be added to the pipeline. In parallel with the capacity building program, AfDB has also initiated a systematic assessment of country systems which will result in capacity building action plan

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<sup>8</sup> African Development Bank Group's Integrated Safeguards System. available [here](#).

owned and implemented by the competent national Authority (Ministries responsible for E&S enforcement).

iii. **BOAD**

12. As of May 1, 2025, the following issues are still pending and require BOAD to provide additional information:

- **I.2 relating to procurement:** All except (d) require further information to confirm policies and procedures are being applied in practice.
- **I.4(a) relating to procedures for operational completion and financial closure, including reporting:** In its January 2023 action plan, BOAD committed to an update of the Project Completion Manual to cover financial closure. Confirmation of this by BOAD, and submission of the Manual is pending.
- **II.2(d) relating to institutional financial risk assessment processes and related II.3 (a) Due diligence assessments of partner fiduciary risks:** BOAD's 2023 action plan on residual risks has been defined and related reporting is in the course of finalization, with an original expected completion date of 2023. Without reviewing the detailed information, it is not possible to assess if this sub-standard has been properly addressed.
- **II.3 (b) Information regarding funding agreements is made publicly available:** This was included in BOAD's 2020 and 2023 action plans, but its status is not yet updated as of this reporting date.

## Annex I. Analysis of partial gaps addressed in the ADB’s new ESF

<b>Assessment/Gaps (GEF C.57/05, November 20, 2019)</b>	<b>GEF Assessment</b>
<i>Minimum Standard 1: Environmental and Social Assessment, Management and Monitoring</i>	
8. ADB’s policies and procedures address most GEF criteria of MS 1. However, the following partial gaps were identified:	
<p>(a) <u>Partial Gap:</u> Para. 4.l states that differentiated risks to persons with disabilities be systematically addressed in screening, assessment, and planning in a manner that ensures non-discrimination and equality, and provision of opportunities and benefits to persons with disabilities on an equal basis with others. ADB’s SPS requires screening and assessment of risks to vulnerable groups, including to persons with disabilities. ADB project documentation demonstrate attention to the risks and circumstances of persons with disabilities. <u>However, the SPS does not fully address the GEF emphasis on ensuring nondiscrimination and equality of opportunity for persons with disabilities.</u> ADB’s Strategy 2030 Operational Priority 1 plan emphasizes that ADB will strengthen attention to disability inclusion in programming.</p>	<p>This partial gap has been addressed in the newly approved ESF. In addition to the definition of “disadvantaged or vulnerable” and “C. Nondiscrimination and Equality of Opportunity and Treatment” under the “<b>ESS2: Labor and Working Conditions</b>”, ADB in its Vision states “<i>ADB will promote nondiscrimination by working with its DMCs to create enabling environments that provide equitable access to services and benefits and permit meaningful participation of all, including disadvantaged or vulnerable people.</i>” (page 1, para 4)</p>
<p>(b) <u>Partial Gap:</u> Para. 4.o: Para. 4.o requires adoption of reporting and response protocols for addressing incidences of GBV/SEA. The SPS and IPSA require identification of gender-differentiated risks and seek to address GBV risks through the focus on vulnerability. ADB Strategy 2030 Operational Priority 2 on gender states that ADB will expand operations addressing GBV and will assess project risks of sexual harassment, SEA, human trafficking. Recently approved templates seek to ensure that such risks are identified at project approval. ADB has a workplan to develop operational guidelines on GBV risks. <u>However, at this time it does not appear that the issue of establishing GBV response and reporting protocols is fully addressed.</u></p>	<p>This partial gap has been addressed in the newly approved ESF. In addition to two good practice notes on SEAH, environmental and social standard (<b>ESS 2: Labor and Working Conditions</b> (para 35), and <b>4: Health, Safety, and Security</b> (para 29) require establishing confidential reporting channels for SEAH incidents.</p>

<p><i>Minimum Standard 3: Biodiversity Conservation and the Sustainable Management of Living Natural Resources</i></p>	
<p>10. The SPS includes policy requirements for the protection and conservation of biodiversity and sustainable management of renewable natural resources. ADB’s policies and procedures address most GEF criteria of MS3. However, the following partial gaps were identified:</p>	
<p>(a) <u>Partial Gap: Para. 8.c states that procurement of natural resource commodities may not contribute to significant conversion or degradation of natural habitats, where feasible, and that the choice of suppliers should be limited to those who can demonstrate compliance with this requirement.</u> ADB’s SPS requirements regarding sustainable management of natural resources requires. in the context of projects, application of sustainable management principles, including where appropriate independent certification. ADB’s guidance note on procurement provides for adoption of sustainable procurement requirements, however this is not considered mandatory. <u>The ADB requirements do not fully address the scope of GEF procurement criteria (which extends beyond the project context).</u></p>	<p>This partial gap has been addressed in the newly approved ESF. <b>ESS 3: Resource Conservation and Pollution Prevention</b> requires the borrower/client to obtain an appropriate system of independent certification to demonstrate the sustainable management of resources. (para 11) In addition, <b>ESS1: Assessment and Management of Environmental and Social Risks and Impact</b> requires the borrower/client to identify and assess adverse risks and impacts to ecosystems and biodiversity related to primary suppliers. (para 36) Furthermore, <b>ESS6: Biodiversity Conservation and Sustainable Natural Resources Management</b> requires the borrower/client to ensure that risk-based sustainable resource procurement, management, and verification procedures are in place to evaluate its primary suppliers. (para 35)</p>
<p>(b) <u>Partial Gap:</u> Para. 8.f requires that projects conform with applicable frameworks and measures related to access and benefit sharing in the utilization of genetic resources. This issue is partially addressed in the ADB Indigenous Peoples safeguard (covering use and commercial development of indigenous peoples’ knowledge, culture and natural resources). ADB requires that projects meet all national obligations, including where a country has ratified the CBD Nagoya Protocol on ABS. <u>While this would address many country situations, a gap may still exist where a country has not ratified the protocol. GEF’s requirement in this regard is broader in scope.</u></p>	<p>This partial gap has been addressed in the newly approved ESF. <b>ESS6: Biodiversity Conservation and Sustainable Natural Resources Management</b> requires the borrower/client to “ensure activities comply with the host country’s applicable laws, where they exist, may include those related to access and benefit-sharing in the utilization of genetic resources.” (para 12) In addition, where the project promotes commercial development of Indigenous Peoples’ land or natural resources, <b>ESS7: Indigenous Peoples</b> requires the borrower/client to afford due process, and offer compensation together with culturally appropriate sustainable development opportunities to project-affected Indigenous Peoples [...] including [...] “enabling Indigenous Peoples to share equitably in the benefits to be derived from the commercial development of the land or natural resources where the borrower/client intends to utilize land or natural</p>

	<i>resources that are central to the identity and livelihood of project-affected Indigenous Peoples and their use exacerbates livelihood risks.” (para 45)</i>
<i>Minimum Standard 5: Indigenous Peoples</i>	
12. The SPS establishes a framework for avoidance and/or minimization of impacts on indigenous communities, provision of culturally appropriate benefits, and recognition of indigenous people’s rights to participate in project decision-making. ADB’s Indigenous Peoples safeguard addresses most of the GEF MS5 requirements; however, some partial gaps were identified:	
(a) <u>Partial Gap</u> : Para. 10a: FPIC: The first FPIC circumstance of MS5 requires obtaining FPIC for projects with “impacts” on indigenous lands and territories, including locating projects on such lands or commercial development of resources on such lands. The relevant SPS consent requirement is limited to commercial development. In addition, the scope of potential impacts that may trigger consent requirements do not fully align ( <u>GEF: impacts on “lands and resources;” SPS: impacts on “livelihoods” and “cultural/ceremonial/spiritual uses”</u> ). <u>ADB has noted that its broad meaningful consultations requirement would likely address the issues targeted by the GEF FPIC circumstances, however the SPS policy language remains narrower in scope.</u>	These partial gaps related to FPIC have been addressed in the newly approved ESF. <b>ESS7: Indigenous Peoples</b> requires the borrower/client to obtain FPIC “ <i>when a project will: (i) have adverse impacts on lands and natural resources subject to traditional ownership or under customary use or occupation; [...] or (iii) have significant impacts on Indigenous Peoples’ cultural heritage that is material to their identity and culture, and/or to ceremonial and/or spiritual aspects of their lives.</i> ” (para 36)
(b) <u>Partial Gap</u> : Para. 10.c: FPIC: The third FPIC circumstance of MS5 requires obtaining FPIC for projects with “significant impacts” on indigenous people’s cultural heritage or the “use of such cultural heritage for commercial purposes.” The relevant SPS consent requirement applies more narrowly to “commercial development of the cultural resources and knowledge of Indigenous Peoples.”	
(c) <u>Gap</u> : Para. 11.j requires that appropriate measures be taken to address the special circumstances of indigenous peoples living in voluntary isolation. The SPS does not address this requirement.	This partial gap has been addressed in the newly approved ESF. When a project will potentially affect remote groups of Indigenous Peoples with limited external contact, <b>ESS7: Indigenous Peoples</b> requires the borrower/client to “ <i>take appropriate</i>

	<i>measures to recognize, respect, and protect their land and territories, environment, health, and culture, and to avoid undesired contact with them as a consequence of a project. The borrower/client will not process further the aspects of a project that would result in such undesired contact.” (para 23)</i>
<i>Minimum Standard 6: Cultural Heritage</i>	
13. The SPS includes policy and procedural requirements to avoid or minimize impacts on physical cultural resources (PCR). Some partial gaps were identified in comparison to the requirements of MS6:	
(a) <u>Partial Gap:</u> Para. 12 (most provisions in section, including 12.a, 12.b, 12.e): Definition of Cultural Heritage: The SPS environmental safeguards include requirements regarding the conservation of “physical cultural resources” (PCR). The term PCR is defined as “moveable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance.” <u>The term PCR does not encompass the full range of Cultural Heritage as defined in the GEF MS, namely in that it does not specifically address “intangible cultural heritage,” that is, the “practices, representations, expressions, knowledge, or skills” that communities, groups, individuals recognize as part of their heritage (see full GEF definition in glossary).</u> ADB has noted that if national law covers intangible cultural heritage it would address this aspect; however, a gap would remain where national law does not address it.	This partial gap has been addressed in the newly approved ESF. <b>ESS8: Cultural Heritage</b> define cultural heritage along the line of GEF Minimum Standard 6: Cultural Heritage (page 4).
(b) <u>Partial Gap:</u> Para. 12.f requires measures to ensure continued access to cultural heritage in the event a project imposes access restrictions. While the SPS safeguards on Involuntary Resettlement and Indigenous Peoples address this circumstance (in full or in part), the GEF requirements apply more broadly, including to projects for which the Involuntary Resettlement safeguard may	This partial gap has been addressed in the newly approved ESF. Where a project may temporarily or permanently prevent user access to or use of cultural heritage sites, including for activities such as pilgrimages, festivals, religious events, or personal contemplative visits, <b>ESS8: Cultural Heritage</b> requires the borrower/client to provide continued access to the cultural heritage sites, or will provide an alternative means of access, subject to

<p>not be invoked. ADB’s general requirements to identify and mitigate project-related adverse impacts may address this provision (or may not depending on the scope of the risk assessment). <u>The SPS’s special considerations for impacts on (physical) cultural heritage do not specifically address the issue of continued access.</u></p>	<p>overriding health, safety, and security considerations based on meaningful consultation with project-affected persons. (para 21)</p>
<p>(c) <u>Partial Gap: Para. 12.g requires fair and equitable sharing of benefits from any commercial use of cultural heritage. The SPS addresses this issue in the context of commercial development of indigenous peoples’ “cultural resources and knowledge.” However, the GEF requirement applies to all relevant projects (not solely those affecting indigenous peoples). ADB would address this issue where it is enacted into national law, but a gap would remain where it is not.</u></p>	<p>This partial gap has been addressed in the newly approved ESF. Where a project proposes to use cultural heritage including traditional knowledge and techniques, or where a project proposes to enhance or develop a cultural heritage site that has long-standing association with a traditional or indigenous community, <b>ESS8: Cultural Heritage</b> requires the borrower/client to (i) inform project-affected persons, including the traditional or indigenous users of a cultural heritage site or the holders of intangible cultural heritage, of their rights under the host country’s applicable laws, the scope and nature of the proposed commercial or non-commercial use or development, and the potential consequences of such use or development; and (ii) enter a documented good-faith negotiation process with project-affected persons, including the traditional or indigenous users of a cultural heritage site or collection, or the holders of intangible cultural heritage, to reach agreement on an arrangement that provides for fair and equitable sharing of benefits from the proposed use or development of such cultural heritage, consistent with their customs and tradition. (para 40-41)</p>
<p><i>Minimum Standard 7: Resource Efficiency and Pollution Prevention</i></p>	
<p>14. The SPS environmental safeguards include requirements that projects avoid and minimize the generation of pollution, wastes, hazardous materials and promote the safe use of pesticides as well as resource efficiency measures. ADB’s policies, procedures and guidelines fully address all but one of the GEF MS7 requirements:</p>	
<p>(a) <u>Partial Gap: Para. 14.d, among other requirements, prohibits use of pesticides that meet the criteria of carcinogenicity,</u></p>	<p>This partial gap has been addressed in the newly approved ESF. Where a project involves pest management measures, <b>ESS3: Resource</b></p>

<p><u>mutagenicity, or reproductive toxicity as set forth by relevant international agencies.</u> The SPS requires the use of less hazardous substitutes for all chemicals and materials. It also bans the use of pesticides that fall into WHO classifications 1a and 1b, and limits use of WHO Class II pesticides. The SPS also calls for pesticide management in accordance with international good practice. <u>These requirements address some but not all of the updated GEF criteria, particularly those on prohibited classes of pesticides due to carcinogenicity, mutagenicity, or reproductive toxicity (GHS Categories 1A and 1B; see the criteria for Highly Hazardous Pesticides in the 2016 FAO/WHO Guidelines on Highly Hazardous Pesticides; note that WHO Class 1a and 1b pesticides are addressed by criterion 1 of the eight HHP criteria).</u></p>	<p><b>Conservation and Pollution Prevention</b> requires the borrower/client to give preference to integrated pest management or integrated vector management or a combination of these two approaches. Priority will be given to the use of traditional and indigenous methods, where appropriate, and biological methods and chemical pesticides will be used as a last resort to prevent unacceptable levels of pest damage (para 29).</p> <p>In the procurement of any pesticide for a project, the borrower/client is required to assess the nature and degree of associated risks during the E&amp;S assessment described in ESS1 and develop appropriate management and mitigation measures, considering the proposed use (para 31).</p> <p>The borrower/client is required, on a case-by-case basis and in consultation with ADB, to consider the use of pesticides not yet subject to extensive international regulatory tests, with a presumption against their use on a project. Before such consideration, the borrower/client will engage a qualified expert to conduct a risk assessment, justify the use of such chemicals, and explain in detail any risks to any E&amp;S receptors, based on internationally peer-reviewed evidence (para 32).</p> <p>The borrower/client is required to apply the following criteria to the selection and use of such pesticides: (i) they will have negligible adverse human and ecosystem health effects; (ii) they will be shown by documented evidence to be effective against the target species; and (iii) they will have minimal effect on non-target species and the natural environment, as supported by internationally peer-reviewed scientific evidence (para 33)</p> <p>The borrower/client is required to avoid and, where avoidance is not possible, minimize as far as possible the use of pesticides in areas sensitive for groundwater, surface water, and biodiversity, and areas where the risks of E&amp;S receptors' exposure to pesticides is high (para 35).</p>
<p><i>Minimum Standard 9: Community Health, Safety and Security</i></p>	
<p>16. The SPS contains a range of provisions regarding community health and safety. It requires identification and assessment of risks and impacts to the safety of affected communities throughout the project cycle. It emphasizes prevention or avoidance of such risks over minimization.</p>	

<p>ADB's policies, procedures and guidelines address all but one of the GEF MS9 requirements:</p>	
<p>(a) <u>Partial Gap:</u> Para. 17.f requires consideration of potential risks associated with the use of security personnel (i.e. security arrangements are proportional and consistent with applicable national laws and good international industry practice). ADB's SPS requires analysis of potential risks and impacts in the project's area of influence, including facilities controlled by contractors. <u>This may partially address the GEF requirement, but it is general in nature and does not specifically address risks associated with security arrangements.</u></p>	<p>This partial gap has been addressed in the newly approved ESF. When a borrower/client retains employees or contractors to provide security services for its personnel and property, <b>ESS4: Health, Safety, and Security</b> requires the borrower/client to assess risks posed by the security arrangements to those within and outside a project site and implement and monitor a security management plan that is proportionate to the nature and scale of the assessed risks. In making such arrangements, the borrower/client is required to ensure that security personnel are hired in accordance with the host country's applicable laws (para 46).</p>