Supplemental Guidance: Disclosure of Project-related Social and Environmental Screenings, Assessments, and Management Plans

Note: this supplemental guidance¹ will be updated once the SESP online tool is operational

1. Introduction

Transparency is essential to building and maintaining public dialogue, increasing public awareness, enhancing good governance, accountability, and ensuring programmatic effectiveness. UNDP is committed to ensuring that relevant information about UNDP programmes and projects will be disclosed to help affected communities and other stakeholders to understand the opportunities and risks of proposed activities and to facilitate meaningful, effective and informed participation of stakeholders in project formulation and implementation.

UNDP's <u>Information Disclosure Policy</u> establishes a presumption in favor of disclosure whereby information concerning UNDP programmes and operations is made available to the public unless there is a compelling reason for confidentiality.² The Policy stipulates that general project information and project documents are to be disclosed through the <u>UNDP Transparency Portal</u> (open.undp.org).

The Information Disclosure Policy specifically requires disclosure of Project Documents and

"the completed Social and Environmental Screening Procedure [SESP] and any related draft and final social and environmental assessments and management plans. Screenings and assessments conducted prior to project approval will be annexed to the Project Document. Subsequent reports and drafts will be disclosed through the UNDP Transparency Portal" (para. 12.g and Annex 1).

The Policy also notes that country specific documentation is available also from the appropriate Regional and Central Bureaux, Country Office websites.

UNDP's <u>Social and Environmental Standards</u> (SES) reinforce the Information Disclosure Policy and stipulate further requirements regarding disclosure of project-related information concerning stakeholder engagement, social and environmental screening, assessments, management plans, and monitoring reports. This note provides guidance on addressing these SES requirements.

2. Timely, accessible, and appropriate disclosure

UNDP is committed to ensuring meaningful, effective participation of stakeholders in its projects. Stakeholders require access to relevant project information in order to understand potential project-related opportunities and risks and to engage in project design and implementation.

For projects with potential adverse social and environmental impacts, stakeholders need access to screening reports, draft and final assessments and management plans. This information is to be disclosed in a timely manner, in an accessible place, and in a form and language understandable to affected persons and other stakeholders. These elements of effective disclosure are briefly elaborated below:

• **Timely disclosure:** information on potential project-related social and environmental risks and impacts and mitigation/management measures should be provided in advance of decision-making.

¹ UNDP's SES Guidance Notes (see <u>SES Toolkit</u>) provide guidance for implementing UNDP's Social and Environmental Standards (SES). The SES Guidance Notes help to explain the relevant policy requirements of the SES; they do not set policy. In the case of any inconsistency or conflict between the Guidance Notes and the SES, the provisions of the SES prevail.

² The Information Disclosure Policy defines a range of limited exceptions to disclosure in Part IV.

Draft SESPs, assessments and management plans should be provided in advance as part of the stakeholder consultation process. In all cases, draft and final screenings, assessments and management plans must be disclosed and consulted on prior to implementation of activities that may give rise to potential adverse social and environmental impacts.

- Accessible information: Stakeholders need to be able to readily access information regarding
 assessments and management plans. While local regulatory requirements might mandate, for
 example, availability of environmental assessments in government offices, this may not be
 sufficient to ensure that local stakeholders are able to access the information. Other means of
 dissemination may need to be considered, such as posting on websites, public meetings, local
 councils or organizations, newsprint, television and radio reporting, flyers, local displays, mail.
- Appropriate form and language: Information needs to be in a form and language that is readily understandable and tailored to the target stakeholder group. Summary information from assessments and management plans may need to be translated and presented by various means (e.g. written, verbal). Level of technical detail, local languages and dialects, levels of literacy, persons with disabilities, roles of women and men, and local methods of disseminating information are important considerations in devising appropriate forms of disclosure. A general solicitation of feedback on project documents may not be an appropriate form of information sharing. Rather, the material may need to be presented in a contextual manner, such as the presentation of options with key information and questions designed to solicit feedback. Appropriate forms of proactive disclosure should be utilized beyond web posting of information. These may include radio broadcasts, brochures, community postings, SMS, oral presentations, etc. Also, it is vital to ensure that appropriate communication methods are devised to reach potentially marginalized and disadvantaged groups.

The stakeholder engagement process is an excellent moment to solicit from stakeholders the types of information they want and need and the most appropriate formats, languages and mechanisms for dissemination.

3. SES disclosure requirements

As part of the stakeholder engagement process, UNDP's SES require that project stakeholders have access to relevant information. Specifically, the SES (SES, Part C, para. 28) stipulates that, among other disclosures specified by UNDP's policies and procedures, UNDP will ensure that the following information be made available:

- Information on a project's purpose, nature and scale, duration, and potential risks and impacts
- Stakeholder engagement plans, summary reports of stakeholder consultations, and a public record of stakeholder engagement throughout the project cycle (note that where necessary identities of stakeholders may be withheld, and statistical information provided)
- Social and environmental screening reports with project documentation
- Draft social and environmental assessments, including any draft management plans
- Final social and environmental assessments and associated management plans
- Any required social and environmental monitoring reports.

Disclosure of SES-related documentation occurs both centrally and at the local level. As noted above, draft SESPs, assessments and management plans should be made available locally as part of the stakeholder consultation process, which may also include disclosure through Regional or Country Office websites.

Final SES-related documentation should be disclosed both locally as well as through the UNDP Transparency Portal. Completed SESPs are appended to the ProDoc and uploaded to the Project Document Center (PDC)

which posts information to the relevant project pages on UNDP's Transparency Portal (open.undp.org). (Note that this is separate from the requirement to upload SESPs to the project Quality Assurance system as part of the QA process.) Other SES documentation—social and environmental assessments, management plans/frameworks, revised SESPs, SES-related monitoring reports—should also be uploaded to relevant project pages through the PDC. These two documents (link and link) provide information on how to upload project information to the Project Document Center. In the PDC upload system, the document type would be "Social and Environmental Standards" and the documents should be classified as "public."

As outlined in the SES and <u>UNDP's Social and Environmental Screening Procedure</u> (SESP), the type and timing of assessments and management plans vary depending on the level of the social and environmental risks and impacts associated with a project as well as timing of the social and environmental assessment. Table **A3.1** below outlines various scenarios for disclosing both draft and final screenings, assessments and management plans.

TABLE A3.1. SES/SESP DISCLOSURE GUIDANCE

WHAT	WHEN	нош
DRAFT SESP	 During project design stage stakeholder consultations, gathering input to SESP If assessment takes place during project design, then SESP can be shared and consulted as part of scoping process for assessment 	 Appended to Project Concept Note and/or draft Project Document and distributed to project stakeholders
FINAL SESP	• Post PAC, when Project Document disclosed (SESP included as an Annex)	 As Annex to the Project Document, uploaded to Project Document Center, which then posts it to project pages on open.undp.org Posted on UNDP unit (e.g. CO) website

DRAFT ASSESSMENTS AND MANAGEMENT PLANS

 Moderate Risk Projects with <u>no</u> stand-alone assessment When no separate assessment is needed,³ a summary of the analysis contained in the SESP and ProDoc, together with the documents and proposed management measures, should be shared with project-affected stakeholders, and revised per relevant stakeholder feedback prior to finalization. 	 At least 30 days prior to PAC Part of stakeholder consultations 	 Summary should be translated in local language and distributed locally Disclose draft ProDoc Posted on UNDP unit (e.g. CO) website⁴
 Moderate Risk Projects with stand-alone assessment and management plan Drafts of any stand-alone targeted assessments and management plans 	 At least 30 days <u>prior</u> to PAC if assessment conducted as part of project preparation If undertaken as part of project implementation, must be disclosed and consulted on at least 30 days <u>prior</u> to implementation of any activities that may cause adverse social/environmental impacts 	 At a minimum, ensure a summary report of draft assessment and management plan is translated into local languages and made available in accessible location together with draft assessment and management plan Disclose draft ProDoc Posted on UNDP unit (e.g. CO) website

³ "In cases where potential adverse impacts are limited in number, well understood, clearly circumscribed, and can be easily avoided or mitigated, the analysis of social and environmental risks and impacts and recommended management actions contained in the SESP may be sufficient (with the risks/impacts and proposed management measures/plans incorporated into the project budget, risk log, and monitoring framework)." UNDP SES Guidance Note on Social and Environmental Assessment, sec. 4.5.

⁴ This is now standard practice for UNDP projects that seek support from the Global Environment Facility (GCF). To address the GCF requirements, UNDP discloses the ESMP for Moderate Risk projects at least 30 days before GCF Board consideration on the relevant UNDP country website in both English and the local language(s). UNDP completes the GCF "Environmental and Social report(s) disclosure" template with the relevant weblinks to the posted documents and submits the template together with the GCF proposal.

TABLE A3.1. SES/SESP DISCLOSURE GUIDANCE

 Substantial Risk and High Risk Projects Disclose draft ESIA or SESAs including any draft management plans. ESIAs and SESAs also require that a summary report be prepared to provide an adequate, accurate and impartial evaluation and presentation of the issues and conclusions of the technical assessment. This report must be presented in an understandable format and in an appropriate language(s), including a non-technical summation that can be understood by many stakeholders to facilitate and encourage comments. 	 When assessment conducted as part of project preparation, disclosed and consulted on prior to PAC at least: 60 days for Substantial Risk projects 120 days for High Risk projects When assessment undertaken early in project implementation, disclosed and consulted on prior to implementation of any activities that may cause adverse social and environmental impacts, at least: 60 days for Substantial Risk projects 	 At a minimum, ensure that a summary report of the draft assessment and management plan is translated into local languages and made available in an accessible location together with the draft assessment and management plan Disclose draft ProDoc Posted on UNDP unit (e.g. CO) website
 Stand-alone targeted assessments for Moderate Risk projects and ESIAs/SESAs for Substantial and High Risk Projects and any management plans 	• Upon receipt. Needs to be prior to the PAC if assessment conducted as part of project preparation, or if undertaken as part of project, before implementation of any activities that may cause adverse social and environmental impacts	 At a minimum, ensure that a summary report of the final assessment and management plar is translated into local languages and made available in an accessible location together with final assessment and management plan Posted on UNDP unit (e.g. CO) website Uploaded to Project Document Center
SES DOCUMENTATION DURING PROJECT IMPLEMENTATIO	N N	
 Revised SESP, updated or supplemental assessments and management plans, monitoring reports 	• Upon receipt or completion, and before implementation of any activities that may cause adverse social and environmental impacts	 Posted on UNDP unit (e.g. CO) website Uploaded to Project Document Center