

Climate Resilient WASH and Disaster Management services for vulnerable children in the Central African Republic (CRDM-CAR)

Environmental and Social Management Framework

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Abbreviations

AE	Accredited Entity
CBD	Convention on Biological Diversity
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
EIA	Environmental Impact Assessment
ESMF	Environmental and Social Management Framework
ESC	Environmental and Social Clauses
ESS	Environmental and Social Safeguards
E&S	Environmental and Social
GCF	Green Climate Fund
GHG	Greenhouse Gases
GIS	Geographic Information System
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
LDN	Land Degradation Neutrality
MEDHR	Ministry of Energy, Development, and Hydraulic Resources
MRV	Monitoring, Reporting, and Verification
M&E	Monitoring and Evaluation
NDC	Nationally Determined Contributions
PPE	Personal Protective Equipment
PSC	Project Steering Committee
SDGs	Sustainable Development Goals
UN	United Nations
UNCCD	United Nations Convention to Combat Desertification
UNFCCC	United Nations Framework Convention on Climate Change

1. Introduction

1.1 Background and Context

The Central African Republic (CAR) remains one of the most climate-vulnerable and fragile countries in the world. The population, particularly children, women, and marginalized groups, faces growing exposure to climate-induced hazards, including increasingly erratic rainfall, prolonged droughts, and severe flooding. These climate stressors have exacerbated existing challenges in delivering equitable access to safe water, sanitation, and hygiene (WASH) services and in ensuring disaster preparedness across both rural and urban areas.

Recognizing these escalating risks, the Government of CAR has prioritized climate adaptation in its national policy frameworks, including its updated Nationally Determined Contribution (NDC) and National Adaptation Plan (NAP), which emphasize resilience-building in the WASH sector and institutional capacity enhancement. In response to these needs, UNICEF, in its dual role as Accredited Entity (AE) and Executing Entity (EE) for the Green Climate Fund (GCF), has proposed the project “Climate Resilient WASH and Disaster Management services for vulnerable children in the Central African Republic (CRDM-CAR)”, with the Ministry of Environment as the National Designed Authority (NDA), and the Ministry of Energy, Development and Hydraulic Resources (MEDHR) as a co-executing entity (EE) for activities 2.1.3 and 2.3.2 .

1.2 Objective of the Project

The overarching objective of the project is to enhance the resilience of national institutions, community systems, and critical infrastructure to withstand and adapt to the impacts of climate change, particularly in the delivery of WASH services and disaster risk management (DRM). The project targets the most climate-exposed and underserved prefectures, Bangui, Ouham, Bamingui-Bangoran, and Vakaga, selected based on risk mapping conducted under the CAR NAP and a Climate Change Risk Assessment (CCRA).

Through a dual approach combining upstream policy reform and downstream service delivery, the project seeks to ensure that the WASH and DRM sectors can anticipate, absorb, and respond to climate risks while promoting inclusive, gender-sensitive, and sustainable outcomes.

1.3 Relevance of UNICEF

UNICEF, which has been present in the CAR since 1986, has five field offices, and plays a pivotal role as the lead technical and financial partner for the WASH sector in the country, actively promoting sectoral and cross-sectoral coordination mechanisms to integrate humanitarian and development programmes. In addition, UNICEF supports various technical working groups to promote the elaboration of norms and standards, monitoring and evaluation, and exchanges of experience in the fields of WASH and climate change adaptation. With an annual budget of US$104,000,000 for 2024 across the multiple sectors of the country programme, UNICEF maintains a strong partnership with the government, supporting the Ministry of Hydraulic Resources through coordination efforts and multifaceted assistance. Since 2021, UNICEF

has leveraged its own resources to initiate studies on the impacts of climate change on the WASH sector and proposed actionable solutions to mitigate these effects, including by supporting the formulation of the WASH component of the revised NDCs and the NAP. This work has elevated climate change to be recognized as a top priority within the sector, driving a shift towards more sustainable and climate-resilient programming. UNICEF's leadership in the climate agenda has not only solidified its role as a trusted partner but has also garnered recognition from key donors like the World Bank, which has utilized UNICEF's documentation to inform country reports, shape policy recommendations, and launch climate-related funding initiatives that address the needs of vulnerable populations. One of the interventions under the present project aims to scale up climate-resilient mini solar power systems, building on successful pilots UNICEF has already implemented.

1.4 Project Components

The project is structured into two mutually reinforcing components:

Component 1: Strengthening National Policies, Systems, and Institutional Capacities for Climate Resilience
This component aims to create an enabling environment for climate-adaptive WASH and DRM programming.

Key activities include:

- Revision and harmonization of policies, technical standards, and regulatory frameworks for climate-resilient infrastructure and services;
- Integration of climate risk analysis into sectoral and cross-sectoral planning tools;
- Enhancement of monitoring, evaluation, and learning (MEL) systems;
- Strengthening of meteorological, hydrological, and early warning data systems; and
- Capacity-building for ministries, local authorities, and civil society organizations.

Component 2: Climate-Resilient WASH and Flood Risk Reduction Infrastructure and Services
This component focuses on the direct delivery of resilient WASH infrastructure and community-based DRM interventions. It includes:

- Hydrogeological assessments to guide infrastructure siting and design;
- Construction and rehabilitation of climate-resilient water supply systems, including solar-powered boreholes and multi-use piped networks;
- Rehabilitation and elevation of latrines and sanitation facilities to withstand flooding;
- Construction of urban drainage infrastructure in high-risk flood zones;
- Community-based early warning and water resource monitoring systems; and
- Behaviour change and WASH promotion activities tailored to climate risks.

1.5 Expected Outcomes and Beneficiaries

The project is expected to directly benefit an estimated 504,600 people, with additional indirect benefits for approximately 2.5 million people through improved water security, public health outcomes, and climate

preparedness. Beneficiaries include children, women, internally displaced persons (IDPs), Indigenous Peoples, and other vulnerable groups.

The implementation period is six years, with projected long-term sustainability and benefit realization extending over a 20-year lifespan. The project is designed to be scalable and replicable in other fragile and conflict-affected settings.

1.6 Purpose of the ESMF

The purpose of this Environmental and Social Management Framework (ESMF) is to provide a structured and consistent approach to managing the environmental and social risks associated with the project. It outlines the screening procedures, mitigation measures, institutional roles, monitoring frameworks, and stakeholder engagement strategies to be adopted throughout the project lifecycle.

Given the GCF's ESS risk Category B classification of the project, indicating moderate risk, and the country's fragile context, this ESMF also ensures that UNICEF's ESS and safeguard standards, complemented by the GCF interim ESS standards and relevant IFC Performance Standards, are embedded into project implementation in line with AMA terms.

2. Project Description

The proposed project, titled “Climate Resilient WASH and Disaster Management services for vulnerable children in the Central African Republic (CRDM-CAR)”, is a flagship initiative led by UNICEF as both the Accredited Entity (AE) and Executing Entity (EE), and with the Ministry of Environment as the National Designed Authority (NDA). The project is designed to address the growing climate vulnerability of WASH services and disaster risk management systems in the CAR, with an emphasis on ensuring the resilience and protection of children and marginalized groups, particularly in the northern and southern prefectures of Bangui, Ouham, Bamingui-Bangoran, and Vakaga.

CAR is experiencing intensifying climate variability, characterized by increasingly erratic rainfall patterns, rising average temperatures, and a growing frequency of both droughts and severe floods. These changes are undermining the availability and quality of surface and groundwater resources, exacerbating sanitation challenges, and increasing the exposure of communities to waterborne disease outbreaks, vector-borne illnesses such as malaria, and broader disaster risks. Vulnerable groups (including children, women, displaced populations, and those residing in informal settlements) face particularly acute risks. Additionally, systemic weaknesses in institutional coordination, early warning, and integrated planning hamper the country’s ability to effectively respond to climate shocks.

This project seeks to strengthen the resilience of national systems, infrastructure, and community capacities by integrating climate risk adaptation into water resource governance, WASH service delivery, and disaster risk reduction. It aligns with CAR’s Nationally Determined Contribution (NDC) under the Paris Agreement, which prioritizes adaptation in the water sector and the protection of health infrastructure, and with the National Adaptation Plan (NAP), which identifies key vulnerabilities in water and sanitation across targeted regions.

Project Objectives

The overarching objective is to improve access to climate-resilient, inclusive WASH services and strengthened disaster management systems, with co-benefits for local economic development.

Specific aims include:

- Increasing the climate resilience of WASH infrastructure through sustainable and flood-adapted design.
- Enhancing national and subnational capacity to assess, monitor, and respond to climate-related water risks.
- Promoting behavioural change and local ownership of climate adaptation strategies.
- Facilitating cross-sectoral coordination in adaptation planning and response.

Project Components

Component 1: Institutional Strengthening for Climate Resilience

This component focuses on building the enabling environment for climate-adaptive WASH and disaster management systems by strengthening institutional frameworks, technical capacities, planning mechanisms, and policy coherence across relevant sectors.

Key Outputs:

- Revision and operationalization of national WASH and water resource management (WRM) policies to integrate climate risk assessments.
- Development of technical standards, sectoral regulations, and financing frameworks for climate-resilient infrastructure.
- Strengthening of monitoring, evaluation, and learning (MEL) systems for adaptive management.
- Upgrading of meteorological, hydrological, and flood/drought risk modelling systems to inform early warning.
- Institutional capacity-building for national and local authorities, particularly the Ministries of Water, Environment, Health, and Territorial Administration.

Component 2: Community-Based Adaptation through Climate-Resilient Infrastructure and Services

This component delivers on-the-ground infrastructure and services to improve the adaptive capacity of communities, particularly in underserved and high-risk areas. It supports integrated approaches to sustainable water supply, sanitation, urban drainage, and disaster risk preparedness.

Key Outputs:

- Hydrological and hydrogeological studies to inform infrastructure siting and resource management.
- Construction and rehabilitation of water systems (e.g., boreholes, multi-use piped networks) using solar-powered pumps and sustainable design principles.
- Rehabilitation and elevation of sanitation facilities to prevent flood-related contamination and destruction.
- Deployment of climate-resilient drainage infrastructure in peri-urban Bangui, including culverts and stormwater networks.
- Promotion of community-led total sanitation (CLTS) and hygiene behaviour change campaigns tailored to climate risks.
- Establishment of community-based early warning systems and catchment-scale water conservation interventions (e.g., reforestation, buffer strips).
- Capacity-building of local governments, youth groups, and entrepreneurs to manage and maintain climate-adaptive WASH systems.
- Piloting of local financing schemes (e.g., revolving funds, vouchers) to promote household investment in resilient infrastructure.

Beneficiaries and Geographic Coverage

The project is expected to directly benefit approximately 504,600 individuals, roughly 9.3% of CAR's population, including children, women, IDPs, and indigenous and pastoralist communities. An additional 2.5 million people are anticipated to benefit indirectly through improved water security, public health, and reduced disaster vulnerability. The interventions are located in the most climate-vulnerable areas identified in the NAP.

Duration and Scaling

The implementation period is estimated at six years, with an overall lifespan of benefits projected to extend over twenty years. The project is intended as a scalable and replicable model for fragile and post-conflict contexts, with a strong focus on sustainability, institutional ownership, and knowledge transfer. Lessons learned from the implementation will inform future policy and program design within CAR and across similarly affected regions in sub-Saharan Africa.

3. Legal and Institutional Framework

This section provides an overview of the environmental and social policy landscape relevant to the implementation of the proposed UNICEF-led GCF project in the CAR. It outlines the key national policies, legal instruments, institutional mandates, and international obligations that shape the environmental and social management context. The section also maps the alignment of the project with the GCF's Revised Environmental and Social Policy and applicable Performance Standards.

3.1 National Policy Framework

The environmental and social dimensions of development in CAR are guided by several key national strategies and policy documents that underscore the government's commitment to sustainable development, climate change adaptation, and inclusive service delivery. The following frameworks are directly relevant to this project:

- Nationally Determined Contribution (NDC, 2021): The revised NDC outlines CAR's priority sectors for climate action, with WASH and disaster risk management (DRM) positioned as central to national adaptation strategies. Objective 1 focuses on securing water resources in urban and rural areas, improving governance, infrastructure resilience, and institutional capacities. Objective 3 calls for the enhancement of stormwater drainage systems, integrated early warning mechanisms, and sanitation improvements in vulnerable communities. The proposed project directly supports the implementation of these objectives.
- National Adaptation Plan (NAP, 2021): The NAP identifies priority adaptation measures to reduce vulnerability in water resources, sanitation, and public health. It specifically highlights the target prefectures of this project (Bangui, Ouham, Bamingui-Bangoran, and Vakaga) as highly vulnerable zones requiring urgent intervention. The NAP emphasizes decentralized adaptation planning, integrated water resource management (IWRM), and climate-resilient WASH services.
- National WASH Strategy (2022–2030): Developed with technical support from UNICEF, this strategy establishes sectoral goals for universal access to sustainable, safe, and climate-resilient WASH services. It prioritizes service delivery in fragile and conflict-affected areas, establishes climate-smart infrastructure guidelines, and calls for integrated WRM approaches. The strategy is a cornerstone for Component 2 of this project.
- National Health Development Plan (PNDS): The PNDS includes environmental health and hygiene promotion as critical components of health system strengthening. It reinforces the need for coordination across WASH, health, and education sectors.
- Decentralization and Local Development Policy (2009): This policy promotes local governance and community participation in the planning, management, and oversight of basic services. It supports the project's approach to community-led adaptation and local-level capacity-building.

3.2 Legal and Regulatory Framework

The legal framework governing environmental and social management in CAR includes several laws, decrees, and regulations relevant to infrastructure development, WASH service delivery, environmental protection, and social safeguards. These include:

- Law No. 07.018 (2007) – Environmental Code: This foundational legislation governs environmental protection, sustainable natural resource use, and pollution control. It establishes the requirement for environmental and social impact assessments (ESIAs) for projects likely to affect the environment including infrastructure, mining, forestry, agriculture, and industrial projects. It also outlines principles of the precautionary approach, public participation, and the right to a healthy environment.
- Decree No. 04/MEED/DIRCAB (2014): This decree regulates the procedural requirements for conducting environmental impact assessments. It classifies projects based on environmental risk, outlines ESIA content, and defines responsibilities for review and approval by the Ministry of Environment and Sustainable Development (MCEDD).
- Labor Code (Law No. 09.004): This legislation governs employment relations, occupational health and safety (OHS), and workers' rights. It prohibits child labour and requires employers to provide adequate workplace protections, relevant to construction and community engagement under the project.
- Water Code (Law No. 06.001, 2006): This law governs water use rights, abstraction permits, groundwater protection, and integrated water management. It is central to Component 2, especially in relation to sustainable groundwater use and WASH infrastructure design.
- Public Health Code and Hygiene Regulations: These instruments establish sanitation standards, disease prevention measures, and institutional mandates for public health monitoring. They inform the technical standards for latrine construction, hygiene promotion, and WASH service operation.
- Urban Planning and Construction Code: This code regulates construction permits, zoning, and infrastructure standards. It will be relevant for urban drainage infrastructure investments in Bangui.
- Gender Equity and Protection Laws: CAR has ratified key instruments protecting women and children from violence and discrimination, including laws operationalizing the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). These instruments support Safeguarding prevention and response and gender mainstreaming efforts under the project.

3.3 Institutional Arrangements and Responsibilities

The project will operate within the existing institutional framework for WASH, DRM, environment, and climate change in CAR. The key agencies involved in policy oversight, implementation, and monitoring are outlined below.

3.3.1 Ministry of Energy Development and Hydraulic Resources

- Lead ministry for national WASH strategy, water governance, and WRM;
- Responsible for issuing water abstraction licenses, conducting water quality monitoring, and regulating water user associations;
- Will co-lead implementation of Component 2 and technical oversight of infrastructure design.

3.3.2 Ministry of Environment and Sustainable Development

- Authority for environmental protection, ESIA approval, biodiversity monitoring, and climate policy;
- Will guide implementation of ESMF provisions, review screening results, and approve any subproject specific environmental assessments;
- Lead counterpart for coordination with GCF safeguards.

3.3.3 Ministry of Health and Population

- Implements public health campaigns, hygiene promotion, and disease surveillance;
- Collaborates with MEWR on WASH-in-healthcare facilities;
- Will support the integration of WASH.

3.3.4 Ministry of Humanitarian Action and Disaster Risk Reduction

- Responsible for disaster preparedness, early warning systems, and community-based DRR;
- Will contribute to planning and deployment of risk reduction activities under Component 2.

3.3.5 Local Government Authorities and Municipal Councils

- Key actors in decentralized planning, land access agreements, community mobilization, and grievance redress;
- Will lead community engagement, monitor infrastructure, and enforce safeguards at the local level.

3.3.6 UNICEF and Implementing partners

- UNICEF will coordinate all project components, monitor safeguard compliance, and liaise with national authorities;
- Local CSOs, contractors, and consultants will play supporting roles in WASH infrastructure delivery, community training, and participatory planning.

3.4 International Environmental and Social Commitments

CAR is party to several multilateral environmental agreements (MEAs) and international conventions that influence project design and safeguard compliance. These include:

- UN Framework Convention on Climate Change (UNFCCC) and the Paris Agreement
- Convention on Biological Diversity (CBD)
- Ramsar Convention on Wetlands
- Convention on the Rights of the Child (CRC)
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- ILO Conventions 138 and 182 on Child Labor
- African Charter on Human and Peoples' Rights

The project's commitment to gender inclusion, SEA/SH prevention, child protection, and biodiversity screening is in direct alignment with these obligations.

3.5. UNICEF's ESS Policies and Instruments

UNICEF has developed a comprehensive set of Environmental and Social Safeguards (ESS) policies and complementary instruments to ensure responsible and inclusive programming. Central to this framework is the Policy on Safeguarding (2025)[1], which sets out the organization's commitment to ensuring that all children and adults who come into contact with UNICEF's staff, partners, and programmes are protected from harm, abuse, neglect, exploitation, and sexual misconduct. The policy establishes clear safeguarding standards and prohibited practices, applying to all UNICEF personnel, implementing partners, suppliers, contractors, and associated individuals, regardless of context. It outlines expected behaviours and accountability measures, reinforces UNICEF's zero-tolerance approach to sexual exploitation and abuse, and requires safeguarding to be systematically integrated into programme design, operations, partnerships, and supply chains. The policy also details mechanisms for reporting, investigation, and redress, while emphasizing survivor-centred approaches, confidentiality, and the duty of care. By embedding safeguarding across humanitarian and development work, UNICEF aims to create safe environments where children and communities can benefit from its interventions without risk of harm.

In parallel, UNICEF has also its ESS Policy in Programming (2025)[2]. It formalizes the organization's commitment to maintaining robust environmental and social standards (ESS) across all programming, aligning closely with the broader UN "Model Approach" for environmental and social safeguards, that aims to embed the principles of sustainability, accountability, and inclusivity throughout UNICEF initiatives. Key goals of the policy include maximizing positive impacts on both communities and ecosystems; preventing, mitigating, and managing adverse environmental and social risks across UNICEF interventions; enhancing transparency, consistency, and accountability in decision-making and operations; and responding effectively to growing donor and UN system-wide expectations for systematic environmental and social risk management.

Broader institutional efforts also embed environmental sustainability across operations, procurement, and supply chains. To strengthen accountability and risk management in humanitarian settings, UNICEF applies the Accountability to Affected Populations (AAP) Handbook[3], the Emergency Procedures (Core Commitments for Children), and operational safeguards that ensure community feedback, transparency, and protection. Together, these policies and instruments provide a coherent framework for safeguarding people and the environment while promoting gender equality, accountability, and resilience in all UNICEF programmes.

3.6 Alignment with GCF Environmental and Social Policy

The project has been screened as Category B under the GCF's Environmental and Social Policy, corresponding to projects with moderate environmental and social risks that are site-specific, reversible, and readily mitigated through known measures.

[1] UNICEF, 2025. Policy on Safeguarding.

[2] UNICEF, 2025. UNICEF Policy on Environmental and Social Standards in Programming.

[3] UNICEF, 2020. UNICEF Accountability to Affected Populations Handbook.

The ESMF complies with the interim GCF safeguard standards, based on IFC Performance Standards 1 through 8. The project specifically triggers relevance for the following:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community Health, Safety, and Security
- PS5: Land Acquisition and Involuntary Resettlement
- PS6: Biodiversity Conservation and Sustainable Natural Resource Management
- PS7: Indigenous Peoples
- PS8: Cultural Heritage

This ESMF also reflects UNICEF's internal environmental and social procedures and commitment to child rights, safeguarding, gender equality, and accountability to affected populations.

3.7 Summary of ESS Requirements

Central African Republic National Law	• Small-scale WASH/DRM infrastructure unlikely to require a full ESIA under national practice. • Environmental and social screening + ESMF sufficient at national level. • Full ESIA may be triggered only if works occur in protected or highly sensitive ecosystems.
GCF ESS Policy	• Project classified as Category B (moderate risk). • Requires an ESMF with cluster –level subproject specific ESMPs for all cluster of subprojects classified as moderate risk once locations are known. • Requires an Indigenous Peoples Plan (IPP) (separate Annex) • Requires a Gender Action Plan (GAP) (separate Annex)
UNICEF Safeguards and ESS Policy	• ESMF, IPP and GAP should be aligned with UNICEF's Safeguards and ESS Policy. • Project's GRM is aligned with UNICEF's AAP to ensure communities participate and provide feedback.

4. Complementarity and Gap Assessment: GCF and CAR's National ESS Frameworks

4.1 Complementarity Between GCF Standards and National Regulations

The CAR possesses a foundational legal and regulatory framework for environmental and social safeguards, which can serve as a platform for alignment with the Green Climate Fund (GCF) Environmental and Social Standards. While institutional capacity constraints remain, several national laws and policies are broadly compatible with GCF principles. Key areas of alignment include:

Environmental Impact Assessment (EIA)
CAR's Law No. 07.018 on the Environment (2007) mandates environmental impact assessments for development activities that may affect natural resources or communities. It incorporates requirements for public participation, mitigation planning, and environmental monitoring, principles that reflect the GCF's "Do No Harm" approach and its commitment to informed stakeholder engagement and UNICEF's commitment to proactive risk management across all programming.

Water and Sanitation Legislation
The Code de l'Eau (Water Code, 2006) and related decrees prioritize equitable and sustainable access to safe drinking water and sanitation services, particularly for vulnerable populations. These objectives complement the GCF's focus on human rights, health, and environmental sustainability and with UNICEF's WASH programming standards, which integrate child-sensitive, gender-responsive, and climate-resilient service delivery.

Gender Equity
CAR is a signatory to CEDAW and has adopted national gender strategies that support women's participation in water governance and rural development. These commitments align with the GCF's Gender Policy and UNICEF's Gender Action Plan, both of which emphasize mainstreaming women's participation and strengthening gender-responsive monitoring.

Public Participation and Transparency
CAR's environmental code requires community consultations for EIA processes. Though implementation varies by region, this legal provision is consistent with the GCF's Information Disclosure Policy and stakeholder engagement guidelines. UNICEF further strengthens this through its Accountability to Affected Populations (AAP) framework, which institutionalizes inclusive participation, community feedback, and grievance redress mechanisms across all projects.

International Commitments
CAR is a party to key international environmental agreements including the UNFCCC, the Convention on Biological Diversity (CBD), and the Sustainable Development Goals (SDGs). These frameworks reinforce

the GCF's thematic areas of climate resilience, biodiversity protection, and social inclusion. UNICEF, as a UN agency, operationalizes these commitments through child rights, climate resilience, and equity-centred programming.

4.2 Gaps Between GCF Standards and National Regulations

Despite areas of alignment, several regulatory and institutional gaps must be addressed to ensure full compliance with GCF Environmental and Social Safeguards:

- Grievance Redress Mechanisms
  While CAR's national framework provides for basic community feedback during EIA processes, there are no formalised, project-level grievance redress mechanisms (GRMs) comparable to GCF standards. UNICEF's procedural framework for project complaints and feedback is set out in the Procedure on Complaints and Feedback Management, which supports implementation of the Policy on Environmental and Social Standards in Programming, the Policy on Safeguarding, and the Accountability to Affected Populations framework.

- Inclusion of Vulnerable Groups
  CAR's regulatory instruments do not comprehensively address the specific needs and rights of indigenous peoples, persons with disabilities, or other marginalised groups. GCF safeguards call for proactive strategies to ensure these groups are engaged and benefit from climate-financed interventions. UNICEF's ESS policy specifically emphasizes child protection, safeguarding, and non-discrimination, highlighting a gap in national law.

- Gender Policy Operationalisation
  Although CAR has gender strategies in place, their application in infrastructure, WASH, and climate resilience projects remains limited. There is a need to strengthen the mainstreaming of gender-responsive indicators, budgeting, and leadership roles in accordance with GCF and UNICEF requirements.

- Climate Resilience Integration
  CAR's EIA law and sectoral plans often lack a structured approach for assessing long-term climate risks or adaptive capacity. GCF programming requires systematic resilience assessments and the inclusion of climate adaptation metrics in project monitoring frameworks, while UNICEF's ESS policy mandates climate-sensitive programming. Strengthening climate risk integration into national procedures remains a gap.

- Institutional Capacity
  The Ministry of Environment and Sustainable Development and other relevant bodies face limited technical and financial capacity to implement and enforce safeguards in line with UNICEF policies and AMA terms. Strengthened coordination, training, and resourcing will be necessary to require compliance and effective risk management.

4.3 Addressing Key Gaps in Safeguards and Policies

To address identified safeguard gaps and ensure effective risk mitigation, the project will implement a comprehensive set of enhancement measures. These measures are designed to strengthen stakeholder engagement, social inclusion, gender equity, climate resilience, and institutional capacity.

For purposes of this project, the grievance redress mechanism will be implemented through UNICEF's Complaints and Feedback Management approach, in line with the Procedure on Complaints and Feedback Management and the Accountability to Affected Populations framework. The mechanism will provide safe, accessible and context-appropriate channels for communities and other stakeholders to raise complaints, concerns and feedback. Complaints will be handled in a timely manner, with appropriate safeguards for confidentiality and the safety of those involved. Closure of a complaint may include resolution, agreement on follow-up actions, or referral to the appropriate body where required. Use of this mechanism will not prevent complainants from seeking judicial or other formal remedies available under national law.

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Second, to promote equity and social inclusion, the project has developed a Stakeholder Engagement Plan (SEP) that is tailored to the different vulnerable groups impacted by the project. This strategy identifies and supports marginalized populations, including IDPs, indigenous peoples, persons with disabilities, and female-headed households, through participatory consultation and inclusive service delivery approaches tailored to their specific needs and vulnerabilities. A separate Indigenous Peoples Plan was prepared. It reflects the project's commitment to inclusivity and the respect of M'boboro and Fulani's rights, culture, and traditions in alignment with the GCF's Indigenous People's Policy.

Gender equality will also be a core operational focus. The project will roll out a Gender Action Plan, which sets measurable targets for enhancing women's participation across planning, implementation, and monitoring processes. Capacity-building modules on gender-responsive programming will be delivered to implementing partners, and dedicated resources will be allocated to support gender-equity initiatives throughout the project lifecycle.

In addition, climate resilience considerations will be systematically integrated. A monitoring framework will be developed to track climate-related risks and vulnerabilities affecting WASH services, aligned with both national adaptation priorities and GCF performance requirements. Relevant sectoral plans will be reviewed and updated to embed adaptive measures for climate-resilient infrastructure and service delivery.

Finally, the project will invest in capacity building and institutional strengthening to ensure effective implementation of environmental and social safeguards. Targeted training will be provided to government agencies, UNICEF country office staff, and implementing partners on the UNICEF Environmental and Social Standards and E&S requirements under AMA terms. Technical assistance will also be offered to strengthen safeguard documentation, inter-agency coordination mechanisms, and monitoring and evaluation systems.

5. Environmental and Social Baseline

5.1 Geography and Topography

The CAR spans approximately 623,000 km² and sits at the heart of the Congo Basin. It features three primary ecological zones: humid equatorial forest in the south, woodland savannah in the centre, and Sahelian steppe in the north. The four target prefectures selected for this project, Bangui, Ouham, Bamingui-Bangoran, and Vakaga, span these zones and reflect a cross-section of the country's diverse physical geography and ecological challenges.

- Bangui, the capital, is located on low-lying floodplains along the Ubangi River. Its topography and drainage patterns make it extremely prone to flooding during peak rainfall months.
- Ouham, in the northwest, is characterised by dry savannah and sparse vegetation, featuring the high-streamflow Ouham River and vast floodplains. This topography, along with increased extreme rainfall, makes it highly prone to flooding.
- Bamingui-Bangoran and Vakaga, in the north, are dominated by semi-arid plains and sparse savannah. These areas are characterized by low elevation variation, shallow riverbeds (part of the Shari river watershed), and expansive drylands.

The elevation ranges from under 400m in southern zones (Bangui) to 600–800m in northern plateaus (Ouham, Bamingui-Bangoran, Vakaga). Seasonal rivers (wadis) are common in the north but dry up entirely during extended dry periods.

5.2 Climate Trends and Hazards

CAR has a tropical climate with two distinct seasons: a rainy season from May to October and a dry season from November to April. Rainfall is highest in the southwest (up to 1,600 mm/year) and lowest in the northeast (under 900 mm/year).

Recent climate trend analyses, including data from the World Bank Climate Change Portal (2023) and the IPCC Sixth Assessment Report (AR6, 2022), indicate a clear pattern of climatic shifts in the region. Over the past 60 years, there has been a recorded increase of approximately 1.0°C in mean annual temperature. This warming has been accompanied by a marked rise in both the frequency and intensity of extreme rainfall events. In northern areas, the dry season is becoming progressively longer, while interannual rainfall variability has increased across the country. These changes are having direct consequences on agriculture, groundwater recharge, and flood risk, highlighting the growing urgency for adaptive climate-resilient strategies.

Climate projections under SSP2-4.5 and SSP5-8.5 scenarios estimate that average annual temperatures will increase by 1.7–1.9°C across Vakaga by 2041–2070, intensifying drought cycles in the north and flooding events in the south.

5.3 Hydrology and Water Resources

CAR's hydrology is dominated by the Congo and Shari River basins. The selected prefectures illustrate stark hydrological contrasts:

- Bangui is rich in surface water, primarily from the Ubangi River. However, its hydrological system is increasingly compromised by
    - sedimentation from deforestation and urban runoff;
    - latrine leachate contamination during flood events;
    - urban encroachment into natural wetlands and drainage corridors.
- Ouham's water resources rely on the Ouham River with high, fluctuating streamflow and groundwater, the primary drinking water source. Despite moderate to high aquifer productivity and storage, water sources are highly vulnerable to contamination, including mercury pollution from mining and widespread faecal contamination.
- Bamingui-Bangoran and Vakaga rely on aquifers which are sometimes prone to depletion and contamination. Recharge rates are low, and increased evapotranspiration is leading to reduced groundwater availability.

Water quality in these areas is largely unmonitored. Where testing exists (e.g., UNICEF, 2022 WASH Surveys), 75–90% of water points in peri-urban Bangui exceed WHO thresholds for faecal coliforms during the rainy season.

5.4 Ecosystems and Land Use

Each target prefecture hosts distinct ecological systems and land use pressures:

- Bangui: Once dominated by gallery forest, now largely urbanized. Key environmental concerns include blocked urban drainage, wetland destruction, and solid waste accumulation. Urban sprawl into flood zones exacerbates exposure to hydrological risks.
- Ouham: characterized by dry savannah and sparse vegetation, faces land use pressures from mining activities causing mercury pollution and inadequate sanitation, leading to widespread faecal water contamination from open defecation and poor waste management.
- Bamingui-Bangoran: Home to the Bamingui-Bangoran National Park and Biosphere Reserve, a critical habitat for elephants, antelope, and endemic bird species. Although project interventions will occur outside protected zones, risks of edge effects and illegal extraction exist if community planning is not strengthened.
- Vakaga: Arid savannah and shrubland, suffering from overgrazing, shifting cultivation, and charcoal extraction. It is the most degraded ecological zone in CAR, with the lowest vegetation productivity and highest desertification indicators (USAID FEWS NET, 2022).

Unsustainable land use, including slash-and-burn agriculture, grazing pressure, and timber extraction, are key contributors to biodiversity loss and carbon emissions in all project areas.

5.5 Environmental Hazards

Each prefecture faces distinct environmental risks:

- Flooding: Bangui and Ouham bear the highest burden nationally in terms of flood exposure. Over 42,000 people were affected by flood events in Bangui between 2021–2023, with major inundation of low-income neighbourhoods (UN OCHA, 2023).
- Drought and Heat Stress: Vakaga, Bamingui-Bangoran experience annual water shortages. Projected warming will shorten the rainy season by up to 15 days and increase drought frequency (IPCC AR6). Pastoralist groups face livestock mortality and shrinking grazing zones. Ouham also experiences droughts.
- Soil Erosion: Hillslope erosion and topsoil loss are common in Bangui's peri-urban zones. Sediment transport into rivers is increasing, reducing surface water quality and contributing to flash flooding.
- Aquifer Depletion: Vakaga is vulnerable to groundwater over-extraction. Hydrogeological mapping by WRI (2021) classifies Vakaga as one of the most aquifer-sensitive regions in West and Central Africa. However, there are very few, if any, high flow boreholes in the area. Hence, over-extraction is unlikely and will be carefully taken into consideration in the project (the project design aims for an average borehole flow of 5m3/h for this reason)

5.6 Natural Resource Pressures

Over 93% of households in CAR rely on wood or charcoal for energy (FAO, 2021). This reliance has intensified pressure on forests, especially in Vakaga, where wood is also a primary construction material. Other factors include:

- Lack of alternative income sources leading to illegal logging;
- Poor land use enforcement and overlapping customary/administrative tenure;
- Fragmentation of critical habitats due to poorly regulated settlement expansion.

In Bamingui-Bangoran, buffer zones around the national park are increasingly encroached for farming and water access. Without enforcement of land use plans, the ecosystem integrity of protected areas may be compromised by project-adjacent development.

5.7 Water Quality and Public Health Linkages

The collapse of WASH infrastructure due to flooding, poor siting, and shallow construction in high water table zones has led to chronic waterborne disease outbreaks. Key issues include:

- Cross-contamination of pit latrines and boreholes in flood zones (Bangui);
- Elevated nitrate and faecal levels in open wells during rainy season;
- Stagnant water accumulation in Bangui's drainage systems fostering mosquito breeding and malaria.

All target areas exhibit a tight coupling of water insecurity, environmental degradation, and public health outcomes, particularly for children, pregnant women, and immunocompromised individuals.

6. Potential Environmental and Social Risks and Impacts

The proposed project comprises two primary components. This section outlines potential environmental and social risks associated with activities under each component, grouped accordingly and assessed in terms of magnitude, reversibility, and manageability. The assessment follows a precautionary approach aligned with GCF's Environmental and Social Policy, the IFC Performance Standards, and UNICEF's internal risk screening and management procedures.

6.1 Risks and Impacts Associated with Component 1:

Strengthening National Systems and Institutional Capacity for Climate-Resilient WASH, WRM, and DRR

This component is largely policy, institutional, and systems strengthening in nature. It is not expected to result in significant direct physical environmental impacts, but some social risks may arise depending on how reforms are operationalized.

Key Activities:

- Regulatory and policy reform (e.g., water governance, climate mainstreaming)
- Development of Monitoring, Evaluation, and Learning (MEL) systems
- Establishment of early warning and data systems for drought and flood events
- Inter-ministerial coordination platforms

Potential Risks and Impacts:

Risk Type	Description
Social Exclusion / Inequity	Risks that national policies, data systems, or MEL frameworks do not adequately reflect the needs of vulnerable groups (e.g., IDPs, women, Indigenous Peoples).
Institutional Weakness	Potential for weak implementation of reforms due to low institutional capacity, leading to delays or uneven application of safeguards.
Limited Participation	Risk that civil society, community representatives, or local authorities are not sufficiently engaged in policy formulation, reducing buy-in and ownership.

Risk Level: Low to Moderate
Reversibility: Reversible with corrective measures
Management Feasibility: High with inclusive stakeholder engagement and capacity building

6.2 Risks and Impacts Associated with Component 2:

Scaling Up Access to Climate-Resilient WASH and Flood Control Infrastructure in Climate-Vulnerable Prefectures

This component involves the majority of subproject specific interventions and therefore carries the highest concentration of environmental and social risks. These are associated with the planning, design, construction, and operational phases of rural and peri-urban infrastructure.

Key Activities:

- Hydrological and feasibility assessments
- Construction/rehabilitation of solar-powered water supply systems
- Construction of flood-resilient latrines and sanitation infrastructure
- Small-scale flood mitigation infrastructure (e.g., embankments, culverts)
- Watershed protection and reforestation activities
- Community-based WRM and DRR capacity building

Potential Risks and Impacts:

Activity	Potential Risk/Impact	Risk Type	Risk Level	Reversibility	Management Feasibility
Borehole Siting and Drilling	Over-extraction of aquifers in drought-prone areas (Vakaga, Bamingui-Bangoran)	Environmental (Water)	Moderate	Partially Reversible	Moderate (with groundwater assessments)
	Land clearance for borehole pads and access roads	Environmental (Biodiversity/Land)	Low	Reversible	High
Construction of Sanitation Facilities	Overflow or collapse of latrines in flood zones, leading to groundwater contamination	Environmental/Health	Moderate	Reversible	High (with flood-adapted design)
	Inappropriate siting on private or communal land	Social (Land Access)	Low-Moderate	Reversible	High (with VLD and community dialogue)
Flood Mitigation Works	Disruption of local drainage flows, increasing flood risk downstream	Environmental (Hydrology)	Moderate	Reversible	Moderate (with hydrological modelling)
Watershed Restoration	Risk of introducing non-native species during reforestation	Environmental (Biodiversity)	Low	Reversible	High (with species screening)

Labor Engagement	Occupational health and safety risks for construction workers	Social (Labor Conditions)	Moderate	Reversible	High (with contractor compliance)
	Risk of child labour or informal, unregulated labour in remote areas	Social	Moderate	Reversible	High (with UNICEF labour protocols)
Community Engagement Activities	Risk of excluding vulnerable groups (e.g., women, IDPs, ethnic minorities) from decision-making or benefits	Social (Inclusion)	Moderate	Reversible	High (with tailored engagement plans)
Presence of Contractors	Safeguarding risks, including Sexual Exploitation and Abuse and sexual Harassment	Social Safeguarding	Moderate	Potentially Irreversible	High (with CoC and SEA Action Plan)
Construction and Civil Works	Generation of construction waste and debris	Environmental	Low	Reversible	High (with waste management plan)
	Noise and dust pollution during works in peri-urban areas	Environmental	Low	Reversible	High
Economic Displacement	Potential land acquisition and economic displacement associated with boreholes and other WASH facilities	Social Safeguarding	Low	Reversible	High with stakeholder engagement and consultations to prioritize WASH facilities location.

6.3 Summary of Risk Categories by Component

Component	Key Risk Themes	Overall Risk Level	Notes

Component 1	Institutional exclusion, limited stakeholder participation, weak regulatory enforcement	Low to Moderate	Primarily upstream/policy risks; manageable with inclusive processes
Component 2	Water resource stress, SEA/SH, labour risks, flood exposure, land access, community health and safety	Moderate	Site-specific, largely reversible, requires active safeguards and monitoring

6.3 Summary of Key Environmental and Social Risks and Mitigation Measures

Key Risk / Impact	Mitigation Measures	Responsible Institutions	Monitoring Indicators
Groundwater depletion or over-abstraction from boreholes in drought-prone areas	Conduct hydrogeological assessments prior to drilling; apply sustainable abstraction thresholds; monitor borehole yield and seasonal recharge; prioritize solar pumps with controlled extraction rates	UNICEF; Ministry of Energy Development and Hydraulic Resources (MEDHR); contractors	• Number of boreholes screened through hydrogeological assessment • Borehole abstraction rates monitored • Evidence of declining groundwater levels
Groundwater contamination from poorly sited sanitation facilities in flood zones	Apply flood-resilient sanitation design (elevated latrines); enforce minimum distance between latrines and water sources; subproject specific ESMPs for sanitation infrastructure within sector cluster.	UNICEF; local authorities; contractors	• % of sanitation facilities meeting design standards • Water quality testing results (faecal coliform levels)
Disturbance to natural habitats and biodiversity during infrastructure construction	Environmental screening of subprojects; avoid sensitive habitats and protected areas; implement biodiversity checklists; restore disturbed areas with native species	UNICEF; Ministry of Environment and Sustainable Development (MEDD); contractors	• Number of subprojects screened for biodiversity risks • Area of habitat restored • Evidence of invasive species introduction
Construction-related impacts (dust, noise, waste generation)	Implement construction environmental management measures; waste collection and disposal protocols; site restoration after works	Contractors; local commune authorities; UNICEF supervision	• Waste management compliance reports • Site inspection records • Community complaints related to construction impacts
Land access disputes or economic displacement related to infrastructure siting	Apply Voluntary Land Donation (VLD) protocol; verify absence of coercion; document land agreements; provide alternative sites where needed	UNICEF; local authorities; community leaders	• Number of land parcels acquired through VLD process • Signed VLD documentation • Land-related grievances recorded
Labour risks (OHS incidents, child labour, unsafe working conditions)	Implement Labour Management Procedures (LMP); enforce contractor Codes of Conduct; provide	Contractors; UNICEF safeguards team	• Number of OHS incidents reported • Worker training records • Labour grievance records

	PPE and safety training; conduct labour inspections		
Sexual Exploitation and Abuse / Sexual Harassment risks associated with contractor presence	Apply SEA/SH Action Plan; mandatory Codes of Conduct; worker training; confidential reporting channels through GRM	UNICEF; contractors; community monitoring structures	• Number of workers trained on safeguarding • SEA/SH complaints reported and resolved • Functionality of reporting channels
Exclusion of vulnerable groups (women, IDPs, Indigenous Peoples) from benefits or decision-making	Implement Stakeholder Engagement Plan; ensure gender-responsive participation; apply FPIC for Indigenous Peoples; targeted outreach to vulnerable groups	UNICEF; local authorities; NGOs	• Participation rates of women and vulnerable groups • Number of consultations held • Inclusion indicators in monitoring reports
Weak institutional capacity to implement safeguards	Deliver safeguards training; establish Safeguards Working Group; conduct regular supervision and project reviews	UNICEF; government partners; implementing NGOs	• Number of staff trained • Frequency of safeguards supervision missions • Compliance findings in project reviews

7. Environmental and Social Risk Management Approach Implementation Plan

This section outlines the overarching framework and methodology through which environmental and social risks and impacts associated with the project will be avoided, minimized, mitigated, and monitored. The approach is grounded in the precautionary principle, participatory engagement, and alignment with the requirements of UNICEF's Environmental and Social Standards, AMA terms and relevant national legal frameworks of the CAR.

7.1 Objectives

The project's Environmental and Social Risk Management Approach is designed to proactively safeguard people and ecosystems while enhancing the sustainability and equity of project outcomes. It aims to ensure that potential environmental and social risks are systematically identified, assessed, and addressed from the earliest stages of project design through to implementation and closure.

A core objective of this approach is the early identification and mitigation of adverse impacts. By integrating risk screening into the project planning process, the initiative ensures that risks are not only anticipated but managed in a timely and effective manner. Throughout the project lifecycle, risk management measures will be applied in a proportionate and adaptive way, aligned with the scale and nature of each subproject or activity.

The approach also seeks to build and strengthen local capacity for safeguards compliance. This includes training government partners and implementing agencies on environmental and social standards, establishing robust systems for monitoring and reporting, and institutionalizing accessible grievance redress mechanisms that are responsive to community feedback.

Critically, the risk management strategy prioritizes inclusive and equitable stakeholder participation. It emphasizes the active involvement of vulnerable and marginalized groups, ensuring their voices are heard and their needs addressed in all stages of project planning and delivery.

7.2 Screening, Categorization, and Risk Assessment

In accordance with GCF guidelines, the project has undergone an initial environmental and social risk screening and has been classified as Category B (equivalent to IFC Category B). This means that project activities may have subproject specific, reversible impacts that can be mitigated with standard management procedures.Given the specific subproject interventions sites will be identified during the implementation and the anticipated large number of subprojects involving similar types of interventions with comparable environmental and social risk profiles, UNICEF may, where appropriate, adopt a clustered or thematic approach. This means that during implementation, subproject specific interventions (e.g., a borehole, latrine, or small flood control structure) will be clustered in groups similar in nature, scale, and risk characteristics. Each cluster will be subjected to further environmental and social screening, using the agreed screening template.

The screening will assess:

- Type, scale, and location of activity cluster;
- Proximity to sensitive ecosystems, cultural heritage sites, or settlements;
- Land ownership and access issues;
- Vulnerability and social inclusion risks;
- Potential cumulative or transboundary impacts.

Risk levels will be determined by UNICEF using the agreed screening and classification criteria set out in this ESMF. Based on these assessments and in alignment with GCF's ESS Policy, subproject specific Environmental and Social Management Plans (ESMPs) will be prepared at a cluster level for those classified as moderate risk (Category B according to GCF risk level and equivalent according to UNICEF ESS Policy). These ESMP will detail the necessary mitigation measures, monitoring protocols, and roles and responsibilities of implementing partners across the relevant subprojects. .

Consistent with the GCF Information Disclosure Policy, Revised Environmental and Social Policy, and stakeholder engagement requirements, moderate risk cluster-level ESMPs or their summaries will be disclosed in a timely and accessible manner to affected communities and other stakeholders, subject to applicable confidentiality and security considerations. Subproject clusters categorized as low risk level won't have to prepare cluster-specific ESMPs or go through disclosure processes.

7.3 Biodiversity Screening and Management Measures

Given the ecological sensitivity of several target regions, particularly Bamingui-Bangoran and Vakaga, which are adjacent to protected areas, dryland ecosystems, and known biodiversity hotspots, the project will incorporate enhanced biodiversity screening and monitoring measures aligned with UNICEF Environmental and Social Standards and guided by IFC Performance Standard 6.

1. Biodiversity Impact Checklists – Biodiversity Management Plan (BMP)
All Component 2 subprojects located in or near ecologically sensitive areas (e.g., buffer zones around the Bamingui-Bangoran National Park, dry savannah corridors in Vakaga) will be screened using a dedicated Biodiversity Impact Checklist. This checklist will be part of the environmental and social screening package (Annex 1) and will assess:

- Proximity to critical habitats or protected areas;
- Presence of natural habitats, ecological corridors, or seasonal wetlands;
- Likely disturbance to flora or fauna during construction or operation;
- Local use of plant or animal species with conservation concern.

Where potential risks are identified, a sub project specific **Biodiversity Management Plan (BMP)** may be developed as part of the cluster-level ESMPs.

2. No Introduction of Invasive Species Protocol
To safeguard native ecosystems during restoration or watershed protection activities (e.g., reforestation, riparian buffer planting), the project will apply a strict **"No Introduction of Invasive Species" protocol.** This will include:

- Mandatory use of native or naturalized plant species for all replanting or revegetation activities;

- Prohibition of exotic, fast-growing, or invasive species unless approved through documented ecological risk assessment;
- Site-level species selection validated by local environmental authorities or biodiversity experts.
- Procurement of seedlings or planting materials will be verified to ensure consistency with this protocol.

3. Alignment with Global and Regional Conservation Priorities
During subproject screening and design, all biodiversity assessments will reference:

- The IUCN Red List of Threatened Species, to identify the presence of endangered, vulnerable, or endemic species within the project area;
- Relevant regional or national conservation plans (e.g., Central African Republic's National Biodiversity Strategy and Action Plan; conservation priorities for the Congo Basin);
- BirdLife International Key Biodiversity Areas (where available), especially in migratory corridors.

Where activities are proposed within or near known habitats of **critically endangered species**, the project will adopt the **precautionary principle** and either:

- Re-design or re-site the intervention to avoid impacts; or
- Conduct a more detailed ecological study and prepare a mitigation plan consistent with IFC PS6, UNICEF policies and requirements and AMA terms.

Monitoring indicators related to biodiversity status, vegetation cover, and habitat condition will be integrated into ESMPs and tracked throughout project implementation (see Section 12.3).

The biodiversity screening process will also document cases where proposed infrastructure locations are rejected or modified due to proximity to protected areas, ecological corridors, or sensitive habitats. During the early stages of project implementation, particular attention will be given to ensuring that boreholes, sanitation facilities, and drainage works are not located within protected areas or known wildlife movement corridors, including areas adjacent to the Bamingui-Bangoran National Park and other ecologically sensitive landscapes. Screening records will therefore include brief justifications where alternative locations are selected in order to avoid potential impacts on natural habitats.

To strengthen adaptive management and institutional learning, the project will also review the effectiveness of biodiversity screening procedures during the project's mid-term evaluation. This review will include a short lessons-learned note summarizing screening outcomes, common siting challenges, and any adjustments made to screening guidance or mitigation measures. Findings will be used to refine subproject siting procedures and strengthen safeguards implementation during the remaining project period.

7.4 Mitigation Hierarchy

The project adopts the Mitigation Hierarchy as its core principle for managing risks:

Avoid: Wherever feasible, eliminate activities likely to cause irreversible harm (e.g., avoid siting in ecologically sensitive zones or customary land without consent).

Minimize: Modify project design to reduce impacts (e.g., raise latrines in flood-prone areas, use solar pumps to reduce carbon footprint).

Restore: Rehabilitate or restore habitats or assets that may be temporarily affected (e.g., replanting vegetation, restoring water points).

Offset: Where residual impacts remain and cannot be fully mitigated, apply offset measures in accordance with UNICEF's ESS risk mitigation hierarchy, particularly for economic displacement or livelihood impacts. Any compensation measures must be consistent with UNICEF's ESS Policy and procedures.

7.5 Environmental and Social Management Instruments

To ensure effective management of environmental and social risks, the project will deploy a suite of dedicated safeguard instruments. These tools are designed to translate overarching commitments into clear, actionable steps throughout the project lifecycle, from planning and design to implementation, monitoring, and closure.

7.5.1. Environmental and Social Management Framework (ESMF)

At the core of this approach is the EMSF, which outlines the guiding principles, procedural requirements, and institutional arrangements that govern safeguards compliance across all project activities. The ESMF serves as the foundational reference for risk mitigation, monitoring, and capacity-building efforts.

7.5.2. ESS Screening Forms and subproject specific Environmental and Social Management Plans (ESMPs)

Given the specific subproject interventions sites will be identified during the implementation and the anticipated large number of subprojects involving similar types of interventions with comparable environmental and social risk profiles, UNICEF may, where appropriate, adopt a clustered or thematic approach. This means that during implementation, subproject specific interventions (e.g., a borehole, latrine, or small flood control structure) will be clustered in groups similar in nature, scale, and risk characteristics. Each cluster will be subjected to further environmental and social screening, using the agreed screening template.

Risk levels will be determined by UNICEF using the agreed screening and classification criteria set out in this ESMF. Based on these assessments and in alignment with GCF's ESS Policy, subproject specific interventions will be clustered by sectors and screened using the agreed screening and classification criteria set out in this ESMF. Based on these assessments and in alignment with GCF's ESS Policy, subproject specific Environmental and Social Management Plans (ESMPs) will be prepared at a cluster level for those classified as moderate risk clusters. These ESMP will detail the necessary mitigation measures, monitoring protocols, and roles and responsibilities of implementing partners across the relevant subprojects.

Consistent with the GCF Information Disclosure Policy, Revised Environmental and Social Policy, and stakeholder engagement requirements, moderate risk cluster-level ESMPs or their summaries will be disclosed in a timely and accessible manner to affected communities and other stakeholders, subject to

applicable confidentiality and security considerations. Subproject clusters categorized as low risk level won't have to prepare cluster-specific ESMPs or go through disclosure processes.

7.5.3. Labor Management Procedure (LMP)

The project will also implement a Labor Management Procedure (LMP**)**, which provides guidance on fair and transparent recruitment practices, occupational health and safety (OHS) standards, arrangements for workers to raise complaints and concerns through the overall project grievance mechanism, and measures to prevent child labour.

7.5.4. Stakeholder Engagement Plan (SEP)

In parallel, a comprehensive Stakeholder Engagement Plan (SEP) will be enacted to ensure that community consultations are inclusive, transparent, and responsive. The SEP will facilitate two-way communication between project teams and stakeholders, allowing for regular feedback and timely dissemination of relevant information.

7.5.5. Indigenous Peoples Plan (IPP)

A separatee IPP for M'boboro Fulani population was prepared as a separate annex with the following objectives:

- Assess a baseline of the M'boboro Fulani people in the project area that includes their socioeconomic profile, the climate risks to their livelihoods, their governance, and land tenure.
- Describe the legal and policy framework for Indigenous Peoples in the CAR, including national frameworks, international commitments, and AMA terms with view to GCF Indigenous People's Policy.
- Assess potential project risks in the M'boboro Fulani population.
- Establish a culturally appropriate action plan to ensure the needs, concerns, and perspectives of the M'boboro Fulani are fully integrated into the project's design and the potential project risks are mitigated effectively.
- Outline a culturally appropriate strategy for collaboration and engagement, fostering active M'boboro Fulani participation throughout the implementation and monitoring phases.
- Provide an overview of the Free, Prior, and Informed Consent (FPIC) process undertaken during the proposal development stage.
- Establish culturally sensitive mechanisms to guarantee continuous participation and feedback from M'boboro Fulani people throughout the project lifecycle.

7.5.6. Grievance Redress Mechanism (GRM)

To address community concerns and grievances, a project-level Grievance Redress Mechanism (GRM) will be operationalized. This mechanism will provide accessible and culturally appropriate channels for lodging complaints and seeking resolution, ensuring that issues are addressed in a timely and transparent manner.

Additional measures to ensure that the project grievance mechanism is accessible and culturally appropriate for Indigenous Peoples will be set out in the IPP.

7.5.7. SEA/SH Prevention and Response Protocol

The project will implement UNICEF's Policy on Safeguarding and the Policy and Procedure on Environmental and Social Standards, inclusive of SEA/SH (Sexual Exploitation and Abuse, and Sexual Harassment). This regulatory framework will uphold strong safeguarding standards. Including for children, and establish clear procedures for preventing and responding to incidents of sexual exploitation and abuse. In addition, UNICEF will cascade PSEA/SH obligations to implementing partners through the UN Harmonized PSEA Assessment Tool and to vendors, through the relevant procurement documents.

A Conflict Sensitivity and Security Risk Assessment and Mitigation Strategy is available in Annex 6b.

A chance-find procedure will be prepared during project implementation.

7.5.8. Construction Waste Management

Civil works activities associated with Component 2, including borehole drilling, construction or rehabilitation of sanitation facilities, installation of small drainage structures, and minor flood mitigation works, will generate a range of typical construction waste streams. Although the scale of infrastructure supported under the project is relatively small, unmanaged construction waste can still pose localized environmental and community health risks, particularly in fragile and low-capacity contexts such as the Central African Republic. The project will therefore apply precautionary waste management practices consistent with UNICEF Environmental and Social Standards 2, on resource efficiency and pollution prevention.

The principal waste streams anticipated during implementation include excavation spoil and drilling cuttings generated during borehole installation and trenching activities; inert construction debris such as broken masonry, concrete fragments, or scrap metal; packaging materials associated with construction inputs, including plastic wrapping, cement bags, timber pallets, and cardboard; and small quantities of surplus construction materials such as sand or aggregates. Temporary worksites may also produce limited amounts of domestic waste generated by construction workers. Hazardous waste is not expected to be significant; however, minor quantities of used oils, lubricants, or fuel containers associated with drilling rigs or generators may occur and will require controlled handling and disposal.

Waste management procedures will be integrated into the sub-project specific Environmental and Social Management Plans (ESMPs) prepared for individual subprojects, as relevant. Contractors will be required to apply basic waste minimisation principles during procurement and construction planning in order to reduce material losses and avoid unnecessary waste generation. Where feasible, excavated materials and drilling spoil will be reused on site for backfilling, grading, or minor landscaping works. Segregation of waste streams at construction sites will be encouraged so that reusable or recyclable materials, such as scrap metal or timber, can be recovered where local markets exist.

Given the limited formal waste management infrastructure across much of the Central African Republic, disposal arrangements will vary by prefecture and will be coordinated with local authorities during subproject preparation. In the capital Bangui, where municipal waste management services and designated disposal areas exist, contractors will transport non-reusable construction waste to municipal dumping sites or other locations approved by city authorities. In Ouham, where formal disposal infrastructure is limited, construction waste will be managed through controlled disposal in communal waste areas identified and approved by prefectural or municipal administrations, with priority given to the local reuse of suitable spoil materials for backfilling or drainage improvement works.

In Bamingui-Bangoran, particular care will be required due to the presence of sensitive ecosystems and the proximity of protected areas such as the Bamingui-Bangoran National Park. Construction waste will

therefore not be disposed of in natural habitats, watercourses, or forested areas. Instead, waste will be transported to controlled communal disposal areas designated by local authorities, and project supervision teams will ensure that spoil reuse and site restoration measures are applied wherever possible. In Vakaga Prefecture, where waste management infrastructure is extremely limited, the project will prioritise waste minimisation and on-site reuse strategies. Residual waste that cannot be reused will be disposed of at community-approved disposal sites identified through consultation with local authorities and documented during environmental and social screening.

Contractors will be required to maintain basic records of waste generation and disposal as part of their environmental compliance reporting. UNICEF supervision missions and site engineers will verify that construction sites remain orderly, that waste is not disposed of in drainage channels or near water sources, and that designated disposal locations are used where required. These monitoring activities will be integrated into routine safeguards supervision and environmental performance reporting under the project.

7.5.9 Cumulative groundwater impact analysis (Vakaga and Bamingui-Bangoran)

Given the reliance on groundwater in Vakaga and parts of Bamingui-Bangoran, and the potential for multiple project-supported water points to be developed over time, the project will apply a simple but conservative cumulative impact approach to ensure abstraction remains within sustainable limits. At subproject screening stage, UNICEF and the Ministry responsible for water resources will review borehole siting proposals against available hydrogeological information (aquifer type, indicative recharge potential, existing water point density and known seasonal constraints). This review will explicitly consider cumulative abstraction, not only the yield of a single borehole, and will document cases where sites are re-positioned, down-scaled, or rejected to avoid over-development in the same hydrogeological unit.

Where hydrogeological data are limited (as is expected in remote areas), the project will apply conservative assumptions and “design-to-protect” principles. Boreholes will be designed for modest yields appropriate to local aquifer conditions, and abstraction will be managed through operational controls (e.g., pump sizing, runtime limits, and flow restrictors) rather than assuming high sustained yields. The cumulative assessment will compare estimated abstraction against a conservative estimate of available recharge/sustainable yield for the local aquifer setting, and will be updated as new field information becomes available through drilling logs, pumping tests, and seasonal monitoring.

In practical terms, each borehole proposal will include an indicative abstraction estimate based on expected yield and operating hours, and this will be aggregated where multiple boreholes are planned within the same area. As a conservative screening benchmark, the project will adopt a precautionary threshold whereby aggregated project abstraction within a defined local cluster (e.g., community / catchment scale) should remain well below the estimated sustainable yield, and will trigger enhanced controls if monitoring indicates emerging stress.

Monitoring thresholds and trigger actions

To make this operational, the project will apply a set of practical thresholds and escalation measures in Vakaga and Bamingui-Bangoran:

- **Baseline establishment:** each new borehole will have baseline measurements recorded at commissioning (static water level, yield, basic water quality), with seasonal follow-up measurements during the first dry season.
- **Operational monitoring:** pump runtime (hours/day) and indicative abstraction (m^3/day) will be tracked using simple logbooks and/or pump-hour meters, complemented by periodic spot measurements of static water level.

The following triggers will be used to guide adaptive management (to be refined as hydrogeological data improve):

- **Water-level decline trigger:** if static water levels show a sustained decline of **>1.0 m** relative to baseline over a dry-season monitoring cycle (or a consistent downward trend over consecutive monitoring periods), the borehole (and nearby project boreholes) will be reviewed for reduced operating hours and/or demand management measures.
- **Yield stress trigger:** if borehole yield declines by **>20%** from commissioning performance under comparable pumping conditions, the system will be investigated for mechanical causes and, if aquifer stress is plausible, abstraction will be reduced and alternative supply options assessed.
- **Cumulative abstraction trigger:** where aggregated abstraction in a local cluster increases (e.g., multiple water points added) and approaches a conservative internal ceiling (set during screening based on available recharge indicators), additional boreholes in that cluster will be deferred or re-sited pending further assessment.

Where any trigger is reached, trigger actions will be applied in a stepwise manner, proportionate to risk: adjusting pump sizing or runtime limits; installing flow restrictors; introducing rotation schedules between water points; strengthening demand management and leakage control; and, where feasible, supplementing supply through rainwater harvesting or storage. If monitoring suggests material risk of over-abstraction, UNICEF and the responsible water authority will pause further groundwater development in the affected cluster until a focused hydrogeological review is completed and mitigation measures are agreed.

7.6 Voluntary Land Donation (VLD) Operational Procedure

The project is not expected to require involuntary land acquisition or physical resettlement. Infrastructure supported under Component 2 (such as boreholes, sanitation facilities, and small drainage structures) will be located on public land or land made available through voluntary community agreements in accordance with the Voluntary Land Donation (VLD) protocol described in this ESMF. Additionally, any production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples will be excluded from the project.

Nevertheless, in the unlikely event that project activities result in involuntary land acquisition, economic displacement, or restrictions on land use that affect livelihoods, the project will prepare and implement a fit-for-purpose Resettlement Action Plan (RAP) or Livelihood Restoration Plan consistent with the requirements of IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement and the GCF Environmental and Social Policy. Any such instrument will be prepared in consultation with affected persons and will be disclosed and agreed with the GCF prior to the commencement of the relevant activities.

While the project is not expected to require large-scale land acquisition or involuntary resettlement, certain small-scale subprojects (e.g., boreholes, latrines, drainage outlets) may require access to small parcels of land owned under customary or individual tenure. In such cases, land may be made available through VLD in accordance with GCF and IFC Performance Standard 5 requirements, and as guided by the project's VLD Protocol (Annex II).

To ensure the legitimacy, fairness, and transparency of any land donation, the following operational steps will be followed:

Step 1: Site Identification and Preliminary Screening

During subproject planning, technical teams will identify suitable land parcels for infrastructure siting. These will be screened using the ESMF's environmental and social criteria to determine land ownership, use, and the presence of any risks (e.g., displacement, disputes, cultural significance).

Step 2: Community Engagement and Donor Dialogue

Once a potential site is identified, UNICEF and its implementing partners will engage the landowner(s) through participatory dialogue. The VLD process, donor rights (including the right to refuse or revoke consent), and potential impacts will be explained clearly and in the local language.

No land will be accepted unless the donor's decision is made free of coercion and with full understanding of the implications.

Step 3: Socio-Economic Impact and Vulnerability Assessment

A safeguards officer[4] will assess whether the donation would result in any direct or indirect harm to the donor. This includes evaluating:

- Proportion of land being donated (<5% of total holdings);
- Whether land is used for housing, farming, or grazing;
- Whether the donor is from a vulnerable group (e.g., female-headed household, elderly, displaced).

If there are any indications of risk or hardship, the donation will be declined or mitigated.

Step 4: Documentation and Mapping

If all safeguards are met, the landowner and witnesses (e.g., local authority, civil society representative, project safeguards officer) will complete and sign the **Voluntary Land Donation Form (Annex III)**. This form includes:

- Description of the land parcel and its current use;
- Confirmation of voluntariness and non-compensation;
- A map or sketch of the land with GPS coordinates;
- Donor and witness signatures.

A copy of the signed form will be provided to the donor, and the original stored in the project's safeguard registry.

Step 5: Verification and Disclosure

The signed VLD form and supporting documentation will be reviewed by UNICEF's safeguards focal point for compliance with AMA terms and IFC standards. The location and size of the donated land will be publicly disclosed to ensure community transparency.

In any case where there is ambiguity, competing claims, or risk of pressure on the landholder, the donation will be rejected and an alternative site identified.

[4] Gender, ESS, IPP and Social Inclusion officer

Step 6: Monitoring and Grievance Redress

UNICEF and its partners will monitor all land donated under the project to ensure continued compliance and absence of harm to donors. Donors will be informed of the **Grievance Redress Mechanism (GRM)** and may raise concerns at any time.

All donations will be subject to third-party review during project reviews and evaluations.

7.7 Labor Management and Worker Protection Measures

To ensure that project implementation adheres to international labour standards and UNICEF's Core Commitments to Children and Humanitarian Principles, the project will adopt enhanced labour risk management protocols in line with IFC Performance Standard 2 and UNICEF Environmental and Social Standards and AMA terms. These measures are particularly important given the fragile context of the Central African Republic, where informal labour practices are widespread, and risks of exploitation, especially among vulnerable and displaced populations, are elevated.

1. Labor Management Procedures (LMP)

An indicative **Labor Management Procedure (LMP)** has been prepared and included in **Annex 4** of this document. This LMP outlines:

- Types of workers likely to be engaged (direct workers, contracted workers, community labour);
- Terms and conditions of employment;
- Occupational health and safety (OHS) obligations;
- Prohibition of child labour, forced labour, and gender-based violence;
- Requirements for equal opportunity, non-discrimination, and protection of vulnerable workers (including those residing in IDP-hosting areas).

This framework will guide all labour-related aspects of subproject implementation and will be updated or expanded as needed during project roll-out.

2. Labor Grievance Mechanism and Record-Keeping

All contractors and implementing partners will be required to establish a site-level Labor Grievance Register, which will:

- Log all labour-related complaints (e.g., harassment, wage disputes, unsafe conditions);
- Disaggregate complaints by grievance type, gender, resolution status, and time to closure;
- Be subject to monthly review by UNICEF field staff and safeguards personnel.

Labour-related complaints and concerns from project workers will be received and managed through the overall project grievance mechanism described in Section 10. Anonymous complaints will be permitted, and all grievance logs will be maintained with due regard to confidentiality.**3. Wage Compliance and Pay Equity**

To reduce risks of exploitation in informal and vulnerable labour markets, particularly in IDP-hosting communities, the project will require that:

- All contracted workers receive wages that meet or exceed the national minimum wage;
- Equal pay for equal work is ensured across gender, age, and displacement status;

- Contractors provide written contracts in accessible formats, outlining wages, hours, and grievance options.

UNICEF will carry out random site inspections to verify compliance with wage standards, contract conditions, and grievance accessibility. Any breach of labour standards may result in suspension or termination of the contractor's engagement, in accordance with UNICEF procurement rules and international good practice.

Supply Chain Labour Risk Management

In addition to risks associated with direct and contracted workers, the project recognises that labour risks may also arise within the supply chain of materials used in civil works activities, including suppliers of construction materials such as sand, gravel, aggregates, cement, bricks, and other locally sourced inputs.

In fragile and conflict-affected contexts such as the Central African Republic, material supply chains, particularly quarrying and small-scale extraction activities—may present risks related to unsafe working conditions, informal labour arrangements, child labour, and environmental degradation.

To address these risks, the project will apply proportionate supply-chain due diligence measures consistent with UNICEF Environmental and Social Standards and the principles of IFC Performance Standard 2.

These measures will include:

- Requiring contractors to source construction materials from licensed or formally recognised suppliers where feasible;
- Including labour and occupational health and safety requirements in procurement contracts and supplier agreements;
- Conducting basic supplier screening during procurement, particularly for high-risk inputs such as aggregates sourced from quarries;
- Requiring contractors to confirm that child labour, forced labour, and hazardous labour practices are not used in the extraction or production of project materials;
- Undertaking periodic spot checks during supervision missions where material sourcing is considered to present elevated labour risks.

Where credible information is received indicating that a supplier is associated with serious labour violations (e.g. child labour, forced labour, unsafe quarry operations), the contractor will be required to take corrective measures or identify alternative suppliers. It is noted that SES-related requirements under this project apply to project-specific labour within the monitored supply chain, and do not extend to the broader supply chain beyond the project's sphere of influence.

Occupational Health and Safety (OHS) Training and Incident Reporting

To ensure safe working conditions during construction and operation activities, the project will apply strengthened occupational health and safety (OHS) procedures consistent with national labour regulations, UNICEF Environmental and Social Standards, and international good industry practice.

All contractors and implementing partners will be required to implement the following measures:

Mandatory OHS Training

- All workers will receive initial induction training on occupational health and safety prior to commencing work, covering hazards associated with construction activities, safe equipment use, emergency response procedures, and the use of personal protective equipment (PPE).
- Contractors will conduct periodic OHS refresher trainings at least every six months, or more frequently where activities involve elevated risk.

- Records of training sessions, attendance, and topics covered will be maintained and made available for review during safeguards supervision missions.

Incident Reporting
Contractors will maintain an **Occupational Health and Safety Incident Register**, which will document:
• workplace accidents and injuries;
• lost-time incidents (defined as injuries resulting in one or more days of work absence);
• near misses and hazardous occurrences; and
• corrective actions taken.

Staff and partners are required to refer immediately to the relevant UNICEF office Concerns, Incidents and Fraud and Corruption, and Aid Diversion Complaints and Feedback received through own feedback channels with due regard to confidentiality, safety and security, in line with the provisions included in relevant agreements and contracts and with the principles of this Procedure. Upon referral, a Record must be created, and this Procedure must be followed.
Monitoring indicators will include:
• number of workers trained in OHS procedures;
• frequency of refresher training sessions;
• number of lost-time accidents recorded; and
• corrective actions implemented following incidents.

7.8 Institutional Roles and Responsibilities

UNICEF, as the Accredited and Executing Entity, will be responsible for:

- Requiring safeguards compliance across all components;
- Leading safeguards capacity building for government and local stakeholders;
- Supervising the preparation, disclosure, and implementation of cluster-level ESMPs for clusters of subprojects assessed as moderate risk;
- Requiring contractor adherence to environmental, labour, and SEA/SH obligations;
- Consolidating monitoring reports and submitting them to GCF.

MEDHR as a co-executing entity for Activities 2.1.3 and 2.3.2. will be responsible for:

- Ensuring safeguards compliance across both activities.
- In coordination with UNICEF, supervising the preparation, disclosure, and implementation of cluster-level ESMPs for cluster of subprojects assessed as moderate risk under activities 2.1.3 and 2.3.2;
- Ensuring contractor adherence to environmental, labour, and SEA/SH obligations for activities 2.1.3 and 2.3.2.;
- Reporting to UNICEF for overall coordination, safeguard compliance, and GCF reporting

Local government authorities, WASH focal points, and community-based organizations will be engaged in safeguards implementation, particularly in:

- Screening and siting of infrastructure;
- Land access negotiations and documentation;
- Social mobilization and grievance resolution;
- Participatory monitoring.

7.9 Monitoring and Adaptive Management

A robust Environmental and Social Monitoring Plan will be applied to all subprojects relevant to the nature and scale of each subproject.(see Section 8). Monitoring responsibilities will be defined in each ESMP and will include indicators on:

- Water quality and abstraction levels;
- Occupational health and safety;
- Inclusion and equity metrics (e.g., disaggregated access to services);
- Incident reporting, including SEA/SH, land disputes, or grievances;
- Environmental performance (e.g., erosion control, vegetation recovery).

Monitoring results will feed into quarterly and annual reporting cycles and be used to adjust mitigation measures if unforeseen impacts arise or if stakeholder concerns emerge.

7.10 Capacity Strengthening

The project includes a dedicated budget for environmental and social safeguards capacity building. Planned activities include:

- Training of local staff and contractors on environmental compliance, SEA/SH risk mitigation, and social inclusion;
- Development of localized guidance materials (in French and relevant local languages);
- Field mentoring and monitoring support during roll-out phases;
- Cross-learning exchanges between prefectures.

8. Institutional Arrangements for ESMF Implementation

This section outlines the institutional roles and responsibilities for ensuring that environmental and social risk management measures, especially those identified under Component 2 infrastructure activities, are systematically applied, monitored, and adapted throughout the project cycle.

8.1 UNICEF as Accredited Entity and Executing Entity

As both the Accredited Entity (AE) and Executing Entity (EE), UNICEF has overall responsibility for the environmental and social performance of the project. This includes:

- Ensuring that all project activities are designed, implemented and monitored in accordance with UNICEF's E&S regulatory framework, AMA terms and IFC Performance Standards (where applicable);
- Leading the development, disclosure, and application of this ESMF, as well as all cluster-level subproject specific ESMPs and screening documents;
- Coordinating environmental and social screening of all subprojects and infrastructure investments prior to implementation
- Overseeing integration of environmental and social clauses (ESCs) into contractor bidding documents, terms of reference, and supervision contracts;
- Managing capacity building and technical support for implementing partners, consultants, and government entities engaged in safeguards tasks;
- Consolidating environmental and social monitoring data into semi-annual performance reports to the GCF as part of regular reporting;
- Leading SEA/SH prevention, child safeguarding, and grievance response at both strategic and operational levels.

UNICEF will designate a Safeguards Focal Point within the CAR Country Office in accordance to the project PMU roles), with direct technical backstopping from regional and headquarters-level Environmental and Social Safeguards Specialists.

8.2 Ministry of Energy Development and Hydraulic Resources (MEDHR) as Executing Entity

As co- Executing Entity (EE) with UNICEF, MEDHR has overall responsibility for the environmental and social performance of activities 2.1.3 and 2.3.2. This includes:

- Ensuring that activities 2.1.3 and 2.3.2. comply with UNICEF's own E&S procedural, AMA terms and IFC Performance Standards (where applicable);
- Leading the development, disclosure, and application of s subproject cluster-level ESMPs and screening documents for activities 2.1.3 and 2.3.2.
- Overseeing integration of environmental and social clauses (ESCs) into contractor bidding documents, terms of reference, and supervision contracts;

- Ensuring FPIC and inclusive engagement processes for activities 2.1.3 and 2.3.2, in alignment with the IPP and GAP.
- Supporting technical screening and approval of borehole siting and hydrological studies;
- Overseeing sustainable groundwater abstraction thresholds, particularly in arid zones;
- Participating in joint supervision and field monitoring visits.
- Reporting to UNICEF for overall coordination, safeguard compliance, and GCF reporting

8.3 National and Sub-National Government Counterparts

While UNICEF retains execution leadership, relevant CAR government agencies will support safeguards implementation at policy and field levels. Key responsibilities include:

Ministry of Environment and Sustainable Development (MEDD)

- Providing technical input on environmental classification and clearance;
- Ensuring alignment with national environmental impact assessment (EIA) requirements;
- Engaging in biodiversity risk assessment, particularly in buffer zones near protected areas.

Ministry of Humanitarian Action and National Reconciliation

- Supporting FPIC and inclusive engagement processes, especially with displaced or vulnerable communities;
- Facilitating stakeholder dialogue where land access issues or minor resettlement risks arise.

Local Prefecture and Commune Administrations

- Participating in site identification, screening, and land negotiation processes;
- Leading the coordination of ward-level grievance redress mechanisms (GRMs);
- Monitoring compliance with environmental and labour standards during civil works;
- Hosting community-level training, engagement, and reporting events.

8.4 Contractors and Implementing Partners

All contractors and infrastructure implementing partners will be contractually required to comply with environmental and social obligations outlined in:

- Cluster-level ESMPs for subprojects;
- CoC on Safeguarding, inclusive of sexual exploitation and abuse and sexual harassment;
- National labour and occupational health and safety regulations.

Specific obligations include:

- Designating a Contactor/IP Safeguards Officer at each active worksite;
- Ensuring all workers are trained in occupational safety and Safeguarding protocols;
- Submitting monthly environmental and social compliance reports; Participating in periodic site reviews conducted by UNICEF and government counterparts.

Non-compliance with these safeguards conditions may result in contract suspension or termination, in accordance with UNICEF procurement procedures.

8.5 Community-Based Structures

Community institutions play a critical role in frontline safeguards implementation and participatory monitoring, particularly in remote and fragile contexts. These include:

- Water User Associations (WUA), water users associations, and Village Development Committees (VDCs): Responsible for promoting safe use, access equity, and basic maintenance of WASH infrastructure;
- Community Health Workers and Women's Associations: Key actors in hygiene promotion, social inclusion, SEA/SH awareness, and feedback channels;
- Community-Based Monitors: Designated individuals trained to observe and report on environmental conditions, labour practices, and contractor conduct, including violations of child protection protocols.

Capacity-building support and ongoing mentoring for community structures will be provided through UNICEF and partners as part of Component 2 activities.

8.6 Institutional Linkages to Mitigation Measures

The institutional roles outlined above are directly linked to the mitigation strategies described in Section 5.3. Examples include:

Risk Category	Responsible Institution(s)	Linked Mitigation Measure
Aquifer stress, over-abstraction	UNICEF, MEDHR	Hydrogeological assessments; siting protocols
Safeguarding	UNICEF, MEDHR, contractors, community monitors	Codes of Conduct; Safeguarding Action Plan; community training
Labor safety & fair conditions	Contractors, UNICEF, MEDHR	LMP application; on-site reviews
Biodiversity impacts	MEDD, UNICEF	Exclusion screening; native species restoration
Social exclusion	UNICEF, MEDHR, local authorities, NGOs	Inclusive SEP; FPIC processes
Construction waste	Contractors, commune offices	Waste management procedures in ESMPs
Land access/resettlement	Local government, UNICEF	VLD protocols or RAPs; mediation support
Grievance resolution	Local GRM committees, UNICEF	Multi-tier GRM operationalization

8.7 Coordination and Oversight

A Project Safeguards Working Group will be established to coordinate E&S implementation, chaired by UNICEF and composed of focal points from MEDHR and key ministries, Implementing partners, and civil society. This body will:

- Review screening outcomes and high-risk subproject classifications;
- Monitor grievance trends and corrective actions;
- Guide adaptive risk management based on field feedback;
- Provide a forum for stakeholder dialogue and safeguards reporting.

9. Capacity Building and Training

The Central African Republic (CAR) faces significant capacity constraints in environmental management, social safeguards, gender equity, occupational health and safety, and inclusive WASH governance—especially in fragile, conflict-affected, and remote areas. This section outlines the project's approach to strengthening technical, operational, and participatory capabilities of all stakeholders involved in the management of environmental and social risks.

9.1 Objectives

The main objectives of the capacity building and training program are to:

- Enhance knowledge and technical skills on the implementation of environmental and social safeguards among project partners and contractors;
- Equip national, subnational, and local actors with the tools needed to screen, monitor, and manage environmental and social risks at the subproject level;
- Build institutional competencies in inclusive stakeholder engagement, SEA/SH prevention, and child safeguarding;
- Support the sustainability of WASH and flood resilience investments through localized environmental stewardship and accountability mechanisms.

9.2 Target Stakeholders

Capacity building activities will be targeted at actors across all levels of implementation, including:

- National Government Staff from MEDHR, MEDD, Ministry of Humanitarian Action, and Ministry of Public Works;
- Local Government Authorities at prefecture, commune, and village levels;
- UNICEF Field and Programme Staff, including M&E, WASH, and Safeguards Officers;
- Contractors and Civil Works Supervisors, including site engineers, foremen, and labourers;
- Community-Based Structures, including Water User Associations (WUAs), Women's Associations, and Community Health Workers;
- Implementing partners engaged in social mobilization or infrastructure delivery;
- Monitoring and Evaluation Teams, especially those responsible for safeguards reporting.

9.3 Training Areas and Topics

A modular training curriculum will be developed and delivered, tailored to stakeholder roles and local language needs. The following thematic areas will be prioritized:

Thematic Area	Target Groups	Key Topics

Environmental and Social Safeguards Overview	All stakeholders	ESMF objectives, screening process, cluster-level ESMP implementation, mitigation hierarchy
Subproject Risk Screening and Classification	UNICEF staff, MEDHR, Government agencies and Local Government Authorities, Implementing partners, Contractors	Use of screening templates, classification of risks, site selection protocols
WASH-Specific Environmental Impacts	UNICEF staff, MEDHR staff, local government, Contractors, Implementing partners, Community-Based Structures	Groundwater protection, sludge handling, erosion control, latrine siting in flood zones
Labor and Working Conditions	Contractors, implementing partners, site supervisors including site engineers, foremen, and labourers	PPE use, OHS basics, child labour prohibition, grievance access
SEA/SH and Child Safeguarding	UNICEF, MEDHR, Implementing partners Contractors, Community-Based Structures,	SEA/SH awareness, survivor-centred response, Codes of Conduct, complaint pathways
Stakeholder Engagement and FPIC	UNICEF, MEDHR, Implementing partners government agencies, implementing partners, Community-Based Structures,	Inclusive consultation techniques, gender-sensitive facilitation, documentation
Grievance Redress Mechanism (GRM)	Local GRM Committees, UNICEF, MEDHR, implementing partners,	GRM structure, roles, documentation, referral protocols, community outreach
Monitoring and Reporting	UNICEF, MEDHR, government agencies, contractors, Monitoring and Evaluation Teams	Environmental and social indicators, non-compliance tracking, corrective action plans

All training modules will be adapted to local literacy levels, cultural norms, and use French and relevant local languages. Community-based learning will be prioritized through participatory workshops, role-playing exercises, and peer-to-peer exchanges.

As part of pre-mobilization requirements, all contractors and site supervisors will receive orientation training on the project's Chance Finds Procedure (Annex V) prior to the commencement of civil works. This training will include practical guidance on recognizing potential cultural heritage materials (such as artefacts, burial sites, or culturally significant landscapes), the steps required to halt works and notify relevant authorities, and the responsibilities of contractors under the procedure. Where relevant, training will also include basic awareness of local cultural sensitivities and customary practices in the project areas to ensure that construction activities are undertaken with appropriate respect for cultural heritage and community traditions.

9.4 Delivery Modalities

The training program will be delivered using a phased, cascade approach:

- Initial Orientation: A national-level safeguards launch workshop will be held in Bangui at project inception.

- Train-the-Trainer Sessions: Targeting regional government focal points and UNICEF field coordinators.
- On-the-Job Mentoring: Technical backstopping and site-level coaching by UNICEF Safeguards Officers and consultants.
- Community-Based Training: Integrated into infrastructure delivery phases, especially during mobilization and handover.
- Refresher Courses: Conducted annually, with updated content based on M&E findings and lessons learned.

Digital training tools, such as video explainers, community radio broadcasts, and mobile-based feedback channels, will complement in-person delivery.

9.5 Capacity Assessment and Adaptation

To ensure training is contextually relevant and leads to behaviour change, the project will:

- Conduct a baseline capacity assessment of key institutions and community structures;
- Establish a training feedback mechanism to capture participant satisfaction and learning outcomes;
- Incorporate adaptive learning, where content is revised based on gaps observed during safeguards monitoring or grievance data.

Indicators on training completion, retention, and application will be included in the project's M&E system and reported to the GCF in annual performance updates.

9.6 Budget and Resourcing

A dedicated budget line will support the development, translation, delivery, and monitoring of capacity-building activities. UNICEF will mobilize internal expertise, regional E&S advisors, and third-party trainers where needed, while government and civil society partners will be supported to lead community-level rollouts.

10. Grievance Redress Mechanism

A grievance is a concern or complaint raised by beneficiaries, affected communities, or stakeholders related to the perceived or actual impacts of the project activities. The objectives of establishing an effective GRM are to:

- Provide stakeholders with a clear and accessible process for raising grievances and concerns, including the option to do so anonymously;
- Structure and manage the handling of comments, responses, and grievances in a timely, fair, and transparent manner, in accordance with local and national regulations;
- Ensure that grievances are addressed in a way that strengthens accountability to project beneficiaries and upholds human rights principles.

To operationalize these objectives, the GRM is based on the following principles:

- **Legitimacy:** Trusted by stakeholders and accountable for fair grievance processing.
- **Accessibility and Cultural Appropriateness:** Widely known and easy to use, with adequate support for stakeholders facing barriers such as language or mobility constraints. The mechanism is gender- and age-inclusive, ensuring protection for marginalized groups and persons with disabilities. It is also publicized in local languages through culturally relevant means.
- **Anonymity and Protection from Retaliation:** The mechanism provides dedicated channels for stakeholders to submit grievances anonymously. To protect against retaliation, UNICEF and its partners will ensure that the identity of the complainant is kept confidential throughout the process, particularly in instances where the complainant expresses fear of reprisal.
- **Predictability:** Provides clear procedures, indicative timeframes for resolution, and transparency on process outcomes.
- **Equitability:** Ensures equal access to grievance processes, providing information, advice, and support so all stakeholders can engage fairly.
- **Transparency:** Maintains open communication channels, keeps complainants informed, and records all grievance responses.
- **Rights-compatibility:** Aligns with internationally recognized human rights and does not prevent access to judicial or administrative remedies. When necessary, it supplements existing formal or informal mechanisms to ensure human rights compliance.
- **Continuous Learning:** Identifies lessons to enhance the mechanism, prevent future grievances, and improve project implementation.
- **Confidentiality:** Prioritizes complainant safety during reporting and investigation. The mechanism incorporates secure, confidential reporting channels and data storage, particularly for cases involving gender-based violence (GBV) or abuse.

By adhering to these principles, the GRM ensures that grievances are handled fairly, efficiently, and in alignment with international best practices, ultimately strengthening trust and engagement with project stakeholders.

The GRM will function as a critical feedback loop to inform project implementation, enhance performance, and identify risks early—particularly in relation to environmental and social safeguards. In situations where movement restrictions or insecurity are present, UNICEF will ensure that staff responsible for managing grievances have remote access to necessary systems, allowing processes to remain operational.

10.1 Project Grievance Redress Mechanisms

This project will operate a single project-level grievance redress mechanism implemented through UNICEF's Complaints and Feedback Management approach. Other mechanisms that may also be available to stakeholders, including existing inter-agency humanitarian feedback channels and the GCF's Independent Redress Mechanism, are described below for information only and do not replace the project grievance mechanism.

10.1.1 UNICEF's Complaints and Feedback Management (CFM) Procedure)

This project will apply UNICEF's Procedure on Complaints and Feedback Management as its project-level grievance redress mechanism. The mechanism is designed to receive and manage complaints and feedback from programme stakeholders in a timely, safe and confidential manner, while protecting personal data and supporting programme effectiveness and risk management.

Framework and Categorization

The Grievance Redress Mechanism (GRM) is structured to receive, record, act upon, and analyse all complaints and feedback in a timely and confidential manner. To ensure a consistent and appropriate response, all submissions are classified into one of four standard categories:

- Category 1: Requests, Observations, and Grievances: Includes requests for information or assistance, suggestions, and general expressions of dissatisfaction.
- Category 2: Concerns: Pertains to potential contraventions of UNICEF's safeguarding or environmental and social standards that pose a risk of harm.
- Category 3: Incidents: Refers to confirmed occurrences or events that have resulted in safeguarding, environmental, or social harm.
- Category 4: Fraud and Corruption, and Aid Diversion: Encompasses fraudulent or corrupt practices as well as the misappropriation of aid resources by external actors.

Procedural Workflow and Timelines

The procedure outlines a clear, multi-stage process for managing complaints, with strict timelines to ensure swift action, particularly for high-risk issues.

Acknowledgement and Closure Timelines

Category	Acknowledgement	Closure
1. Requests, Observations, & Grievances	Within 2 working days	Within 31 days (or 90 days for Data Subject Requests)
2. Concerns	Within 2 working days	Within 15 days
3. Incidents	Within 12 hours	Within 48 hours
4. Fraud & Corruption, and Aid Diversion	Within 2 working days	Within 31 days

Assignment and Initial Follow-up

Each recorded complaint is assigned to a designated focal point based on its category:

- Requests, Observations and Grievances and Concerns records are assigned to the relevant Programme Focal Point(s). More serious Incident records are assigned to the relevant Chief of Programme Section, while records of Fraud and Corruption, and Aid Diversion are assigned to the Head of Operations.
- For serious cases (Incidents and Fraud/Corruption), an initial follow-up is conducted to confirm necessary information and ensure immediate support, such as victim/survivor assistance, is initiated. This process is not an investigation and must not interfere with one.

Review and Decision-Making

If a complainant is not satisfied with the resolution proposed by the Country Office the mechanism does not prevent access to judicial or administrative remedies available under the laws of the Central African Republic

The final decision on the recommended course of action for these cases rests with the Representative. A record is formally closed upon resolution, implementation of an agreed course of action, or referral to OIAI.

If a complainant is not satisfied with the resolution proposed by the Country Office Representative, the mechanism does not prevent access to judicial or administrative remedies available under the laws of the Central African Republic

Management of Outstanding Records

The procedure includes a clear escalation pathway for records that are not closed within their specified timelines or where the complainant is not satisfied. Outstanding requests or concerns are transferred to the Chief of the Programme Section for resolution and can be escalated to the Deputy Representative if needed. More serious outstanding incidents or fraud and corruption records are immediately escalated to the Representative, who convenes senior staff to determine a final course of action.

Management of Anonymous Grievances

The project grievance mechanism will allow anonymous submissions through available feedback channels, where feasible. To appeal anonymously a Unique Tracking ID will be used to assign a code to the grievance and communicate its resolution anonymously through established channels. Anonymous complaints will be reviewed and acted upon to the extent possible based on the information provided. Stakeholders will be informed that anonymous submissions may limit UNICEF's ability to seek clarification, provide direct feedback, or undertake a full follow-up where essential information is missing. Any information received will be handled with due regard to confidentiality, safety, security and personal data protection.

Accountability and Oversight

Clear lines of responsibility ensure accountability at all levels.

- Country Office: The Representative is ultimately responsible and accountable for the effective implementation and strategic oversight of the procedure. Programme and Operations Focal Points manage the day-to-day handling of records, while Specialized Focal Points provide technical guidance.
- Oversight: Cases involving potential misconduct by UNICEF personnel or partners, such as sexual exploitation and abuse or significant fraud, are promptly referred to the Office of Internal Audit and Investigations (OIAI), which is the independent office authorized to conduct such investigations.
- Analysis and Learning: Complaints and feedback data are regularly analysed to identify systemic trends, risks, and issues, which are then used to inform and improve programme effectiveness and strengthen risk management.

Requirements for Implementing Partners

Implementing partners and vendors involved in the project will be required to promote the project grievance channels and ensure that communities are informed about how to use them. Complaints and feedback received through their own channels in relation to project activities will be reported to UNICEF in line with agreed reporting arrangements. Any concern, incident, or allegation of fraud and corruption will be referred to UNICEF immediately and confidentially for handling under the applicable process.

10.1.2 The CAR Standard Operating Procedures for Collective Feedback Mechanisms

In some project areas, communities may also use existing inter-agency humanitarian feedback channels, including community information and feedback structures and mobile feedback arrangements where these are operational. These channels are not the project grievance mechanism, but they may serve as entry points for project-related feedback and grievances. Where project-related matters are received through such channels, they will be referred to UNICEF for handling through the project grievance mechanism, subject to appropriate confidentiality and data protection safeguards.

10.1.3 The GCF's Independent Redress Mechanism (IRM)

Paragraph 69 of the GCF's Governing Instrument mandates the establishment of an IRM, which reports directly to the GCF Board. The IRM is tasked with:

- Reviewing requests for reconsideration of projects or programmes denied funding by the GCF Board;
- Addressing complaints or grievances from persons or communities who may be adversely affected by GCF-funded activities through problem solving and/or compliance review;
- Initiating investigations independently where warranted;
- Monitoring implementation of Board decisions and agreements reached through the grievance process;
- Recommending policy or procedural changes to the Board based on observed trends or international best practices;
- Supporting capacity-building for grievance mechanisms of Direct Access Entities (DAEs); and
- Providing education and outreach on grievance redress to GCF stakeholders and the public.

Requests may be submitted to the IRM in any of the six official UN languages via: https://irm.greenclimate.fund/case-register/file-complaint. For CAR, the French version of the request will take precedence in case of any discrepancy.

Stakeholders do not need to exhaust the project-level GRM or UNICEF's CFM before contacting the GCF IRM. Information on how to access the IRM will be clearly communicated during all stakeholder engagement sessions and through simplified brochures distributed in Fulani communities.

Terms of disclosure and access to the IRM are to be negotiated with the GCF.

IRM Contact Information:
Green Climate Fund
175, Art center-daero, Yeonsu-gu, Incheon 22004, Republic of Korea
Email: irm@gcfund.org
Website: https://irm.greenclimate.fund

10.2 Grievances Related to Safeguarding, inclusive of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

In line with UNICEF's zero-tolerance policy, all allegations of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) will be handled with the utmost seriousness, urgency, and confidentiality. Such allegations are classified as Category 3: Incidents under the UNICEF CFM Procedure and are managed through a specialized, fast-tracked process separate from the general GRM to ensure the safety and dignity of the survivor. The project will follow a strict survivor-centred approach, adhering to both the humanitarian procedures in CAR and the official UNICEF CFM Procedure.

Core Principles

The handling of all Incident records is guided by the following principles:

- Safety and Do-No-Harm: The survivor's physical and psychological safety is the highest priority. Measures will be taken to prevent re-traumatization and mitigate risks of retaliation.
- Confidentiality and Privacy: Case details will only be disclosed with the survivor's informed consent and on a strict need-to-know basis to protect them from further harm.
- Respect and Non-discrimination: Survivors will be treated with dignity, respect, and empathy, without blame or prejudice.
- Choice and Agency: Survivors have the right to determine how they wish to proceed and can withdraw consent at any point. The goal is to empower them in the reporting and response process.
- Access to Services: The project will facilitate timely access to comprehensive, survivor-centred assistance, including medical, psychosocial, legal, and safety support.
- No Investigations: Project staff will not investigate allegations. Their role is strictly to receive the report safely and make a confidential referral to the appropriate internal channels or designated investigation bodies.

Roles and Contacts

UNICEF will rely on the Office of Internal Audit and Investigations (OIAI) Hotline (Integrity1@unicef.org) for reports of wrongdoing and/or misconduct.

For issues not falling under OIAI's remit, the relevant reporting channel will be provided when the project starts. mailto:psea.car@un.orgmailto:lamine.traore@un.org

Process and Timelines (for Managing Incident Records Category 3)

1. Confidential Intake and Acknowledgement (0-12 hours)

Any project staff or partner who receives an allegation will listen with empathy, ensure the survivor's immediate safety, and inform them of their rights and available support options. They will not ask for details beyond what is necessary to obtain informed consent for a referral. An acknowledgement of the complaint will be provided to the survivor within 12 hours of UNICEF becoming aware of the record.

2. Assignment and Initial Follow-up (within 12 hours)

Once recorded, the complaint is assigned to the relevant Chief of Programme Section. A designated Programme Focal Point, working in coordination with a Specialized (PSEA/Safeguarding) Focal Point, immediately conducts an Initial Follow-up. This is not an investigation; its purpose is to ensure a survivor-centred response is activated, including timely referral for medical, psychosocial, legal, and other assistance based on the survivor's needs and wishes.

3. Review, Referral, and Decision (within 24 hours)

A decision on the course of action is made swiftly:
If the allegation involves a UNICEF staff member, affiliate personnel, implementing partner, , or vendor, it falls under the mandate of the Office of Internal Audit and Investigations (OIAI). The UNICEF Representative must refer the matter to OIAI within 24 hours of being notified.
If the matter does not fall under OIAI's mandate, the Incident Review Team (IRT) is convened to review the case and recommend a course of action to the Representative for a final decision.

4. Record Closure and Parallel Case Management (Closure within 48 hours)
The official CFM record for the incident is formally closed within 48 hours of UNICEF becoming aware of it, once the matter has been referred to OIAI or a course of action has been decided by the Representative. It is critical to note that this procedural closure does not mean that support for the survivor ends. Survivor-centred case management is a parallel process that continues in coordination with specialized GBV partners for as long as needed, always respecting the survivor's wishes and consent.

Data Protection

All information is handled on a strict need-to-know basis. Survivors decide what information may be shared. The following rules apply:

- Data Collection: Collect the minimum data needed for a safe referral. Do not record graphic details.
- Consent: Record if the survivor/complainant consented to referral and to anonymized reporting.
- Storage: Keep records in an encrypted file with role-based access. Retain for 24 months, then delete securely (unless there is a legal hold).
- Reporting: Only anonymized data appear on dashboards or routine reports.

Community Information & GRM Interface

Safe reporting options (including hotlines and named focal points) will be clearly posted in project areas in French and local languages. Incident records involving SEA/SH/GBV bypass the standard GRM steps and are managed directly through this specialized procedure. The main GRM log will only contain an anonymized entry confirming a referral was completed to maintain confidentiality.

Monitoring
The PMU will report the following anonymized metrics quarterly:

- Number of reports received
- Percentage of cases referred within 24 hours
- Percentage of survivors accessing services within 72 hours
- Average case-closure time
- Optional survivor-satisfaction feedback (with consent)

10.3 Fulani-Specific Measures

Consultations with Fulani communities in different project locations highlighted context-specific preferences for how project-related complaints and feedback can be raised safely and effectively. The project will therefore apply additional culturally appropriate access measures and Traditional Dispute Resolution Systems (TDR) to ensure that Fulani communities can use the overall project grievance mechanism in ways that reflect local communication practices and trusted entry points. Depending on the local context, these measures may include engagement through recognized community or religious leaders, direct contact with designated UNICEF or partner staff, and communication in relevant local languages. These arrangements will serve as entry points to the overall project grievance mechanism and will not replace it. Confidentiality,

safety, and voluntary use of available channels will be maintained, including for anonymous submissions where feasible.

Fulani-Specific Grievance Channels and Resolution Pathways

Based on the consultations, the following entry points and TDRs structures are formally recognized for this project and will be publicized for Fulani communities:

- **Bangui (Traditional/Religious Leadership):** In Bangui, grievances will be channelled through traditional leadership structures, specifically clan chiefs or religious leaders (imams), and may be resolved through mediation led by them. The project PMU will document the outcomes of these traditional sessions to ensure alignment with GCF human rights standards.
- **In Bossangoa**, the community can raise concerns via a direct phone call or via mobile community feedback and complaint collectors .
- **In Ndélé,** a hierarchical channel is preferred, where the community informs their customary chief, who then escalates the issue to the Sultan Mayor of the town of Ndélé. Concerns reported to the Sultan Mayor may be resolved through the Sultanate's customary court. UNICEF will maintain a liaison role to ensure the process remains inclusive of women and youth. Same mechanism will apply for Vakaga Prefecture.
- In all locations, the project will maintain an alternative confidential route that can be used directly by women, adolescent girls, young people and others who may face barriers to raising concerns through traditional leadership structures. This is important to ensure that culturally appropriate engagement does not unintentionally exclude some voices
- **Agreement on Usage:** Complainants have the right to choose between the TDR or the standard UNICEF CFM at any time. If a person wants anonymity, they must use the UNICEF channel rather than the TDR channel. In cases where an anonymous grievance alleges corruption or SEAH, the investigation will be led by the UNICEF Office of Internal Audit and Investigations (OIAI).

11. Stakeholder Engagement

Inclusive, transparent, and sustained stakeholder engagement is a core principle of this project and central to the effective implementation of the Environmental and Social Management Framework (ESMF). In the fragile and conflict-affected setting of the Central African Republic (CAR), meaningful stakeholder participation is essential not only for the legitimacy and ownership of project interventions, but also for managing social risks, upholding the rights of affected communities, and ensuring that vulnerable populations benefit equitably from climate-resilient WASH and disaster preparedness investments.

This section outlines the project's stakeholder engagement strategy, including principles, methods, key stakeholder groups, and engagement mechanisms, with reference to international good practice and the requirements of the Green Climate Fund (GCF), UNICEF's Core Commitments for Children, and IFC Performance Standards 1 and 7.

11.1 Objectives

The project's stakeholder engagement approach is designed to:

- Ensure that all stakeholders, particularly vulnerable and marginalized groups, are informed and meaningfully consulted throughout the project cycle, ensuring full alignment with the Gender Action Plan (GAP) to guarantee women's participation in benefit distribution and decision-making
- Facilitate informed participation in subproject planning, site selection, design, and implementation, ensuring women's participation and integration of their knowledge as specified on the GAP;
- Prevent exclusion, discrimination, or elite capture in the allocation of WASH and resilience investments;
- Support the implementation of the Gender Action Plan (GAP) to ensure women and men participate equally and benefit equitably from the project's investments.
- Support the Free, Prior and Informed Consent (FPIC) of Indigenous Peoples where applicable;
- Build trust and transparency between communities, UNICEF, government authorities, and Implementing partners;
- Provide accessible feedback channels and strengthen social accountability mechanisms.

11.2 Stakeholder Mapping and Identification

Stakeholders have been mapped across three levels: (i) national institutions; (ii) sub-national/local government; and (iii) directly affected communities and civil society.

Key Stakeholder Groups:

Category	Stakeholders
National Government	Ministry of Energy Development and Hydraulic Resources (MEDHR), Ministry of Environment and Sustainable Development (MEDD), Ministry of Humanitarian Action and Social Cohesion, Ministry of Public Works, Ministry of Health

Sub-National Government	Prefecture authorities in Bangui, Ouham, Bamingui-Bangoran, and Vakaga; commune-level technical officers; WASH coordination platforms
Local Communities	Households in target localities (including peri-urban IDP camps and rural villages), water user groups, women's collectives, Indigenous Peoples (e.g., Aka communities), elderly and disabled persons
Civil Society and NGOs	National NGOs (e.g., JUPEDEC, Caritas), Red Cross, local faith-based groups, humanitarian actors operating in WASH and DRR
UNICEF and Partners	Field teams, UNICEF safeguards officers, WASH coordinators, contractors, and implementing partners
Vulnerable and Marginalized Groups	Internally Displaced Persons (IDPs), female-headed households, persons with disabilities, children and youth, ethnic minorities

11.3 Engagement Methods and Tools

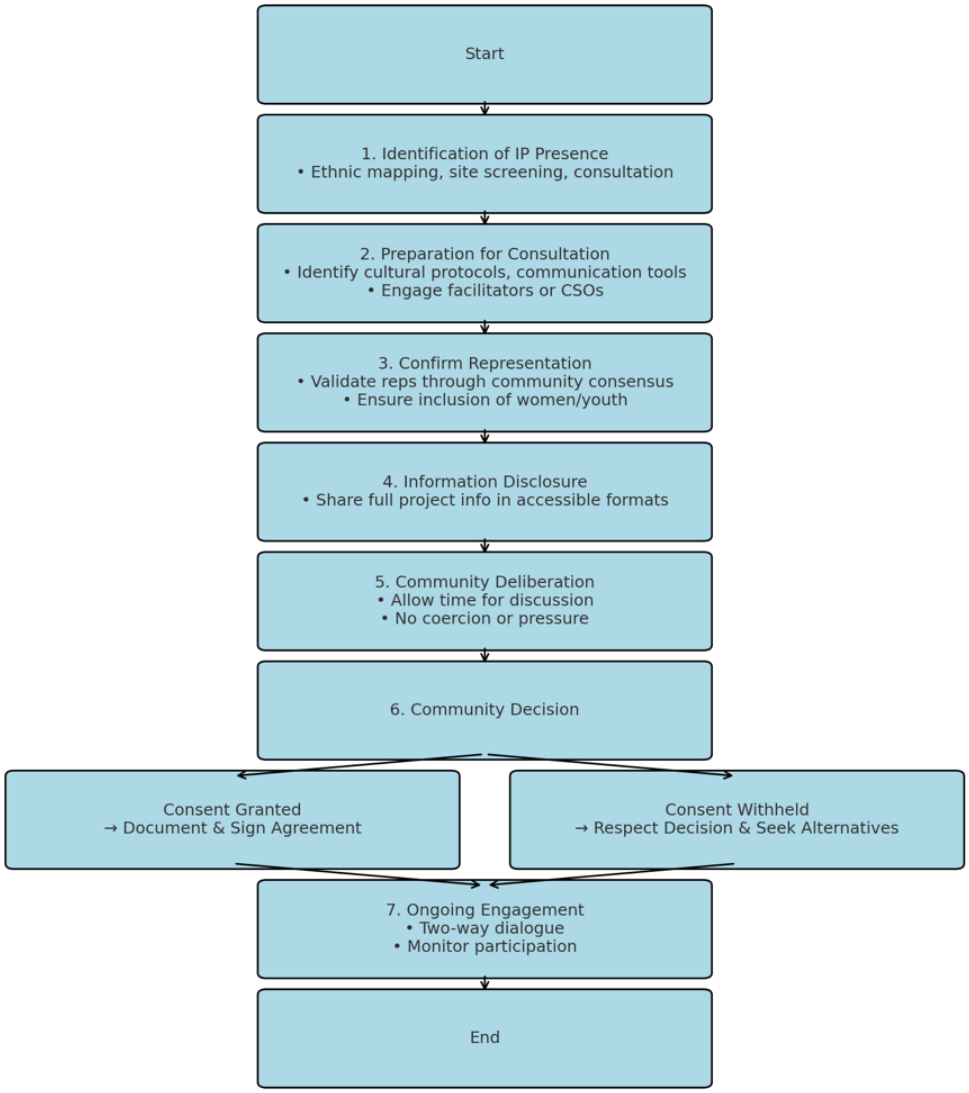
Stakeholder engagement will be culturally appropriate, accessible, and conflict sensitive. Engagement will include:

- Community Consultations and Barazas: Open forums in local languages to discuss project plans, infrastructure locations, and water access rules.
- Focus Group Discussions (FGDs): With targeted groups such as women, youth, Indigenous Peoples, and persons with disabilities to identify specific needs and risks.
- Mobile Outreach and Door-to-Door Campaigns: Especially in insecure or remote areas with low literacy or ICT access.
- Traditional Leadership Engagement: Structured briefings and negotiation processes with customary authorities and clan heads to secure consent and legitimacy.
- Radio Broadcasts and Posters: Dissemination of project information through trusted communication channels.
- Participatory Mapping and Transect Walks: To support risk screening, land access, and ecosystem assessment at local level.
- Consultation Logs and Meeting Records: Documenting concerns, preferences, and agreements, including signed minutes or consent forms.

Engagement methods will be tailored to security constraints, cultural norms, and social power dynamics, including separate, safe spaces for female and child participation.

11.4 Free, Prior and Informed Consent (FPIC)

In accordance with GCF Environmental and Social Policy, IFC Performance Standard 7, and UNICEF's Core Commitments for Children, this project will require the **Free, Prior and Informed Consent (FPIC)** of Indigenous Peoples for any subproject likely to affect their land, resources, territories, or cultural heritage. In the CAR this includes forest-dependent and mobile groups such as the Aka and other minority ethnic communities residing in or near Bamingui-Bangoran.



This will be:

- Conducted in local language and through culturally appropriate methods;
- Led by neutral facilitators and involve trusted community intermediaries;
- Carried out before any final project decisions are made or works are commenced;
- Documented and validated with the participation of IP leaders and civil society observers.

Where consent is withheld, no subproject activities will proceed in the affected area.

The FPIC process will follow these sequential steps:

1. Identification of IP Presence

- Screening of each subproject site using ethnic mapping, field verification, and consultation with local authorities and NGOs.
- Determination of whether any IP groups may be affected (positively or negatively).

2. Culturally Appropriate Consultation Preparation

- Identification of preferred communication channels, languages, and consultation venues.
- Engagement of independent facilitators or local CSOs with prior experience in IP facilitation.

3. Legitimate Representation Confirmation

- Verification of customary and elected IP representatives through community validation (e.g., open forums or clan-based consensus).
- Documentation of recognized representatives in signed meeting minutes.

4. Information Disclosure

- Provision of full and comprehensible information about the proposed activity (e.g., maps, impacts, timelines, mitigation measures).
- Disclosure to be done **prior to decision-making** using oral, visual, and written formats appropriate to literacy levels and cultural norms.

5. Deliberation and Decision-Making

- Time and space provided for internal discussion and decision-making without coercion or pressure.
- Support for women, youth, and persons with disabilities to participate.

6. Consent or Withholding of Consent

- Consent documented through signed agreements, audio-visual recordings, or attested meeting minutes.
- If consent is withheld, the activity will not proceed in the affected area.

7. Ongoing Engagement

- Continuous dialogue and monitoring by trusted intermediaries throughout implementation.
- Participation of IP representatives in project monitoring and grievance processes.

Legitimacy of Representation

Legitimate representatives of Indigenous Peoples will be:

- **Affirmed by the IP communities themselves** through documented community validation;
- **Inclusive of elders, women, and youth** where culturally appropriate;
- **Independent from political or project-affiliated actors**, with no financial or coercive conflict of interest;

- Validated through CSO or NGO facilitation, particularly for mobile or unregistered groups.

Where IP groups are nomadic or do not have a fixed governance structure, the project will use **locally embedded intermediaries** (e.g., trusted clan leaders, religious figures, or mobile outreach teams) to initiate and maintain consent processes.[5]

Protocols if Consent is Withheld

If FPIC is **not granted**:

- No physical works or project activities will proceed in the affected IP area;
- The project will document the reasons for non-consent and respect the decision;
- Alternative site options or approaches will be explored;
- No coercion, intimidation, or punitive action will be taken;
- The grievance mechanism will remain accessible to the community.

If disputes arise regarding the FPIC process, mediation will be offered by an **independent third-party** agreed upon by both UNICEF and the IP community.

11.5 Stakeholder Engagement During ESMF Preparation

This ESMF was informed by preliminary consultations with national authorities, WASH cluster actors, and community representatives during the concept design phase. Initial feedback emphasized:

- The need to consult with IDPs and displaced women in site selection;
- Concerns about security of access to WASH infrastructure in fragile areas;
- Strong demand for SEA/SH prevention training and grievance redress mechanisms;
- Importance of water governance capacity at commune level.

Full disclosure of this ESMF and draft ESMP templates will take place via UNICEF and government websites, radio summaries, and local meetings. Stakeholders will be invited to submit feedback through a hotline, written channels, and public forums.

11.6 Continuous Engagement During Implementation

Stakeholder engagement will be an ongoing activity throughout the project cycle, with specific engagement required at:

- Subproject screening and classification;
- Design and siting of infrastructure;

[5] A Site-Readiness Packet for activities involving Indigenous Peoples is available in Annex 21.

- Contractor mobilization and implementation;
- Grievance handling and corrective actions;
- Final handover and post-construction monitoring.

UNICEF and its partners will prepare Stakeholder Engagement Reports every six months and track participation indicators, disaggregated by gender, age, and vulnerability status.

Relevant information will be communicated to communities through a combination of participatory outreach methods designed to ensure accessibility and local ownership. During project implementation, local authorities, implementing partners, and community structures will work together to disseminate emergency preparedness information using multiple communication channels. These will include community awareness meetings facilitated by local leaders and social mobilizers, practical simulation exercises or drills where appropriate, and integration of preparedness messaging into existing WASH and hygiene promotion campaigns. In areas where local radio stations operate, public service announcements, community radio programmes and U-reporters channel may also be used to disseminate key preparedness messages, particularly at the onset of the rainy season when flood risks increase.

Community-based structures established or strengthened under the project, such as Water User Associations, Village Development Committees, and local disaster preparedness groups, will play an important role in ensuring that emergency procedures are understood and maintained at the community level. These groups will help organize awareness sessions, communicate early warning messages, and coordinate local response actions when hazards occur.

Clear institutional responsibilities will be established to ensure effective coordination during emergency situations. Local government authorities, particularly commune and prefecture administrations, will retain primary responsibility for coordinating emergency response actions and activating local disaster management mechanisms. Community committees will support local authorities by disseminating warnings, mobilizing households, protecting critical WASH infrastructure where possible, and reporting damage or hazards to relevant authorities.

UNICEF, as the Accredited and Executing Entity, will support these processes by providing technical guidance on risk communication, integrating emergency preparedness messaging into WASH programming, and supporting the development of simple emergency response protocols during project implementation. UNICEF will also assist local authorities and partners in capacity-building activities, including training and awareness campaigns that strengthen community preparedness.

Through this collaborative approach, emergency preparedness responsibilities will be shared across institutional levels, with local authorities leading response coordination, communities playing a central role in local communication and preparedness, and UNICEF providing technical oversight, capacity building, and safeguards monitoring.

11.7 Integration with Other Safeguard Instruments

Stakeholder engagement activities will be closely linked with:

- Cluster-level ESMP preparation and risk mitigation plans (e.g. consultations on erosion risks or water source management);
- SEA/SH prevention (e.g., engagement with women and youth on Codes of Conduct and safe spaces);
- Grievance Redress Mechanism (e.g., awareness-raising campaigns, referral systems);
- Monitoring and Evaluation (e.g., citizen feedback tools, participatory monitoring frameworks).

- Indigenous Peoples Plan – FPIC and IP engagement and inclusion
- **Gender Assessment and Action Plan:** Set measurable outcomes that guarantee women and men participate equally and benefit equitably from the project's investments. For instance, and as detailed in the GAP, to counter the historical exclusion of women from WASH governance, the project systematically mandates their inclusion in leadership roles, the project will promote female representation in water user associations, local sanitation committees, and resilience planning meetings, targeting at least 35% to 50% female participation in these decision-making bodies. Moreover, it will engage women to actively co-design community-led resilience plans and interventions so that their unique local and traditional knowledge on water management is integrated into adaptation solutions and implement gender-specific focus group discussions to gather direct feedback from women and girls on the safety, functionality, and inclusivity of WASH infrastructure.

Specifically for the borehole site selection, the project recognizes that because women are primarily responsible for fetching water, their practical needs and safety concerns must dictate where infrastructure is built, as indicated on the GAP. For this, the project will

- Conduct detailed hydrogeological field assessments that include community consultations specifically targeting women, youth, pastoralists, and vulnerable groups to gather information on water sources and past climate-related impacts
- Rely explicitly on women’s input on location and safety features when constructing community water points
- Select sites based on transparent, criteria-based stakeholder consultations (including women) to ensure locations avoid flood-prone or geologically unstable areas
- Ensure that 100% of water systems are built or rehabilitated explicitly taking females’ specific safety and privacy needs into consideration, such as ensuring safe access paths and locating systems as close to households as possible

12. Monitoring and Evaluation Framework for the ESMF

Monitoring and evaluation (M&E) of environmental and social risks and mitigation measures is an essential pillar of this ESMF. Given the fragile governance and post-conflict context in the Central African Republic, continuous monitoring and adaptive management are critical to ensuring that safeguards are effectively implemented and responsive to community feedback. This section outlines the monitoring and reporting approach that will be applied throughout the project, including responsibilities, indicators, tools, and adaptive feedback mechanisms.

12.1 Objectives

The overarching objectives of the E&S monitoring system are to:

- Ensure that environmental and social mitigation measures outlined in the ESMF, ESMPs, and other safeguards instruments are effectively implemented;
- Track compliance with national laws, UNICEF ESS Standards and safeguards policies and in line with AMA terms;
- Detect and address emerging risks, grievances, or unintended impacts in real-time;
- Verify whether stakeholder engagement, SEA/SH prevention, and social inclusion objectives are being achieved;
- Provide evidence-based reporting to the GCF, national stakeholders, and affected communities.

12.2 Environmental and Social Monitoring Framework

All moderate-risk subprojects (as determined by UNICEF through the screening and classification process set out in Section 7.2 of this ESMF) will be clustered and prepare a cluster-level specific Environmental and Social Management Plan (ESMP), which will contain a corresponding monitoring plan. This plan will include:

- Performance Indicators (quantitative and qualitative);
- Monitoring Frequency (daily, monthly, quarterly, or as needed);
- Monitoring Methods (visual inspection, interviews, sample testing, community scorecards);
- Responsible Entities (UNICEF staff, contractors, local government, community monitors);
- Corrective Actions and escalation protocols.

Monitoring will be integrated into the project's overall Results-Based Management (RBM) framework but will also generate standalone E&S compliance reports.

12.3 Monitoring Indicators

The table below presents a selection of key E&S indicators aligned with previously identified risks and mitigation measures:

Risk Category	Key Indicator	Monitoring Frequency	Responsible Party
Groundwater over-abstraction	Water table depth; pump runtime logs	Quarterly	UNICEF, MEDHR
Latrine overflow/flood risk	Number of latrine failures during flood; user complaints	Monthly (rainy season)	Contractor, WUA
Labor and OHS	PPE availability; incident logbook; number of safety briefings	Weekly	Contractor, UNICEF Field Staff
SEA/SH	Number of Code of Conduct breaches; number of SEA/SH-related complaints	Ongoing	UNICEF SEA/SH focal point, GRM committee
Construction waste	Volume of debris removed/recycled; waste disposal site inspection	Monthly	Contractor
Land access	Number of disputes; documentation of Voluntary Land Donation (VLD) forms	Before construction	Commune administration
Indigenous Peoples	Evidence of FPIC obtained; consultation attendance sheets	Pre-implementation and semi-annually	UNICEF, local NG/CSOO partners
Stakeholder engagement	Number of community consultations held; disaggregated participation data	Quarterly	UNICEF, Commune officers
Grievance redress	Number of grievances received, resolved, and escalated; average resolution time	Monthly	GRM committee
Biodiversity impacts	Change in vegetation cover; sightings of invasive species	Annually	MEDD, local monitors

Any chance finds identified during construction activities, along with the actions taken in response (including site protection, notification of authorities, and mitigation measures), will be documented and reported as part of the project's annual environmental and social safeguards reporting.

12.4 Roles and Responsibilities

Environmental and social monitoring will be conducted through a multi-tiered structure:

- UNICEF Country Office Safeguards Focal Point: Oversees overall coordination of E&S monitoring, prepares consolidated semi-annual reports, and ensures feedback loops.

- UNICEF Field Teams and Engineering Staff: Conduct regular site visits, collect monitoring data, verify contractor compliance.
- Contractors and implementing partners s: Maintain site-level logs, submit monthly reports, flag incidents or breaches.
- Community-Based Monitors: Trained local actors who track WASH service functionality, inclusion, and SEA/SH concerns at community level.
- Government Agencies: Participate in joint monitoring missions (e.g. for borehole compliance, EIAs, IP safeguards) and provide regulatory oversight.

12.5 Tools and Approaches

- Safeguards Compliance Checklists: For each infrastructure type (borehole, latrine, flood embankment);
- Digital Monitoring Forms: Where feasible, mobile apps or SMS-based forms will be used to track incidents, complaints, and environmental performance;
- Community Scorecards: Periodic participatory assessments of infrastructure quality, equity of service access, and grievance handling;
- Photographic Monitoring: Visual documentation before, during, and after construction to assess site integrity and environmental restoration;
- Incident Reporting Protocol: Established process for immediate escalation of serious E&S incidents, including SEA/SH, child protection violations, or unsafe working conditions.

12.6 Reporting and Feedback Mechanisms

Environmental and social performance will be reported through:

- Monthly Contractor Reports: Containing checklists, photos, incidents, and actions taken;
- Semi-annual Safeguards Progress Reports: Prepared by UNICEF and submitted to internal steering committees and government partners;
- Semi-annual GCF Performance Reports: Including safeguards compliance summaries and lessons learned;
- Public Disclosure: Community feedback sessions and summary reports in French/local languages on infrastructure outcomes and safeguards performance.

12.7 Adaptive Management and Corrective Action

Where monitoring identifies non-compliance or unexpected impacts:

- A Corrective Action Plan (CAP) will be developed, detailing actions, responsibilities, and timelines;
- If significant risks are identified, an updated cluster-specific ESMP may be prepared;

- The Project Safeguards Working Group will oversee follow-up and resolution;
- Results will be documented and integrated into annual learning sessions.

12.8 Independent Reviews and Project Reviews

To enhance accountability, the project will:

- Commission at least one independent environmental and social project review during the implementation period;
- Facilitate community-led monitoring exercises with civil society observers;
- Incorporate third-party validation of selected mitigation measures (e.g., SEA/SH safeguards, Indigenous Peoples' FPIC documentation).

13. ESMF Budget

Activity	Funding Source	Budget Categories	Detailed Budget				Annual Budget						Total Budget
			Unit	# of Unit	Unit Cost	Total Cost	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	
ESS commitments	GCF	Workshop/ Training/ Conference	Units	6	$5,000	$30,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$30,000
Independent environmental and social review during the implementation period	GCF	Professional/ Contractual Services	Contracts	6	$4,000	$24,000	$4,000	$4,000	$4,000	$4,000	$4,000	$4,000	$24,000
Gender, ESS, IPP and Social Inclusion officer	GCF	Staff Costs	Months	72	$2,280	$164,153	$27,359	$27,359	$27,359	$27,359	$27,359	$27,359	$164,153
Gender, ESS, IPP and Social Inclusion officer	UNICEF	Staff Costs	Months	72	$3,420	$246,229	$41,038	$41,038	$41,038	$41,038	$41,038	$41,038	$246,229

Annex I: Biodiversity Impact Screening Checklist

Purpose

This screening form is to be completed during the environmental and social screening of all subprojects under Component 2 of the project. It supports identification of potential overlap with critical habitats and the need for enhanced biodiversity assessments or mitigation. It aligns with IFC PS6, UNICEF ESS policies and AMA terms.

Section A: Subproject Information

Item	Details
Subproject Name	
Location (Region, Prefecture, Coordinates)	
Type of Activity	
Size and Footprint (ha)	
Anticipated Start Date	
Implementing Partner	

Section B: Screening Criteria

Complete the checklist below to assess whether the subproject may overlap with or impact critical habitat.

Screening Question	Yes/No	Notes / Evidence Source
1. Is the site within or adjacent to a legally designated protected area?		(e.g., Bamingui-Bangoran NP)
2. Is the site located within a Key Biodiversity Area (KBA) or Important Bird Area (IBA)?		Refer to BirdLife/KBA datasets

3. Does the area support species listed as Critically Endangered or Endangered on the IUCN Red List?	Highlight known species in Section C
4. Does the area contain endemic, range-restricted, or migratory species populations?	
5. Are there critical seasonal use areas (e.g., breeding, nesting, foraging, migratory stopovers)?	
6. Is the project site in or near known ecological corridors or intact natural habitat patches?	
7. Will vegetation clearing or construction occur during breeding or nesting season?	(Indicate timing and mitigation planned)

If **Yes** is selected for any of the above, proceed with Section C.

Section C: Species of Concern (Indicative List)

Based on ecological data and expert consultation

Bamingui-Bangoran (including buffer zones near National Park):

- **Loxodonta africana** (African Elephant) – Endangered (IUCN)
- **Tragelaphus eurycerus** (Bongo Antelope) – Near Threatened
- **Neotis nuba** (Nubian Bustard) – Vulnerable
- **Diceros bicornis longipes** (Western Black Rhino, historical range)
- Endemic birds: **Caprimulgus batesi**, **Turdoides reinwardtii**

Vakaga (semi-arid savannah and transitional forest zones):

- **Panthera leo** (African Lion) – Vulnerable
- **Eupodotis senegalensis** (Savannah Bustard) – Near Threatened
- **Gazella rufifrons** (Red-fronted Gazelle) – Vulnerable
- Dryland amphibians and reptiles (limited baseline; refer to MoE studies)

Section D: Preliminary Risk Classification

Critical Habitat Likelihood	Description
Low	No overlap with critical habitat or species of concern. Proceed with standard ESMP.

Moderate	Proximity to critical habitat or occasional presence of sensitive species. BMP required.
High	Direct overlap with critical habitat. Project CANNOT proceed.

Section E: Fauna Protection and Construction Timing Guidance

To minimize impacts on biodiversity, particularly sensitive fauna:

- Avoid vegetation clearing during peak nesting and breeding seasons (typically May–July in CAR).
- Where possible, time noisy construction (e.g., drilling, trenching) outside of migratory or calving periods.
- Conduct pre-construction surveys to flag nesting sites or animal burrows for temporary buffer zones.
- Use low-noise, non-invasive machinery where wildlife presence is confirmed.
- Train contractors and site supervisors on species identification and protection protocols.
- Implement a "Stop Work" protocol if protected fauna are observed on-site.

Section F: Safeguards Officer Review[6]

Item	Details
Name of Reviewing Officer	
Position / Institution	
Date of Review	
Recommendation	☑ No further action ☑ BMP required ☑ Redesign required
Signature	

This form should be attached to each subproject file and referenced in the ESMP, where applicable.

[6] Gender, ESS, IPP and Social Inclusion officer

Annex II: Voluntary land Donation Protocol

Purpose and Scope

This Voluntary Land Donation (VLD) Protocol outlines the process, eligibility, documentation, and safeguards for accepting voluntary land contributions for subprojects under the UNICEF-GCF CAR project. It ensures that:

- Land donations are genuinely voluntary and informed.
- There is no coercion or pressure on donors.
- Donations do not result in displacement, livelihood loss, or inequity.
- Documentation is complete, transparent, and accessible.
- Donated land is suitable and free of disputes.

This protocol applies to all Component 2 subprojects that involve small-scale infrastructure requiring land use (e.g., boreholes, latrines, drainage points).

Eligibility Criteria for VLD

VLD may be considered only if the following conditions are met:

- The land is not subject to formal or informal dispute.
- The donor holds clear legal or customary ownership rights.
- The land is not used for primary residence, livelihood (e.g., farming), or cultural/spiritual purposes.
- The impact is minor (e.g., <5% of total landholding, no displacement).
- The donation will not result in food insecurity or economic harm.
- The donor is not a vulnerable person unless accompanied by third-party legal/CSO support.

VLD Due Diligence Steps

Step	Action	Responsibility
1	Identify infrastructure site requiring land	UNICEF/Contractor
2	Conduct preliminary land assessment (ownership, usage)	Local Authority / Technical Team
3	Engage potential donor in participatory dialogue	UNICEF Safeguards Focal Point
4	Assess voluntariness and socio-economic impact	Safeguards Team / Local CSO

5	Fill and sign VLD Form (Annex III) with witness	Donor, Local Authority, NGO/CSO
6	Verify boundaries and map GPS coordinates	Technical Team / Surveyor
7	Disclose terms and retain copies	Donor and Project Records

Safeguard Conditions

- Donations must be **free of coercion**, with the option to refuse.
- Donors may **revoke consent** until physical works begin.
- No donation shall involve **involuntary resettlement or lands owned or claimed under adjudication by Indigenous Peoples**, even if minor.
- Grievance redress options must be explained to the donor.
- Records shall be kept for **reviews and verification** by GCF and independent reviewers.

Where risks are identified, the project will require:

- Mediation by independent CSO;
- Provision of minor in-kind compensation (e.g., fencing, replanting);
- Adjusted design to reduce impact.

Annex III: Voluntary Land Donation Form

1. Subproject Information

- Project Name:
- Subproject Location:
- Type of Infrastructure:

2. Donor Information

- Name:
- Age:
- Gender:
- Occupation:
- National ID / Customary ID:
- Village / Commune:

3. Description of Donated Land

- Total landholding of donor (m² or ha):
- Size of land to be donated (m² or ha):
- % of total holding:
- Current use of land:
- Is any structure or crop affected? (Yes/No)

4. Voluntariness and Awareness

- Have you been informed of your right to refuse? (Yes/No)
- Are you donating land voluntarily without coercion or pressure? (Yes/No)
- Do you understand that you will not receive compensation? (Yes/No)
- Are you aware of the grievance mechanism? (Yes/No)

5. Declaration I, the undersigned, declare that:

- I voluntarily donate the land described above for the purpose of project infrastructure.
- I understand I may withdraw this donation before works begin.
- I have received a copy of this signed form.

Signature of Donor: _____
Date: _____
Witnessed by:

- Local Authority Representative: _____
- NGO/CSO Representative: _____
- UNICEF/Contractor Safeguards Officer: _____

GPS Coordinates of Donated Parcel: _____
Map/Sketch Attached: ☑ Yes ☑ No

Annex IV: Indicative Labour Management Procedure

Introduction

These Labour Management Procedures (LMP) outline the approach for managing labour in compliance with IFC Performance Standard 2, the GCF Environmental and Social Policy, and UNICEF's Core Commitments for Children. They apply to all project workers—including direct, contracted, community, and primary supply workers—engaged under the UNICEF-GCF project in CAR.

The LMP is intended to guide contractors, implementing partner government stakeholders, and UNICEF field staff in ensuring decent work conditions, occupational safety, non-discrimination, and grievance redress for workers involved in climate-resilient WASH and DRR infrastructure and services.

Types of Project Workers

Worker Type	Description
Direct Workers	UNICEF staff and consultants hired for project implementation.
Contracted Workers	Staff hired by contractors, , or implementing partners.
Community Workers	Individuals voluntarily mobilised by communities (e.g., for trenching, fencing).
Primary Supply Workers	Workers engaged by suppliers of materials or services (e.g., borehole drilling rigs, solar equipment).

Applicable Labour Standards

All project workers will be managed in accordance with the following:

- **CAR Labour Code (Law No. 09.004)**
- **IFC Performance Standard 2**
- **UNICEF Core Commitments for Children in Humanitarian Action**
- **International Labour Organization (ILO) Conventions 138 & 182 (Child Labour)**
- **UNICEF Child Safeguarding Policy and SEA/SH Guidelines**

Working Conditions and Terms of Employment

- All workers must be provided **written contracts** with clear terms of employment, job descriptions, wage rates, hours, and conditions.
- Working hours will not exceed national limits, and **overtime must be voluntary and compensated.**
- Workers shall receive **equal pay for equal work**, regardless of gender, ethnicity, or displacement status.
- Workers must be at least **18 years old**, except for government-permitted apprenticeships (16–17) under supervision.

Occupational Health and Safety (OHS)

Contractors, implementing partners are responsible for ensuring:

- Use of **Personal Protective Equipment (PPE)** appropriate to work activities.
- Access to clean drinking water, sanitation, and rest breaks at work sites.
- Training on safe tool handling, machinery, and construction protocols.
- Immediate access to first aid and referral services for injuries.

All incidents must be reported using the **OHS incident register** and investigated within 72 hours.

Prevention of Child labour, forced labour and prevention of Safeguarding risks, inclusive of SEA and HS

Child labour is strictly prohibited. No worker under 18 shall be engaged in hazardous activities.

Forced or coerced labour of any form is forbidden.

All workers and supervisors must sign and comply with **Codes of Conduct (CoC)** addressing:

- Child protection;
- Sexual exploitation and abuse (SEA), and Sexual Harassment (SH);
- Non-discrimination and respectful workplace behaviour.

UNICEF's SEA/SH protocol must be followed for all complaints and disclosures.

Labour Grievance Redress Mechanism (L-GRM)

A dedicated labour grievance mechanism will be established at site level with the following features:

- **Anonymous and verbal complaints accepted**.
- **Designated focal person or committee** responsible for intake, investigation, and response.
- All grievances logged in a **Labour Grievance Register**, including:
    - Nature of complaint
    - Time to resolution
    - Actions taken

    - **No retaliation** permitted against workers who raise concerns.
- Grievance information will be reviewed monthly and escalated to UNICEF if unresolved.

Roles and Responsibilities

Entity	Responsibilities
UNICEF	Oversight, monitoring, compliance reviews , and capacity building.
Contractors / NGOs	Implementation of LMP, provision of contracts, OHS, grievance redress.
Supervisors / Site Managers	Daily monitoring, toolbox talks, incident response, and worker awareness.
Labour Inspectors / Govt	Enforcement of national labour laws and site inspections.
Community Monitors	Informal reporting on labour conditions and compliance in community-based worksites.

Training and Capacity Building

- Pre-mobilization orientations will be provided for all contractors and labourers.
- Topics include:
    - Worker rights under the CAR Labour Code
    - OHS protocols and PPE usage
    - SEA/SH prevention and CoC
    - Grievance channels and whistleblower protections
- UNICEF and its partners will conduct **semi-annual refresher sessions**.

Monitoring and Reporting

- Labour indicators (e.g., number of workers, grievances, SEA/SH cases, OHS incidents) will be disaggregated by gender, age, and status (IDP, returnee, etc.)
- Site inspections will be conducted quarterly.
- Labour external reviews may be commissioned by UNICEF or the GCF at any time.

Annex V: Chance Finds Procedure

Purpose:

This procedure outlines the steps to be taken if any previously unknown archaeological, historical, cultural, or paleontological materials are discovered during UNICEF programme activities or project implementation. It ensures that discoveries are appropriately managed according to applicable laws and international standards (GCF, UNICEF guidelines, national legislation) to prevent inadvertent damage or destruction of valuable cultural heritage resources. All programme or project activities avoid known locations of archaeological, historical, cultural, or paleontological objects, during the planning and implementation of the works. This chance finds procedure is intended to minimise and mitigate impact of such artifacts. that are encountered by chance/accident.

Applicability:

This procedure applies to all personnel, contractors, and subcontractors working on project sites where excavation, site clearing, or demolition is part of construction or rehabilitation activities.

This Chance Finds Procedure shall form an integral part of all bidding documents, contracts, and agreements with contractors, subcontractors, implementing partners. Compliance with this Procedure is mandatory. Any failure to comply, including failure to stop work or to notify the relevant authorities, shall constitute a material breach of contract and may result in suspension of works, contract termination, and other remedies in accordance with UNICEF contractual provisions.

13.1.1 Definition:

Chance Find: Any previously unknown archaeological, historical, cultural, or paleontological object or site discovered during project activities.

Examples: Building ruins, burial sites, fossilized remains (human, animal), statues, paintings/engravings (on rocks, walls), unusual soil discoloration, concentrations of stone/bone/shell, tools, utensils, personal belongings of historic significance.

Project Particulars:

- The project's infrastructure interventions are focused on climate-resilient water and sanitation systems in rural and peri-urban areas within the prefectures of Ouham, Bamingui-Bangoran, and Vakaga; the constructions or rehabilitations of water networks and sanitation infrastructures, installation of hydrometeorological equipment in the same prefectures and; Urban drainage in Bangui.
- The scope includes the construction or rehabilitation of 200 water supply systems, comprising 80 large-scale piped networks for larger communities and 120 smaller systems for villages, utilizing solar power and designed to ensure reliability during dry season. Furthermore, the project will upgrade Water, Sanitation, and Hygiene (WASH) infrastructure in 100 primary schools and 100 healthcare facilities, installing rainwater harvesting systems, gender-segregated flood-resilient latrines, and medical waste

management facilities such as Montfort incinerators. Rural infrastructure also includes 45 small-scale units or Water Resource Management and Disaster Risk Reduction infrastructure in rural areas.

- In terms of hydrometeorological equipment the project will support 3 hydrometric telemetry stations, 3 limnometric scales, 12 piezometric sensors, 3 synoptic and 3 agrometeorological stations.
- Urban drainage in Bangui interventions will include secondary drainage channels, retention basins, culverts, interlocking pavements, and other complementary features.
- Historical activities that have resulted in finds of significance in the targeted areas include the recovery of Sangoan and Lupemban stone tools (heavy-duty picks, core-axes, and lanceolate bifaces) from the alluvial river gravels of Ouham and the borders of Bamingui-Bangoran.[7] These Paleolithic assemblages were initially identified during diamond and mineral prospecting surveys in the 1950s and later systematically cataloged by archaeologist Roger de Bayle des Hermens in the 1960s.[8] In the Iron Age context, urban expansion and infrastructure works in Bossangoa (Ouham) and Ndélé (Bamingui-Bangoran) frequently unearth sub-surface ceramic shards and extensive iron slag heaps, evidence of the region's intensive metallurgical history dating back over 2,500 years.[9] Furthermore, the capital city of Bangui sits atop significant paleo-metallurgical sites such as Pendere-Sengue, while the Ndélé area contains the archaeological remains of the Tata of Sultan Senoussi, a UNESCO Tentative List site, necessitating heightened vigilance during earthworks.[10]
- Activities likely to involve chance finds are the following:

  i. Borehole drilling

  ii. Drainage channel excavation

  iii. Foundation works for WASH infrastructure

  iv. Excavation for sanitation facilities and medical waste infrastructure

  v. Foundation works for hydrometeorological infrastructure

Roles and Responsibilities:

vi. UNICEF Project/Programme Lead:

The UNICEF Project Team Lead, in consultation with the Environmental and Social Safeguards (ESS) Specialist (or Focal Point), ensures the overall implementation of and adherence to this procedure. The specific responsibilities include*:*

- Develop, review, and update this procedure as needed.
- Train and raise awareness among workers (including partners and vendors) regarding the procedure's requirements.

[7] Nassr (2014), Large cutting tools Variations of Early Sudan Palaeolithic from site of Jebel El Grain east of Lower Atbara

[8] IUGS (2021), The First 100 IUGS Geological Heritage Sites

[9] Zangato & Holl (2010), On the Iron Front: New Evidence from North-Central Africa

[10] UNESCO (2025), Sites Tentative Lists

- Establish and maintain an up-to-date contact list of authorized personnel within national, local, and community stakeholders.
- For the formal notification to the Relevant Authority, i.e. Ministry of Arts, Culture, and Tourism, General Directorate of Culture and Heritage - Direction Générale de la Culture et du Patrimoine and for coordinating next steps
- Ensure full implementation of the procedure.

vii. Contractor/Implementing Partner Team/:

Supports the effective implementation of this procedure. *Responsibilities include:*

- Raise awareness among all workers regarding the procedure.
- Immediately initiate a "stop work" order if there is a reasonable indication of a chance find.
- Promptly notify the UNICEF project team lead (or designee) of any potential chance finds.
- Collect and compile relevant information about the chance find.
- Secure the site.
- Implement agreed-upon mitigation measures.

viii. Relevant Authority (Ministry of Arts, Culture, and Tourism, General Directorate of Culture and Heritage - Direction Générale de la Culture et du Patrimoine) :

Ensures the procedure is developed and implemented according to national laws and legislation. Re*sponsibilities include:*

- Review and endorse the chance finds procedure developed by UNICEF.
- Provide leadership in protecting, collecting, and managing chance finds.
- Provide expertise and resources for securing, removing/collecting, and managing finds.
- Provide UNICEF with access to alternative land if activities need to be relocated.
- Only the Relevant Authority (or formally delegated specialist) can authorize, in writing, resumption of works in the affected area.

ix. Community Leads:

Support the Relevant Authority, UNICEF, and the contractor in securing and managing the finds. *Responsibilities include:*

- Assist in protecting, removing/collecting, and managing finds.
- Help provide access to alternative land if activities need to be relocated.

x. Legal and Regulatory Framework:

This Chance Finds Procedure is implemented in accordance with the applicable national legal framework of the Central African Republic governing the protection of cultural heritage, archaeological objects, historical sites, and human remains, and with international good practice as reflected in the Green Climate Fund Environmental and Social Policy and international standards on cultural heritage protection. The Ministry of Arts, Culture, and Tourism, through the Direction Générale de la Culture et du Patrimoine, is the legally mandated authority responsible for cultural heritage protection. In the event

of any inconsistency between this Procedure and national legislation, national law shall prevail.

More specifically, this procedure operationalizes the following national legislation:

- Law No. 06.002 of 10 May 2006,
- Decree No.09.383 of 20 November 2009, and
- Order No. 0007MJSAC/CAB/SG/DGP/DCVP of 1 August 2003 on the Prohibition of the Exploitation and/or Exportation of the Oral Tradition of Cultural Minorities of the Central African Republic for commercial purposes.[11]

Cost responsibility:

All reasonable costs associated with the implementation of this Chance Finds Procedure, including site protection, assessments by qualified specialists, temporary works suspension, and agreed mitigation measures, shall be borne by the project in accordance with contractual arrangements. Under no circumstances shall affected communities be required to bear any costs related to chance finds management.

More specifically, the following is a breakdown of cost items related to this Chance Finds Procedure, alongside parties responsible for bearing these costs:

- Securing the site (fencing/guards): Contractor
- Work stoppage/idle time (initial): Contractor
- Preliminary assessment/survey: Project Budget
- Training on procedures: Project Budget
- Recovery/removal of artifacts: National Authority
- Redesign and major delays: Project Contingency

Procedure:

Training:

All project workers (UNICEF staff, contractors, partners, subcontractors) will receive training on this Chance Finds Procedure as part of their project induction.

Minimum Training Content:

- Explanation of potential materials that may be encountered, with specific examples relevant to the project location.
- Steps to take upon discovery: Stop, Secure, Notify, and Manage.
- Importance of protecting cultural heritage resources.

Discovery:

Workers should be vigilant for chance finds during excavation or rehabilitation, based on their training and awareness.

Specific Actions:

[11] UNESCO (2010), Periodic reporting on the Convention for the Safeguarding of the Intangible Cultural Heritage

- Where the likelihood of chance finds is high, excavation/demolition should occur in daylight or under bright light, using extreme caution.
- In congested areas with a high chance of encountering artifacts (e.g., near cemeteries), use less-destructive excavation/demolition methods (hand tools, burrowing).

Stop Work Actions:

If a worker discovers a potential chance find:

- Immediately stop work within a minimum 10-meter radius as precautionary buffer.
- The buffer may be expanded immediately if the find is suspected to be part of a larger site (e.g. burial ground, shrine, settlement remains), pending assessment by the Relevant Authority
- Do not move, clean, or disturb the find.
- Do not investigate or take actions that could cause damage.
- If the find is likely part of a larger site (e.g., shrine, cemetery), stop all work in the entire area.

Chance Finds Incident Notification:

- The worker must immediately notify their supervisor.
- The supervisor must immediately notify the UNICEF project lead or designee. *Notification should include:*
  - Description of the potential chance find (type, name, size, photos if possible).
  - Location (GPS coordinates or reference points).
  - Confirmation of "stop work" order.
  - Proposed immediate actions to secure the area.
  - Potential impact on the project.
- The UNICEF project lead will notify the Relevant Authority within 24 hours. *Notification to* the Relevant Authority should include:
  - All available information about the find (location, description, context).
  - Any immediate actions taken.
  - Recommended actions.
  - Request for support (assessment, significance determination, next steps, mitigation).

Special Protocol for Human Remain, Burial Grounds, or Sites of Significance:

If chance finds involve human remains, burial grounds, or sites of religious, spiritual, or cultural significance to local communities, all works shall cease immediately in the affected area. The find shall not be removed or disturbed under any circumstances. UNICEF shall ensure prompt consultation with the Relevant Authority and affected communities, respecting customary practices and cultural sensitivities. Works may resume only following written authorization from the Relevant Authority and after agreement on appropriate mitigation measures, including avoidance or redesign where necessary.
Furthermore, human remains require a distinct, sensitive workflow.

- Upon discovery, assess immediately for signs of recent death or violence. IF yes: stop Work, treat as a crime scene, and notify the Gendarmerie Nationale and Public Prosecutor immediately. Do not take photos.

- If remains are ancient or traditional, initiate Free, Prior, and Informed Consultation (FPIC) with local elders to determine lineage and agree on treatment (preservation in situ or reburial). No removal can occur without community consensus.

Securing the Area:

- After work stops, install barriers (warning tape, fencing) to prevent unauthorized access.
- Clearly mark the area with flagging tape and signage ("DO NOT ENTER").
- If the find is vulnerable to the elements, provide temporary protection (shed, plastic wrapping).
- If the find is vulnerable to looting/vandalism, coordinate with the community for security (guards).

Assessment by Relevant Authority/Specialist:

- The Relevant Authority will determine if a detailed assessment is needed.
- If so, the Relevant Authority (or a qualified archaeologist/specialist) will conduct the assessment, which may include:
  - Excavation and documentation.
  - Analysis of artifacts.
  - Consultation with local communities.

Decision Making & Mitigation:

- Based on the assessment, the Relevant Authority will determine the appropriate course of action. *Actions may include:*
  - Relocating the project activity to avoid the find.
  - Excavating and preserving the find.
  - Preserving the find in situ.
  - Other appropriate mitigation measures.

Implementation of Mitigation Measures:

- The Project Manager will implement mitigation measures as directed by the Relevant Authority, following their standards and guidelines.

Contingency for Authority Delays:

The Relevant Authority will be formally notified within 24 hours of a chance find. If no response is received within a reasonable period, UNICEF shall issue written follow-up notifications and maintain the stop-work order until written guidance or clearance is received. No works shall resume in the affected area without written authorization, regardless of delays.

More specifically, after the first notification and to prevent indefinite project paralysis due to administrative inertia:

- Level 1 (48 hours): if no response from DGCP to the initial notification, UNICEF sends an urgency reminder via official channels
- Level 2 (7 days): if no response after 7 days, the project may activate the Independent Expert Roster that includes DGCP experts or experts cleared by DGCP. A pre-vetted archaeologist (e.g., from University of Bangui) acts as a proxy for the DGCP to conduct the assessment and rescue excavation, filing a full report with the Ministry.

Documentation:

- The UNICEF Team Lead will maintain a record of all chance finds, including:
  - Date and time of discovery.
  - Location (GPS coordinates).
  - Description of the find.
  - Photographs.
  - Name of the person who discovered it.
  - Names of the people who assessed it.
  - Decisions made by the Relevant Authority.
  - Mitigation measures implemented.
- All chance finds incidents shall be recorded as environmental and social incidents within the project monitoring system (GRM) within 24 hours and reported through regular environmental and social performance reporting. Community concerns related to cultural heritage or chance finds should also be raised through the project Grievance Redress Mechanism. Records of all chance finds, and their management shall be retained and made available for review by the Green Climate Fund upon request.

Resumption of Work:

- Resumption of works in the affected area requires written clearance (email or letter) from the Relevant Authority or its formally appointed representative.
- Clearance must confirm either (i) no cultural heritage significance, or (ii) completion of agreed mitigation measures

Contact Information:

- UNICEF Primary Contact: Felix Ackebo representant UNICEF RCA, Fackebo@unicef.org
- UNICEF Secondary/Alternate Contact: Anita Ingabire deputy representant UNICEF RCAAingabire@unicef.org
- Relevant Authority Primary Contact: Arts, culture and tourism minister Mne Ngola Marie Francoise Ramanda-Manata
- Relevant Authority Secondary/Alternate Contact: Arts, culture and tourism Charge de mission Mr Philipp Bokoula
- Contractor/IP/ Primary Contact: [To be determined upon contract award]
- Contractor/IP Secondary/ Alternate Contact: To be determined upon contract award
- Community Focal Point Primary Contact: [To be updated once communities are identified]
- Community Focal Point Secondary/Alternate Contact: [To be updated once communities are identified]

[NOTE: This Chance Finds Procedure is an integral part of the Environmental and Social Management Framework for this project. All project personnel are expected to adhere to this procedure to ensure the protection of cultural heritage resources.]