FRAMEWORK FOR ADVANCING ENVIRONMENTAL AND SOCIAL SUSTAINABILITY IN THE UN SYSTEM

SELF-ASSESSMENT PILOT PROJECT OUTCOMES:

SYNTHESIS REPORT
Summary version

June 29, 2016
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EXECUTIVE SUMMARY

This Synthesis Report presents the findings of a pilot project carried out by the Environment Management Group (EMG) to test the utility of the Environmental and Social Sustainability (ESS) Framework and its related Interim Guide in volunteer United Nations (UN) entities. The pilot was initiated with a view to share lessons learned, improve the understanding of the practical implications of implementing the Sustainability Framework, and to improve the Framework and the Guide based on the pilot agencies’ experiences in applying them in practice.

During 2015, seven UN entities including the World Health Organisation, World Food Programme, International Fund for Agricultural Development, UN Environment Programme, UN Industrial Development Organisation, UN Office for Project Services, and UN Women, participated in the pilot project to analyse the extent to which the minimum essential building blocks of the ESS Framework were in place within their institutions.

This Report analyses the self-assessment work undertaken within each pilot agency and summarizes identified areas of gap that can be used by the respective agencies as a direction for future possible action to enhance integration of environmental and social sustainability measures. The Report takes the analysis a step further by pointing to issues of shared concern with regard to implementation of ESS measures. Lessons learned in the project have been captured to provide useful starting points for other UN agencies at different stages of development of their ESS Frameworks. While the Framework and Guide were considered useful by the pilot agencies, the report also makes preliminary observations about how the Framework and the Guide might be improved and better communicated going forward.

The agencies that participated in the pilot project represented a variety of mandates, cultures and operational models. The results clarify the implications of applying the Sustainability Framework for agencies at different stages of implementation.
1.0 INTRODUCTION

In September 2012, the Senior Officials of the Environment Management Group (EMG) endorsed the “Framework for Advancing Environmental and Social Sustainability in the UN System” (the “Framework”). The Framework recognizes the responsibility of the United Nations System to embody internationally accepted environmental and social principles in its internal management and provides a basic architecture for integrating sustainability measures into policies, programmes, and operations of the UN.

In order to support the implementation of the Framework, an Interim Guide was developed in 2014 to raise awareness about the Framework and environmental and social sustainability (ESS) measures that could be adopted at the individual agency level; to sensitize staff about institutional processes and enabling conditions needed to support the use of such ESS measures; and, to help entities across the UN system learn from each other’s experiences in advancing environmental and social sustainability.

Together, the Framework and the Interim Guide present a model that can be used to outline how and where agencies can use ESS measures (tools and instruments) to achieve environmentally and socially sustainable outcomes. The model is based on two fundamental concepts. The first is that environmental and social considerations can be integrated into service delivery mechanisms using three “entry points” of policy/strategy, programme/project, and facilities/operations. The second is that the institutional structures and processes needed to support ESS measures can be described in terms of five minimum “building blocks”:

1. Corporate commitment is defined as an agency’s overall commitment to integrating environmental and social sustainability measures across its activities.

2. Performance or quality standards define the organization’s expectations and criteria to be met with respect to environmental and social sustainability.

3. Operational procedures are the specific processes, tools, resources and instruments needed to “operationalize” and implement environmental and social sustainability commitments and performance/quality standards.

4. Mechanisms for ensuring accountability and transparency include elements such as: stakeholder engagement procedures; access to information; independent evaluation and oversight, and complaints mechanisms and processes.

5. Finally, monitoring and reporting systems focus on measuring and learning from progress made in reaching sustainability goals or targets, and include components such as sustainability reporting indicators.
Table 1: Entry Points and Building Blocks for the Implementation of a Sustainability Framework within Agencies

<table>
<thead>
<tr>
<th>Building block</th>
<th>Entry point</th>
<th>Corporate commitment</th>
<th>Performance/quality standards</th>
<th>Operational procedures</th>
<th>Mechanisms for ensuring accountability and transparency</th>
<th>Monitoring, reporting and evaluation systems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy/Strategy Level</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Programme/Project Level</td>
<td>✓ ✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Facilities/Operations Level</td>
<td>✓ ✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

Table 1 provides a snapshot of the relationship between entry points and building blocks. Three points help the understanding:

First, the “ticks” in cells represent where each building block is most often applied. Not all are equally relevant at each entry point. For example, operational procedures such as environmental and social assessment and environmental management systems (EMS) are most relevant at the programme/project and facilities/operations levels respectively, and may be less applicable at the high-level policy/strategy entry point.

Second, while entry points are distinct, they are not mutually exclusive. Policies and strategies for environmental and social sustainability, be they in the form of international agreements/standards or individual agency policies/strategies, can exist at both the programme/project and facilities/operations entry points, e.g., an environmental screening policy at the programme/project level or a greening-of-buildings strategy at the facilities level. Just as important is what might be done to an agency’s general policies or strategies to make them environmentally and socially sustainable.

Third, the policy/strategy entry point means not only policies or strategies whose specific purpose is to protect or enhance environmental and/or social sustainability, but also what might be done to an agency’s general policies or strategies to make them environmentally and socially sustainable.

The Interim Guide set out to provide a process for agencies to “self-assess” the extent to which they have in place the minimum building blocks necessary to support the implementation of ESS measures as defined in the Framework.

The pilot project tested the utility of the Guide. Volunteer agencies representing a variety of mandates, cultures, and operational models used the Guide to diagnose the extent to which the enabling conditions for ESS outcomes were in place in their institutions.

This synthesis document reports on the findings of the pilot project. It aims to capture learnings that might be applied more widely across the UN system by providing “starting points” for agencies looking to take action. The report consists of three sections. Section 2 briefly outlines the approach taken to the self-assessment.
3 by an examination of the results of the pilot agency exercise. Finally, Section 4 presents conclusions relating to the steps pilot agencies would need to take to meet the requirements of the ESS Framework, and suggestions for changes to the Framework and the Interim Guide.

2.0 THE SELF-ASSESSMENT METHODOLOGY

2.1 Background

In early March 2015, seven agencies volunteered to pilot the implementation of the Framework. They were: World Health Organisation, World Food Programme, International Fund for Agricultural Development, UN Environment Programme, UN Industrial Development Organisation, UN Office for Project Services, and UN Women. UNDP also engaged in the pilot project to share lessons learned. An inception meeting for the pilot project was held in Geneva on March 30th and 31st, 2015, where participating agencies discussed and agreed on the pilot approach and the process ahead. The meeting agreed to implement the pilot in three phases:

- **Phase 1** – Development of an approach for collecting data
- **Phase 2** – Agency-specific reports including recommendations on options for implementing the ESS Framework.
- **Phase 3** - A summary report detailing findings and recommendations for suggested revisions to the Interim Guide.

During the first two weeks of May, all seven pilot agencies were contacted and Skype/teleconferences undertaken with each. As expected, experience with implementation of the ESS building blocks varied widely. All agencies had at least one of the building blocks in place, although for some this was a relatively recent development. Others had had some or all of the building blocks in place for a considerable period of time.

As a consequence of this variation, the objectives and interests of the pilot agencies during this self-assessment period also differed. Those with less ESS experience indicated that they were primarily interested in using the process to raise awareness about ESS measures with senior management and non-environmental staff. With these internal stakeholders, it was decided that the emphasis would likely be on showcasing the benefits of adopting the ESS Framework.

Agencies with more experience indicated an interest in the pilot project providing external “leverage” to enable initial ESS experience to be extended to otherwise untouched parts of their agency’s mandate. These organisations were less concerned with raising awareness and more interested in mapping the gaps between the Framework and current policies and practices, as a means of building the business case for working in a more integrated fashion.
Agencies with extensive experience appeared to be interested in reviewing building block aspects that have been in place for some time. They indicated a special interest in receiving comparative information from peer multi-lateral organisations that might help them improve fine-level details associated with the operation of, for example, grievance mechanisms and climate change screening during project approvals.

2.2 Approach to the Self-Assessment Work

The initial focus of the self-assessment work was an agency-specific diagnostic review. Focal points in the pilot agencies completed a questionnaire that guided them through the five building blocks. This information then informed a schedule of activities the timing of which is outlined in Table 2.

Table 2: Pilot Agency Self-Assessment Intensives (2015)

<table>
<thead>
<tr>
<th>Date</th>
<th>Pilot Agency and Place</th>
</tr>
</thead>
<tbody>
<tr>
<td>June 22/23</td>
<td>UN Women (New York)</td>
</tr>
<tr>
<td>June 25/26</td>
<td>UNOPS (Copenhagen)</td>
</tr>
<tr>
<td>June 29/30</td>
<td>IFAD (Rome)</td>
</tr>
<tr>
<td>July 2/3</td>
<td>WHO (Geneva)</td>
</tr>
<tr>
<td>July 6/7</td>
<td>WFP (Rome)</td>
</tr>
<tr>
<td>July 10/11</td>
<td>UNIDO (Vienna)</td>
</tr>
<tr>
<td>During July</td>
<td>UNEP (two teleconference meetings)</td>
</tr>
</tbody>
</table>

Because the work programmes were customized, a brief agency-specific Terms of Reference was drafted for each agency, and an example is appended as Annex 1. In addition, pre-visit briefing notes were produced to elicit engagement from senior management and non-environmental staff. The two-day work programmes with each agency consisted of a combination of large group presentations, small group discussions, and individual interviews.
3.0 FINDINGS FROM THE SELF-ASSESSMENT EXERCISE

3.1 Implementation of ESS Measures

The self-assessment exercise produced a wealth of information from both the diagnostic review component and from the many discussions and interviews with staff that focused on gaps and opportunities related to agency-level actions to apply/institutionalize ESS measures outlined Framework. The outcomes discussed in this synthesis document have been distilled from the seven agency-specific reports.

The diagnostic review questionnaire was completed by all seven agencies. Most undertook this exercise in a collaborative fashion, prior to the two-day organized work programmes. An overall analysis of the results allows for some initial conclusions to be drawn about the relative readiness of the participating agencies to adopt and implement ESS measures. For example, some agencies have been working to introduce ESS measures at the facilities/operations entry point for some time while others are at the earliest stages of developing awareness about ESS measures. Some agencies have considerable depth of experience with the application of ESS measures, but these measures are not being applied across the work of the organizations in a systematic manner consistent with what is proposed in the Framework.

When combined with on-site consultations, the diagnostic review questionnaire enabled a detailed comparative picture to be drawn up, showing the extent to which pilot agencies have responded to internal and external drivers and the manner in which they have attempted to implement ESS measures.

3.2 Integration of the ESS Framework and Awareness within Agencies Prior to the Pilot

Three of the pilot agencies specifically mention the influence of the EMG ESS Framework on the design of their own ESS frameworks. During consultations, most of the other pilot agency staff indicated that they were aware of the significance of the EMG ESS Framework. This was especially the case for those officers who had been involved with the EMG's Environmental Sustainability Management Issue Management Group.

3.3 Influence of External and Internal Drivers

Agencies differ with respect to the relative influence of internal and external drivers. For some of the agencies the initial driver of the development of their safeguard policies and procedures has been external pressure from multi-lateral and bilateral donors. Other agencies have faced different external pressures where, for example, a significant initial driver has been the recognition of the environmental impact of the major humanitarian crises of the 1990s, combined with the impact of deteriorating environmental conditions on beneficiaries. For some bodies, internal pressures have been more significant. These have included initiatives promoted by motivated “champions”, or the need to reduce reputational risk. These differences may well affect how a common approach to advancing environmental and social sustainability should be designed.
3.4 Level of Activity at Entry Points

An analysis of the level of activity at the three entry points shows that very few of the agencies have formal procedures for considering the environmental or social implications of their policies or strategies. This may be due to the fact that overall understanding about such procedures may be limited. Environmental and social mainstreaming is treated seriously by a number of the pilot agencies, but on the whole this is recommended for country programmes\(^\text{1}\) rather than for internal agency-specific policies or strategies.

At the programme/project entry point, there has been much recent activity, with most of it focused on the development of safeguard procedures that attempt to deal with environmental and social risk associated with programmes/projects. Much of this activity has been driven by the requirements of multilateral donor funds such as the Global Environment Facility and the Green Climate Fund. However, this activity has taken place in an ad hoc, agency-specific manner, with no obvious basis in a common approach. Given this ad-hoc approach, there is a risk that the UN system may end up with a proliferation of different safeguard requirements, which could be inefficient and confusing for partner countries and donors.

Finally, all of the agencies have been active with respect to the greening of facilities and operations, including to varying degrees, transport and procurement. The approach to these issues has been eclectic, although there is strong commonality in the way agencies have reported greenhouse gas emissions as part of the Climate Neutral UN initiative. It is perhaps worthy of note that, with the exception of WFP, little mention was made during the self-assessments of the integration of social considerations at the facilities/operations entry point.

\(^{1}\) The UNDAF (2009) guidance on "Mainstreaming Environmental Sustainability in Country Analysis and the UNDAF" has been influential in this regard.
3.5 Adoption of Building Blocks

Corporate commitment

The discussion about corporate commitment in the Interim Guide suggests that it should be sought at the highest level possible. For example, the Guide states that:

“UN entities need to establish their mandate for the integration of environmental and social sustainability measures across their activities. This can come from their governing bodies, inter-governmental processes, responses to independent evaluations, inter-agency and system-wide commitments.”

High-level corporate commitment of this kind is clear in the agencies with defined ESS Frameworks. Commitment is also clear for agencies that have free-standing environmental or sustainability policies, such as a Gender Policy, Indigenous Peoples Policy, Climate Change Strategy, Sustainability Policy or Natural Resources and Environmental Management Policy.

Table 1 indicates that corporate commitment can be shown at any of the three entry points and ideally at all of them. For example, it could be exhibited at the facilities/operations entry point through a decision to attain “Climate Neutrality” or an accreditation such as LEED certification for buildings, or through adoption of an agency-wide green procurement policy. Commitment at the programme/project entry point could be displayed through the development and implementation of an environmental and social safeguards procedure.

Performance/quality standards

Performance and quality standards at the level of programmes and projects are commonly applied using environmental and social safeguard systems. Standards at the facilities/operations entry point often take the form of voluntary adoption of externally defined standards such as those developed by the International Standards Organisation (ISO) or the Global Reporting Initiative (GRI). These can also be applied at the policy/strategy level.

The Interim Guide provides a hypothetical example of a performance standard on climate change that might require all policies and strategies to be screened so as to identify opportunities to mainstream climate resilience. A standard on climate change might also require that all tenders for procured goods and services include information about associated greenhouse gas emissions.

There is no common approach to how performance/quality standards are presented by the pilot agencies. The programme/project standards of four of the pilot agencies share a similar structure, all building on emerging standard practice around safeguards and UN international standards and commitments. The requirements of funding mechanisms such as the Global Environment Facility, the Green Climate Fund or bilateral donors have also played a role.

Evidence of environmental and social performance standards exists in the other three pilot agencies, but these tend to be less visibly placed. For example, one of the agencies has de facto standards for GHG emissions, office facilities, waste management, water use and procurement.

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Operational procedures

All seven pilot agencies have operational procedures in place at the different entry points. At the strategy/policy level, two agencies have procedures that, over time, should result in the mainstreaming of environmental and social issues into their own policies and strategies, although this would appear to be some way off. All agencies have clear processes to support gender mainstreaming at all levels of their work, likely in relation to the UN System-Wide Policy on Gender Equality and the Empowerment of Women endorsed by the Chief Executives Board for Coordination (CEB) in October 2006, and its related UN System-Wide Action Plan (SWAP, (2012).

At the programme/project entry point, strong safeguard procedures are evident for four of the agencies although in one case, these are only being applied to a representative sample of projects. Operational procedures are less clear for the other three agencies. While one agency may have no safeguard procedures in place, other agencies may have existing safeguard procedures, but these are not universally applied.

At the facilities/operations entry point, all agencies are active to some extent. Some have sophisticated facilities management procedures. Some agencies, for example, have high-level LEED certification for their HQ buildings.

The greening of procurement is also of considerable interest and concern for most of the pilots. Activity at this entry point is sometimes but not consistently backed up by policy.

Accountability mechanisms

Only three of the pilot agencies have grievance redress/complaints procedures in place at the programme/project level to deal with stakeholder concerns specific to environmental and social issues associated with agency policies or projects. In all three cases, these mechanisms are very new and have not been “field tested” at this point. Three agencies have internal audit and investigations offices, but these tend to focus on fiduciary, ethical and human resource complaints. Most of the agencies have information disclosure policies in place.

Monitoring systems

As a consequence of the Climate Neutral UN initiative, all pilot agencies have adopted the reporting of GHG emissions to some extent. The relative ease with which this requirement has been taken up seems to be related to the fact that most agencies have signed on to the UN Secretary General’s Road Map for a Climate Neutral UN, committing them to engage in such reporting. It may also be due to the fact that reporting is focused on the collection of quantitative data and that reporting agencies have access to consistent centralized guidance and support through the Sustainable UN facility at UNEP. The HLCM has committed all agencies to EMS development on a ‘flexible and voluntary’ basis. Reporting against other aspects of environmental and social performance is customized according to the administrative structures of each agency. One agency has, for example, developed a sustainability reporting system based on the Global Reporting Initiative’s G4 Sustainability Reporting Guidelines. In another example the reporting system was primarily designed in response to the Global Environment Facility’s new Environmental and Social Policy, making it tied closely to the
requirements of the GEF. In the remaining pilot agencies, where E&S reporting exists, monitoring and reporting tends to focus on a limited number of indicators.

4.0 CONCLUSIONS

This pilot project was the first time that UN agencies had formally applied the situational assessment and gap analysis procedure laid out in the Interim Guide. The detailed work undertaken with seven agencies has allowed provisional conclusions to be drawn about how identified gaps might be dealt with in each case. It has also highlighted issues of shared agency concern and provided pointers for UN agencies looking to take action. Because the project involved application of the Interim Guide’s self-assessment process, it is also possible to make some preliminary observations about how the Framework and the Guide might be improved and better communicated.

4.1 Issues of Common Concern

The self-assessment exercise indicated that there are a number of issues or concerns with regard to implementation of ESS measures that agencies share in common. Most of these are focused at the programme/project entry point, and relate to safeguard procedures, although it is worth noting that many of them will also be faced at the operational entry point by agencies as they move towards EMS development:

* How should an agency’s safeguard procedures relate to those of the relevant partner country?
* How should safeguard procedures work when there is more than one donor partner?
* How can screening fit effectively within the project approval process?
* How are agencies designing the project categorization scheme within screening?
* Where should Strategic Environmental Assessment (SEA) fit within operational procedures?
* What is the best design for operationalizing grievance mechanisms?
* When a new safeguards procedure is put in place, how should projects be prepared differently?
* How do other agencies deal with information disclosure requirements?
* How are agencies dealing with the design and implementation of free, prior, and informed consent (FPIC)?
* How are agencies dealing with monitoring?
* How can in-house and programmatic efforts be integrated?
* What good practices exist for mainstreaming ESS throughout an agency?
* How can resources be obtained when high risk projects are required to undertake full Environmental and Social Impact Assessments (ESIA)?
What incentives can be provided to enable better buy-in to the environmental screening and management process by Task Managers?

4.2 Pointers for UN Agencies Looking to take Action

The seven agencies that participated in this pilot project were all at different stages of development of their ESS Frameworks. This diversity made it possible to capture “lessons learned” that might provide useful starting points for other UN agencies beginning to consider how they might take action.

First, it is clear that as a starting point, attempting to implement measures outlined in the Framework at all three entry points at the same time will likely not be effective. Pilot agency experience suggests that starting at one entry point is advisable. Most of the agencies which recently approved ESS Frameworks have concentrated on developing safeguard procedures that attempt to predict and manage risk at the programme/project level. This has been the case for three of the agencies and again, it is worth noting that these Frameworks were often driven by multi-lateral donor fund requirements. Once ESS measures are accepted and “bedded down” at one of the entry points, it may be easier to extend to the others.

Second, wherever the initial focus for implementation lies at the programme/project level, then a phased approach to development and implementation is recommended. A crucial determinant of success is to ensure that the safeguards procedure is embedded in the agency’s programming approach and operations management. This can be challenging, as it often involves making changes to the way programming takes place, and these procedures are usually formalized in programming manuals. Two other steps in a phased approach are important: making sure that there is enough support for internal capacity building by developing guidance materials, toolkits and training activities; and ensuring that there is budget for technical support, outreach, communication, and partnerships.

Third, the proper “institutional home or homes” for the endeavor need to be identified taking into consideration the structure and business model for each organization. For example, if the initial focus of ESS measures is at the facilities/operations level, it may be difficult to extend beyond the greening of facilities and procurement to deal with programmes and projects. In agencies with quality assurance departments that cover both programming and operations, this department may be the most suitable institutional home for the initiation of ESS frameworks, where ESS implementation can be seen to be part of corporate risk management and overall quality assurance. This is in fact most often the case for other institutions such as the multilateral finance institutions that have used ESS measures, specifically at the project level, for some time. The application of ESS measures to the programme/project level could then, for example, also be designated to a policy or programming department.

Fourth, anchoring the ESS Framework in the correct policy basis is important. UN agencies should look to relevant components of the UN Normative Framework such as the UNDG normative principles and guidelines or the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention number 169, or other
value frameworks developed by UN bodies, such as the Global Compact, or independent guidance frameworks such as the Global Reporting Initiative.

4.3 Possible Improvements to the Framework and Interim Guide

The Framework and Interim Guide were extremely useful in the design of the pilot self-assessments and as methodological tools. Experience in implementing the self-assessments suggests that the following amendments might improve the value of the documents for agencies either starting to develop their approach to the implementation of ESS measures, or reviewing what they currently have in place.

(i) Specific suggestions for improving the Framework and Interim Guide

Suggestions for the Framework document

- The Framework document should define a common vision in response to identified needs of coherence.
- The Framework should define the fundamental elements or architecture of [a common approach to] environmental and social sustainability applicable in any UN agency.
- The Framework could be strengthened by clarifying concepts and adding more illustrative examples to make it more tangible.

Suggestions for the Interim Guide

- The title “Interim Guide” should be changed to better describe what the Guide aims to achieve (for example: self-assessment tool; situational analysis; or diagnostic review).
- The Guide in its current form is not easily applied by agencies to the design of an ESS process. The Guide could be strengthened by including a set of practical steps that could be taken following the self-assessment against the Framework, supported by case study material from the pilot agencies.
- Certain concepts need to be clarified. For example, it should be explained what is meant by a mandate for the integration of environmental and social sustainability measures under Corporate Commitment. Some agencies may not include ESS aspects in their organizational mandates, even though there may be a corporate directive to act.
- A distinction between grievance mechanisms and internal audit or oversight systems should be made.
- The Guide should include a reference to the decision by the High-Level Committee on Management (HLCM) of the United Nations System Chief Executives Board Secretariat (CEB) by which UN agencies are encouraged to develop Environment Management Systems on a voluntary basis.
- Key challenges in implementing ESS experienced by the pilot agencies and how these were addressed could be highlighted and included in the Guide.
In addition to the Framework and the (self-assessment) Guide, guidance on ways to approach and implement specific ESS measures should be developed. Alternatively, the current Framework and Interim Guide could be reorganized into two new documents. The Framework document would outline the ideal typical structure of an agency specific ESS Framework, including an elaboration of the entry point/building block idea. A new Framework Implementation Guide would replace the Interim Guide, and would include updated examples from the pilot agencies. The Framework Implementation Guide could be based on the current Part 2 and Part 3 of the Interim Guide, but would consist of more detailed step-by-step guidance, using as a case study one of the pilot agencies with recent ESS Framework experience. It would also draw on, and amplify, the "lessons learned" as presented in Section 4.3. Further, a new Annex could be attached that would explain the outcomes of the pilot project.

(ii) Define more clearly the policy/strategy entry point and the corporate commitment building block

Some of those consulted during the pilot project found the definition of entry points and building blocks, and the distinction between the two, difficult to understand. This was especially the case with the policy/strategy entry point. It is, of course, possible to have policies and strategies that work at the level of the other two entry points. In a sense then, the idea of an exclusive policy/strategy entry point only works if the policies/strategies being discussed are high-level, overarching agency policies, and not those focused on programmes/projects or facilities/operations. If the idea of a policy/strategy entry point is that it not be exclusive, then this needs to be clearly explained with examples of how environmental and social considerations can be made part of policies and strategies that sit within the programme/project "umbrella" or the facilities/operations level.

Another potential confusion exists with how the concept of "corporate commitment" is dealt with in the Interim Guide. It should be made clear that corporate commitment can be shown at any of the three entry points. The examples given on pages 12 to 13 of the Guide imply that corporate commitment can be shown only through the establishment of a high-level mandate. This section could be redrafted to provide examples of corporate commitment at the programme/project and facilities/operations levels.

(iii) Seek more active input in defining social sustainability

As stated in section 3.4, many pilot agencies made only limited reference to the integration of social considerations at the facilities/operations and policy/strategy entry points in their self-assessments. This may be due to the fact that the work being done in facilities/operations has been led by the EMG Issue Management Group on Environmental Sustainability that is focused on environmental sustainability management. It is suggested that the Consultative Process seek a more active input in defining social sustainability at the facilities/operations and the policy/strategy entry points going forward.
(iv) Clarify the role of EMS

The UN HLCM, in March 2013, committed all agencies to the ‘voluntary, flexible and phased’ implementation of environmental management systems in accordance with the requirements of the international standard ISO 14001.

The ISO standard has historically applied only to direct environmental impacts arising from an organization's own activities (correlating closely to the ‘Facilities and operations’ entry point). However, a significant revision to this standard published during the pilot period (September 2015) extends this to considering upstream and downstream impacts, such as supply chain/procurement impacts, and the impacts of an agency’s ‘products and services’ (which may be interpreted as correlating with projects/programmes).

Considerable uncertainty persists within many agencies as to the relationship between the ESS Framework, as presented during the pilot programme, and the development of EMS. While EMSs have historically focused on dealing with the environmental management of physical infrastructure, work practices and logistics, the newly released international standard (ISO 14001:2015) proposes that an EMS could be extended to deal with an organization’s products and services. Whether an EMS can properly deal with the social implications of UN agency actions, or whether it can be extended to deal with environmental and social mainstreaming in policies and programmes is uncertain. In any event, the Framework/Guide would need to address the issue of the role of EMS in Environmental and Social Sustainability Frameworks, including the fact that the UN’s EMS process (the ISO 14001) does not specifically cover social sustainability aspects although there is a related standard for Social Responsibility Guidance (ISO 26000).

(v) Produce summary documents and support materials to facilitate the introduction of ESS concepts with senior management and mainstreaming across multi-disciplinary staff.