

**Comment/Response Table for Model Approach to
Environmental and Social Standards for UN Programming (30 October 2018 version)**

Comments received from 1 November 2018 – 15 January 2019

Comments/Responses Table for Model Approach to Environmental and Social Standards for UN Programming

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Introduction

The UN Environmental Management Group (EMG) posted the draft Model Approach to Environmental and Social Standards for UN Programming (30 October 2018 version) for public comment between 1 November 2018 to 15 January 2019.

Thirty-three sets of comments were received: fourteen from UN entities, eight from NGOs, six from individuals/academics, two each from international federations and consulting firms, and one comment from a national bilateral agency.

Comments addressed all aspects of the draft Model Approach, from overall objectives to structure, specific provisions and plans for implementation.

The following tables indicate the (a) a summary of key changes to the Model Approach as a result of comments received, and (b) a summary of specific comments received and corresponding responses indicating how the comment was addressed

Summary of key changes as a result of November 2018 – January 2019 comment period

Model Approach Sections	Key changes
Introduction and Background	Edited to reduce repetition
Overview	Edited to reduce repetition and to improve flow
	Added para. on supporting and working with national partners in applying benchmark standards
Guiding Principle: Gender and Women’s Empowerment	Strengthened language on handling and responding to sexual harassment, gender-based violence, sexual exploitation and abuse
Guiding Principle: Accountability	Provision added regarding compliance with legal norms and standards (with higher standards prevailing)
Screening, Assessment and Management	Revisions throughout section to more consistently address how benchmark standards are addressed either through screening and assessment or – for early response by humanitarian actors – through other mechanisms (management controls, standard operating procedures). For screening and categorization process, MA now refers to activities with a “distinct planning phase,” relevant for humanitarian actors as their support transitions to early recovery and development
	Text added to recognize range of types of Moderate Risk programming (from relatively simple to more complex) that, while impacts remain limited, may require different types of assessment and management
Stakeholder Engagement and Accountability	Provision added to disclose record of consultations

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Biodiversity, Ecosystems, and Sustainable Natural Resource Management	Various strengthening provisions and references added, including explanation of modified habitat, impacts on World Heritage sites, and in sustainable management section clauses regarding animal welfare and minimization of antimicrobial resistance
Climate Change and Disaster Risks	Simplified title to Climate Change and Disaster Risks, leaving out “Mitigation and Adaptation” after CC and “Reduction” after DR as the benchmark standards focus mainly on risks and not on fuller complement of actions to support M&A nor all aspects of DRR
	Strengthened provisions regarding risk analysis, including clearer treatment of exposure and vulnerability, analysis of risk drivers/factors, inclusion of natural hazard-triggered technological accidents (Natech hazards), increased emphasis on ecosystem-based mitigation and adaptation measures, monitoring
Community Health, Safety and Security	Provisions strengthened regarding health issues, including reference to the right to health, use of appropriate health and safety expertise, and broadened the range of community health impacts to consider, including nutrition, mental health and well-being.
	Further emphasis on types of natural and human-made hazards to consider, with explanatory footnote regarding Natech accidents
	Incorporated antimicrobial stewardship in the provision of health services
	Rephrased universal access provision to cover services (not just facilities)
Cultural Heritage	Deeper introductory explanation of role and importance of cultural heritage (CH), and more comprehensive listing of CH conventions
	Note added that CH does not need to be ancient to be considered CH
	Included references to Heritage Impact Assessments and references to guidance on impact assessments of world heritage sites and for safeguarding intangible culture heritage
	Reframed objective and paragraph on “utilization” of CH, with greater focus on “integrating” CH in programming rather than solely commercialization, Where commercial use is foreseen, provision added to avoid distorting meaning and purpose of intangible CH
	Added provision respecting rights of communities to restrict access to aspects of intangible CH
	Strengthened language regarding in situ protection
	Strengthened provision regarding protection of landscapes with natural features with cultural significance
	Added new paragraph regarding safeguarding intangible CH
Displacement and Involuntary Resettlement	Greater emphasis on considering social and cultural impacts of displacement
	Where displacement impacts are significant, greater focus on improving and enhancing livelihoods of affected persons, not just “at least restoring.” As commentators noted, restoration may not be adequate objective in the face of significant impoverishment risks of displacement. To note, the Thematic Area had already included “improving” livelihoods as an objective regarding impacts on displaced poor and marginalized groups, but it has

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	now been generalized. Language added that the objective of restoring livelihoods may be appropriate where displacement impacts are minor
	Greater emphasized placed on “collaboration” with persons and communities affected by displacement
	Further emphasized characterization of lawful evictions and distinguishing them from forced evictions
	Strengthened language on options assessments and collection of baseline information
	Strengthened characterization of negotiated settlements
	Added provision that an abbreviated action plan may be developed where displacement impacts are minor
	Re-emphasized that for significant displacement impacts, action plans to be designed as sustainable development programs that seek to improve livelihoods
	Strengthened provision on “land-for-land” resettlement for physical displacement of persons with formal land rights/claims
	Included need to ensure displaced persons have access to legal advice and judicial/administrative remedies prior to displacement
	Included provision of long-term monitoring to assess impacts on livelihoods
Indigenous Peoples	Consultation and FPIC paragraphs streamlined and integrated, creating stronger linkage and reducing repetition.
Labour and Working Conditions	Strengthened provision that any terminations to be conducted on non-discriminatory basis
	Added provision that terms and conditions for migrant workers to be the same or substantially equivalent to non-migrant workers performing same type of work
	Suggested edits on workers’ organisations accepted.
	Additional reference on due diligence made
Pollution Prevention and Resource Efficiency	No significant changes

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Comments and Responses Table

Issue/ Section	Comment	Response
<i>Note: ref to para #s are from October 30 version; however revised version may alter para. numbers</i>		
General Comments		
General	<ul style="list-style-type: none"> Well written and articulates clearly the standards. As we are establishing our own system, it was very useful to read this document. Would be great to see the framework turned into practical tools (e.g. common UN checklist based on these standards; monitoring and evaluation questionnaire) 	Thanks for the comments. We will explore developing checklists, practical tools and gathering guidance materials in the next phase of developing the Model Approach
General	Great to also add a couple of lists or text boxes into the document with the major activities or recommended actions listed. Since it's all in text, it gets a bit hard to follow all the different things which should be done. So while the document works well as a reference guide, it's hard to keep track of the minimum requirements.	Very helpful comments. As with the above comment, we will explore how to best present key material and benchmark standards (lists, boxes, diagrams)
General	Control for instances of gender-biased language throughout document	Addressed ("man"-made changed to human-made disasters, etc.)
General	<ul style="list-style-type: none"> Use of terms "Common Approach" and "Model Approach may create confusion, esp for Agencies not familiar with process Various edits and corrections provided 	<ul style="list-style-type: none"> Introductory sentence added noting Model Approach is a key step in moving towards a common approach. Incorporated suggested edits and corrections
General	There will be need for technical training and support at country-level and sufficient funding to integrate this comprehensive enviro and social screening and management	Yes, as UN entities seek to align with the Model Approach, training and support will be needed. As a first step, the Working Group has considered pulling together related guidance materials to facilitate implementation.
General	<ul style="list-style-type: none"> How do the requirements relate to updated WB ESF? Would be useful to have country-by-country analysis of alignment of national regs with the requirements here (perhaps through UNDP?) 	<ul style="list-style-type: none"> Requirements of the World Bank ESF (together with the standards of other agencies, including the GCF and GEF) were reviewed and considered in the development of the Model Approach. Some elements of the World Bank framework, such as those regarding financial intermediaries, were not incorporated as most UN entities do not engage in such intermediation. Analysis of country-by-country alignment with Model Approach standards would be immensely helpful for all agencies. However, it entails a work programme far beyond what is possible here and would need to be discussed by the Working Group

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Issue/ Section	Comment	Response
General	Consider Monitoring & Reporting requirements for Thematic 1,2, 3, 7 & 8 as well as the needs of E&S audit (frequency will be subjected to requirements) and review processes	We have tried to reduce redundancy in each thematic area. The monitoring and reporting requirements listed in the Screening, Assessment and Management section would apply across all the areas. For some areas, such as for Displacement and Indigenous Peoples, we have further emphasized aspects of monitoring and reporting that should be addressed for those areas.
General	<ul style="list-style-type: none"> • Reduce repetition in front sections and overall length • Identify synergies/differences with WB, GEF, GCF requirements • How does this dovetail with country approaches, programs, priorities? 	<ul style="list-style-type: none"> • Front sections edited to address repetition • Safeguard requirements of the WB, GEF, GCF were reviewed in developing the Model Approach to ensure general consistency • UN entities generally partner with govt and national partners to support their priorities and programs. New para. added in Scope section that UN entities need to ensure implementation of MA standards and work with national partners on consistency
General	<ul style="list-style-type: none"> • “Report” needs general para on aim of report, a conclusion, detailed references, and limitations • Resiliency should be a thematic area • More concentration on Water and Energy • Replace term "Water reuse" w/ "Water use" • More focus on quantity aspects such as Virtual Water • more focus on economics • address overuse of fertilizers 	<ul style="list-style-type: none"> • The Model Approach is not a report per se, but a set of benchmark standards for programming • Resiliency is a cross-cutting principle to be addressed throughout • Issues regarding water and energy are integrated across the MA. While the issue of virtual water is vital, the MA is not able to set standards in this regard • Economic aspects are addressed in part in the cross-cutting sustainability principles • Nutrient loading is a risk factor identified in the Biodiversity thematic area
General	<ul style="list-style-type: none"> • Reframe Indigenous Peoples thematic area as ethnic/religious/linguistic minorities to be more inclusive • Align with SDG Environmental Goals • Include participatory approach by including gender and minority perspectives 	<ul style="list-style-type: none"> • Model Approach seeks to align with the UN Declaration on the Rights of Indigenous Peoples and uses common terminology. The Thematic Area on Indigenous Peoples notes different terms may be used at the country-level • While the Model Approach seeks to support implementation of the SDGs, it does not establish programming priorities per se for UN entities; these are set through UN entity strategic plans • The Model Approach supports a human-rights approach and includes cross-cutting participatory and non-discrimination provisions, as well as a comprehensive stakeholder engagement requirements that are gender-inclusive and focus on participation of marginalized groups
General	Welcome the initiative which is fundamental to environmental protection and ecosystem balance	Thank you

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Issue/ Section	Comment	Response
General	<ul style="list-style-type: none"> Welcome inclusion of Cultural Heritage as thematic area. Consider including section on educating public on CH Suggest also include section on Educating the Public on climate change 	Thanks. Regarding sections on educating the public, that would move beyond the mandate of the Model Approach exercise, which is to articulate benchmark standards for UN entity programming
General	<ul style="list-style-type: none"> Appreciate the draft Model Approach Give due credence to five forces/energies that support all life: The Earth, The Air, The Water, The Sun and The Sky (including use of definite article) Focus more on rural areas and conduct related meetings/conferences in rural areas to connect with core people Support rural hospitals and health centers 	Thank you for the comments. The Model Approach seeks to conserve and protect the life-giving elements of nature. A number of UN entities undertake targeted programming in rural areas. The point on supporting rural health infrastructure is noted, however that falls within the strategic programming of UN entities rather than the specific focus of the Model Approach
General	Provide a diagram of the framework or model approach to better communicate, particularly for English secondary user or readers. Illustrations/diagrams would help support the narrative texts	Thank you. A diagram of the main areas of the MA has been added; further diagrams, etc. will be considered
General	<ul style="list-style-type: none"> Well written, easily understandable, well structured. It aims at the “right” themes and balances them in a good manner. The Model Approach reflects the UN core values and supports the implementation of the SDGs. The learning perspective is making it even more attractive. Welcome pollution prevention has own chapter. 	Thank you
General	The Model Approach could be linked to the Global Pact on Environment , i.e. supporting the elaboration of it by offering the social and environmental standards to become also guiding principles for the Global Pact.	Interesting. Linking to GPE will require further discussion and understanding of GPE’s status
General	<ul style="list-style-type: none"> Revised Model Approach should meaningfully answer Environment Dimension of SDG, AAAA, COP21, Agenda 21 and NIEO Urge implementation of Model Approach w/o delay to promote delivery of SDGs, do not wait for perfect MA various resources/links provided on achieving SDGs 	Thank you for the submissions and encouragement to implement the MA as soon as possible to strengthen efforts to achieve the SDGs. As noted in comments above, the MA supports implementation of the SDGs and other UN frameworks, but does not per se establish the strategic priorities for programming
General	Unclear comment. Seems to critique that MA does not represent prescriptive framework. Also seems to note that many “whole community approaches” should be reviewed, and a different thematic approach could be taken	Comments are unclear. Benchmark standards would be prescriptive once integrated into UN entity policy framework

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Issue/ Section	Comment	Response
General	<p>Grand work!</p> <ol style="list-style-type: none"> 1. Impressive document and very interesting! 2. A number of repetitions that can be eliminated 3. From a facilities point of view there could be reference to other pieces of the puzzle such as the IMG on ESM and the work of SUN to show that the approaches are complementary. 4. Once approved it would be good to have a good designer to lay it out and make it into something more interactive and easier to read. As it is it has a daunting effect on the reader 5. There is a slight contradiction between having an approach that helps benchmark and making the approach voluntary. 6. The document needs a definition of “programs” and a definition of “management” and also I would have liked to understand where it sits in the framework. And where it does NOT sit (i.e. does it cover policies or programs? Is it meant to further implement the framework? What is the hierarchy in these documents?) 7. As follow up to the above: there is some overlaps (for instance on procurement) where the document steps over areas that are already covered by HLCM work and SUN work (fleet management under climate change and pollution; procurement, use of renewables, mention of green building standards it is not clear, etc..) 8. what is the approval mechanism within the EMG? now that you have it, what will happen to the document? is there an ambition to take it the HLCP/CEB? 9. What will be the reporting mechanism associated ? how will experiences be shared? The document could benefit from a plan /proposal on how implementation will be supported and progress assessed. Could that be one of the possible elements of our Corporate strategy? 	<ol style="list-style-type: none"> 1. Thank you 2. Front sections edits to reduce repetition 3. Working group will consider linkages/references to IMG and SUN to emphasize complementarity of efforts 4. Point well taken on design elements to improve readability. Will consider diagrams, checklists, etc. 5. The benchmark standards of the MA would be mandatory once incorporated into UN entity policy frameworks. The MA itself is a tool to assist UN entities to develop more consistent safeguard frameworks 6. Comment a bit unclear. Will consider providing more definitions throughout the MA and clarifying “management” and “programmes.” UN entities support multiple types of activities and operations that should be addressed by the MA. The MA would apply to projects and programmes. 7. Thanks. We need to further consider linkages with HLCM and SUN work re procurement and other standards. 8. Development of the MA has been endorsed by the EMG. We will provide updates on steps for approval and other work programmes related to the MA. 9. As noted above, we will provide updates on the moving forward with the MA
General	<ul style="list-style-type: none"> • The draft is solid in relation to how environmental and climate change related issues are outlined, and in relation to the guiding principles how these should be communicated and implemented (e.g. in a culturally appropriate manner (page 21), with full respect for indigenous people’s dignity, identity and aspirations (page 10) etc. 	<p>Welcome comments. Thank you</p>

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	<ul style="list-style-type: none"> Very positive that the standards strive to extend beyond “do no harm” (page 8), by expressing a clear ambition to identify opportunities to promote environmental and climate change (and other) related benefits. 	
General	<p>Strongly support the principle of “reaching the furthest behind first” and “leave no one behind” as in line with the SDGs (page 9). However, there could be major challenges to adhere to this principle. MA should ensure necessary budgeting and resource allocation for in-depth assessments of local contexts, lessons learned, up-to-date research and knowledge</p>	<p>Point regarding appropriate budget and resource allocation for undertaking environmental and social assessments added to criteria for the Assessment and Management Process. However, larger point regarding in-depth contextual/situational analysis not addressed here as this is typically part of UN entity general programme/project development requirements (e.g. situation analysis).</p>
General	<ul style="list-style-type: none"> Emphasize the importance of ownership (mentioned but not elaborated). More clearly emphasize who has the ownership - who will identify the problems that need to be solved with a UN programme? Who identifies at what cost, and for whom, the programme should be implemented? Clarify role of UN entity in relation to partner govt. Who is responsible for what? For example, grievance mechs, resettlement comp, freedom of association – govts often have key role. Further clarify what happens if conflicts between standards and national law. This is also related to structural issues (partner may not prioritize participation, grievance, focus on marginalized). What will UN entity do? Perhaps add provision in Assessment section that reporting how the UN entity could handle these, perhaps through reporting them and use them to influence future programmes Seek to clarify how to address structural issues that may undermine programming standards. For example, what actions to take if grievance processes not operating due to govt 	<p>Important points, thank you. UN entities have a range of modalities for development of programming and the Model Approach does not seek to specify specific roles and responsibilities, as these will be defined by each UN entity as it aligns with the MA. At the same time, a new para. was added to the Scope section that notes while programming supports national ownership, at the same time UN entities remain responsible for sound use of resources and for quality assurance, and implementation of the benchmark standards (as adopted by the UN entity) are integral to these responsibilities, and all partners are bound by partnership agreements that should reference the applicable standards. In addition, the Assessment and Management criteria (as noted) include a proviso to ensure compliance with national and international law, and where they differ, to respect the higher standard. The call for UN entities to ensure they have functional Independent Accountability Mechanisms serves as an additional channel for stakeholders to express concerns if local grievance mechanisms are not effective</p>
General	<p>The Model Approach standards could be helpful take-off point for a UN environmental management system. Related, in minimizing GHG emissions, consider UN entity actions as well (minimize flights)</p>	<ul style="list-style-type: none"> We will explore linkages with other workstreams regarding standards for UN environmental management systems (e.g. SUN, IMG)
General	<p>Audience: consider additional focus beyond UN entities. Consider providing directly to affected people short, clear, focused material and guidelines on their rights in addressing potential impacts. Could the thematic area be converted into more accessible guidelines?</p>	<ul style="list-style-type: none"> Thanks for the suggestion. Will be considered in review and development of available guidance. As you note, the thematic areas are in the first line meant to guide development of UN entity policies.

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Issue/ Section	Comment	Response
General	Consider impacts of private sector investments and PPPs	<ul style="list-style-type: none"> Thanks. This is an important area. We will further consider linkages between Model Approach benchmarks for UN entities and potential private sector actions in the context of UN-entity programming.
Introduction and Background		
Throughout	<ul style="list-style-type: none"> Disagree that “robust” standards “increasingly” applied in programming (para. 3). We see weakening among IFIs from mandatory policies to more flexible “standards” Avoid term “standards” as opposed to “policies:” need binding policies, not flexible standards 	<ul style="list-style-type: none"> Start of para. 3 modified to emphasize purpose of robust safeguards The use of the term “standards” is retained here as it has become common usage. However, the intent is for UN entities to adopt standards as binding policies that are applied across their programming. On this point, the expected “mandatory” nature of entity-adopted policies aligned with the MA has been further emphasized in the section on Utilizing the MA
	How to handle potential discrepancies between Agency safeguards (in joint programming), those of donor agencies, and those of the host government (in case they exist)? Should the safeguards of the host government prevail or should the most stringent safeguards of any of the involved actors (UN entity, donor agency, host government) prevail? Model Approach should address this issue	A new para. was added to the Scope section that notes while programming supports national ownership, at the same time UN entities remain responsible for sound use of resources and for quality assurance, and implementation of the benchmark standards (as adopted by the UN entity) are integral to these responsibilities, and all partners are bound by partnership agreements that should reference the applicable standards.
Para. 8	Document appears to say that some requirements always apply, others more aspirational. Overview Para. 8 notes Guiding Principles and “certain” thematic standards considered always relevant, others not (also, notes SAM and stakeholder engagement are always relevant, but these are not thematic areas).	Para. modified. Distinction whether some thematic areas are always relevant, some not was meant as a situational distinction: if no indigenous peoples, then IP requirements would not apply. But removed this language as it creates confusion, noting that screening and assessment typically indicate the benchmark standards to be addressed
	Perhaps add paragraph in the guiding principles that acknowledges that apparent conflicts may sometimes seem to exist between a UN entity’s mandate, the guiding principles, or the safeguards in one of the thematic areas. The paragraph could also suggest how such conflict should be addressed (e.g. through ‘stakeholder engagement’ and the application of the ‘mitigation hierarchy’ to determine the extent to which individual good practices can be achieved, once the do-no-harm priorities have been incorporated)	Language has been added to emphasize need for UN entity to work with national partners for consistency with the MA
Para. 6	Add note that UNDAF programming principles will be revised and Model Approach will be updated accordingly	Note added. Thank you

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Issue/ Section	Comment	Response
Overview		
Para. 1	3 rd sentence states that MA seeks to ensure “minimum requirements” to promote human well-being and protection of environment are applied. Focus on “min. reqs.” undercuts human-rights based approach. Should ensure highest possible requirements applied	The Model Approach benchmarks are intended to reflect leading practices and requirements which at a ‘minimum’ should be considered and applied in UN entity programming, much of which focuses directly on strengthening well-being. Sentence reworded accordingly.
Throughout	Too much flexibility and caveats provided in utilizing Model Approach (adapt per mandates, not prescriptive, voluntary,) to serve as an effective harmonization instrument and benchmark. Should be mandatory, binding overarching policy framework	The Work Group developing the MA does not have the authority to develop a binding overarching policy framework. The voluntary, step-wise pilot approach toward greater harmonization of env/social programming standards is devised as a practical way forward. The operational focus and mandates of diverse UN entities does require flexibility in determining relevance of certain benchmarks and devising the most relevant architecture. Successful piloting of the MA may strengthen the appetite for a stronger overarching policy framework. MA provisions would be made mandatory by incorporation into UN entity policies and procedures.
Paras. 3-4	Combine paras to reduce repetition regarding “not prescribed framework,” “not mandatory framework”	The two paras. make two different points: (a) the benchmark requirements are not mandatory unless incorporated into an entity’s policy framework; and (b) that the presentation of thematic areas does not represent a fixed architecture. Paras. retained with edits.
Para. 7	Add “per its mandate” regarding UN entity implementation of Model Approach principles/standards	Added
Para. 9	Add phrase “into preparedness and prevention” protocols” regrading integration of Model Approach by humanitarian actors	Added
Para. 10	When aligning with MA, UN entity should retain own requirements if they are higher/more stringent than those of the MA (adopt highest). Comparison and alignment should be mandatory	Welcome point. Text modified, and note included that EMG should be informed by entity where benchmarks can be further strengthened. As noted earlier, at this time only a voluntary approach is possible
Para. 10	In spirit of broadening and localizing SDGs, consider adding call for other actors (govts, private sector) to adopt the UN Model Approach programming standards as best practice	That is a welcome suggestion, but would need to be considered at a later stage after piloting the Model Approach among UN entities
Para. 14	Replace “should” with more mandatory statement regarding interpreting standards in manner consistent with intl law and national law	Revised

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Issue/ Section	Comment	Response
Para. 16 BDV	Add “ecosystems” in addition to conserving and avoiding impacts on biodiversity	Maintenance and enhancement of ecosystem services is a clearly stated objective of the thematic area
Para. 16	Define “meaningful” engagement. Needs to include providing copies of applicable safeguard requirements (rights) and providing legal representation to communities	Meaningful engagement defined in Stakeholder Engagement thematic area. Language added in that section on informing communities of their rights (incl. applicable policies). Legal representation provisions included in the Displacement thematic area.
I. Model Approach		
Para. 4, SDGs	In spirit of localizing efforts to achieve SDGs, acknowledge work with local governments and entities beyond national govts	Added
Guiding Principles		
General	Add note that UNDAF programming principles will be revised and Model Approach will be updated accordingly	Note added. Thank you
General	Use “vulnerable” to describe marginalized, disadvantaged groups	We utilize the terms “marginalized” and “disadvantaged” to convey that conditions of vulnerability are the result of economic, social, political forces. The term “vulnerable” is more static and does not necessarily convey this dynamic.
General	<ul style="list-style-type: none"> • Inclusion and articulation of UNDAF principles welcome, they elaborate “how” to achieve SDGs • Emphasis on ‘leave no one behind’ is commendable, placing empowerment of marginalized groups at center 	Thanks
General	<ul style="list-style-type: none"> • To promote well-being, equity, and empowerment jointly, welcome emphasis on participatory approaches should go further and focus on collaboration/collaborative approaches 	Thanks. Emphasis on collaboration added
General	<ul style="list-style-type: none"> • To advance guiding principles, will need further emphasis on measuring outcomes of well-being 	We will further consider this important point. Programming specific measures of well-being may need further development beyond the measures UN entities typically put in place
General	<ul style="list-style-type: none"> • Welcome linking of sustainability and resilience. However section includes too many risks that do not pertain to the 	MA seeks to align as much as possible with the Sendai Framework which includes broad range of social and environmental risks linked to hazards

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	natural environment (violence, conflict, instability). These should be addressed in a separate principle on human security.	
General	<ul style="list-style-type: none"> Welcome focus on downward accountability to communities. Should include value of “integrity” under accountability principle 	Thanks. Section includes strengthened language on compliance with legal norms and standards
General	<ul style="list-style-type: none"> Include a separate principle on respect for IP Rights and UNDRIP 	Support for and realization of UNDRIP clearly stated in Indigenous Peoples Thematic Area
General	<ul style="list-style-type: none"> Under human rights, note application of human rights in humanitarian crises and reference UN humanitarian principles Strengthen statements re human rights (not just “anchored in” and “respect for”) but that human rights (and humanitarian principles) “prevail” 	<ul style="list-style-type: none"> Provision added regarding upholding human rights in humanitarian action in application of humanitarian principles Common usage of ‘respect, protect, fulfil’ human rights retained
Para. 7, Gender	Provision on sexual harassment and sexual exploitation and abuse could be strengthened	Strengthened language on handling and responding to sexual harassment, gender-based violence, sexual exploitation and abuse
Para. 9, Accountability	To support “Accountability” principle, add reference to Aarhus Convention and Almaty Guidelines	Reference added
Para. 9., Accountability	Note local community engagement is in collaboration with local govts, NGOs, private sector	Local level noted, suggestion to list engagement partners deferred to Stakeholder Engagement section
Para. 9, Accountability	<p>On accountability principle:</p> <ul style="list-style-type: none"> consider including need for access to legal advice and procedures for affected communities consider some advice on addressing corruption and its impacts on communities add reference to accountability in context of human rights violations that could result from forced displacement 	<ul style="list-style-type: none"> Accountability principle strengthened by referencing compliance with legal norms and standards (with higher standard prevailing) Corruption is not specifically addressed by the benchmark standards of the Model Approach beyond compliance with legal standards. Corruption typically addressed through other mechanisms Note added that grievance mechanisms will not inhibit access to judicial and administrative remedies. Access to legal advice noted in Displacement Thematic Area. Displacement Thematic Area notes forced evictions are considered a human rights violation notes that

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Issue/ Section	Comment	Response
II. Operationalizing the Model Approach		
Humanitarian action	At para 3, recognition that standards relevant for activities that cannot be readily screened (emergency response) and that standards should be integrated into SOPs and management practices. This distinction should be consistently reflected throughout the section, utilizing difference between application of standards in humanitarian response and longer term interventions	Thanks. Modifications added to strengthen consistency that standards may be addressed through management systems as well as screening, assessment, management. Changes made to Screening section para. 3 (and added ftnt), para. 7; Assessment section para. 9, para. 10, para. 15. Text on screening now refers to programming with distinct planning phase.
Screening, Assessment and Management		
General	Consider clearer depiction of steps of assessment process (screening, scoping, baseline studies, impact prediction and evaluation, mitigation, management plan, impact statement)	Key steps of the screening and assessment process are outlined in the section. More specific articulation of conducting an assessment would be addressed in supporting guidance materials
General	Social and env impacts require different considerations, skills, authorities, time frames, budgets, experts to address them. We find the two fields are insufficiently recognizable in own right. Consider greater separation	There has been a trend toward integrating social dimensions into environmental assessments rather than treating them separately. Of course, targeted social assessments need to be undertaken where warranted
Para. 8, Risk category	In assigning risk category, are affected communities involved? If no, why not?	MA specifies that affected stakeholders are to be involved in the identification of env and social risks. It is recognized that the initial UN entity screening procedure may be based largely on a desk review, but the risk identification, categorization, and proposed assessment and management measures are to be reviewed with affected communities
Para. 8, Moderate Risk	Moderate Risk category can encompass broad range of limited risks	Text added to recognize broad range of types of Moderate Risk programming (from relatively simple to more complex) that, while impacts remain limited, may require different types of assessment and management.
Ft. nt. 9, Analyses	For High Risk projects, additional analysis/assessments will undoubtedly be required, not "may"	Revised
Para. 9, Impact assessments	Note Espoo Convention and SEA protocol set out obligations and procedures for enviro and health impact assessment and stakeholder engagement. Please reference in Scope, in Operationalizing the Model Approach, in Screening Assessment, and Management	Ftnt reference added to Assessment and Management section. Entering the same reference in the earlier sections would be duplicative

Comments/Responses Table for Model Approach to Environmental and Social Standards for UN Programming

Issue/ Section	Comment	Response
Para. 9, Baseline data	Ensure assessment is based on recent social and environmental baseline data at an appropriate level of detail, recognizing that variability over time (e.g. seasonal variations, movement of people) may require additional baseline data.	Added
Para. 9, Cost-Benefit	There is often lack of will to fully consider alternatives to proposed projects and their design, and robust cost-benefit analysis may be needed in order to understand the overall costs of proposed actions	Ftnt added that cost-benefit analysis may be required to fully weigh the potential overall costs of potential social and environmental impacts against anticipated project benefits
Para. 9, Stakeholders	Include need of stakeholder mapping and collaboration with local govts and private sector	Stakeholder mapping and range of stakeholders addressed in Stakeholder Engagement section
Para. 10, Health impact assessment	Broaden screening and assessment requirements regarding health impacts (here and in CHSS)	Health impacts are included in assessment process but re-phrased for added emphasis (from “community health and safety” to “impacts on the health, safety and well-being of affected communities”)
Screen humanitarian action	<ul style="list-style-type: none"> • Add need to screen and assess standard operational activities that UN humanitarian agencies typically would be doing to mitigate risk, and there would be time for this in the preparedness phase • Move up consideration of ESMF before discussion of ESMP 	This issue has been discussed and addressed in a phased approach: humanitarian actors would address benchmark standards in management controls and standard operating procedures that would apply during crisis response (where screening and assessment may not be practical), and then move to screening and assessment as support transitions to early recovery and development
Para. 9, Stakeholders	<ul style="list-style-type: none"> • Replace term “iterative” stakeholder engagement with more easily understood (and translatable) “ throughout the programming cycle” • Ensure “all” relevant information to be disclosed • Revise “enabling” taking account of stakeholder views to “ensuring” 	Revised accordingly
Para. 13, Contractors/suppliers	The last sentence, acting as a disclaimer on holding programming contractors and primary suppliers to account beyond the “UN entity’s control or influence over them”, creates a dangerous loophole in the effective management of risks. While there indeed may be limits of what UN entities can realistically achieve, the overall message that should be given is that “programming contractors and primary suppliers shall be held to account for their actions and all measures shall be taken to ensure their compliance, as per national and international laws and programming requirements, with clear consequences in case of non-compliance”.	Additional sentence added: “Programming contractors and primary suppliers are obligated to comply with covenants and legal agreements, national law and relevant international law, and should be held to account for actions that contravene their obligations.”

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Issue/ Section	Comment	Response
Para. 14, Humanitarian action	Regarding humanitarian action, further clarify and consistently treat distinction between requirements for early response and longer term intervention (some inconsistency noted). Further emphasize point on integrating requirements into SOPs. Consider specifying timeframe that would distinguish longer term interventions	Revised to address points and align more closely with points in Scope, para. 9.
Para. 15, Heritage impact assessment	Add reference to potentially conducting Heritage Impact Assessment	Reference not added here as this section discusses more generic tools (ESIA, SESA), but added in Cultural Heritage thematic area
Para. 21, Stakeholders	Simplify term “programming stakeholders” to just “stakeholders”	Revised here and several other places. Definition of stakeholders in SE section captures programming context
Para. 21, Local govts	Note potential role of local govts in monitoring	Added
Stakeholder Engagement and Accountability		
Para. 1, Local govts	Note local govt actors among range of stakeholders	Added
Para. 1, Aarhus	Add reference to Aarhus Convention and Almaty Guidelines	Added (here and in Guiding Principles)
Para. 3, Various edits	<ul style="list-style-type: none"> • Clarify that it is the Stakeholder Engagement Plan which defines the elements in the paragraph (timing, methods, differentiated measures) • Include “free of charge” in criteria for meaningful effective consultations • Move good existing definition of “stakeholders” from ftnt to text • Move list of non-exclusive topics to be discussed with stakeholders from ftnt to main text • Clarify and improve clause on maintaining and sharing records of stakeholder consultations 	Revised accordingly

Comments/Responses Table for Model Approach to Environmental and Social Standards for UN Programming

Issue/ Section	Comment	Response
Para. 3, Stakeholders	Note Good Practice Guidance on stakeholder engagement in SEA	Reference added
Para. 3, Participation, disclosure	<ul style="list-style-type: none"> • Define what is meant by “meaningful” participation • Emphasize “collaboration” and “collaborative approaches”, not just participation and consultation • Provide translated copies of applicable policies and requirements to stakeholders so they know • Provide for support/legal representation of affected 	<ul style="list-style-type: none"> • Meaningful consultation and participation defined in para. 3, 4th bullet. • Collaboration with stakeholders further emphasized • Note added that affected persons should be provided, in understandable form, an explanation of relevant laws, regulations and the UN entity’s standards • Legal advice addressed in Displacement thematic area
Para. 4, Representation	When engaging with third parties and go-betweens in challenging environments, seek to ensure that they genuinely represent stakeholders who cannot be engaged directly	Sentence added
Para. 4, Challenging environments	Last sentence unclear: Risks to stakeholders from participation in supported activities should be closely monitored.	It is difficult to specify the types of risks that stakeholders may face when participating in activities in challenging environments (conflict, crises). This could range from being targeted by groups opposed to potential interventions to theft to interpersonal violence in insecure situations.
Para. 5, Drafts	<ul style="list-style-type: none"> • In addition to description of key programming activities, ensure access to draft and approved programming documentation • Ensure programming information is provided free of charge 	Revised accordingly
Para. 5, Public record	Maintain and disclose a public record of stakeholder engagement throughout the programming cycle. In cases where it may be necessary to safeguard the identities of stakeholders, statistical information is recorded and disclosed.	Added
Para. 5, Fnt 15, Disclosure	Re disclosure of information, why are specific timelines given (120d high risk, 30d moderate risk). Are these intl reference points?	Disclosure of assessments and management plans at least 120 days in advance of approval for high risk programming and at least 30 days for moderate risks has been a common reference point (GCF, ADB)
Paras. 6, 8, GRM/IAM	Ensure GRMs and UN Entity Accountability Mechanisms provide access free of charge	Revised accordingly
Para. 8, IAMs	Good to have a checklist on activities that need to be done in establishing Independent Accountability Mechanism	General criteria noted for effective IAMs. More specific information on establishing an IAM may be provided in guidance

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Issue/ Section	Comment	Response
Para. 9, Reprisals	Ensure anti-reprisal provision is broader than just those seeking access to GRMs	Broadened to address reprisals against stakeholders who seek information or participation in programming activities or express concerns in addition to those accessing GRMs and IAMs
III. Thematic Areas		
Biodiversity, Ecosystems and Sustainable Natural Resource Management		
General	Acknowledge “Nature-Based Solutions” concept, and include references to non-UN sources and guidelines	We will further consider use of “Nature-Based Solutions” as an organizing concept. Additional non-UN references added
General	Add following points to standard: (a) Role of govts to curb activities that adversely affect habitats/resources; (b) maintaining seed banks; (c) sustainable procurement; (d) public awareness	Valid points regarding responsibilities and actions for biodiversity conservation. Procurement is addressed in para. 19. Other actions not included as they actions not included as move beyond focus on minimum safeguard benchmarks to avoid adverse impacts
General	Para. 2: Note biodiversity being ‘destroyed’; para. 3: ‘encourage’ use of traditional knowledge and customary use of BDV; para. 4 typo;	Added, corrected
Para. 4, BDV assessments	Emphasize need for biodiversity assessments to be undertaken early given often long time frames needed	Ftnt added noting long lead times needed for biodiversity assessments given seasonal changes, migratory issues
Para. 5, Ecosystem approach	Add reference to IUCN document on The Ecosystem Approach, and not it also involves adaptive management	Added
Paras. 6, 7, Ecosystems	To be more consistent with Ecosystem-Based Approach, should limit siting preferences and impacts on habitats based on risks to ecosystems, and cite IUCN Red List of Threatened Ecosystems	Highly threatened or unique ecosystems are a key criteria for defining critical habitats. Link to IUCN Red List of Threatened Ecosystems in critical habitats definition (ftnt)
Para. 8, Protected areas	Make specific reference to protected areas with international designation, in particular World Heritage Sites, RAMSAR sites and Man and Biosphere Reserves. For World Heritage sites, the ESIA should review specifically the potential impact on the Outstanding Universal value of the site, in line with the IUCN guidelines on impact assessments for natural World Heritage sites	World Heritage and Ramsar sites included in protected areas that fall under the definition of critical habitats (paras. 6, 7) with a standard of no measurable adverse impact on biodiversity values. In para. on protected areas (8), cross-referencing footnote added including reference to IUCN guidelines.

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Issue/ Section	Comment	Response
Para. 11, Offsets	Add “redesign” as necessary step before considering biodiversity offsets	Redesign is included in specified “avoidance” and “minimization” steps
Para. 11, Offsets	Biodiversity offsets should not be considered in World heritage sites given unique and irreplaceable nature.	Footnote added making this point.
Para. 16, Animal welfare	<ul style="list-style-type: none"> • It would be useful to include guidelines on animal welfare in para. on sustainable management of living natural resources (“standards developed and agreed by member countries of the World Organisation for Animal Health, including those covering animal welfare”). • Also, the World Bank is developing additional guidelines in conjunction with the FAO for incorporating animal welfare into agricultural development projects. These may be relevant to this paragraph once they are finalized 	General text added to adopt appropriate measures to promote animal welfare. More specific guidance will be addressed in guidance materials (this brief para. is general to cover multiple sectors: forests, agriculture, fisheries, livestock)
Para. 16, Antimicrobials	Address risks of antimicrobial resistance	Added
Para. 17, Water resources	Include reference to the UNECE Water Convention in para. on water resources	Added
Para. 19, Suppliers	Add “loss” (not just conversion and degradation) of habitats	“Loss” covered by conversion, and we are seeking to align with the earlier requirements on natural and critical habitats
Climate M&A and DRR		
Title		Simplified title to Climate Change and Disaster Risks, leaving out “Mitigation and Adaptation” after CC and “Reduction” after DR as the benchmark standards focus mainly on risks and not on fuller complement of actions to support M&A nor all aspects of DRR
Para. 3, Hazards	Consider regrouping list of hazards under main category “environmental” (encompassing biological, geological, hydrometeorological) and technological	We are following the typology of hazards as presented in the Sendai Framework
Para. 4 ftnt, HFCs	Add phrase on HFCs to footnote explanation of Montreal Protocol	Added

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Issue/ Section	Comment	Response
Para. 9, technological hazards, monitoring	<ul style="list-style-type: none"> Specific attention should be paid to addressing man-made and technological hazards, including those stemming from chemical and industrial accidents, nuclear and radiological emergencies as well as accidents in the transport sector and those associated with the particular case of "Natech" hazards. Strengthen language on monitoring disaster risk planning and measures 	<ul style="list-style-type: none"> Man-made and technological hazards further emphasized in Community Health and Safety section. Here, natural hazard-triggered technological hazards (Natech) are noted and footnoted Monitoring of management plans and adoption of corrective actions noted
Para. 9, Risk exposure	Separate analysis of exposure and vulnerability to CC impacts and disaster risks, two separate factors of risk	Separated, and vulnerability factors reframed to be more in line with UNISDR terminology
Para. 9, Resilience	Suggest to include the CREATE tool (The Climate Resilience Evaluation for Adaptation through Empowerment) to identify and assess social vulnerabilities.	We will include this in a resource listing on guidance
Para. 9, Ecosystem-based approaches	Elevate consideration of ecosystem-based approaches to CC/DRR and include reference to work on "nature-based solutions" to CC/DR	Ecosystem-based approaches noted in text and nature-based solutions noted in footnote reference
Para. 10, Carbon sinks	Revise header of para 10 from "Minimize GHG emissions" to "GHG emissions and carbon sinks" to more consistently reflect requirements in para.	Revised
Para. 10, Ecosystem-based approach	Note nature-based solutions/ecosystem-approaches to CC mitigation	Ecosystem-based approaches noted
Para. 10, GHGs	In minimizing GHG emissions, consider UN entity actions as well (minimize flights)	The Model Approach is focused on direct programming requirements. UN-entity sustainable management of facilities, personnel, travel is generally covered under other UN entity policies. Linkage to UN SUN work noted in introduction.
Community Health, Safety and Security		
Para. 4, Risk assessments, impacts	<ul style="list-style-type: none"> Consider need for Environmental and Health Risk/Chemical Health Risk Assessments at design stage in identifying potential hazards and risks and ways to avoid, minimize and mitigate the impacts. Consider that potential impacts may also arise during all phases (pre-construction, commissioning, operational and decommissioning/closure). 	Points added

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Issue/ Section	Comment	Response
General, training	<ul style="list-style-type: none"> Consider H&S and Security related trainings for the affected communities particularly the vulnerable groups 	Not included at this time. Fully informing potentially affected communities of potential risks and management measures is addressed in stakeholder engagement section
Paras. 1, 4, 5, Health assessments	<ul style="list-style-type: none"> Include reference to right to health Broaden listing of potential health impacts, incl broadly classified as communicable diseases, noncommunicable diseases, injuries, nutritional disorders, mental health and well-being (not just communicable and noncommunicable diseases) Clarify differences in approach for addressing occupational exposure and community exposure to health and safety hazards. Revise ftnt on undertaking a health impact assessment (not just when significant impacts anticipated as may need HIA to make such a determination) Note different instruments such as health impact assessment, health needs assessment, and health risk assessment. Ensure appropriate expertise required Add links to relevant materials 	<p>Included several revisions:</p> <ul style="list-style-type: none"> Reference added to right to health and link to ICESCR and OHCHR/WHO fact sheet Broadened types of community health risks to be avoided and minimized (added injuries, nutritional disorders, mental health and well-being). Clarified that occupational exposure to health risks addressed in Labour and Working Conditions thematic Added ftnt with examples of range of health and safety assessment instruments Included need for appropriate expertise for health assessments Revised ftnt on HIA, and added link to WHO HIA guidance
Para. 4, Human-made disasters	Specific attention should be paid to addressing man-made and technological hazards, including those stemming from chemical and industrial accidents, nuclear and radiological emergencies as well as accidents in the transport sector and those associated with the particular case of "Natech" hazards	Human-made and technological hazards to be considered in risk assessment and emergency planning. Ftnt references to UNISDR guides added. Natech and other hazards also flagged in Climate Change and Disaster Risks area
Para. 5, Mental health	Need to be cognizant of potential mental health issues	Added to potential range of health impacts
Para. 5, References	<ul style="list-style-type: none"> Note UNECE/WHO Protocol on Water and Health Note UNECE Convention on Industrial Accidents 	Added
Para. 5, HIA guidance	Note Espoo Guidance on assessing health impacts in plans and programs (See specific guidance on assessment of health impacts of plans and programmes, in Resource Manual to support the application of the Protocol on SEA, annex A1.1 on Health prepared by WHO (available at: http://www.unece.org/fileadmin/DAM/env/documents/2011/eia/ece.mp.eia.17.e.pdf)	Not included here (note: WHO guidance on HIA was added). Espoo HIA guidance to be added in compilation of broader range of guidance materials

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Issue/ Section	Comment	Response
Para. 5, Antimicrobials	Incorporate antimicrobial stewardship in provision of health services (as noted in updated draft EBRD safeguards)	Added
Para. 6, References	Include reference to Espoo Convention and SEA protocol for intl standards regarding infrastructure development	Reference added
Para. 6, Geophysical hazards	Geological and geophysical hazards should be considered particularly in programming that involves physical planning/construction decisions. Earthquake hazard and risk assessment are fundamental tools for developing risk reduction measures.	Assessing geological and geophysical risks further emphasized
Para. 7, Universal access	Rephrase universal access to also cover services (not just facilities), per Convention on the Rights of Persons with Disabilities	Revised
Para. 10, Emergency response	As part of emergency planning, note ecosystem-based approaches to ensure long-term and sustainable responses to tackle climate change and reduce disaster risk. Thus strengthening communities climate resilience.	Ecosystem-based approaches to addressing CC/DRR noted in Climate Change/DRR section. Focus here is on development of specific emergency response plans
Cultural Heritage		
Para. 1, Importance of CH	Note that cultural heritage (CH) is central to memory, and has a crucial role within the sustainable development process, through enhancing social cohesion, diversity and well-being, supporting cultural rights by protecting the heritage of minority and indigenous groups, fostering socio-economic regeneration, enhancing long-term tourism benefits, enhancing the appeal and creativity of cities and regions, increasing the resource-efficiency and quality of life in human settlements, and enhancing disaster preparedness as a repository of information for traditional, sustainable practices. Cultural heritage resources are often unique and irreplaceable, their loss irreversible, and their symbolism a target for terrorist attacks, rendering them particularly fragile	Added, with minor edits
Para. 2, Conventions	Add fnt references to range of relevant conventions	Added

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Issue/ Section	Comment	Response
Para. 3, Definition	Ensure definition states that cultural heritage does not have to be ancient to qualify. Cultural heritage safeguards should incorporate no such age limitation.	Added footnote: “The listed elements and features do not need to be ancient in order to be considered Cultural Heritage and the benchmark standards do not apply an age limitation.”
Para. 3, Definition	Include human settlements in definition of tangible CH and note may be located in any setting/environment (not just urban, rural)	Added and revised
Para. 3, Definition	In defining intangible heritage, note it is also referred to as living heritage	Noted
Para. 4, Objectives	Include avoiding disruption of and safeguarding of CH among objectives	Added
Para. 4, Objectives	Emphasize “inappropriate alteration” as objective	Revised
Para. 5, Impact avoidance	Also protect CH from “irreversible” impacts	Added
Para. 5, Assessments	Refer to need to conduct Heritage Impact Assessment, with link to ICOMOS Guidance and IUCN advice note	Added
Para. 5, Assessments	Ensure that communities, groups, local, national and transnational organizations and individuals carefully assess the direct and indirect, short-term and long-term, potential and definitive impact of any action that may affect the viability of intangible cultural heritage or the communities who practice it.	New para added regarding specific provisions related to intangible CH, and points offered on community participation in assessing risks and determining appropriate safeguarding measures included there
Para. 6, Stakeholders	Ensure the involvement and participation of communities, groups and relevant non-governmental organizations in the identification, inventorying and elaboration of safeguarding measures of the various elements of the intangible cultural heritage. Ensure that communities, groups and, where applicable, individuals play a significant role in determining what constitutes threats to their intangible cultural heritage including the decontextualization, commodification and misrepresentation of it and in deciding how to prevent and mitigate such threats.	See above point

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Issue/ Section	Comment	Response
Para. 7, Access	Ensure access of communities, groups and individuals to the instruments, objects, artefacts, cultural and natural spaces and places of memory whose existence is necessary for expressing the intangible cultural heritage and respect customary practices governing access to intangible cultural heritage even where these may limit broader public access.	Added in modified form
Para. 8, Restricted access	Add concept of restricted access by communities: Respect customary practices enacted and conducted by the communities which restrict access to certain specific aspects of intangible cultural heritage or to information about it.	Added
Para. 9, Chance finds	Include requirement for documentation of chance finds (not just protection and non-disturbance)	Added
New para on intangible CH	In section on provision for types of CH, add new para on “Intangible cultural heritage.” Identify, with the participation of communities concerned, appropriate mitigation and safeguarding measures aimed at ensuring the viability of the intangible cultural heritage, including the identification, documentation, research, preservation, protection, promotion, enhancement, transmission, particularly through formal and non-formal education, as well as the revitalization of the various aspects of such heritage. Respect and recognize the right of communities, groups and, where applicable, individuals to continue the practices, representations, expressions, knowledge and skills necessary to ensure the viability of the intangible cultural heritage. Respect the dynamic and living nature of intangible cultural heritage.	New para added that integrates points offered regarding intangible CH
Para. 10, Integration of CH	Move away from terminology of “use” of cultural heritage to one of strengthening the role of CH in development programming and its integration	Revised to “integrate and utilize.” Important to make clear that additional requirements are triggered when propose to utilize, including commercial use, of CH
Para. 10, Agreements	Establish FPIC as standard for integration of CH in programmes/projects and for any commercial use	Current language refers to good faith negotiations with successful outcomes, but not FPIC. If CH of indigenous peoples utilized, then FPIC processes would need to be followed per IP thematic area requirements. Para. includes cross reference to IP reqs
Para. 10, Commercial use	Replace “commercialization” with “commercial use” (less negative connotation)	Revised

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Issue/ Section	Comment	Response
Para. 10, Commercial use	Ensure that any commercial use does not distort the meaning and purpose of the intangible cultural heritage for the community concerned.	Added
Para. 11, Plans, stakeholders	Add conservation master plans and specify local govts and heritage authorities among stakeholders to be consulted	Added
Para. 12, Archeological sites	<ul style="list-style-type: none"> • Ensure documentation on possible CH is provided to relevant authorities undertaking programming activities (e.g. departments of waterworks, agriculture, tourism, transportation and energy) • Add language that most archaeological features are best protected by preservation in situ. If not possible, transfer of the cultural heritage to another location shall be conducted in consultation with and agreement of programming-affected people, in accordance with good international practice 	Added
Para. 12, Archeological sites	Add reference to cultural sites with an international designation such as (cultural) World Heritage sites and refer to the need for a Heritage Impact Assessments (HIA).	Ftnt added to this affect to para. 11 on legally protected areas
Para. 13, Built heritage	Note that most built heritage features are best protected by preservation in situ. If not possible, transfer of the cultural heritage to another location shall be conducted in consultation with and agreement of programming-affected people, in accordance with good international practice.	Added
Para. 14, Natural features	Add “landscapes” to section on natural features, and emphasize significance of maintaining their integrity	Revised
Para. 15, Moveable CH	Also note artefacts stored and displayed in museums that may be affected by programming activities	Noted
Displacement and Involuntary Resettlement		
General	<ul style="list-style-type: none"> • Given UN entities not required to align with MA (voluntary exercise), gives rise to impression that this is an exercise in appearances rather than genuine commitment to avoidance of negative impacts from programming 	As noted above, provisions of Model Approach are intended to be mandatory policy requirements as adopted by individual UN entities

Comments/Responses Table for Model Approach to Environmental and Social Standards for UN Programming

Issue/ Section	Comment	Response
Para. 4, Objectives	<ul style="list-style-type: none"> Require that livelihoods of displaced persons are “improved” not “at least restored” regardless of pre-displacement socio-economic status. Remove “or at least restore” as this has been repudiated (simple compensation and restoration may still lead to impoverishment in face to severe risks of IR) 	<ul style="list-style-type: none"> Programming of UN entities is primarily focused on improving livelihoods of poor and marginalized groups, and this would apply to displaced persons. Some provisions strengthened, including all physically displaced Text had already included “improving” livelihoods as an objective regarding impacts on displaced poor and marginalized groups, but it has now been generalized to all where displacement impacts significant. Language added that the objective of restoring livelihoods may be appropriate where displacement impacts are minor (no physical displacement, minor land acquisition, no disruption of livelihoods).
General	The objective of “restoring” livelihoods after resettlement is not adequate in practice. Need to move beyond compensation and consider resettlement as a process of “reconstruction” that involves not just economic dimensions, but social and psycho-social impacts	<ul style="list-style-type: none"> See above Focus on “reconstructing” lives and livelihoods emphasized
General	Provide guidance to displaced persons: Model Approach (and UN Guidelines on displacement) written largely for UN Staff, but do not explain rights and processes to affected persons. Need to make documents more accessible. This is needed to not ‘leave people behind’	As acknowledged, the Model Approach is targeted to staff of UN entities to develop relevant safeguard policies. Consideration of focused guidance for affected persons would need to be considered at another stage.
General	What happens when violations occur to provisions of Model Approach? Is there a UN-level body for affected persons to appeal to? What recourse do they have to attempt to stop dispossession? Is Special Rapporteur system only mechanism?	Each UN entity that aligns with the Model Approach is to establish a functioning Independent Accountability Mechanism to receive complaints from persons who may be harmed by supported activities. Such mechanisms are to be accessible and to operate transparently. These mechanisms are at the UN entity level; the Model Approach does not envision a UN-level mechanism at this time
Para. 4, Objectives	<ul style="list-style-type: none"> Define what is meant that any resettlement will be carried out as “sustainable development program” (additional investment, direct benefits from project, livelihood development through investment, training, provision of expertise) 	Further emphasized need to ensure resettlement activities executed as sustainable development programmes to provide sufficient resources and opportunities to enable displaced persons to benefit directly from programming activities and that seek to improve affected persons livelihoods and living standards. Further highlighted in objectives with added explanation in para. on developing plans.
Para. 4, Objectives	<ul style="list-style-type: none"> Consider IFC PS 5 point on ensuring “seamless transition of livelihoods)” affected by displacement 	Point requires further review regarding content of what constitutes “seamless”

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Issue/ Section	Comment	Response
Paras. 1, 2, Terms	<ul style="list-style-type: none"> More precision in use of terms “displacement” (compulsory loss of land/assets and/or access thereto) and “resettlement” (process to address displacement) 	Replaced usage of “resettlement” with “displacement” in several places. However, Model Approach utilizes common usage of term “involuntary resettlement” among safeguard policies
Para. 2, Losses	<ul style="list-style-type: none"> Over focus on economic and physical losses misses other key losses of resettlement, incl social cohesion, health, well-being. Consider psycho-social impacts 	Noted other dimensions of loss in definitional para.1.
Para. 3, Context	<ul style="list-style-type: none"> Need further specification of what “exceptional circumstances” means (public interest test?) before IR should proceed. Also, need broader focus than on compensation. What about assistance, and information? 	<ul style="list-style-type: none"> Exceptional circumstances further modified to “support the general welfare” and are to be “reasonable and proportional.” “Assistance” and “information” added
Para. 3, Context	Resettlement should be framed as process of social, economic and psycho-social reconstruction	Noted that where displacement impacts are significant, programming to support economic and social reconstruction of affected persons lives and livelihoods. This point also emphasized below regarding resettlement being conceived as sustainable development with sufficient resources
Para. 6, Exemptions	Careful regarding exemption of standard not applying to voluntary market transactions. This is a grey area, and may provide cover for forcible acquisition under the guise of market transactions	Footnote added that due diligence required to ensure that sellers are not being compelled to sell land
Para. 6, Definition	Acknowledge displacement is accumulated process of first expropriation then dispossession. Two processes, both traumatic	Not added at this point. Could be addressed in guidance
Para. 7, Gap analysis	Ensure gap analysis conducted between national laws and UN entity standards re resettlement and displacement (most national laws are inadequate)	Added
Para. 9, References	Add intl law reference to forced evictions	Added ESCR No. 7 reference (in addition to existing explanatory links)
Para. 9, Forced eviction	Define forced evictions	Definition already provided Added ESCR No. 7reference
Para. 10, Avoidance	Strengthen language on avoiding displacement/resettlement, calling for options assessment to show that it is unavoidable	Added
Para. 11, Customary lands	Include reference to often overlooked customary/communal lands, such as community forests, fishing areas, fallow lands	Footnote reference added

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Issue/ Section	Comment	Response
Para. 12, Terms	<ul style="list-style-type: none"> Revise term “man”-made hazards to avoid sexist language 	Revised to “human” made to align with CC/DRR and other thematic areas
Para. 12, Assessment	<ul style="list-style-type: none"> When noting that ESIA may not be needed where displacement impacts minimal, acknowledge that “fair and just compensation” may be insufficient to re-establish, improve livelihoods. 	Where displacement be minimal (no physical displacement, small land acquisition or easements that do not disrupt livelihoods), fair and just compensation may be adequate, as livelihoods not disrupted and do not need to be reestablished
Para. 12, 14, Terms	<ul style="list-style-type: none"> How do you define “directly affected”? This may not encompass all those affected (rural communities not in formal labour arrangements or holding lands) 	Point noted. Changed to “affected persons.”
Par. 13-14, Affected persons	<ul style="list-style-type: none"> Place emphasis on collaboration with displaced persons rather than simply consultation Ensure preferences of displaced persons are integrated into design Inform affected persons of applicable standards and requirements (not just “informed of rights”) and provide access to legal representation financed by project/programme Ensure interests of marginalized groups addressed Note that “good faith” needs more definition regarding reaching negotiated settlements (not a high bar) 	Added and revised accordingly
Para. 13, Participation	Broaden participation requirements to include consideration of the wider public interest rationale for the project	<ul style="list-style-type: none"> Included participation on “rationale for proposed activities”
Para. 15-17, Plans	<ul style="list-style-type: none"> Plans should seek to “improve” livelihoods and living standards, not restore. Restoration as an objective has been shown to fail in cases of involuntary resettlement Set objective as “improve” throughout benchmark standards in paras. 15, 16, 17 (removing references to “equal” or equivalent” values) 	<ul style="list-style-type: none"> Revised accordingly. Added new para. stating that for projects with physical displacement and economic displacement with significant adverse impacts, activities need to be designed as sustainable development programmes with the aim to “improve” livelihoods and living standards. Text notes that “restoring” livelihoods may be an appropriate objective where impacts are minor and readily addressed (minor land acquisition, minor easements, no disruption of livelihoods). Revised to establish “improved” value/characteristics as objective of benchmarks, noting “wherever possible”
Para. 15, Plans	<ul style="list-style-type: none"> Restoration alone is not enough to prevent impoverishment (wide range of impacts, incl lost opportunities compared to non-displaced). W/o additional assistance, displaced cannot catch up. Focus on improving livelihoods 	Addressed. See above point.

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Issue/ Section	Comment	Response
Para. 15, Plans	<ul style="list-style-type: none"> • Ensure full replacement costs based on costs at resettlement sites • Transitional support should be financial and in-kind and continue as long as needed 	Added
Para. 16, Physical displ	Ensure land-based resettlement is principle for land-based livelihoods	Added to para .on physical displacement; already noted in para. on economic displacement
Para. 16, Physical displ	Add reference to Voluntary Guidelines on Responsible Governance of Tenure of Land (in IP section, but not here)	Added
Paras. 15-17, Plans	<ul style="list-style-type: none"> • Acknowledge that customary and various types of tenure will be part of resettlement/reconstruction process (not converting to fee simple) 	This is noted
Para. 17, Economic displ	<ul style="list-style-type: none"> • Emphasis “collaborative” not just participatory process to “negotiate” nature of access restrictions 	Added
Para. 19, Grievance redress	<ul style="list-style-type: none"> • Grievance redress should be broader, not just a separate mechanism. Ensure independent legal advice prior to displacement, with priority to marginalized and disadvantaged; access to fair and impartial legal processes as may be available in local legal systems. • Also, GRM should address issues during consultation processes 	Added note on provision of legal advice and access to judicial and administrative remedies as available. Broadened scope of GRM to all phases of resettlement process
Para. 20, Monitoring	Ensure monitoring is long term to assess whether objectives achieved	Added
Para. 20, Monitoring	Should indicate how monitoring to be funded, possible a fund for conducting monitoring and completion analysis	Added provision that adequate budget to be provided for monitoring activities.
Indigenous Peoples		
General	Further emphasize IP role in biodiversity conservation	Point noted in Biodiversity Thematic area (customary sustainable use para. and indigenous protected areas and conservation areas)

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General	Emphasize need to increase public awareness of IP rights and need for knowledge sharing on success stories	Valid point, but not included here as goes beyond articulating minimum benchmark standards
General	IP Thematic area rightly structured around ILO 169, UNDRIP, and FPIC. Also, welcome objectives and the appropriate caveats regarding definition of IPs	Thanks
Paras. 1, 2, Cultural heritage	Emphasize centrality of cultural heritage to IPs	Added
Para. 10-15, Consultation and FPIC	Streamline and strengthen linkage between “meaningful consultation and participation” and “consent”(FPIC). Need to be more straightforward regarding need for consent, which is also needed in order to deal with the issues listed in # 18 (collective land rights) or # 21 (relocation). We note moderation of the FPIC provisions from earlier version	<ul style="list-style-type: none"> • Consultation and FPIC sections streamlined, combined into one section. MA takes a broad approach to when FPIC processes are to be pursued (programming that may affect the indigenous peoples’ rights, lands, territories, natural resources, traditional livelihoods, tangible and intangible cultural heritage, including activities proposing the development, utilization or exploitation of mineral, forest, water or other resources.) • Working Group will further discuss how FPIC provisions are addressed
Para. 10-15, Consultation and FPIC	Streamline sections on “meaningful consultation and participation” and “consent” (now two-separate sections/sets of paras.), as participation and reaching agreements are part of same process per No. 169 and UNDRIP. Specific edits to text offered	Consultation and FPIC sections streamlined, creating stronger linkage, and reduction in repetition. Specific edits adopted in whole or in part
Para. 16, Assessments	Consider need to require IP household surveys as part of assessment	This level of specificity would be determined based on the type of programming rather than a general requirement
Labour and Working Conditions		
	<i>From Working Group Task Team: The comments provided below are appreciated. In view of the need contain the length and detail of the provisions, some comments will be considered for use in a subsequent guidance note.</i>	
Para. 4, Terms of Employment	Suggest adding to end of paragraph: “There shall be clear employment relationships providing secure, stable and direct employment to the extent permitted by the nature of the project/programme. Seasonal or temporary work shall be used	The issue of employment relationships is an important one and the risk of disguised employment needs further discussion and elaboration in guidance. The proposed addition has not been made here for issues of length and consistency in the level of detail across sections

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	only as appropriate for the nature of the project/programme and not to avoid employers' responsibility."	
Para. 7, Terms of Employment	Suggest adding to end of paragraph: "Terminations shall be carried out in a non-discriminatory manner and after consultation with workers or their trade union when applicable. Where possible, transitions to other employment or priority consideration for re-hires shall be put in place."	An addition has been made: 'Terminations shall be carried out in a non-discriminatory manner and when applicable after consultation with workers or their trade union.'
Para. 7	Last sentence: Strengthen language on ensuring that payments received by workers, not just providing evidence of payments	The concern about payment is addressed in the text 'All wages that have been earned, social security benefits, pension contributions and any other entitlements shall be paid, either directly to the project/programme workers or, where appropriate, for the benefit of the project/programme workers.'
Para. 10, Non-discrim	Suggest adding to end of paragraph: "The working conditions and terms of employment of migrant workers (domestic or foreign) shall be the same or substantially equivalent to those of non-migrant project/programme workers performing the same type of work."	An addition was made to the paragraph: 'The terms and conditions of employment of project workers who are migrants (domestic or foreign) shall be the same or substantially equivalent to those of non-migrant project/programme workers performing the same type of work.'
Para. 11, Workers orgs	<ul style="list-style-type: none"> • Replace the “;” in the 4th-to-last line between “employment” and “seek” with “or”. • Replace the “;” in the 3rd-to-last line after “mechanisms” with a period (.) • In the 3rd-to-last line, suggest deleting the words “and/or” and rewriting the last clause as a separate sentence with changes and added words as follows: “The responsible party shall not discriminate, harass, intimidate or retaliate against project/programme workers who participate, or seek to participate, in such workers’ organizations and collective bargaining or alternative mechanisms.” <p>Suggest adding to end of paragraph: “Workers who have been dismissed unfairly shall be reinstated in a timely manner, and any changes made for the purpose of retaliation and discrimination shall be promptly reversed.”</p>	Suggested edits have been incorporated. With regards to the proposed addition, the issue of dismissal is also covered in Para. 8.
Para. 11	Comment: The use of this term “workers organizations” is always open for abuse. The right term is “trade union organization”. Many employers exploit this term to establish ‘workers organizations’ that they control covertly. Yes there are workplaces where there are no trade union organizations but these should be treated as	'Workers' organisations is the term used in ILO's international labour standards, see in particular Convention No. 87 - Freedom of Association and Protection of the Right to Organise Convention, 1948.

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	exceptional cases. The model should not be seen as encouraging or promoting them.	
Para. 12, Forced labour	Suggest adding to end of paragraph: “Where cases of forced labour are identified, immediate steps shall be taken to end these practices and remedy them, including employing the worker with full rights as other direct workers or the rehabilitation and social integration of the worker where necessary and appropriate.”	The issue of remedy is addressed in Para. 12, and is part of P029 Protocol of 2014 to the Forced Labour Convention 1930, which is referenced.
Para. 12	Add phrase in quotes to definition of forced labour: ... exacted from an individual under “monetary or any kind of incentives,” threat of force or penalty, ...	Footnotes 66 and 67 provide information relevant to the definition of forced labour.
Para. 18, OSH	Sub para (f): Suggest adding to end of paragraph: “Such benefits and remedies shall be adequate and commensurate with the harm suffered.”	Not added. Will discuss remedy further in subsequent guidance.
Para. 18	Revise sub para (b): The elimination of hazards and minimization of risks through the implementation of preventive and protective measures implemented in the following order of priority: elimination or substitution, engineering and organizational controls, administrative controls, and where residual hazards and risks cannot be controlled through these collective measures, provision of personal protective equipment at no cost to the worker; “Controlling the source shall be the basis of all hazard management and the procedure of eliminating hazards shall start with prevention, followed by substitution and end with control measures. Control measures shall include administrative controls, engineering controls, personal protection and personal and public hygiene. Personal protection should be the last option and must take into account local situation including local weather and climate, availability of materials and equipment, knowledge on the use of personal protective equipment and cleaning and washing facilities.”	The formulation in the draft seeks to make the hierarchy of controls understandable to specialists and non-specialists
Para. 18	New sub para (e): “Workplace health and safety risk assessments”	Assessments are addressed in para 18 (a): ‘Identification and assessment of potential hazards and risks’.
Para. 21, OSH	Consider project/programme to adhere local/national requirements OR reference on minimum/Best Practices of management and quality of accommodation to protect and	A reference to GIIP is lacking in the OSH provisions in general and has been added to para. 19 along with the ILO Codes of Practice.

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	promote the H&S and well-being of the project/programme workers.	
New paras to OSH section re hazardous chemicals	<p>Add following paras after para 20:</p> <p>“21. Where extremely dangerous chemicals or highly hazardous chemicals are used e.g. Class 1 A and B, Carcinogenic, immune depressing substances, Mutagenic and Endocrine Disrupting Substances extra measures should be taken to prevent exposure particularly to children, pregnant and nursing mothers and HIV/AIDS victims.</p> <p>22. Where dangerous chemicals are applied in enclosed environments e.g. greenhouses, homes and offices recommended re-entry intervals should be displayed and communicated to all workers, their families, visitors and passers-by.</p> <p>23. In the case of possible use of hazardous chemicals, the location of projects shall take into account recommended distances from residential areas, schools and other sensitive ecosystems.”</p>	Specific hazards will be dealt with through references to ILO Codes of Practice, GIIP and other guidance materials. Hazards for communities related to pesticides and other pollutants are also discussed in Thematic area 3 on Community Health and Safety and Thematic area 8 (see especially para.5)
Para. 24, GRM	<ul style="list-style-type: none"> Revise 1st sentence: “A grievance mechanism shall be provided for all project/programme workers (and, where relevant, their organizations) to raise concerns ...” <p>Comment: A mention of national grievance handling mechanism is needed here. Many countries have these mechanisms in the labor laws. This will avoid projects to design their own mechanisms and ignore national mechanisms.</p>	The issue of the relationship with national grievance mechanism is addressed in the text ‘the grievance mechanism shall not impede access to other judicial or administrative remedies that may be available under the law or through existing arbitration procedures or substitute for grievance mechanisms provided through collective agreements’.
Para. 26, GRM	<p>Comment on GRM through collective agreements: “There is a misconception here. CBAs cannot establish their own mechanisms. Whatever they propose must be in line with the national mechanism. It is therefore dangerous to give an impression that mechanism under CBAs are higher than that provided by a national mechanism. I think what need to be stressed here is that grievance mechanisms should be enshrined in CBAs and should be in line with the national mechanism.”</p>	References to compliance to national law are present throughout the standard, including Para. 2 ‘Ensure projects/programmes comply with national employment and labour laws and international commitments’.
Para. 27, Contractor/3 rd party	<p>Suggest adding to end of paragraph: “Due diligence must include an examination of the past and current labour practices of the contractor/third party as regards compliance with the requirement of these standards. Provision of labour through a contractor or a third party such as a broker, agent or intermediary shall not be</p>	An addition regarding due diligence has been made in the relevant footnote.

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	used to disguise the true employment relationship or to avoid the requirements of these standards as they apply to direct workers.”	The issue of employment relationships is an important one and the risk of disguised employment needs further discussion and elaboration in guidance.
Para. 27	Include requirement for Contractor/Third Party and the Primary Supplier Workers to complete EHS and Social related trainings required as planned within the Environmental and Social Management System Framework or Contractor Management Plan.	Will be considered in guidance.
Para. 30, Suppliers	Comment: “The concept of ‘primary supplier workers is dehumanizing. It reminds us of slavery. It should be discouraged. However since it is a reality this protection is needed for now. Project programmers should be encouraged to discourage the ‘worker supply’ arrangement. The UN should be the last body on earth to encourage this kind of arrangements.”	‘Supplier’ is a common designation for a party that provides goods to another entity. The text refers to ‘suppliers’ workers to indicate workers who work for a supplier.
Para. 32, Suppliers	In 1 st line, suggest replacing “these risks” with: “the risks identified in paragraphs 30 and 31”	Suggested edits have been incorporated.
Pollution Prevention and Resource Efficiency		
General	In objectives, should not single out climate pollutants, but more hazardous types of pollution: It would be more appropriate to enlarge the scope to the generic definition of persistent pollutants. For example, Persistent Organic Pollutant (POPs) are banned at global level as considered among the most harmful substances to human health and the environment. It is therefore important not to narrow to the climatic pollutants. See the following international agreement to complete this section: Minamata Convention, Stockholm Convention, SAICM, Montreal Protocol. Pollutants covered by these international agreements are considered the most harmful to human health and the environment. Include: Priority should be given to phase down and phase out the emission of pollutants covered by the above-mentioned agreements	POPs and the most toxic substances are covered throughout the thematic area, in sections on wastes, hazardous materials, pesticides. International agreements on bans and phase-outs are referenced. The emphasis on climate pollutants in the objectives is to emphasize the need to treat GHGs as pollution
Para. 2 fnt, ODS	Update definition of ozone-depleting substances (ODS)	Updated per recommendation

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Para. 3, Emissions	Include atmospheric emissions in addressing pollution	Atmospheric emissions are covered by pollution definition and are part of references to controlling emissions
Paras. 3, 7, References	Reference UNECE Conventions on transboundary air pollution, industrial accidents, watercourses, and Espoo Convention and SEA protocol	References added. Espoo Convention and SEA Protocol referenced in earlier assessment and management section.
Para. 3, Emergency response	To identify requirement of Emergency Response Plan to be in place in an event of pollution releases/spillages etc.	Noted in hazardous materials section, with cross-reference to Community Health, Safety and Security Thematic Area re emergency response plans
Para. 9, References	Add reference to Aarhus Protocol on Pollutant Release and Transfer Registers	Added