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#### HARMONIZING ENVIRONMENTAL AND SOCIAL SUSTAINABILITY STANDARDS WITHIN THE UN SYSTEM

#### BM SİSTEMİNDE ÇEVRESEL VE SOSYAL SÜRDÜRÜLEBİLİRLİK STANDARTLARININ UYUMLAŞTIRILMASI

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#### ABSTRACT

Until recently, environmental and social standards have primarily been established within international financial institutions. In recent years, a number of UN entities have put in place or have started to adopt environmental and social standards for programming, including establishing grievance mechanisms to investigate compliance with applicable social and environmental policies and procedures. This paper evaluates the efficiency and effectiveness of UN entities in meeting these requirements. Through an analysis of existing frameworks and practices, it identifies key challenges and gaps, providing recommendations to enhance the integration of environmental and social sustainability standards into UN policies and implementation strategies.

**Key words:** International Law, Human Rights, International Environmental Law, Environmental and Social Sustainability Standards, UN Law.

#### ÖZET

Yakın zamana kadar çevresel ve sosyal standartlar esas olarak uluslararası finans kuruluşları bünyesinde oluşturulmuştur. Son yıllarda ise birçok BM kuruluşu, programlama faaliyetleri için çevresel ve sosyal standartlar benimsemiş ya da benimsemeye başlamış; ayrıca ilgili çevresel ve sosyal politikalara ve prosedürlere uyumu incelemek üzere şikayet mekanizmaları kurmuştur. Bu makale, BM kuruluşlarının söz konusu gereklilikleri konusundaki etkinliğini ve verimliliğini değerlendirmekte, mevcut çerçevelerin ve uygulamaların analizi yoluyla başlica zorlukları ve boşlukları belirlemekte, çevresel ve sosyal sürdürülebilirlik standartlarının BM politikalarına ve uygulama stratejilerine entegrasyonunu geliştirmek için öneriler sunmaktadır.

**Anahtar kelimeler:** Uluslararası Hukuk, İnsan Hakları, Uluslararası Çevre Hukuku, Çevresel ve Sosyal Sürdürülebilirlik Standartları, BM Hukuku.

#### 1. INTRODUCTION

Until recently, environmental and social standards have primarily been established within international financial institutions, including the World Bank,<sup>2</sup> multilateral development banks such as the Inter-

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<sup>2</sup> The World Bank was the first financial institution to embark on this process. From 1984 the World Bank does not finance projects that contravene the borrowing country's obligations under international environmental law, human

American Development Bank and the Asian Development Bank.<sup>3</sup> In recent years, a number of UN entities have put in place or have started to adopt environmental and social standards for programming,<sup>4</sup> including establishing grievance mechanisms to investigate compliance with applicable social and environmental policies and procedures. This alignment reflects a commitment to international environmental law and human rights frameworks, including the Sustainable Development Goals.<sup>5</sup>

This paper evaluates the efficiency and effectiveness of UN entities in meeting these

requirements. Through an analysis of existing frameworks and practices, it identifies key challenges and gaps, providing recommendations to enhance the integration of environmental and social sustainability standards into UN policies.

## 2. A MODEL FOR HARMONIZING ENVIRONMENTAL AND SOCIAL SUSTAINABILITY STANDARDS IN UN PROGRAMMING

In recent years, a number of UN entities have put in place or have started to adopt environmental and

rights, and indigenous rights protection. This principle has been incorporated into various Bank policies and procedures. In 2016, the World Bank adopted a new set of environment and social policies called the Environmental and Social Framework (ESF), which now applies to the World Bank investment project financing. The Environmental and Social Framework (The World Bank, 2017), accessed November 20, 2025, <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf>.

<sup>3</sup> I. Shihata, “The World Bank’s Contribution to the Development of International Environmental Law”, in *Liber Amicorum*, ed. G. Hafner, G. Loibl et al (the Hague: Kluwer, 1998), 631; A. Gualtieri, “The Environmental Accountability of the World Bank to Non-State Actors: Insights from the Inspection Panel”, *BYIL* 72 (2001); E. Pushkareva, “Environmentally Sound Economic Activity: International Law”, in *Max Planck Encyclopedia of Public International Law*, vol. 3, ed. R. Wolfrum (Oxford: Oxford University Press, 2012), accessed November 10, 2025, <https://opil.ouplaw.com/display/10.1093/law:epil/9780199231690/law-9780199231690-e1549>.

E. Nurmukhametova, “Problems in Connection with the Efficiency of the World Bank Inspection Panel Activity”, *Max Planck Yearbook of United Nations Law* 10 (2006): 397-421; J. Cernic, *Corporate Accountability Under Socio-Economic Rights* (London: Routledge, 2019), 40-63; K. Marshall, *The World Bank: From Reconstruction to Development to Equity* (London: Routledge, 2008); D. Desierto, “Due Diligence in World Bank Project Financing”, in *Due Diligence in International Legal Order*, ed. Krieger, Peters, and Kreuzer (Oxford: Oxford University Press, 2020), 329-347; S. Moerloose, *World Bank Environmental and Social Conditionality as a Vector of Sustainable Development* (Geneva: University of Geneva, 2020); A. Naude Fourie, *World Bank Accountability* (Utrecht: Eleven International Publishing, 2016); W. Genugten, *The World Bank Group, the IMF, and Human Rights* (Cambridge: Cambridge University Press, 2015); S. Fujita, *The World Bank, Asian Development Bank and Human Rights* (Cheltenham: Edward Elgar Publishing, 2013); H. Cisse, *International Financial Institutions and*

*Global Legal Governance* (Washington: the World Bank, 2012).

<sup>4</sup> Programming, in this context, refers to supported activities with defined outcomes and resources, over which the UN entity exercises significant organizational influence (Moving towards a Common Approach to Environmental and Social Standards for UN Programming (UN EMG, July 2019), 7, accessed November 20, 2025, [https://unemg.org/wp-content/uploads/2019/07/FINAL\\_Model\\_Approach\\_ES -Standards.pdf](https://unemg.org/wp-content/uploads/2019/07/FINAL_Model_Approach_ES -Standards.pdf)).

<sup>5</sup> In alignment with the Environmental, Social, and Governance (ESG) concept, the 2030 Agenda for Sustainable Development, and the 2015 Addis Ababa Action Agenda of the Third International Conference on Financing for Development, an important milestone was the 2018 UN General Assembly Working Group’s Report on Human Rights and Transnational Corporations. This report recommended that investment entities and financial institutions systematically integrate human rights due diligence into their operations, recognizing it as a core responsibility under the 2011 UN Guiding Principles on Business and Human Rights (UN Guiding Principles on Business and Human Rights (2011), accessed November 20, 2025, [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)). The report further urged these entities to “not only require effective human rights due diligence” from the companies they invest in but also to “coordinate with other organizations and platforms to ensure alignment and foster meaningful engagement with businesses” on these issues ((UN General Assembly Working Group’s Report on Human Rights and Transnational Corporations, A/73/163, 2018). This recommendation signals a critical evolution in the role of international organizations and financial institutions in ensuring that human rights and environmental sustainability are embedded within global business practices. According to Anne Peters and Heike Krieger, the rise of due diligence is a response to, a manifestation of, and a catalyst for “structural change” in international law (in Krieger, Peters, and Kreuzer, eds., *Due Diligence in International Legal Order* (Oxford: Oxford University Press, 2020), 351-389).

social standards for programming,<sup>6</sup> including establishing grievance mechanisms to investigate compliance with applicable social and environmental policies and procedures. These grievance mechanisms offer a formal avenue for stakeholders to engage with UN agencies when they believe a UN-supported project may negatively impact them socially or environmentally. They serve as a recourse for individuals and communities who have already raised concerns through standard stakeholder consultation and engagement channels, whether with Implementing Partners or the respective UN agency, but have found the response unsatisfactory. These standards are being developed in alignment with the provisions and principles outlined in the 2012 UN document, *A Framework for Advancing Environmental and Social Sustainability in the United Nations System*, as well as the environmental, social and gender policies of the Global Environmental Facility adopted in 2012 and updated in 2018.<sup>7</sup>

In 2016, senior officials of the UN Environment Management Group (EMG) agreed to establish a new work stream under the ‘Consultative Process on Advancing the Environmental and Social Sustainability in the UN system’. This work stream aimed to explore options for developing a unified approach to environmental and social standards for programming within the UN system. As part of this initiative, a comparative analysis was conducted on the existing environmental and social standards of seven participating UN entities, such as FAO, IFAD, UNDP, UNEP, UNICEF, UNIDO, and UNOPS. The analysis identified key areas of both commonality and divergence in the content and scope of safeguard requirements. Additionally, the study examined the normative foundations of key safeguard-related thematic areas and reviewed the safeguard frameworks of other international entities.

As a result of this initiative, in 2019, the UN EMG introduced the *Model Approach to Environmental*

*and Social Standards for UN Programming*.<sup>8</sup> This approach provides a set of guiding principles and benchmarks designed to support the implementation of the 2030 Agenda; “reflects key elements of a human rights-based approach to programming and also applies a risk-informed approach to addressing environmental and social risks and impacts.”<sup>9</sup> The Model Approach aims “to strengthen the sustainability and accountability of UN-entity programming.”<sup>10</sup> By aligning with these benchmarks, UN entities are better positioned to assist partner countries in achieving the Sustainable Development Goals.

Individual UN entities, on a voluntary basis, “would seek to align their environmental and social standards with those of the Model Approach, consistent with their mandates, corporate systems for programme and risk management as well as other related corporate policies and commitments,”<sup>11</sup> including those on environmental and social sustainability. The Model Approach is “not a prescribed policy framework and its benchmark standards in themselves do not establish grounds for defining compliance and accountability, which must be established through entity-specific mandatory policies and procedures.”<sup>12</sup>

According to the Model Approach greater alignment of environmental and social standards across UN entities will strengthen “policy coherence and improve collaboration with governments and other national counterparts in country level programming.”<sup>13</sup> With regard to the provisions of this document programming shall “anticipate and avoid, and where avoidance is not possible, minimize and mitigate adverse impacts to people and the environment,” utilizing a process of screening, assessment and management of environmental and social risks and impacts and application of standard operating procedures, with “special attention to potential impacts on marginalized and disadvantaged groups.”

<sup>6</sup> Programming, in this context, refers to supported activities with defined outcomes and resources, over which the UN entity exercises significant organizational influence (Moving towards a Common Approach to Environmental and Social Standards for UN Programming, UN EMG, 2019, 7).

<sup>7</sup> Updated Policy on Environmental and Social Safeguards, GEF, 2018, accessed November 20, 2015, [https://www.thegef.org/sites/default/files/council-meeting-documents/EN\\_GEF.C.55.07.Rev.\\_01\\_ES\\_Safeguards.pdf](https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.55.07.Rev._01_ES_Safeguards.pdf).

<sup>8</sup> Moving Towards a Common Approach to Environmental and Social Standards for UN Programming. UN EMG, 2019, 7.

<sup>9</sup> *Ibid*, 9.

<sup>10</sup> *Ibid*.

<sup>11</sup> *Ibid*.

<sup>12</sup> *Ibid*, 6.

<sup>13</sup> *Ibid*, 3.

Stakeholder engagement and accountability programming shall promote “meaningful and effective engagement with stakeholders and affected parties” – and in particular marginalized or disadvantaged groups – “throughout the programming life-cycle”; ensure stakeholders have “timely access to appropriate, understandable information on programming activities and potential environmental and social risks and impacts”; and ensure that “affected parties have access to fair, transparent, and inclusive” grievance redress processes and mechanisms. Special effort should be made to engage marginalized and disadvantaged groups, in line with the principle of ‘reaching the furthest behind first’ and considering that these groups may be “disproportionately affected by potential adverse impacts from programming activities”. Measures are to be adopted “to identify, address and reduce the risk of reprisals against programming stakeholders.”<sup>14</sup>

The Model Approach calls on the UN entity to ensure implementation of the following measures. With regard to the screening and categorization: the UN entity aligning with the Model Approach shall “screen and categorize proposed programming activities with a distinct planning phase to identify potential environmental and social risks and impacts associated with supported activities”, including the risks referred to in the Guiding Principles and Thematic Areas of the Model Approach, and “to determine the nature and level of environmental and social review and assessment”, and, provisionally, “the management measures necessary for addressing the identified risks and impacts”. Screening, together with the assessment process, establishes the relevance of the benchmark standards outlined in the Model Approach for the programming activities. The UN entity may utilize screening to identify potential environmental and social risks as well as “opportunities for enhancing beneficial programming outcomes”. The screening process results “in the assignment of a risk category based on the significance of potential environmental and social risks”, including “direct, indirect, cumulative and transboundary impacts”, as relevant, in the programming area, including those related to associated facilities. Screening and categorization shall occur as early as possible for programming “with a distinct planning phase,” well in advance of

approval of supported activities, and be updated accordingly. The UN entity shall seek “to align its environmental and social risk categorization procedures with good international practice”, i.e. low risk, moderate risk, high risk.

Programming categorized as Moderate and High Risk requires “environmental and social analysis and assessment that is proportionate to the potential risks and impacts presented by the programming activities”. Analysis and assessment shall be undertaken “as early as possible for programming with a distinct planning phase”. In no case shall programming activities that may cause adverse impacts “be carried out until completion of the analysis and/or assessment and adoption of necessary management measures”, or in the case of initial emergency response and humanitarian action, “application of necessary management controls and procedures to avoid, minimize, and mitigate adverse impacts.”

According to the document, the environmental and social assessment, informed by the screening process and initial analysis and scoping of issues, “shall take into account all relevant environmental and social risks and impacts of throughout the programming cycle”, including but not limited to impacts on “water and air quality (including impacts on the ozone layer)”; “biodiversity and natural habitats, including land and soils, water, ecosystems and ecosystem services”; livelihoods; the rights of women, older persons, youth, indigenous peoples, persons with disabilities, and marginalized and disadvantaged groups and individuals; fundamental principles and rights at work; worker health and safety; “impacts on the health, safety and well-being of affected communities; tenure security; risks to human security through escalation of conflict, crime and violence”; risks to cultural heritage; “potential exposure and vulnerability of communities to climate change impacts and disaster risks, and potential risks that climate change and disasters may pose to programming outcomes; and the risk of reprisals against individuals and communities in relation to supported activities.”<sup>15</sup>

The Model Approach requires the UN entity to ensure that “parties affected by programming activities have access to fair, transparent, and inclusive grievance redress processes and

<sup>14</sup> *Ibid*, 10.

<sup>15</sup> *Ibid*, 20.

mechanisms free of charge.”<sup>16</sup> Accordingly, grievance mechanisms should be: legitimate (“enabling trust from the intended stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes”); accessible (“being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access”); predictable (“providing a clear and known procedure”); and transparent.

A systematic analysis of existing frameworks and practices is essential for evaluating the efficiency and effectiveness of UN entities in implementing Environmental and Social Sustainability (ESS) requirements, such as Model Approach to Environmental and Social Standards for UN Programming, and for identifying key challenges and gaps.

This paper examines the development and implementation of ESS frameworks within the UN system, focusing on common challenges and gaps identified across organizations. The research findings are based on the analysis of all seven entities that participated in the 2016 UN Environment Management Group (EMG) project. As participants in this initiative, these organizations were the first within the UN system to be informed about the forthcoming changes in environmental and social sustainability standards. To illustrate these points, the paper uses UNEP and UNDP as representative examples of EMG project participants.

In addition to the EMG project participants, the study also includes a broader analysis of other UN entities outside the project. Among the organizations examined, ILO, UN Women, and UNESCO were included in the analysis, with UNESCO serving as a representative case to

illustrate the shared characteristics of the current state of integration of ESS in UN entities outside the scope of the EMG project.

## 2.1. UNDP

UNDP’s projects and programmes effective 1 January 2015.<sup>17</sup> The objectives of the Standards were to: “strengthen the social and environmental outcomes of UNDP projects”; “avoid adverse impacts to people and the environment affected by projects; minimize, mitigate, and manage adverse impacts where avoidance is not possible”; “strengthen UNDP and partner capacities for managing social and environmental risks”; and ensure “full and effective stakeholder engagement, including through a mechanism to respond to complaints from project-affected people”. The Standards contained two key components: a Social and Environmental Compliance Unit to respond to claims that UNDP is not in compliance with applicable environmental and social policies; and a Stakeholder Response Mechanism (SRM) that ensures individuals, peoples, and communities affected by projects have access to appropriate grievance resolution procedures for hearing and addressing project-related complaints and disputes.

In 2021, the revised Social and Environmental Standards (SES)<sup>18</sup> were introduced, reinforcing UNDP’s “commitment to integrating social and environmental sustainability into its programmes and projects, thereby supporting the achievement of sustainable development.”<sup>19</sup> The revised standards highlight foundational principles, such as the commitment to “leaving no one behind”, the protection and promotion of human rights, the advancement of gender equality and women’s empowerment, “the enhancement of sustainability, and the upholding of accountability.”<sup>20</sup>

These standards cover a range of critical areas, including biodiversity conservation and sustainable

<sup>16</sup> *Ibid*, 26.

<sup>17</sup> UNDP Social and Environmental Standards, UNDP, 2014.

<sup>18</sup> Social and Environmental Standards, UNDP, 2021, accessed November 20, 2025, [https://ses-toolkit.info.undp.org/sites/g/files/zskgke446/files/2025-02/undp-social-and-environmental-standards\\_2019-update\\_rev2023.pdf?gl=1\\*9s86jd\\*\\_gcl\\_au\\*MTU5MDA0ODcxLjE3Mzk1MzMzMzQ.\\*ga\\*MTkzMTA4NDAxMS4xNzM5NTMzMzM2\\*\\_ga\\_3W7LPK0WP1\\*MTc0MzA2ODg1NS41LjAuMTc0MzA2ODg1NS42MC4wLjA.](https://ses-toolkit.info.undp.org/sites/g/files/zskgke446/files/2025-02/undp-social-and-environmental-standards_2019-update_rev2023.pdf?gl=1*9s86jd*_gcl_au*MTU5MDA0ODcxLjE3Mzk1MzMzMzQ.*ga*MTkzMTA4NDAxMS4xNzM5NTMzMzM2*_ga_3W7LPK0WP1*MTc0MzA2ODg1NS41LjAuMTc0MzA2ODg1NS42MC4wLjA.)

<sup>19</sup> According to the SES, when the implementing partner is a government institution, UN entity, inter-governmental organization, or nongovernmental organization, it is responsible and accountable to UNDP for overall management of the project. UNDP remains ultimately accountable to its Executive Board and respective donor(s) for the sound use of financial resources channelled through UNDP accounts and must ensure the quality of its support. Implementation of the SES is therefore integral to UNDP’s quality assurance responsibilities (Social and Environmental Standards. UNDP, 2021, 5).

<sup>20</sup> Social and Environmental Standards, UNDP, 2021, 6-11.

natural resource management, climate change and disaster risks, community health, safety, and security, cultural heritage, displacement and resettlement, indigenous peoples, labour and working conditions, “pollution prevention and resource efficiency.”<sup>21</sup> Additionally, UNDP emphasizes “the importance of meaningful, effective and informed stakeholder participation”<sup>22</sup> in the formulation and implementation of its projects, ensuring inclusivity and transparency throughout the process.

The SES describe the requirements regarding screening, assessment and management of social and environmental risks and impacts; stakeholder engagement and response mechanisms; access to information; and monitoring, reporting and compliance. UNDP utilizes its Social and Environmental Screening Procedure (SESP) to identify potential social and environmental risks and opportunities associated with the project.<sup>23</sup> UNDP’s mandatory Social and Environmental Screening Procedure (SESP) provides detailed requirements and guidance on screening and assessment. The SESP screens projects for “all environmental and social risks and impacts associated with the SES Programming Principles and Project-level Standards, including direct, indirect, cumulative, transboundary risks and impacts and those related to associated facilities”. Based on the screening, UNDP categorizes projects according to “the degree of potential social and environmental risks and impacts, such as low risk, moderate risk, substantial risk and high risk”. In addressing projects with potential adverse social and environmental impacts, UNDP requires that “key principles are applied, including a precautionary approach.”<sup>24</sup>

In addition, UNDP requires that “the progress of implementation of mitigation and management plans required by the SES is monitored, complaints

and grievances are tracked and monitored”; “follow-up on any identified corrective actions” is tracked; and any required monitoring reports on SES implementation are finalized and disclosed. UNDP will ensure the disclosure of relevant information about UNDP programmes and projects “to help affected communities and other stakeholders understand the opportunities, risks and impacts of the proposed activities.”<sup>25</sup> In addition, for projects with potentially significant risks and impacts, “periodic reports are provided to the affected communities that describe progress with implementation of project management and action plans and on issues that the consultation process or grievance mechanism has identified as a concern.”<sup>26</sup>

To address concerns about UNDP’s compliance with its Social and Environmental Standards, policies and procedures, in 2013 UNDP has established a Social and Environmental Compliance Unit (SECU), which is acting on the basis of the Investigation Guidelines.<sup>27</sup> The main purpose of the Compliance Review is to “investigate alleged violations of UNDP’s environmental and social commitments” in any UNDP project. Any person or community, or their representative, may file a complaint, if they believe that the environment or their well-being may be affected by a UNDP-supported project or programme.<sup>28</sup> The compliance review may result in findings of non-compliance, in which case recommendations will be provided to the Administrator about “how to bring the Project into compliance” and, where appropriate, “mitigate any harm resulting from UNDP’s failure to follow its policies or procedures.”

In addition to Social and Environmental Compliance Unit UNDP established a UNDP’S

<sup>21</sup> *Ibid*, 12-61.

<sup>22</sup> Individuals or groups or organizations representing them who (a) are affected by the project and (b) may have an interest in the project (Social and Environmental Standards, UNDP, 2021, 68).

<sup>23</sup> See UNDP Social and Environmental Screening Procedure, including guidance in applying the SESP (UNDP SES Toolkit, accessed November 20, 2025, <https://ses-toolkit.info.undp.org/>).

<sup>24</sup> *Ibid*, 66.

<sup>25</sup> Social and Environmental Standards, UNDP, 2021, 69; UNDP Information Disclosure Policy of 1996, revised in

2020, accessed November 20, 2025, <https://www.undp.org/accountability/transparency/information-disclosure-policy>.

<sup>26</sup> Social and Environmental Standards, UNDP, 2021, 70.

<sup>27</sup> Investigation Guidelines: Social and Environmental Compliance Unit, UNDP, 2017, accessed November 20, 2025, [https://www.undp.org/sites/g/files/zskgke326/files/publications/SECU%20Investigation%20Guidelines\\_4%20August%202017.pdf](https://www.undp.org/sites/g/files/zskgke326/files/publications/SECU%20Investigation%20Guidelines_4%20August%202017.pdf).

<sup>28</sup> The UNDP Accountability Mechanism, Platform, accessed November 20, 2025, <https://www.undp.org/accountability/audit/social-and-environmental-compliance-review-and-stakeholder-response-mechanism>.

Stakeholder Response Mechanism.<sup>29</sup> This mechanism helps project-affected stakeholders, UNDP's partners, e.g. governments, NGOs, businesses, jointly "address grievances or disputes related to the social or environmental impacts of UNDP-supported projects". Affected people have a choice, they can ask SECU to pursue a compliance review examining UNDP's compliance with UNDP social and environmental commitments, or they can attempt to resolve complaints and disputes through the Stakeholder Response Mechanism.

## 2.2. UNEP

UNEP adopted Environmental, Social and Economic Sustainability Framework in 2015<sup>30</sup>, which sets out the environmental and social safeguard principles and standards for UNEP programmes and projects. It established procedures for identifying and avoiding, or where avoidance is not possible, mitigating environmental, social and economic risks, and "for discerning and exploring opportunities to enhance positive environmental, social and economic outcomes".

In 2020, UNEP introduced a revised Environmental and Social Sustainability Framework (ESSF) aimed at strengthening the management of environmental and social impacts throughout the project lifecycle. The revised Framework seeks to align with the 2030 Agenda for Sustainable Development, emphasizing improved sustainability practices within UNEP's operations.<sup>31</sup>

The UNEP's ESSF as well as UNDP's SES, are both grounded in key principles of sustainable development, including gender equality and women's empowerment, human rights, leaving no one behind, sustainability, resilience, and accountability. UNEP's standards address similar critical areas as UNDP's SES: "biodiversity, ecosystems and sustainable natural resource

management"; "climate change and disaster risks"; "community health, safety, and security"; "cultural heritage"; "displacement and involuntary resettlement; indigenous peoples"; "labour and working conditions", "pollution prevention and resource efficiency."<sup>32</sup>

Under UNEP's ESSF, UNEP commits to implementing a structured approach that includes "screening, assessing, managing, and monitoring environmental and social risks"; and "ensuring meaningful stakeholder engagement and accountability". However, the detailed procedures for implementing this framework are expected to be developed at a later stage within the UNEP Programme Manual.<sup>33</sup>

UNEP screens and categorizes proposed programme and project activities using the Safeguard Risk Identification Form (SRIF), "to identify potential environmental and social risks and impacts associated with supported activities", "to determine the nature and level of review and management measures required for addressing the identified risks and impacts", and "to identify opportunities to support other positive changes to the environment and societies". The screening process results "in the assignment of a risk category" based on the programme and project components "presenting the most significant potential environmental and social risks". The risk categories include "consideration of direct, indirect, cumulative and induced potential impacts" in the programme or project area. Unlike UNDP's four risk categories, UNEP's screening process classifies projects into three risk levels, such as low, moderate, and high.<sup>34</sup> It is essential to highlight that both UNEP and UNDP mandate the application of a precautionary approach in projects with potential adverse social and environmental impacts.<sup>35</sup>

<sup>29</sup> UNDP'S Stakeholder Response Mechanism: Overview and Guidance, accessed November 20, 2025, <https://www.undp.org/content/dam/undp/library/corporate/Social-and-Environmental-Policies-andProcedures/SRM%20Guidance%20Note%20r4.pdf>; UNDP official website, accessed November 20, 2025, <https://www.undp.org/accountability/audit/social-and-environmental-compliance-review-and-stakeholder-response-mechanism>.

<sup>30</sup> UNEP Environmental, Social and Economic Sustainability Framework, UNEP, 2015, accessed November 20, 2025, [https://wedocs.unep.org/bitstream/handle/20.500.11822/8718/-UNEP\\_environmental%2c\\_social\\_and\\_economic\\_sustainability\\_framework2015UNEP\\_26.pdf](https://wedocs.unep.org/bitstream/handle/20.500.11822/8718/-UNEP_environmental%2c_social_and_economic_sustainability_framework2015UNEP_26.pdf)

<sup>31</sup> Environmental\_Social\_and\_Economic\_Sustainability\_Framework.pdf.pdf?sequence=2&isAllowed=y.

<sup>32</sup> UNEP Environmental and Social Sustainability Framework, UNEP, 2020, accessed November 20, 2025, <https://wedocs.unep.org/bitstream/handle/20.500.11822/32022/ESSFEN.pdf?sequence=1&isAllowed=y>.

<sup>33</sup> *Ibid*, 17.

<sup>34</sup> *Ibid*, 17-18.

<sup>35</sup> UNEP Environmental and Social Sustainability Framework, UNEP, 2020, 21; Social and Environmental Standards, UNDP, 2021, 66.

It is crucial that both UNEP's and UNDP's indigenous peoples' policies are based on Free, Prior and Informed Consent principle. According to UNDP's policies, from the earliest stage of project conceptualization and design through implementation and closure, mechanisms are established and applied to ensure the meaningful, effective and informed participation of indigenous peoples in all relevant matters. Culturally appropriate consultations are conducted with the aim of reaching agreement, and Free, Prior, and Informed Consent (FPIC) is secured for any actions that may impact, positively or negatively, the rights, interests, lands, territories (whether titled or untitled), resources, traditional livelihoods, or tangible and intangible cultural heritage of indigenous peoples.<sup>36</sup>

UNEP's policy mandates documentation of a mutually accepted process for good faith negotiations, outcomes, including agreements and dissenting vex, and efforts to accommodate Indigenous peoples' concerns in project design<sup>37</sup>. Both UNDP and UNEP emphasize that they will exclude from their projects any activities for which agreement or consent with indigenous peoples cannot be obtained.<sup>38</sup>

UNEP's ESSF also requires monitoring, including "reporting of environmental and social risks and impacts to project-affected communities"; "effective and meaningful stakeholder engagement", including access to "timely and relevant information and grievance redress."<sup>40</sup>

According to the UNEP's standards, stakeholders may access UNEP's Stakeholder Response Mechanism (SRM), which handles both compliance reviews and grievance redress. To address concerns

about UNEP's compliance with its environmental and social standards, an Independent Office for the Review of Stakeholder Responses started having responsibility for managing the Stakeholder Response Mechanism, including compliance concerns and grievances, in 2015.<sup>41</sup> In 2020<sup>42</sup> and 2021, UNEP further developed its operating procedures for the SRM<sup>43</sup>. They established the process and guidelines for UNEP's SRM through an Independent Office for Stakeholder Safeguard-related Response. These procedures guide UNEP staff, implementing partners, and affected communities in addressing safeguard-related concerns under the ESSF. The SRM offers compliance review or dispute resolution for UNEP projects and serves as a complementary mechanism to local grievance processes, which should be the first point of contact for stakeholders before escalating issues to UNEP.<sup>44</sup>

## 2.3. UNESCO

Since 2010, UNESCO has actively participated in the UN Greening the Blue initiative, contributing to UN-wide sustainability efforts. This commitment was further reinforced in 2019 with the adoption of the *Strategy for Sustainability Management in the UN System 2020-2030 - Phase I: Environmental Sustainability in the Area of Management*.<sup>45</sup>

Building on this foundation, UNESCO introduced its Environmental Sustainability and Management Policy in 2021.<sup>46</sup> This policy provides a structured framework and overarching principles for integrating environmental sustainability considerations into UNESCO's global activities. It applies to all UNESCO premises, operations, policies, and programmatic activities that have either a direct or indirect environmental impact,

<sup>36</sup> Social and Environmental Standards, UNDP, 2021, 46.

<sup>37</sup> UNEP Environmental and Social Sustainability Framework, UNEP, 2020, 39.

<sup>38</sup> Social and Environmental Standards, UNDP, 2021, 46; UNEP Environmental and Social Sustainability Framework, UNEP, 2020, 39.

<sup>39</sup> UNEP Environmental and Social Sustainability Framework, UNEP, 2020, 18-19.

<sup>40</sup> Ibid, 19.

<sup>41</sup> UNEP Environmental, Social and Economic Sustainability Framework, UNEP, 2015, Para 3.

<sup>42</sup> UNEP Environmental and Social Sustainability Framework, UNEP, 2020, 20.

<sup>43</sup> UNEP's Stakeholder Response Mechanism. UNEP, 2021, accessed November 20, 2025, <https://wedocs.unep.org/bitstream/handle/20.500.11822/32023/ESSFRM.pdf?sequence=13>.

<sup>44</sup> UNEP's Project Concern Feedback Form accessed November 20, 2025, <https://www.unep.org/about-un-environment/why-does-un-environment-matter/un-environment-project-concern>.

<sup>45</sup> Strategy for Sustainability Management in the UN System 2020-2030 - Phase I: Environmental Sustainability in the Area of Management. UNEMG. CEB/2019/3/Add.2.

<sup>46</sup> The Environmental Sustainability and Management Policy, UNESCO, 2021, accessed November 20, 2025, <https://unesdoc.unesco.org/ark:/48223/pf0000377627/PDF/377627eng.pdf.multi>.

ensuring that UNESCO exercises at least a minimal level of control over these aspects.<sup>47</sup>

The objectives of UNESCO's Environmental Sustainability and Management Policy are as follows: "fully account for the externalities imposed by UNESCO's own operations and facilities"; "prevent the pollution of water, land and air through UNESCO's operations and facilities"; "preserve biodiversity and cultural heritage of and in the communities in which it operates; contribute to climate change mitigation"; "use resources efficiently"; comply with "local, national, regional and international environmental regulations"; provide "safe and healthy workplaces".

Through this policy, UNESCO commits to integrating environmental considerations into its programs and across all stages of the programmatic cycle, including "planning, implementation, monitoring, and evaluation". The policy also emphasizes stakeholder engagement, particularly with "UNESCO staff, Member States, as well as programme implementation partners, contractors, tenants of UNESCO premises."<sup>48</sup> The UNESCO Environmental Management System serves as the principal tool for the implementation of this policy. The implementation process will be closely monitored by the Environmental Management Working Group, which will "conduct regular audits... to ensure adherence to the policy's objectives."<sup>49</sup>

While progress has been made, UNESCO has not yet established a comprehensive environmental and social safeguard framework,<sup>50</sup> nor a complaints mechanism comparable to those of UNDP and UNEP, including a dedicated platform for receiving

and addressing grievances. However, UNESCO has taken initial steps towards addressing environmental and social sustainability in its supported projects, reflecting its ongoing efforts to integrate environmental and social standards within its operations. UNESCO has also developed its own policy on engaging with indigenous peoples, intended to guide the organization's work across all areas of its mandate where indigenous communities may be affected or stand to benefit.<sup>51</sup> While the policy affirms UNESCO's commitment to upholding the UN Declaration on the Rights of Indigenous Peoples (UNDRIP)<sup>52</sup> in its policies, planning, programming and implementation,<sup>53</sup> its primary focus is on integrating UNCRIP principles into relevant programme areas. Unfortunately, the policy does not establish specific requirements or procedures for the development and implementation of UNESCO-supported projects, such as engagement of indigenous peoples in project planning or of FRIC, leaving a gap in its implementation at the project level.

### 3. CONCLUDING REMARKS

As observed, UN entities are actively enhancing human rights and environmental due diligence requirements. These standards are becoming integral to the definition, preparation, and implementation of country programming, ensuring that supported activities align with sustainability goals. The Environmental and Social Sustainability Frameworks (ESSF), for example, establish minimum sustainability standards for UN entities and their implementing partners, enabling them to anticipate and manage emerging environmental,

<sup>47</sup> Strategy for Sustainability Management in the UN System 2020-2030 - Phase I: Environmental Sustainability in the Area of Management, UNEMG. CEB/2019/3/Add.2.

<sup>48</sup> *Ibid*, 2.

<sup>49</sup> *Ibid*, 4.

<sup>50</sup> A similar situation applies to both UN Women and the International Labour Organization. However, unlike UN Women, the ILO, like UNESCO, has taken steps towards addressing environmental sustainability. This includes initiatives such as the ILO Environmental Sustainability Action Plan 2020-2021 (ILO Environmental Sustainability Action Plan 2020-2021, ILO, accessed November 20, 2025, [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/40ed\\_emp/40emp\\_ent/documents/publication/wcms-753577.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/40ed_emp/40emp_ent/documents/publication/wcms-753577.pdf); Sustainable Development and Climate Change, UN Women official website, accessed November 20, 2025, <https://www.unwomen.org/en/what-we-do/economic-empowerment/sustainable-development-and-climate-change>).

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empowerment/sustainable-development-and-climate-change; ILO Strategic Frameworks in the Area of Environmental Sustainability and Climate Change, ILO official website, accessed November 20, 2025, <https://www.ilo.org/resource/ilo-strategic-frameworks-area-environmental-sustainability-and-climate>.

<sup>51</sup> UNESCO Policy on Engaging with Indigenous Peoples, 201 EX/6, 2018, accessed November 20, 2025, <https://unesdoc.unesco.org/ark:/48223/pf0000262748/PDF/262748eng.pdf.multi>.

<sup>52</sup> The UN Declaration on the Rights of Indigenous Peoples, A/Res/61/295, 2007, accessed November 20, 2025, [https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP\\_E\\_web.pdf](https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf).

<sup>53</sup> UNESCO Policy on Engaging with Indigenous Peoples, 201 EX/6, 2018, accessed November 20, 2025.

social, and economic challenges. These Frameworks promote an integrated approach that balances environmental, social, and economic sustainability, ensuring a more balanced and responsible development process.

As of today, not all UN entities developed ESSF and related guidance. While participants in the 2016 UN Environment Management group (EMG) project on comparative environmental and social standards analysis have already established such policies, non-participating entities have only begun incorporating basic principles to enhance environmental and social sustainability in their projects, often without detailed procedures or effective mechanisms.<sup>54</sup> It is evident that corporate sustainability due diligence should be a fundamental element of all UN entities' policies. Therefore, each UN entity should develop its own ESSF, drawing inspiration from leading organizations in this field, such as UNDP and UNEP.

A significant challenge across all UN entities is the implementation of grievance mechanisms, which remain undeveloped and inconsistent. Even among UN entities that have established such mechanisms, concerns persist regarding their effectiveness. For instance, since its establishment in 2015, UNEP's Stakeholder response mechanism has received only three complaints.<sup>55</sup> Similarly, UNDP's Social and Environmental Compliance Unit (SECU), in operation since 2013, has recorded just three complaints.<sup>56</sup> In contrast, the World Bank's Inspection Panel, within its first ten years of operation, received 35 complaints.<sup>57</sup> If we consider the period 2013-2023, the World Bank' Inspection Panel received 92 complaints,<sup>58</sup> far exceeding those reported within UNDP and UNEP. While one might assume that this discrepancy reflects a lack of

environmental and social concerns in UNEP and UNDP projects, this interpretation is unlikely to be accurate. Since the 1990s, global awareness of environmental and social sustainability issues has risen significantly, and stakeholders, including communities and indigenous peoples, are increasingly relying on grievance mechanisms to seek protection from unsustainable project management and implementation.

Although direct statistical comparisons are complex, it is reasonable to expect that UNDP, as a leading development organization supporting and financing thousands of projects worldwide,<sup>59</sup> would receive more complaints than the World Bank did two decades ago. The significant display in grievance cases suggests a systematic issue, indicating a need for urgent improvements in the design and accessibility of grievance mechanisms within UN entities.

Assuming institutional alignment, the adoption of a standardized grievance mechanism could significantly contribute to greater accountability and more effective redress systems. Establishing a UN Inspection Commission under a unified framework would create a structured, transparent, and accessible process for addressing grievances across all UN entities. The UN Inspection Commission should function as an independent oversight body, responsible for assessing compliance with the ESS of UN entities. While it would not conduct judicial proceedings, it would perform independent administrative reviews, focusing on collecting and analysing grievances related to UN-supported projects, providing impartial evaluation of complaints, recommending corrective actions to enhance adherence to UN policies and standards.

<sup>54</sup> This conclusion does not apply to UN financial entities such as the Global Environmental Facility (GEF) or UN Capital Development Fund (UNCDF), as, appropriately, these funding institutions have already integrated environmental and social standards into their policies and procedures. Policy on Environmental and Social Safeguards, GEF, SD/PL/03, 2019, accessed November 20, 2025, [https://www.thegef.org/sites/default/files/documents/gef\\_environmental\\_social\\_safeguards\\_policy.pdf](https://www.thegef.org/sites/default/files/documents/gef_environmental_social_safeguards_policy.pdf); UNCDF Social and Environmental Compliance Review and Stakeholder Response Mechanism, UNCDF official website, accessed November 20, 2025, <https://www.uncdf.org/compliance>.

<sup>55</sup> UNEP's Stakeholder response Mechanism official website accessed November 20, 2025, <https://www.unep.org/resources/report/unesps-environmental-social-and-economic-sustainability-stakeholder-response>.

<sup>56</sup> UNDP's Social and Environmental Compliance Unit official website accessed November 20, 2025, <https://secu.info.undp.org/home>.

<sup>57</sup> The World Bank Inspection Panel official website accessed November 20, 2025, <https://www.inspectionpanel.org/panel-cases>.

<sup>58</sup> *Ibid.*

<sup>59</sup> Annual Report. UNDP, 2024, accessed November 20, 2025, <https://annualreport.undp.org/assets/Annual-Report-2024.pdf>.

The mandate of the UN Inspection Commission should be limited to external stakeholders directly affected by the implementation of UN-supported projects. Any individual or community believing they have suffered, or may suffer, adverse socio-economic or environmental impacts due to a UN-supported project may submit a request for investigation. For eligibility, complaints must relate to an active or proposed UN-supported project and demonstrate actual or potential harm linked to project implementation. In addition, they must show reasonable efforts to resolve the grievance through existing channels before escalation.

It is imperative to integrate post-investigation control measures within UN grievance mechanisms to ensure effective follow-up on findings and recommendations. Without systematic monitoring and enforcement mechanisms, even a well-founded grievance process risks becoming symbolic rather than impactful. Moreover, it is critical to expand standing in grievance procedures to include non-governmental organizations, both national and international, thereby allowing them to submit complaints on behalf of affected communities. Encouragingly, existing UN grievance mechanisms already incorporate elements of post-investigation monitoring<sup>60</sup> and representative complaint submission by civil society organizations.<sup>61</sup> These practices serve as important precedents for the broader institutionalization of NGO participation in grievance mechanisms.

In addition to supporting affected communities in submitting grievances, granting standing to NGOs is particularly essential in addressing global public interest concerns, such as environmental protection and the preservation of common human heritage. In cases where no directly affected individuals or communities can file complaints, NGOs can effectively represent these collective interests and advocate for broader societal and environmental concerns.

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<sup>60</sup> Social and Environmental Standards, UNDP, 2021, 70-71; UNEP Environmental, Social and Economic Sustainability Framework. UNEP, 2020, 19.

<sup>61</sup> According to the UNDP's social and environmental standards, "a representative, such as a civil society organization, may also file a complaint on behalf of affected communities" (UNDP's Social and Environmental Compliance Unit's official website: <https://www.undp.org/accountability/audit/secu-srm/social-and-environmental-compliance-review>).

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## CONFLICT OF INTEREST STATEMENT

The author declares that she has no conflicts of interest to this work.