



World Food Programme
Programme Alimentaire Mondial
Programa Mundial de Alimentos
برنامج الأغذية العالمي

Executive Board

First regular session
Rome, 21 January 2025
and
Rome, 18–21 February 2025

Distribution: General

Agenda item 6

Date: 13 January 2025

WFP/EB.1/2025/6-A/1

Original: English

Oversight functions

For decision

Executive Board documents are available on WFP's website (<https://executiveboard.wfp.org>).

Summary report on the evaluation of WFP's environmental policy

Executive summary

The evaluation of WFP's 2017 environmental policy assessed the quality and results of the policy and related approaches to environmental and social sustainability in the organization, along with the factors that enabled or hindered the achievement of those results. The evaluation aimed to support accountability and learning and to inform WFP's decisions on the future direction of the policy.

The policy provides a solid foundation for WFP's efforts to improve environmental sustainability. However, the broader vision and objectives of the policy have been overshadowed by a focus on specific tools, including the safeguards and environmental management system adopted in WFP's 2021 environmental and social sustainability framework. This has skewed focus and efforts towards these tools and away from key areas of environmental impact such as supply chains.

The policy is focused on environmental sustainability rather than covering both environmental and social sustainability. The environmental and social sustainability framework sets environmental and social standards, but those standards have not been effectively reflected in the implementation of the policy. Commitment to environmental and social sustainability is still largely at a conceptual rather than programmatic level, with missed opportunities to maximize environmental benefits and avoid or mitigate risks to people in vulnerable situations.

In line with WFP evaluation policy (2022) (WFP/EB.1/2022/4-C), to respect the integrity and independence of evaluation findings the editing of this report has been limited and as a result some of the language in it may not be fully consistent with the World Food Programme's standard terminology or editorial practices. Please direct any requests for clarification to the Director of Evaluation.

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While the policy does not detail the institutional, human or financial resources required for its implementation, the environmental and social sustainability framework specifies the tools, processes, resources and institutional ownership needed to operationalize the policy. There are important gaps, however, particularly with regard to funding sources, how the policy should work alongside existing functions and tools (especially those relating to social standards), and mechanisms to ensure accountability for safeguards. The absence of a high-level lead or champion for the environmental policy, its split divisional ownership and the policy being equated with tools may have undermined WFP's efforts to realize the vision set out in the policy, achieve its objectives and embed its principles.

Although WFP has established structures for implementing the safeguards and environmental management system at headquarters and regional bureaux, implementation has been largely reliant upon consultants rather than staff. At the country level, there is a system for appointing focal points but some focal points lack experience with environmental sustainability approaches, hindering policy implementation.

There has been progress towards the environmental policy's five objectives, yet the evaluation identified challenges to the achievement of results such as the inconsistent application of the safeguards and the limited scope of the environmental management system. In addition, existing policy monitoring is insufficient to allow a full assessment of WFP's progress towards the policy objectives.

The safeguards are aligned with international standards and donor requirements. However, it is too early to assess the results or influence of the safeguards on the environmental and social sustainability of WFP interventions. The rollout of the safeguards process has been unsystematic and inconsistent. Attention has been skewed towards implementing safeguards for development-focused work, and very little work has been undertaken to embed or even explore the potential application of safeguards in emergency settings.

WFP's approach to its environmental management system is well structured and generally aligned with global best practices and it is yielding early positive results in the environmentally sound management of WFP facilities in areas such as energy efficiency and waste reuse and recycling. However, this is only a small part of the organization's environmental impact and not all facilities are currently compliant with the environmental management system. There are opportunities for WFP to advocate for the use of environmental management systems with partners and governments, which could significantly reduce WFP's indirect environmental impact.

Results reported through monitoring processes do not provide accurate measures of progress towards policy implementation and cannot be used to support policy-related decision making. However, other mechanisms – such as the United Nations "Greening the Blue" initiative and WFP's forthcoming environmental plan of action 2030 – provide a sound basis upon which to build future monitoring.

The evaluation generated four recommendations, pointing to the need for WFP to establish a stronger approach and governance structure to ensure that environmental and social sustainability issues are systematically addressed across the organization; ensure that safeguards are applied across all CSP activities; improve the extent to which environmental and social sustainability are addressed by the environmental management system and broaden the application of such systems; and strengthen the monitoring of environmental and social sustainability across WFP.

Draft decision*

The Board takes note of the summary report on the evaluation of WFP's environmental policy (WFP/EB.1/2025/6-A/1) and management response (WFP/EB.1/2025/6-A/1/Add.1) and encourages further action on the recommendations set out in the report, taking into account the considerations raised by the Board during its discussion.

* This is a draft decision. For the final decision adopted by the Board, please refer to the decisions and recommendations document issued at the end of the session.

Introduction

Evaluation features

1. The evaluation of WFP's environmental policy, approved in 2017, assessed the quality of the policy, the results achieved and the reasons why the policy's expected results have, or have not, been achieved. The goal of the evaluation is to uphold accountability to stakeholders and inform WFP's future policy on environmental and social sustainability.
2. The evaluation is global in scope and covers the period from 2017 to mid-2024. A theory-based approach was used, with data collection and analysis organized into two core components: policy architecture and the implementation and results of the policy and its associated tools; and WFP's wider approaches to environmental and social sustainability. The design, conduct, analysis and reporting of the evaluation ensured that policy results and processes were assessed in terms of gender, equality, disability and social inclusion and the extent to which those concerns were addressed in the design and implementation of activities.
3. The evaluation faced several limitations, including uncertainty and pressure on staff created by an ongoing restructuring process, but this did not compromise data quality. A comprehensive cost efficiency analysis was hindered by data limitations and variation in WFP's approach to sustainability. The recent implementation of policy tools further complicated the assessment of results, and data were uneven for the analysis of gender, equality, disability and social inclusion. Despite these challenges, valuable insights were gained and the overall findings are reliable.

Box 1: Evaluation data collection and analysis

Primary and secondary data collection and analysis took place between December 2023 and July 2024 at the headquarters, regional and country levels and included the following:

- Retrospective participative construction of the theory of change underpinning the policy
- Systematic document and literature review
- Field missions to Egypt, Ghana, Kenya, Kyrgyzstan, Namibia and Nicaragua
- "Desk review plus"¹ undertaken in Afghanistan, Guatemala, Madagascar, Mali and Yemen
- Key informant interviews and focus group discussions with WFP staff at headquarters, regional bureaux and country offices; cooperating partners; government departments; and other United Nations, multilateral and donor entities
- Review of external entities covering the International Committee of the Red Cross, the Office of the United Nations High Commissioner for Refugees, the United Nations Children's Fund and Cargill Incorporated (a corporation with a supply chain similar in size to that of WFP)
- In-depth analysis drawing on data collection and follow-up interviews

¹ "Desk review plus" refers to document review and selected key informant interviews.

Context

4. Several external and internal factors have driven WFP's approach to environmental sustainability and the development of the 2017 policy:
- Growing evidence on the environmental impact of humanitarian and development activities on natural resources and how those activities affect the security, livelihoods and well-being of the people who depend on those resources.
 - The progressive mainstreaming of environmental sustainability in development and humanitarian activities, driven largely by international agreements² and increasing global consensus on how to manage environmental risks.
 - Increasing recognition of the tension between addressing immediate emergency needs and achieving long-term environmental and social sustainability.
 - The growing prominence of environmental sustainability at WFP, including a shift towards environmental and social sustainability as reflected in its strategic plans.³
 - Funding gaps, with rising needs and food costs increasing pressure on resources.⁴
 - The restructuring of WFP, with changes in the responsibilities and position of some of the units tasked with implementing the environmental policy.

Subject of the evaluation

5. WFP's 2017 environmental policy has five objectives and seven principles, as listed in table 1.

TABLE 1: ENVIRONMENTAL POLICY OBJECTIVES AND GUIDING PRINCIPLES

Policy objectives	
1	Enhancing the environmental sustainability of activities and operations
2	Managing risks and maximizing the environmental opportunities of activities and operations
3	Minimizing the carbon footprint and increasing the resource-efficiency of activities and operations
4	Aligning WFP's approach with global standards and international practice
5	Strengthening the understanding and capacities of partners and WFP stakeholders
Guiding principles	
1	Systematic consideration of correlations between healthy local ecosystems and livelihoods
2	Alignment with local regulatory contexts as well as global standards and United Nations requirements
3	Minimization and mitigation of adverse environmental impacts of WFP activities and operations
4	Engagement with local communities on protection and sustainable use of natural resources
5	Precautionary approach to prevent potential negative impacts on the environment
6	Consideration of the full life cycle of activities and operations, from acquisition to final disposal
7	Continual identification of opportunities to improve environmental performance and resource efficiency and design actions that are scalable over time

Source: Adapted from WFP/EB.1/2017/4-B/Rev.1.

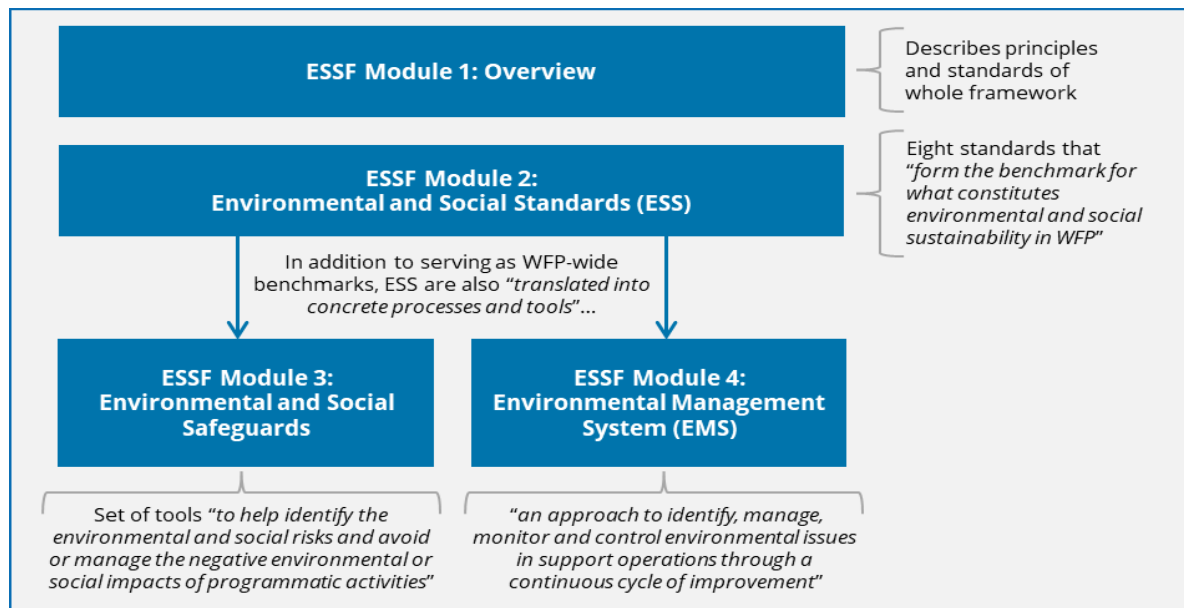
² United Nations. 2012. [A Framework for Advancing Environmental and Social Sustainability in the United Nations System](#); United Nations. 2015. [Resolution adopted by the General Assembly on 25 September 2015 \(A/RES/70/1\) – Transforming our world: the 2030 Agenda for Sustainable Development](#); United Nations. [Strategy for Sustainability Management in the United Nations System 2020-2030](#), phases I (2019) and II (2021).

³ WFP's [strategic plan for 2022–2025](#) at page 34 commits WFP to enhancing the environmental and social sustainability of its operations.

⁴ As noted in its [annual performance report for 2023](#), in 2023 WFP received USD 8.3 billion against a needs-based plan of USD 22.8 billion, resulting in its highest recorded funding shortfall.

6. Three tools were established to implement the policy and ensure consistency with the United Nations 2012 environmental and social sustainability framework:⁵ environmental standards; environmental risk screening and categorization (referred to, along with other measures, as “safeguards”); and the environmental management system (EMS). These tools were formally adopted by WFP in its 2021 environmental and social sustainability framework (ESSF),⁶ which became WFP’s principal framework for increasing the environmental and social sustainability of its programme activities, supporting its operations and guiding its interactions with partners (figure 1).⁷

FIGURE 1: OVERVIEW OF THE ESSF



Source: Environmental and social sustainability framework.

7. The ESSF divides institutional ownership of the policy and related tools between the Climate and Resilience Service,⁸ which leads on the development of standards and safeguards, and the Management Services Division – Infrastructure and Facilities Management Branch (MSDI), which leads on the EMS.
8. More recently, MSDI has also been leading the development of WFP’s environmental plan of action 2030 (EPACT), which will compile commitments relating to environmental sustainability from divisions and operations across WFP.
9. Neither the environmental policy nor the ESSF included a costed implementation plan. Table 2 presents expenditures related to the policy between 2018 and 2024, including staffing and travel costs. These figures give an indication of the level of resources allocated to MSDI and the Environmental and Social Safeguards Unit of the Climate and Resilience Service.

⁵ United Nations. 2012. [A Framework for Advancing Environmental and Social Sustainability in the United Nations System](#).

⁶ See Executive Director’s Circular OED2021/018, “[Establishment of the WFP environmental and social sustainability framework](#)”, which announces the adoption of the framework and provides hyperlinks to its various modules.

⁷ For information on environmental management systems see Executive Director’s circular OED2021/018, “[Establishment of the WFP environmental and social sustainability framework](#)”, [module 4](#).

⁸ Formerly the Programme – Humanitarian and Development Division, Climate and Disaster Risk Reduction Unit.

TABLE 2: EXPENDITURE FOR MSDI AND THE ENVIRONMENTAL AND SOCIAL SAFEGUARDS UNIT, 2018–2024 (USD)

	2018	2019	2020	2021	2022	2023	2024*
MSDI	169 410	271 706	419 839	773 366	988 442	935 778	593 551
Environmental and Social Safeguards Unit	59 922	434 340	318 196	457 717	140 779 ⁹	824 081	555 724

* To end June 2024.

Source: WFP internal data from the Infrastructure and Facilities Management Branch and the Climate and Resilience Service.

Evaluation conclusions and supporting findings

10. The following section presents the five main conclusions of the evaluation and the findings that support them.

Conclusion 1: Rationale and approach to environmental and social sustainability

The policy sets out a clear rationale for taking a systematic approach to environmental and social sustainability. At the same time, WFP is laying strong foundations to better understand its environmental performance and inform decision making. However, WFP's focus on applying the safeguards and EMS has detracted from the policy's broader vision, objectives and principles, undermining the extent to which environmental and social sustainability is being addressed systematically across WFP.

11. **Policy consultation, vision and alignment with external and internal norms.** The design and implementation were and continue to be informed by consultations across WFP. The policy provides a clear, high-level vision of how to integrate environmental sustainability into the design and implementation of WFP operations. It contains a set of principles and objectives as a foundation for the organization's efforts to improve environmental sustainability.
12. The policy reflects external factors such as United Nations system-wide commitments, the increasing priority given to environmental sustainability by national governments and pressure from donors to apply environmental standards.¹⁰
13. However, while the logic of the policy is generally clear, it has not been supported by a detailed theory of change or results framework setting out what the policy aims to achieve. The absence of these elements has meant that there is little detail regarding the operationalization of the policy's vision and the achievement of results.
14. **WFP policy coherence.** The environmental policy is coherent with and refers to other relevant WFP policies; its own visibility in other WFP policies, however, is limited, despite the existence of commonalities and operational links. While supply chains are only mentioned briefly in the policy, the document catalysed efforts to understand the environmental footprint of WFP's supply chain operations, which is now reflected in WFP's 2024 supply chain environmental strategy.

⁹ No information was available to explain the low expenditure of the Environmental and Social Safeguards Unit in 2022.

¹⁰ For example, International Bank for Reconstruction and Development/World Bank. 2017. [The World Bank Environmental and Social Framework](#).

15. **Focus of policy implementation.** The tools selected to support policy implementation were relatively limited in scope and focus on quite specific aspects of environmental sustainability. For example, although safeguards and standards are applicable to “all [WFP] activities and operations,”¹¹ they are sharply focused on risk management rather than broader environmental sustainability considerations. Moreover, while the EMS is a high-level approach featuring principles for analysing and addressing environmental sustainability, its application has been narrow, restricted to in-house operations (WFP facilities management) rather than WFP operations such as logistics or food procurement, which often have a larger footprint.
16. The focus on and allocation of resources to safeguards and the EMS have led to these tools becoming synonymous with the policy. The divided institutional ownership of the policy has only strengthened that perception: the Climate and Resilience Service leads exclusively on safeguards, while MSDI leads exclusively on the EMS. Policy-related collaboration between MSDI and the supply chain function has been based on good interpersonal relationships, but there is no formal connection between them. The absence of a high-level lead or champion for the environmental policy may have undermined WFP's efforts to address environmental and social sustainability, and thus achieve the vision and objectives of the policy. Notwithstanding this, recent work on developing EPACKT, led by MSDI, is helping to deepen the involvement of more operational areas (e.g. supply chain) in the implementation of the environmental policy.

Conclusion 2: Integration of the social dimensions of sustainability

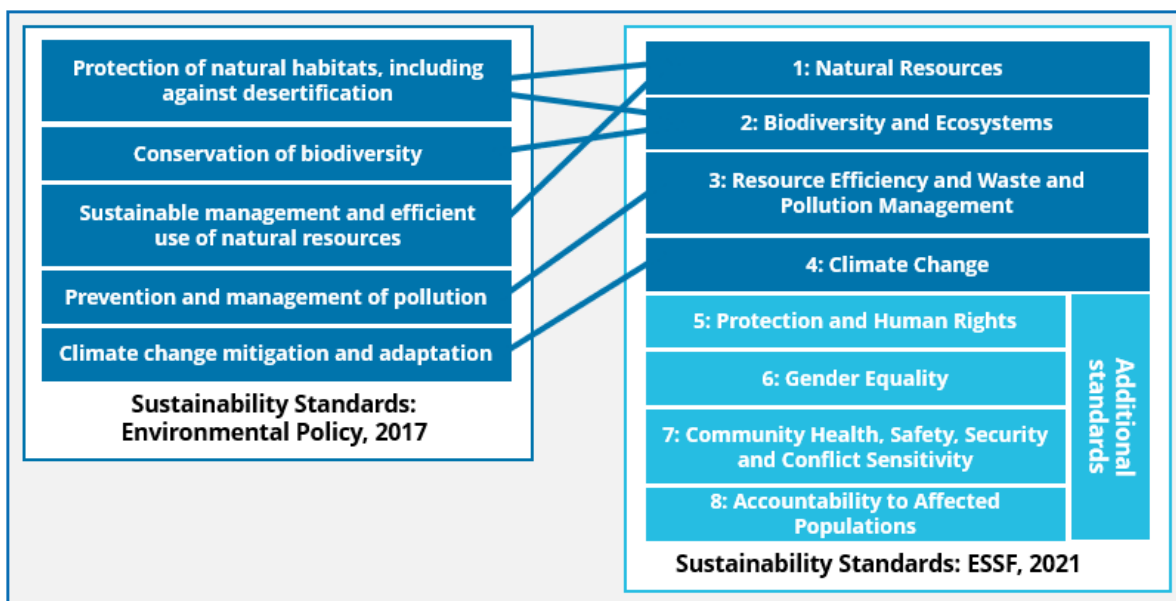
The social dimensions of sustainability have not been adequately incorporated into policy implementation.

17. **Social sustainability standards.** The original policy did not adequately consider social sustainability or include analysis of gender, equality, disability or social inclusion considerations related to environmental sustainability, placing it at odds with the framework for advancing environmental and social sustainability in the United Nations system.¹² However, this was partly resolved through the ESSF, which introduced four social sustainability standards as part of its broader sustainability framework (see figure 2). This brought WFP's environmental and social sustainability and safeguards process into much tighter alignment with the standards and safeguards applied by other United Nations and multilateral bodies.
18. Beyond the introduction of safeguards, no strategic or practical direction was provided on how social sustainability should be incorporated into environmental policy responses and thus into the operationalization of the policy.

¹¹ See paragraphs 37, 41 and 52, “WFP environmental policy” (WFP/EB.1/2017/4-B/Rev.1).

¹² United Nations Environment Programme. 2011. [A Framework for Advancing Environmental and Social Sustainability in the UN System](#).

FIGURE 2: COMPARISON OF STANDARDS IDENTIFIED IN THE 2017 ENVIRONMENTAL POLICY WITH STANDARDS ADOPTED IN THE 2021 ESSF



Source: Evaluation team analysis of the 2017 environmental policy and the environmental and social sustainability framework.

19. The absence of substantive guidance on environmental and social sustainability continues in the forthcoming EPACKT. This limits the extent to which social sustainability is being addressed alongside environmental sustainability within WFP and risks WFP not making crucial connections between environmental management and its potential effects (positive and negative) on the people it serves. Thus, the policy's objective of ensuring that WFP is avoiding harm, in terms of environmental and social sustainability, through its interventions is in question. In addition, lack of attention to environmental and social sustainability could result in missed opportunities to maximize benefits and avoid or mitigate risks to affected people.

Conclusion 3: Staffing and capacity for policy implementation

The presence of policy-focused teams at headquarters, regional bureaux and country offices, including focal points, has been essential to achieving progress in implementing the policy. However, challenges with temporary staffing and limited resourcing have compromised the sustainability of the policy and its results.

20. **Resources, complementarity and accountability.** While the policy does not detail the institutional, human and financial resources required for implementation, the ESSF specifies the tools, processes, resources and institutional ownership needed to operationalize the policy. Important gaps remain, however, particularly with regard to funding sources; how the policy works alongside existing functions (e.g. supply chain, gender, protection and inclusion), tools (e.g. gender analyses, conflict-sensitivity principles) and accountability mechanisms for safeguards; and how non-compliance with safeguards would be addressed.
21. **Structures for implementation.** WFP has established structures for implementing both the safeguards and the EMS at the headquarters, regional bureau and country office levels. This institutional support, however, has been largely reliant upon consultants rather than staff. The recent organizational restructuring has reduced the number of regional advisers for both safeguards and the EMS by approximately 50 percent across the regional bureaux. Country offices identify focal points for safeguards and the EMS but the incumbents do not consistently have the required expertise, and they must take on these responsibilities alongside their other core tasks.

22. **Support to country offices.** For both safeguards and the EMS, a strong positive correlation was found between the extent of policy implementation by country offices and the level of support they received from headquarters and the regional bureaux. The inverse also tends to be true: where there has been limited headquarters and regional bureau support there has been limited policy implementation. Implementation is also dependent on country offices being able to identify sufficient new or existing resources. This has been challenging for country offices that are operating in increasingly resource-constrained environments.
23. **National government and cooperating partner capacity.** Government partners and NGO cooperating partners face the same resource, capacity and expertise limitations as WFP. Training has been undertaken with partners, but it has mostly been focused on safeguards and associated screening processes. Stakeholders reported that training and support provided by WFP has been helpful, but a lack of in-country capacity, specifically the absence of firms or consultants with the requisite technical experience, remains a constraint. Limited resources and capacity and the steep learning curve required to integrate environmental sustainability hinder the systematic implementation of safeguards. However, the vast majority of governments and cooperating partners appreciate the value of safeguards and support WFP's efforts to establish a safeguards system that aligns with their own principles and accountability requirements.

Conclusion 4: Achievement of policy results

While efforts to meet the five environmental policy objectives are still at an early stage, some progress has been made towards each objective. The evaluation identified challenges to the achievement of results such as inconsistent application of safeguards and the limited scope of the EMS. Existing policy monitoring, however, does not provide an adequate basis for fully assessing WFP's progress against the policy's objectives.

24. An overview of progress towards the five objectives of the environmental policy is presented in table 3. Further details are set out in conclusions 4a and 4b.

TABLE 3: SUMMARY ASSESSMENT OF PROGRESS AGAINST ENVIRONMENTAL POLICY OBJECTIVES

Policy objective	Summary assessment of progress against objective
1: Progressively enhancing the environmental sustainability of activities and operations, improving efficiency and outcomes over time	The EMS approach has helped to enhance the environmental sustainability of WFP facilities. However, it has not been applied beyond facilities to cover more substantial aspects of WFP operations such as logistics or food procurement.
2: Protecting the environment and preventing pollution by managing risks and maximizing the environmental opportunities of all activities and operations	A safeguards system has been established to support risk management, but it is not being applied consistently or systematically, nor is it being applied to all WFP activities.
3: Minimizing the carbon footprint and increasing the resource-efficiency of operations and facilities management, particularly the management of materials, water, energy and waste	While the EMS is resulting in reduced carbon intensity and increased resource efficiency of WFP facilities, it has not been applied to operations to address the greenhouse gas emissions of WFP's broader work. The Supply Chain and Delivery Division is working on better understanding WFP's operational carbon footprint and resource usage.

TABLE 3: SUMMARY ASSESSMENT OF PROGRESS AGAINST ENVIRONMENTAL POLICY OBJECTIVES

Policy objective	Summary assessment of progress against objective
4: Aligning WFP's approach to environmental sustainability with global standards and good international practice, including in donors' policies and expectations	Both the safeguards and the EMS are reasonably well aligned with relevant global standards and practices. However, there are some gaps in the standards applied by safeguards system, and donors have raised concerns about the inconsistent application of safeguards across WFP.
5: Strengthening the understanding and capacities of national governments, cooperating partners, suppliers and, particularly, beneficiary communities in planning and implementing sound activities for food security and nutrition	Although WFP has trained partners on safeguards, there has been no systematic, externally focused capacity development or awareness raising about environmental or social sustainability as they relate to WFP operations.

Conclusion 4a: Application of safeguards

It is too early to determine the extent to which WFP's safeguards have enhanced the environmental and social sustainability of its programming. WFP has designed a safeguards model that is generally consistent with models applied by other entities. However, its implementation has been limited and unsystematic, which, given the need to comply with donor requirements, could limit WFP's ability to maintain existing – and access new – funding streams.

25. **Adoption of the international financial institutions model.** WFP's use of safeguards as part of its approach to environmental sustainability is aligned with the model used by international finance institutions (IFIs) and climate funds and therefore constitutes an advanced framework for considering environmental sustainability aspects of programmes. However, the IFI safeguards model is designed for development activities rather than the humanitarian and emergency responses that comprise the majority of WFP's work. This suggests that the IFI model may not fit the full range of WFP's programming.
26. WFP is distinct from other United Nations agencies in not adopting standalone standards for labour, land acquisition, displacement and resettlement and cultural heritage. This may impede WFP's ability to manage social and environmental risks and could pose funding and reputational risks for WFP.
27. **Environmental and social sustainability results.** It is too early to assess the results or influence of the safeguards process on the environmental and social sustainability of WFP activities. Currently the extent of implementation varies across and within countries. However, the evaluation found that WFP activities are yielding results relevant to environmental and social sustainability aligned with (rather than driven by) the vision of the policy; these are often by-products of the activities. Examples of positive environmental and social sustainability results related to the policy at the country office level are presented in box 2.

Box 2: Examples of environmental and social sustainability related results

- Water conservation in the implementation of resilience programming (Ghana)
- Emissions reductions due to more efficient supply chains and a shift to single annual procurements (Namibia)
- Use of agricultural waste in biogas production (Egypt)
- Reduced packaging waste through reverse logistics supply chains (Kenya)
- Promotion of solar energy and fuel-efficient cooking technologies in school meal programming (Guatemala)

28. Country offices applying safeguards reported that the requirement to apply a structured screening process pushed them to consider sustainability risk in a deliberate, systematic manner, thereby improving the environmental and social risk management of their activities.
29. **Implementation challenges in applying safeguards to the full spectrum of WFP interventions.** Country strategic plans (CSPs) provide an entry point for environmental and social sustainability risk assessment. While post-2021 CSPs respond consistently to the ESSF on paper, the practical application of safeguards during CSP implementation varies considerably.
30. The evaluation found that only 3 of the 11 country offices analysed were making substantive progress towards a systematic, CSP-wide approach to applying safeguards as envisaged by the ESSF. For example, the Yemen country office appointed two safeguard focal points for environmental and social standards, respectively. Other country offices had started taking a similar approach to mainstreaming environmental and social sustainability risk assessment, but this work was still at a preliminary stage during the evaluation period.
31. Even where the evaluation found a more consistent approach to mainstreaming the safeguards, there were gaps in coverage. In the country offices that are more advanced in this work, safeguards are largely applied to long-term development activities (such as community asset building and smallholder agricultural development) rather than the emergency responses that constitute the majority of their work.
32. This includes country offices where there are active emergency responses. Indeed, WFP's emergency activation protocol,¹³ which guides the organization's emergency responses, does not refer to the ESSF or safeguards. Insufficient direction and guidance on where and how safeguards should be incorporated into WFP's activity design and implementation processes creates a particularly consequential gap for emergency operations; the perception that the process is disproportionate or inappropriate for some contexts is widespread.
33. The challenge of integrating safeguards is common to other organizations, in particular those institutions working in emergency settings. Some described the application of safeguards in humanitarian and emergency situations or in fragile contexts as challenging. Others were taking a voluntary approach to safeguard implementation.
34. **Management prioritization.** Staff report that there has been little pressure from senior management to apply safeguards. The limited convening power of the Environmental and Social Safeguards Unit and its position within WFP's organizational structure have also sometimes been interpreted as a signal that safeguards are not a programmatic priority. The reported low priority given to safeguards by senior management is linked to the absence of

¹³ Executive Director's circular on WFP's emergency activation protocol (OED2023/003).

accountability mechanisms to support or encourage compliance with the safeguard requirements. There are no internal consequences for the failure to apply safeguards.

35. **Donor requirements for safeguards.** The implementation of safeguards has helped to meet donor requirements and supported risk management. Indeed, meeting donor safeguard requirements has been a prerequisite for some funding agreements, such as that with the German Development Bank, which in 2023 provided almost USD 100 million, and with the World Bank for activities (within the evaluation country sample) in Afghanistan, Madagascar and Yemen. Since donor requirements to apply safeguards are increasing and becoming more stringent,¹⁴ access to many funding streams will be increasingly dependent on the existence of a safeguards system capable of meeting donor requirements.

Conclusion 4b: Implementation of environmental management systems

WFP's approach to its EMS is well-structured, generally aligns with global best practices and is yielding early positive results. However, the approach does not consider social sustainability and the work has only covered a small part of WFP's overall environmental footprint. There are opportunities for WFP to further engage with partners and governments to leverage WFP's work on environmental management systems.

36. **EMS implementation and results.** WFP has taken an incremental approach to its EMS, but human and financial capacity has meant that progress has been uneven, as has the degree to which regional bureaux and country offices have prioritized and implemented EMS.
37. The EMS approach has nevertheless helped to enhance the environmental sustainability of WFP facilities, improving things such as waste management and energy efficiency at the office level. Examples of positive environmental and social sustainability results linked to country office implementation of the EMS are shown in box 3.

Box 3: Examples of country office results of EMS implementation

- **Emissions reductions and cost savings** in Mali due to the ongoing solarization of facilities
- **Energy and cost savings** in Nicaragua due to the switch from fluorescent to LED lighting
- **Reduced waste generation** in Kyrgyzstan due to recycling and promotion of changes in staff behaviour
- **Reduced water usage** in Kenya due to wastewater recycling and rainwater harvesting
- **70 percent reduction in plastic bottle use** in Yemen through the use of water dispensers
- **Paper use reduction** in Namibia through staff engagement and behaviour change promotion

38. Reporting through the United Nations "Greening the Blue" initiative, while covering only a small portion of WFP's environmental footprint,¹⁵ demonstrates a positive trajectory for WFP's environmental performance. Although total CO₂ emissions increased between

¹⁴ For example, new requirements from the World Bank require the integration of components such as land acquisition and cultural heritage risks.

¹⁵ Greening the Blue applies the [Greenhouse Gas Protocol](#) for emissions tracking, including what the protocol terms [Scope 1 and Scope 2 emissions, plus Scope 3 business travel emissions](#). Scope 3 emissions include indirect emissions from activities upstream and downstream of an organization (e.g. emissions from suppliers, transportation of goods and use of the organization's products).

2017 and 2022,¹⁶ emissions per staff member are trending slightly downward, while waste generation has decreased by 70 percent as a result of improved waste management in accordance with the environmental policy and the EMS tools and resources established under the policy.

39. **Missed opportunities.** The evaluation identified several missed opportunities to achieve results through the EMS:
- Currently the application of the EMS excludes large-scale operational activities such as supply chain operations, food procurement and logistics. These areas are substantial sources of emissions, and expanding the EMS to include them would align with the policy's goal of minimizing environmental impact.
 - The focus on internal operations has led WFP to miss opportunities to engage with external partners and governments for collaborative efforts in relation to sustainability that could significantly reduce its environmental footprint (e.g. through partner-operated facilities such as warehouses).
 - Moreover, the EMS does not address or consider social sustainability as part of environmental management, although some country offices have identified EMS measures that successfully address both environmental and social sustainability, such as combining gender considerations with staff well-being and occupational health in the design of and access to sanitary facilities in Kenya. However, these efforts have been undertaken independently, in the absence of any high-level corporate guidance.
40. **Comparative performance on EMS.** The evaluation found WFP to be a positive outlier in its approach to its EMS compared to its peer organizations. The environmental policy and the ESSF give the organization's approach more structure, standardization and rigour than was evident in other organizations. It was particularly notable that WFP is the only organization identified that is seeking to comply with International Standards Organization standard 14001. This represents good progress against the policy commitment of having an EMS consistent with this international benchmark.

Conclusion 5: Policy monitoring and reporting framework

Policy monitoring processes are inadequate. They do not measure progress effectively and are not capable of supporting policy related decision making. However, other mechanisms – most notably, “Greening the Blue” and the forthcoming EPACT – provide a sound basis upon which to build future monitoring.

41. **ESSF monitoring and reporting.** Some processes have been established within the ESSF to contribute to corporate monitoring and reporting, assess compliance and maintain regular monitoring and oversight. This includes a new requirement for WFP annual country reports to incorporate an environment section describing environmental and social sustainability outcomes. However, these broader results are not reported against a consistent structure or shared metrics and therefore cannot be aggregated. Moreover, reported results are invariably positive examples, with challenges or gaps rarely identified. The EMS is reported on in more detail than are safeguards.
42. **Corporate indicators.** The ESSF sets out two cross-cutting indicators and three management key performance indicators (KPIs) for environmental reporting (table 4), which focus exclusively on the implementation of safeguards and the EMS.

¹⁶ From 80,036 to 108,014 metric tons of carbon dioxide equivalent. United Nations Environment Programme. [Greening the Blue – WFP data page](#).

TABLE 4: CORPORATE RESULTS FRAMEWORK CROSS-CUTTING INDICATORS AND MANAGEMENT KPIS IDENTIFIED IN ESSF

Cross-cutting	Safeguards	Proportion of field-level agreements, memorandums of understanding and construction contracts for CSP activities screened for environmental and social risks
	EMS	Percentage of WFP operations implementing the EMS
Management KPIS		Percentage of countries reporting on greenhouse gas emissions
		Percentage of countries reporting on waste management
		Percentage of countries reporting on water management

Source: Environmental and social sustainability framework.

43. The two indicators provide limited information for understanding policy-related contributions and results, since they track activities and outputs relating to safeguards and the EMS rather than providing a basis for measuring broader progress against the policy's objectives. The impact of the policy on the environmental sustainability of WFP's work is therefore not being effectively monitored or reported.
44. **Wider monitoring and reporting.** The EPACT under development has the potential to improve policy monitoring because it has key elements of a results framework, such as activities, milestones, targets and impacts. The EPACT also encompasses work on environmental sustainability being undertaken by WFP and its partners beyond the areas currently covered through the safeguards and EMS tools.
45. WFP's input into "Greening the Blue" also provides a stronger basis for tracking and understanding some aspects of progress made in implementing environmental policy, although it gathers no substantive data on social sustainability.

Recommendations

#	Recommendation	Rationale	Responsibility	Deadline
1	Recommendation 1: WFP should establish a stronger approach and governance structure to ensure that environmental and social sustainability are systematically addressed across the organization.	Safeguards and the EMS are essential components of a comprehensive approach to environmental and social sustainability. However, these two tools have dominated policy implementation: the broader policy intent and the policy's applicability to other aspects of WFP operations have been somewhat lost. At the same time, work on supply chain sustainability being carried out by the Supply Chain and Delivery Division (SCD) has the potential to demonstrate the relevance of the policy to WFP's broader operations and to offer tools for improving decision making regarding environmental sustainability. While collaboration between the current policy owners and SCD has been strong (particularly on the development of the environmental plan of action), it has been based on good interpersonal relationships, and there is no formal connection between the SCD Sustainability Unit, the EMS function and the broader policy implementation process. The informality of this relationship risks undermining the policy. At the country office level, the quality and extent of safeguard and EMS implementation are strongly correlated with the level of resources and technical support that the country office receives. Where resources and technical support are not available, there tends to be little or no progress on implementing safeguards and EMS. Consistent with broader moves across the United Nations system, the ESSF extended the scope of the policy to encompass both environmental and social sustainability. However, this was not accompanied by the substantive involvement of relevant offices at	Lead: Deputy Executive Director Support: Management Services Division (MSD), Programme Policy and Guidance Division (PPG), SCD	Fourth quarter 2025
	Sub-recommendation 1.1: Complementing existing WFP policies, the environmental policy should be revised to reflect the updated framing, structures and conceptual approaches for environmental and social sustainability.		Lead: PPG Support: MSD, SCD, Gender, Protection and Inclusion Service (PPGG)	Fourth quarter 2026
	Sub-recommendation 1.2: WFP should establish a sustainability unit responsible for – at a minimum – safeguards and environmental management system (EMS), along with the sustainability functions performed by the Supply Chain and Delivery Division (SCD). Guided by a high-level champion (at the level of Deputy Executive Director or Assistant Executive Director), the unit should take the organizational lead on ensuring the operationalization of the environmental policy (including subsequent revisions) and the mainstreaming of sustainability across WFP.		Lead: Programme Operations Department (PO) Support: MSD, PPG, SCD	Fourth quarter 2025
	Sub-recommendation 1.3: WFP should make it a priority to identify stable resourcing models for the sustainability unit. This should include – but not be restricted to – a “lift and shift” model, whereby existing resources for safeguards, EMS and the SCD sustainability unit are retained and redeployed to the newly formed sustainability unit.		Lead: PO Support: MSD, PPG, SCD	Fourth quarter 2025

#	Recommendation	Rationale	Responsibility	Deadline
	<p>Sub-recommendation 1.4: The ESSF should be reviewed and revised as needed to support WFP's efforts to address environmental and social sustainability by providing practical guidance for all operations. This should include the following, as required:</p> <ul style="list-style-type: none"> ➤ References and guidance for applying tools and analyses developed by SCD, PPGG and other relevant units. ➤ Guidance on incorporating environmental and social sustainability considerations into country strategic plans and activity design and implementation 	WFP and – in practice – social sustainability has only been addressed to a very limited extent.	Lead: PO Support: MSD, PPG, SCD, PPGG	Fourth quarter 2025
	<p>Sub-recommendation 1.5: WFP's forthcoming strategic plan should reflect the organization's strengthened approach to environmental and social sustainability by including social dimensions in its framing of environmental sustainability as a cross-cutting priority.</p>		Lead: PO Support: PPG, SCD, PPGG	Third quarter 2025
2	<p>Recommendation 2: WFP leadership should ensure that safeguards are applied across all country strategic plan activities.</p>	Although WFP has tools in place to support the safeguard system, the inconsistent and unsystematic rollout of safeguards is a function of multiple shortcomings, including limited leadership and messaging, the limited convening power of the Environmental and Social Safeguards Unit, weak accountability mechanisms and gaps in activity-specific guidance and technical expertise.	Lead: PO	Second quarter 2026
	<p>Sub-recommendation 2.1: WFP's safeguards system should be strengthened through the following measures:</p> <ul style="list-style-type: none"> ➤ Establish an accountability mechanism that incentivizes and ensures the application of safeguards across all country strategic plan activities with a view to mitigating reputational risk and establishing access to new funding streams. ➤ Develop a process that requires activity managers to ensure adherence to relevant safeguards before interventions are approved. ➤ Clarify where and how other WFP expertise (e.g. gender analysis) could be used or must be used during safeguard screening processes. 		Lead: PPG Support: Programme Cycle and Quality Unit (POCQ), HRM, PPGG	Second quarter 2026

#	Recommendation	Rationale	Responsibility	Deadline
	<p>Sub-recommendation 2.2: WFP should develop mechanisms that give greater priority to and tailor the safeguards system so that it is better aligned with WFP's mandate and operating model. In particular, WFP should:</p> <ul style="list-style-type: none"> ➤ Explore whether, how and in what contexts tailored safeguards processes could be applied: this should include clearly defined thresholds for applying any streamlined processes. ➤ Develop a road map for analysing and identifying where safeguards would be feasible in WFP's emergency operations. This should include establishing whether – and if so, what – thresholds should be applied. WFP should consider undertaking this research in coordination with other humanitarian actors that are facing similar challenges. Consideration should be given to involving donors in this research, with a view to improving their understanding of the barriers to applying safeguards during emergency responses. 		<p>Lead: PPG Support: PPGE, Emergency Coordination Service</p>	<p>Second quarter 2026</p>
3	<p>Recommendation 3: Improve the extent to which environmental and social sustainability is addressed by the EMS and broaden the application of the EMS.</p> <p>Sub-recommendation 3.1: EMS documentation and guidance (including the environmental and social sustainability framework) should be screened to identify opportunities for incorporating social sustainability considerations into the design of the EMS and into the ESSF itself.</p>	<p>The EMS is well-structured, reflects best practice and is delivering results. These early achievements could be built on by broadening the scope of the EMS so that both environmental and social sustainability are formally addressed. There are opportunities for WFP to further engage with partners and governments to leverage WFP's work on environmental management systems in line with WFP strategic outcome 5 (Humanitarian and development actors are more efficient and effective).</p>	<p>Lead: MSD Support: SCD, PPG</p> <p>Lead: MSD Support: PPGG</p>	<p>Fourth quarter 2026</p> <p>Fourth quarter 2025</p>

#	Recommendation	Rationale	Responsibility	Deadline
	<p>Sub-recommendation 3.2: WFP should develop protocols and guidance for engaging and supporting partners (including the landlords of facilities leased by WFP, vendors, governments and cooperating partners) in the application of the EMS.</p>		<p>Lead: MSD Support: SCD, PPGG</p>	<p>Fourth quarter 2025</p>
4	<p>Recommendation 4: Strengthen the monitoring of environmental and social sustainability across WFP.</p>	<p>Policy monitoring processes have not allowed WFP to measure progress and do not generate the depth of evidence needed to support policy related decision making.</p>	<p>Lead: PPG</p>	<p>Third quarter 2025</p>
<p>Sub-recommendation 4.1: The CRF indicator, “proportion of FLAs/MOUs/CCs that have been screened for environmental and social sustainability risks”, should be reformulated to capture all activity management agreements (including those activities directly managed by WFP). Complementary qualitative indicators/processes should also be developed to track the rollout of safeguards. The EMS would also benefit from additional reporting focused on qualitative progress.</p>	<p>Lead: PPG Support: MSD, Analysis, Planning and Performance Division (APP)</p>		<p>Third quarter 2025</p>	
<p>Sub-recommendation 4.2: WFP should develop a monitoring framework capable of measuring WFP’s work on environmental and social sustainability, including the results achieved.</p>	<p>Lead: MSD Support: PPG, SCD, PPGG, APP</p>		<p>Third quarter 2025</p>	

Acronyms

CSP	country strategic plan
EMS	environmental management system
EPACT	environmental plan of action 2030
ESSF	environmental and social sustainability framework
IFI	international finance institution
KPI	key performance indicator
MSDI	Infrastructure and Facilities Management Branch